

PLANNING STATEMENT

FORMER QUINN RADIATOR SITE, NEWPORT

Planning Application (PAC Submission)

Microsoft

November 2023

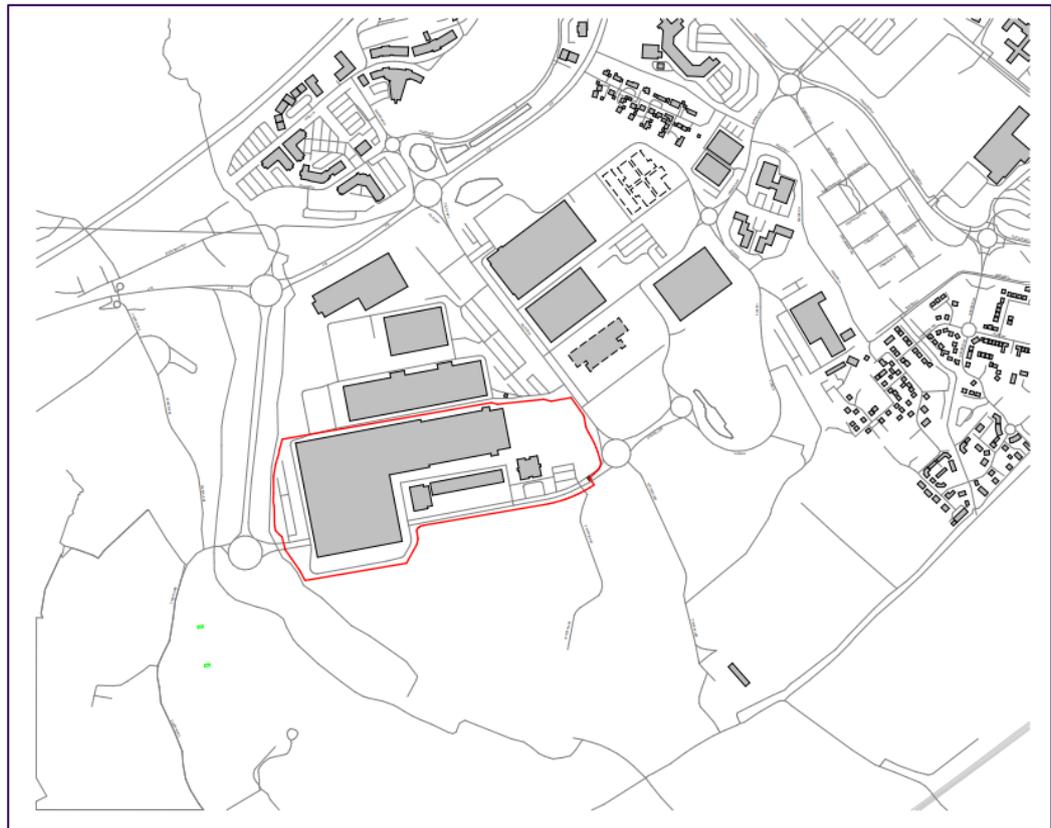
Carter Jonas

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1.0 INTRODUCTION

- 1.1 This Planning Statement accompanies a planning application made by Microsoft (the 'Applicant') to Newport City Council (the 'Council' or 'NCC') for the development of the Former Quinn Radiators site, Celtic Way, Newport ('the site' / 'application site').
- 1.2 The proposals are for the demolition of existing principal building and remaining structures and construction of new hyperscale data centre (Use Class B8) across two main buildings plus ancillary structures and other associated works.
- 1.3 The proposal also includes the provision of emergency back-up generators, security facilities, significant levels of hard and soft landscaping, internal access roads, car parking and drainage. The existing site access from the Imperial Way roundabout will be used as well as a secondary/emergency access using the existing point accessed via a roundabout off Church Lane and Dyffryn Lane.
- 1.4 The application site is shown below.



- 1.5 The proposal is considered 'major development' due to the scale of floorspace proposed and accordingly has been subject to EIA screening with further details on this contained in the planning history section.

1.6 This full application comprises the following documents:

Drawings

- Site Location Plan (CWL01 A-P-01 P02)
- Existing Site Plan (CWL01 A-P-02 P02)
- Demolition Plan (CWL01 A-P-03 P02)
- Demolition Existing Photos (CWL01 A-P-04 P02)
- Existing Permeability Plan (CWL01 A-P-05 P02)
- Proposed Permeability Plan (CWL01 A-P-06 P02)
- Proposed Masterplan (CWL01 A-P-07 P02)
- Existing Level 01 GA Plan (CWL01 A-P-11 P02)
- Existing Level 02 GA Plan (CWL01 A-P-12 P02)
- Existing Roof GA Plan (CWL01 A-P-13 P02)
- Existing Elevations (CWL01 A-P-14 P02)
- Demolition Level 01 GA Plan (CWL01 A-P-21 P02)
- Demolition Level 02 GA Plan (CWL01 A-P-22 P02)
- Demolition Roof GA Plan (CWL01 A-P-23 P02)
- Demolition Elevations (CWL01 A-P-24 P02)
- CWL01 Proposed Level 01 GA Plan (CWL01 A-P-101 P02)
- CWL01 Proposed Roof GA Plan (CWL01 A-P-102 P02)
- CWL02 Proposed Level 01 GA Plan (CWL02 A-P-103 P02)
- CWL02 Proposed Roof GA Plan (CWL02 A-P-104 P02)
- Sprinkler Tank & Pump House (CWL01 A-P-110 P02)
- External Plant Room (CWL01 A-P-111 P02)
- UMS – E-House (CWL01 A-P-112 P02)
- Guard House (CWL01 A-P-113 P02)
- Water Treatment Building (CWL01 A-P-114 P02)
- Site – Bin Store (CWL01 A-P-115 P02)

- Substation (CWL01 A-P-116 P01)
- Transformer EHouses (CWL01 A-P-117 P01)
- CWL01 Proposed Building Elevations Overall (CWL01 A-P-301 P02)
- CWL01 Proposed Admin Elevations (CWL01 A-P-302 P02)
- CWL02 Proposed Building Elevations Overall (CWL02 A-P-303 P02)
- CWL02 Proposed Admin Elevations (CWL02 A-P-304 P02)
- CWL01 – Proposed Sections (CWL01 A-P-401 P02)
- CWL02 – Proposed Sections (CWL01 A-P-402 P02)
- Site – Landscape Materialisation Plan (CWL01 L-P-01 P02)
- Site – Landscape Section (CWL01 L-P-02 P02)
- Site – Landscape Tree Removal Plan (CWL01 L-P-03 P02)
- Site – Landscape Proposed Tree Plan (CWL01 L-P-04 P02)
- Site – Landscape Planting Plan (CWL01 L-P-05 P02)
- Site – Gate Details (CWL01 L-P-10 P01)
- Site – Barrier Details (CWL01 L-P-11 P01)
- Site – Fence Details (CWL01 L-P-12 P01)
- Site – RCS Dence Details (CWL01 L-P-13 P01)
- Site – Bike Parking, Smoke Lounge Details (CWL01 L-P-14 P02)
- Site – Typical Softscape Details (CWL01 L-P-15 P02)
- Planting Schedule (CWL01 L-P-16 P02)
- Sitewide Vehicle Tracking – Max Legal Vehicle (CWL01-02-C-C-45)
- Sitewide Vehicle Tracking – Oil Tanker (CWL01-02-C-C-46)
- Entrance & Substation Vehicle Tracking – Low Loader (CWL01-02-C-C-47)
- Drainage Layout – Overall Site Plan (CWL01-02-C-D-01)
- Electrical Overall Lighting Plan (CWL01-02-E-P-01)
- Private Sewer Diversions Sheet 1 – Rev P03 (CWL01-C-B-05)
- Private Sewer Diversions Sheet 2 – Rev P05 (CWL01-C-B-06)

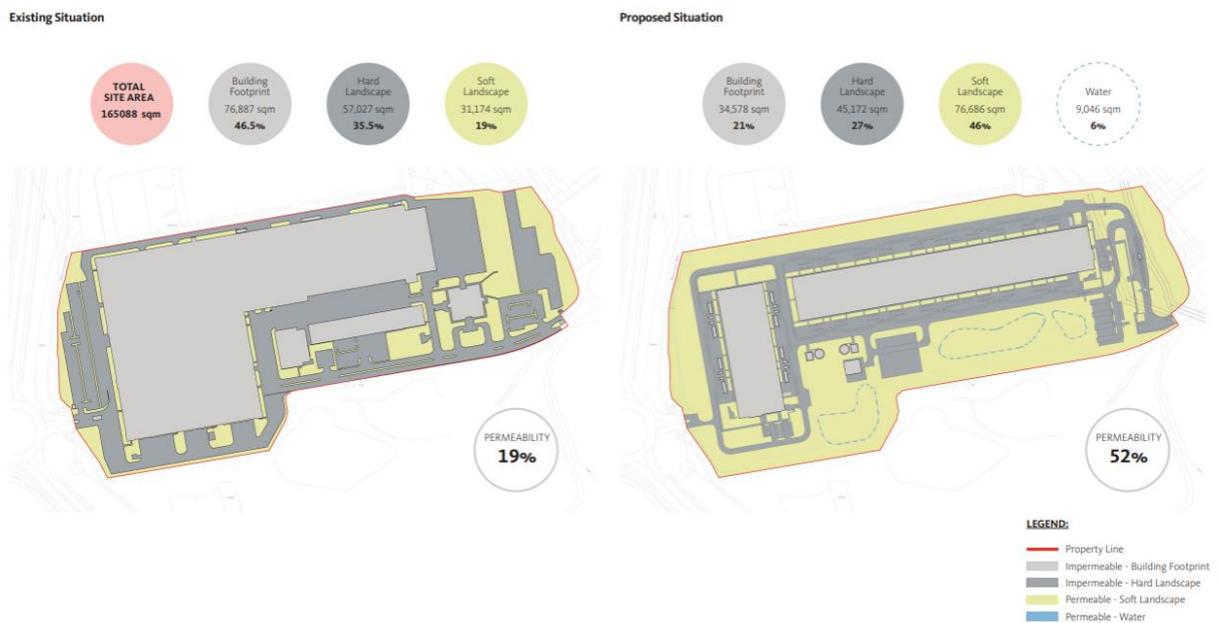
Documents

- Application form
- Planning Statement (Carter Jonas)
- Design and Access Statement (Gensler)
- Noise Impact Assessment (ERM)
- Air Quality Impact Assessment (ERM)
- Draft Air Quality Management Plan (ERM)
- Arboricultural Impact Assessment & Tree Protection Plans (ERM)
- Desk Based Archaeology Assessment (ERM)
- Ecology Impact Assessment (ERM)
- Biodiversity Net Gain (ERM)
- Outline Environmental Management Plan (ERM)
- Ground Investigation Report (Geotechnics)
- Geoenvironmental Summary (Geotechnics)
- Site Investigation Report (Geotechnics)
- Transport Statement (Pinnacle)
- Travel Plan (Pinnacle)
- Flood Consequence Assessment (JBA Consulting)
- Demolition Method Statement (Colemans)
- External Lighting Strategy (RED)
- Drainage Strategy Report (Pinnacle)

- 1.7 Since purchasing the site, Microsoft and their design team has carried out extensive public engagement and significant survey work to influence the final proposals.
- 1.8 Throughout the course of the application, Microsoft has been engaged in positive discussions with planning officers, securing general support for the proposals.
- 1.9 This Planning Statement seeks to explain how the submitted proposals accord with the relevant local and national planning policies and guidance.

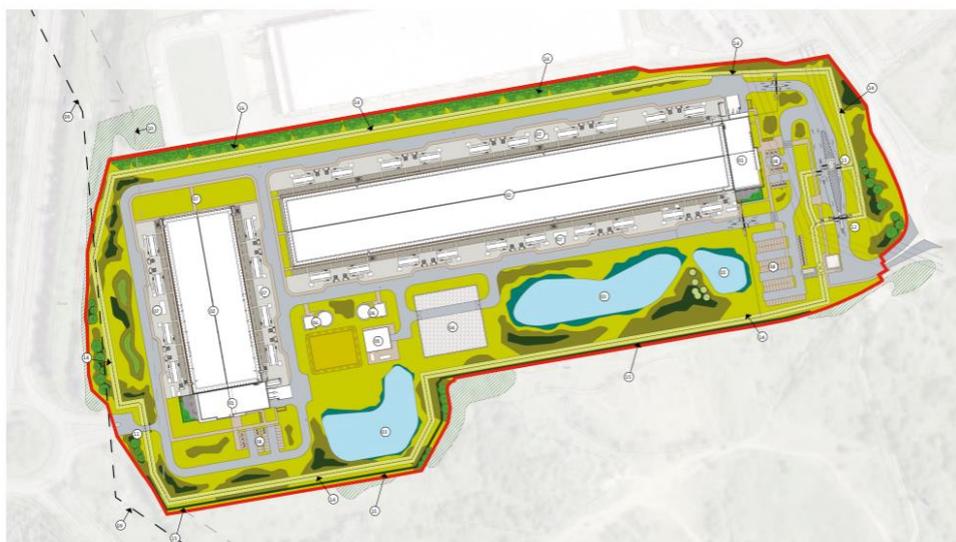
2.0 THE PROPOSED DEVELOPMENT

- 2.1 This proposed scheme is for a Hyperscale Data Centre development on the site of the former Quinn Radiator Manufacturing Plant at Duffryn Lane, Coedkernew Newport for Microsoft Data Center operations. Microsoft has the ambition to establish an ‘Availability Zone’ with several Data Centres in South Wales; the proposed development on the Quinn site is part of realising this ambition.
- 2.2 Further background on the role of a data centre and how they work is contained within the accompanying Design and Access Statement.
- 2.3 The site is currently occupied by a large industrial building; and a number of support buildings for storage, technical functions, and office (approximate area 76,000 m²); with portions in a state of disrepair due to the lack of maintenance and depreciation of construction materials.
- 2.4 For the proposed scheme, the existing structures will be demolished; and 2no. Hyperscale Data Centres, along with support structures for daily operations, will be built in its place (approximate area 38,000 m²). In addition to a reduction in built surface area, the proposed scheme also includes a reduction in impermeable paved areas, and the inclusion of additional storm water retention as clearly demonstrated in the image below.



- 2.5 In addition to a greatly reduced footprint, the proposed structures will also sit lower than the existing buildings, presenting an improved visual appearance in the wider landscape.

- 2.6 With regards to the overall design, the proposed materials and colour palette are driven by the site's industrial and coastal context, and the adjacencies to the SSSI (Site of Special Scientific Interest) to the south
- 2.7 The Primary access to the Data Centre Campus will be from the roundabout at Dyffryn Lane in the East. A secondary entrance on the West side of the campus offers an alternate access to the facility, should the primary entrance become unusable (for example, because of an accident or because of scheduled maintenance).
- 2.8 Internal to the site, parking facilities are located close to the building entrances for easy access. A separated footpath and cycle paths leads from the roundabout to the entrance of the main building. Footpaths, cycle paths and roadways surround the proposed building.
- 2.9 The proposed development will greatly reduce the amount of private car parking available on site by circa 200 spaces in order to align with the level of employment proposed. Further information on this is contained within the accompanying Transport Assessment.
- 2.10 A high level illustration of the proposed development is contained below.



DESCRIPTION:

- Two Data Centre Buildings
- Direct evaporative cooling
- Easement/Clearance zone for 400 kV overhead power line at west side of site

KEY:

- 01 Office and logistics Area
- 02 Data Centre
- 03 Stormwater Pond Area
- 04 Substation
- 05 Water Treatment Facility
- 06 Sprinkler Tank and Pump House
- 07 e-Houses (It is assembled, walk-in modular outdoor enclosures to house low voltage (LV) and medium voltage (MV) switchgear as well as secondary equipment)
- 08 Parking
- 09 400 kV HV overhead power cable
- 10 Minimum clearance from 400kV line (30m from outer cable)
- 11 Secondary entrance
- 12 Primary entrance
- 13 Gatehouse
- 14 Security Fence
- 15 Species-rich hedgerow for visual and vehicle mitigation
- 16 Planted landscape berm for visual and vehicle mitigation

- 2.11 One of the main opportunities of the site is the enhancement of the retained existing habitats, as well as the creation of new ones. The edges are seen as the best areas to create a green buffer that offers privacy, but also increases the biodiversity on site and strengthens the connections to the local SSSI and the 'Landscape of Outstanding Historic Interest'.

- 2.12 These objectives will not only be achieved through planting but also with the construction of a series of swale ponds that will provide both a sustainable drainage system, and will bring new aquatic and wetland habitats.
- 2.13 There is currently no wildlife on the site, however, ecological landscape measures will be introduced to provide habitats away from the building façade; encouraging nesting in areas that will remain undisturbed by facility operation. Boundary habitats such as semi-improved neutral grassland and scattered scrub within the Survey Area are of ecological interest due to their potential to support a range of protected species.
- 2.14 The proposal will enhance any retained habitats on site through additional planting and sensitive management, to benefit foraging bats, breeding birds, reptiles and invertebrate species. There are opportunities for new habitat creation within the development (e.g., Sustainable Drainage Scheme (SuDS) ponds or basins to be designed to benefit wetland species, aquatic invertebrates, and amphibians).



LEGEND:

- - - - Property Line
- - - - Security Fence
- Pole Mounted Bird Box
- Bee Insect Box/Tower
- Pole Mounted Invertebrate Box
- Species Rich Native Hedgerow
- Native Wildflower Meadow
- Native Emergent Flora
- Scattered Native Tree Species

- 2.15 With regards to security, this is of the utmost importance for a data centre complex and as such the are will be surrounded by a secure 2.4m high fence, further details of which can be submitted to discharge planning conditions.
- 2.16 Access points will also be protected by security gates, barriers and gatehouses. Landscaping further aids in the security of the site as detailed in the DAS.

3.0 SITE DESCRIPTION AND SURROUNDINGS

The Site

- 3.1 The circa 40.75 acres (16.49ha) site of the former Quinn Radiator Factory sits within the Imperial Park business park situated on the outskirts of Newport and comprises manufacturing, distribution and warehousing facilities and offices.
- 3.2 The site lies within a wider strategic employment area that includes Airbus, R&D centres and Gocompare.com.
- 3.3 The site itself contains five units currently for the uses of B2 (General Industrial) and B8 (Storage and Distribution). Ancillary to the factory is an office space which is established as a B1 (Business) use. The existing site has a range of elevations up to a maximum of 11.43m ridge height and incorporates the provision for 336 car parking spaces across three car parks with an additional lorry parking area.
- 3.4 The site is bound by industrial development to the north and east within Imperial Park. The western boundary is bounded by a dual-carriageway linking to the A48 and a small residential area further afield. South of the site is undeveloped land.
- 3.5 The Nant-y-Moor Reen is situated on the western boundary and an element of the western part of the site is known to have flooded in the past. There is a pumping station on the site. The site benefits from fences around its boundary and two security gates at its accesses.
- 3.6 The site has an existing 24-hour security team in place monitoring the site and to restrict unauthorised access.
- 3.7 The site is currently vacant; however it was most recently occupied by Quinn Radiators Limited as a radiator production facility. Access to the site is via the unnamed dual carriageway to the west that connects to the A48, in addition to southern access points appearing available via Dyffryn Lane off the Celtic Way roundabout to the east. The site is well located in terms of access to the M4 which enables travel to Newport, Cardiff, Swansea and Bristol.

Wider Context

- 3.8 Newport is located in South East Wales at the mouth of the River Usk. Newport has strategic transport links to Swansea, Cardiff, Bristol and London via the M4 and the Swansea to London mainline railway.
- 3.9 Imperial Park is a business park covering more than 140 hectares on the western edge of Newport. The site has good access to the A48 and Junction 28 of the M4. Imperial Park comprises various B class uses, including research and development, manufacturing, warehousing and the existing NGD data

centre. Other companies operating at Imperial Park include Gocompare.com, Quinn Radiators, Smiths News and Beachcroft.

- 3.10 There are four Sites of Importance for Nature Conservation (SINC) and one Site of Special Scientific Interest (SSSI) within a 1km radius of the site. These include the Celtic Springs SINC, LG Duffryn Site 1 SINC, LG Duffryn Site 2 SINC, Duffryn Pond SINC and the Gwent Levels-St Brides SSSI.
- 3.11 The site lies within the Gwent Levels National Character Area and in proximity to the Cardiff, Barry and Newport National Character Area.
- 3.12 Existing large buildings within Imperial Park screen views of the application site from the north and east although the application site is visually prominent from the south.
- 3.13 The Gwern Y Cleppa Burial Chamber Scheduled Monument is located to the north of the M4 approximately 800m to the north of the site. A number of listed buildings at Tredegar House are situated within 800m north east of the application site.
- 3.14 The proposed site is partially located in Zone B of Natural Resources Wales (NRW) Development Advice Map (DAM). Zone B is defined as areas of the floodplain that are known to have flooded before, as evidenced by sedimentary deposits.
- 3.15 There are no Public Rights of Way within or adjacent to the application site.
- 3.16 It is important to highlight the designations and constraints that apply to the site:
 - Within Urban boundary;
 - Previously Developed Land/Brownfield;
 - Allocated Employment Land (EM1);
 - Parking Zone 5;
 - Duffryn Pond 1 Site of Importance to Nature Conservation (SINC) (South of Plot 5);
 - Duffryn Pond 2 Site of Importance to Nature Conservation (SINC);
 - Archaeologically Sensitive Area (South of site);
 - Wentlooge Levels- Special Landscape Area (SLA) (South of site);
 - Gwent Levels- Site of Special Scientific Interest (SSSI) (South of site);
 - Nearest Residential Properties – 300m North West, Church Crescent, 900m North East, Pencarn Avenue and 900m East, Powis Close.

4.0 PLANNING HISTORY & TIMELINE

4.1 A high-level assessment of the site’s planning history has been undertaken using NCC’s on-line planning application search register. The site has an extensive planning history; an executive summary is provided below:

Application Reference	Location	Proposal	Decision
The Site			
23/0889	Quinn Radiators Celtic Way Celtic Lakes Newport NP10 8FS	Prior notification of proposed demolition of 3 no. buildings and slab	Decision Issued Prior Approval not required
23/0323	Former Quinn Radiators Submitted by F55 Sterling Newport S.a r.l based in Luxembourg	Request for a screening opinion for proposed data centre.	Es not required 18 th May 2023
21/0344	Former Quinn Radiators Submitted by F55 Sterling Newport S.a r.l based in Luxembourg	Change of Use from B2 (General Industrial) and B8 (Storage and Distribution) Ancillary B1 to Flexible Use B1 (Business), B2 (General Industrial) and B8 (Storage) to allow subdivision to create 5 new units	Granted with conditions
07/0720	Celtic Way, Celtic Lakes	Certificate of Lawfulness for proposed use of existing buildings to accommodate electrical energy storage plant	Refused 26 th September 2008
05/0207	Former LG Electronics Site, Imperial Park, Coedkernew, Newport	Change of use to radiator manufacturing plant together with alterations and extension	Granted 28 th July 2005

97/1072	Land at and Adjacent Imperial Park A48 (South of) Coedkernew 3	Installation of a BOC Gas Plant at LG Semicon (Reserved Matters Application relating to previous planning permission 96/0663/OE)	Granted 17 th December 1997
96/0663	Land at and Adjacent Imperial Park A48 (South of) Coedkernew 3	Construction of an integrated plant for the manufacture of television monitors colour picture and colour display tubes other electronics equipment (LG Electronics Inc) a wafer fabrication and assembly plant (LG Semicon Co Ltd) including ancillary buildings and uses and associated buildings, engineering and other operations and landscaping (Class B2 of the Town and Country Planning (Use Classes) Order 1987) (involving the diversion of public footpaths 7 and 8 and the stopping up of public highways Celtic Way and Dyffryn Lane	Granted 24 th September 1996

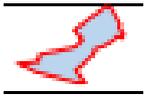
- 4.36 Of particular note, Application 07/0720 sought a Certificate of Lawfulness for the proposed use of the existing building to accommodate an electrical energy storage plant, which was subsequently refused on 26th September 2008.
- 4.37 The application was refused owing to insufficient evidence being submitted to prove that the proposed use could be classed as B2 Use. The Officer’s Report outlined that the proposed use did not fall within the description of Class B2 (General Industrial) as defined in article 2 of the Town and Country Planning (Use Class) Order 1987.

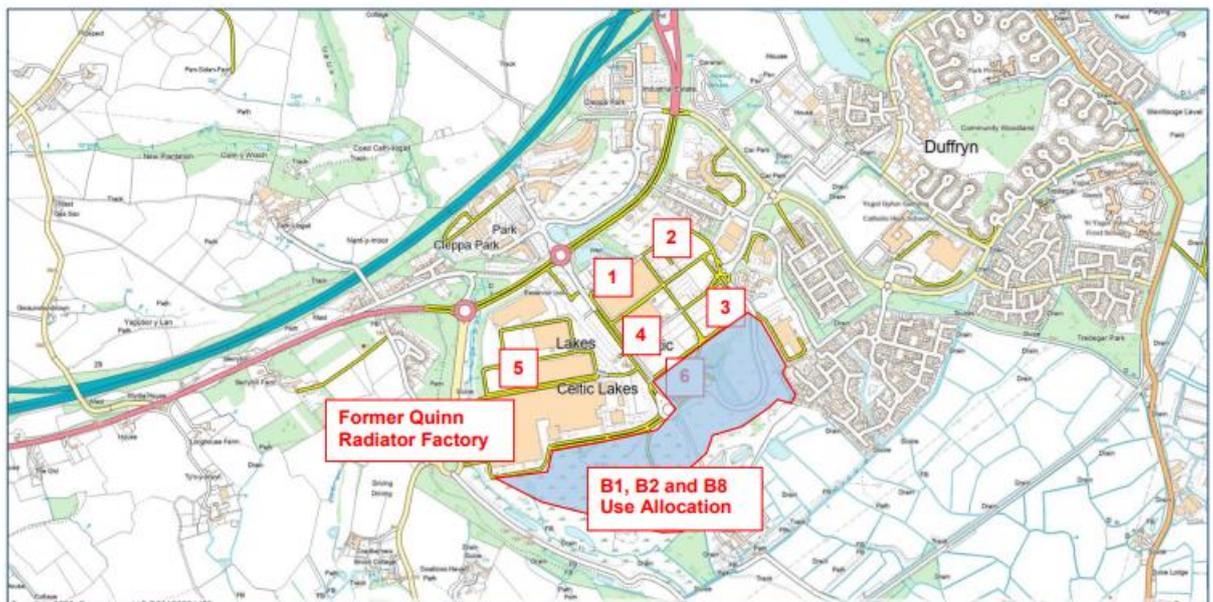
4.38 The Officer's Report considered that it was possible that the proposed use was within Use Class B8 (Storage), but whilst there were permitted development rights of use from B2 to B8, this was subject to a floor space restriction of 235 sq metres which the site exceeded.

Other B8 / Data Centre Uses in Proximity

The below table and plan provides details of other consented or allocated sites for B8 (Storage or Distribution) sites in proximity of the appraisal site.

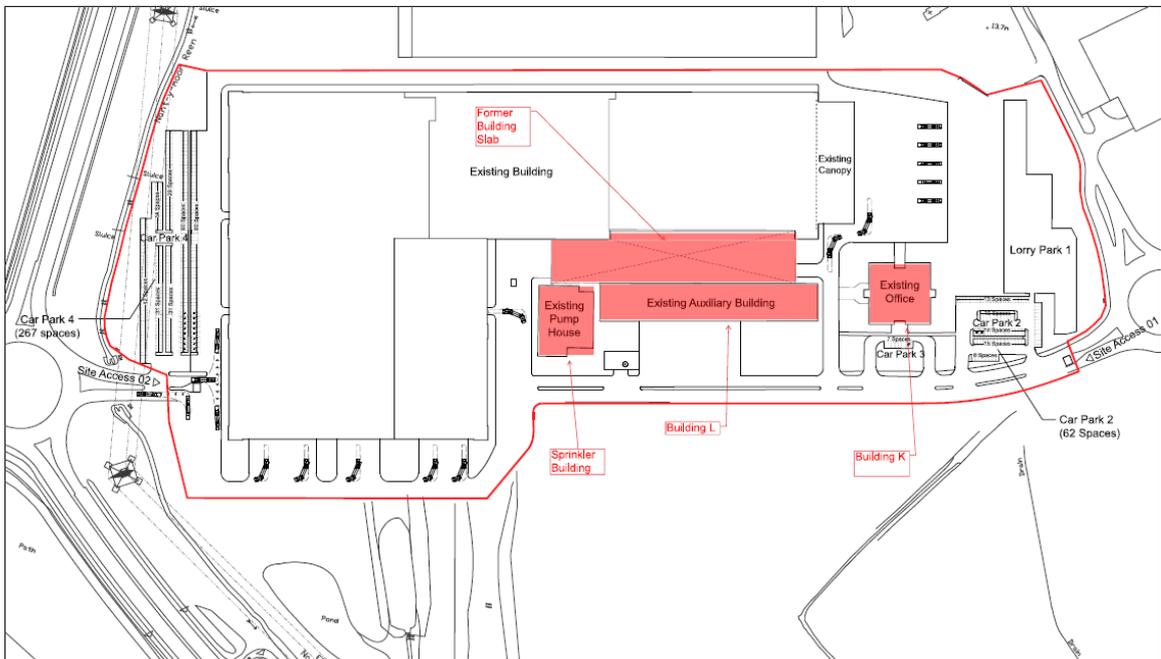
Application (or policy)	Address	Use	Plan Ref.
07/1533	Land and buildings to East of Quinn Rad, Celtic Way, Celtic Lakes, Newport Granted 18th March 2008 - Constructed	Re-use of existing FAB building as a Data Centre – and the construction of buildings to house stand-by generators, the provision of a security fence and a gatehouse	1
20/0039	Land East of Celtic Technology Centres, Celtic Way, Celtic Lakes Granted 10th September 2020	Erection of 4 no, three storey data centre buildings comprising B8 Use and Ancillary B1 Use, provision of emergency generators	2
20/1176	Next Generation Data Land South of Unit 3, The Courtyard, Imperial Park Granted 3rd March 2021	Erection of two storey Data Centre building comprising B8 Use and ancillary B1C Use, provision of emergency generators	3
18/0233	Land to the north east of and adjacent to Celtic Way, Celtic Lakes	Provision of staff and visitor car and cycle parking, a secure external plan compound with multiple covered storage areas and single storey gas bunker; 2 no. sprinkler tanks, roof mounted plant and discharge flues installation of 16 no. refrigeration	4

		units, external alteration to fabric of building and creation of new access junction onto Celtic Way – B2 (General Industrial)	
18/0383	Unit 12-21 Celtic Way, Celtic Lakes Granted 20th December 2018	Hazardous substance consent for the storage and use of 0.447 tonnes of arsine (Arsenic Trihydride)	4
19/0427	IP5 Celtic Way, Celtic Lakes, Newport NP10 8BE Granted 7th June 2019	Change of use from Manufacturing B2 to Storage / Distribution B8	5
16/0314	Land to the South East of unit 12-21 Celtic Way, Celtic Lakes	EIA Screening Opinion for provision of industrial units (B1, B2, B8 Use) – ES Not Required	6
Policy EM1(i)	38.5 ha of land at Dyffrn	Allocation for B1, B2 and B8 Uses	



5.0 DEMOLITION

- 5.1 In order to aid the overall programme of delivering the proposed development, a separate application for prior notification of proposed demolition (Ref: 23/0889) has been submitted in advance of this submission to allow for early demolition of some of the ancillary structures.
- 5.2 This application has been determined with the Council content that Prior Approval was not required. Accordingly, demolition of the structures below will commence in November 2023.
- 5.3 The works proposed relate to the three buildings highlighted red in the site plan below as well as the ground floor slab which was left behind following earlier demolition works (not carried out by current owner).



- 5.4 The application is accompanied by a thorough demolition management plan which is also submitted as part of this planning application.
- 5.5 The main demolition works will only take place on approval of this planning application which is reflected in the proposed description of development.
- 5.6 While early demolition will occur, the site has been fully assessed, in its current state (i.e. with all structures in place) in terms of all survey work so the baseline data is as accurate as possible.

6.0 CONSULTATION

- 6.1 Pre-application advice was first sought in 2022 with a meeting held on 30th November of that year (Ref: P/22/0215).
- 6.2 Formal written advice was issued on 27th January 2023 confirming, inter alia:
- The proposal would be supported by policy SP18 (Urban Regeneration) and the general brownfield strategy of the Newport LDP
 - The proposal would be encouraged and supported at local and national policy level in terms of its cluster location and as a development which would generate economic prosperity and regeneration
 - The design is comparable with a recently approved scheme by SPTS, which provide some welcome synergy across the Park
 - It is proposed that vehicles enter and exit the site via the existing accesses off Celtic Way and the unnamed road to the West. The site has good vehicular links to the principal and motorway network
 - The Council would support the broad principles of a data centre use of this site. A detailed assessment of the proposals will depend on the provision of further assessment and survey work.
- 6.3 Further, subsequent meetings were held with officers to discuss primarily the role of the proposed back up diesel generators.
- 6.4 In terms of public engagement, ahead of the PAC submission, Microsoft undertook two days of consultation events at Parc Golf Club, a 3-minute drive from the site at Imperial Park. The aim of the consultation events was to present the proposals for the proposed development, engage with local residents and answer any questions they had, as well as taking onboard any feedback.
- 6.5 Further information on this work is included in a separate report however in summary, to advertise the consultation events to the local community, an advert was placed in the South Wales Argus newspaper on Wednesday 20th September. In addition to this, a postcard invite was distributed on Monday 18th September to 1,400 local addresses, with 400 being business addresses and 1,000 being residential addresses. Further to this, invitations to the local ward councillors, Senedd members and two local community organisations.
- 6.6 The two days of consultation events were well attended, and the proposals well received from a range of different local residents, local organisations and political stakeholders. The project team stood on

hand to answer a range of questions that attendees had. The team included community affairs, planning consultant, architect, demolition, and construction.

- 6.7 Members from the design team have also met separately with other community groups as part of existing meetings and met and local councillors on site to tour the existing facilities.
- 6.8 The application will be submitted in November 2023 for statutory preapplication consultation ('PAC'). Full information on this process will be submitted at the time of final submission, demonstrating how the applicant has adhered to the consultation requirements as part of the planning application submission.

7.0 PLANNING POLICY

7.1 Planning Policy in Wales is guided by National as well as Local Policy in the form of Planning Policy Wales, Future Wales: The National Plan 2040, Technical Advice Notes (TANs), circulars, and policy clarification letters.

Planning Policy Wales (11th Edition, February 2021)

7.2 The primary objective of Planning Policy Wales ('PPW') is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

7.3 PPW provides the national strategic guidance for land use planning matters in Wales and aims to deliver the vision for Wales as set out in the Well-being of Future Generations Act:

A more prosperous Wales, a resilient Wales, which supports healthy, functioning ecosystems and recognises the limits of the global environment, a healthier Wales, a more equal Wales, a Wales of more cohesive communities, a Wales of vibrant culture and a globally responsible Wales.

7.4 PPW aims to ensure that the planning decisions taken in Wales, regardless of scale, will improve the lives of both current and future generations, building a better environment to accommodate current and future needs.

7.5 PPW and the National Development Framework ('NDF') set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

7.6 Paragraph 2.13 of PPW states that "*The plan-led system underpins the delivery of sustainable places. To ensure all development plans and decision taken by the planning system work together to deliver sustainable places. The 5 Key Principles represent a guiding vision for all development plans, including the National Development Framework*".

7.7 The key principles are:

- Growing the economy in a sustainable manner;
- Making best use of resources;
- Facilitating accessible and healthy environments;
- Creating and sustaining communities;

- Maximising environmental protection and limiting environmental impact

7.8 Paragraph 2.28 provides the key factors in the assessment process with regards to economic development. This includes:

- *“The numbers and types of long-term jobs expected to be created or retained;*
- *Whether, and how far, the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing local employment opportunities or upgrading the environment;*
- *The contribution the development would make to achieving wider strategies, for example the growth or regeneration of certain areas;*
- *The contribution this economic activity will have to wider policy goals; and*
- *How the proposal would support the achievement of a more prosperous, low carbon, innovative and resource efficient Wales.”*

7.9 PPW requires that the planning system should support economic and employment growth which generate economic prosperity and regeneration where possible. To this end, the planning system, including planning policies, should aim to ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic use.

7.10 In respect of the Re-Use of Previously Developed Land, Paragraph 3.55 states that *“Previously developed land in settlements should generally be considered suitable for development because their re-use will promote sustainability principles.”*

7.11 In relation to Good Design, Paragraph 2.27 considers that good design is fundamental to creating sustainable places and that it is not just about the architecture of a building but the relationship between all elements of the natural and built environment. To achieve sustainable development, design must go beyond aesthetics and include the social, environmental, cultural and economic aspects of the development, including its construction, operation and management, and the relationship with its surroundings.

7.12 Paragraph 5.4 states that *“For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long term prosperity, jobs and income”*.

7.13 Paragraph 5.4.2 states that economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services. The construction, energy, minerals, waste and telecommunications sectors are also essential to the economy and are sensitive to planning policy. This section focuses primarily on

traditional employment land uses (B1, B2 and B8) while policies on other economic sectors are found elsewhere in PPW.

- 7.14 Paragraph 5.4.4 states that *“Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration; Sites identified for employment use in a development plan should be protected from inappropriate development”*.
- 7.15 Paragraph 5.4.16 states that *“Economic clustering typically occurs when businesses from the same or similar industry, or with a common interest, choose to locate in close proximity for mutual benefit. Often, clustering concerns high technology, innovative or research and development based companies, but may also include finance, food and media businesses, or supply industries serving larger manufacturers. Businesses can benefit from shared facilities, infrastructure, local pools of skilled and qualified labour, common supply chains and links to higher education”*.

Future Wales: The National Plan 2040

- 7.16 Future Plan Wales – The National Plan 2040 (February 2021) is Wales’ national development framework which sets out the direction for development in Wales to 2040. It is a development plan that sets out a strategy for addressing key national policies including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities. The spatial strategy is a guiding framework which sets out the key national policies that will guide and encourage development which supports sustainable growth in both urban and rural areas across Wales.
- 7.17 Policy 33 “National Growth Area – Cardiff, Newport and the Valleys” outlines that the Welsh Government supports an increased role for Newport as a focus for sustainable, long-term growth and investment. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport. The Welsh Government is determined to see development and growth in Newport, allowing the city to fulfil its potential as a second focal point for the region.
- 7.18 Other Policies set out in the Plan that are considered most relevant to this application as follows:
- Policy 1 & 33 identifies Newport as a national growth area for housing and employment opportunities and investment in infrastructure.
 - Policy 13 (supporting digital communications) states new developments should include the provision of Gigabit capable broadband infrastructure from the outset.

- Policy 16 (Heat Networks) states new developments of 100 or more dwellings or 10,000sqm or more of commercial floorspace should consider the potential for a heat network.

Technical Advice Notes

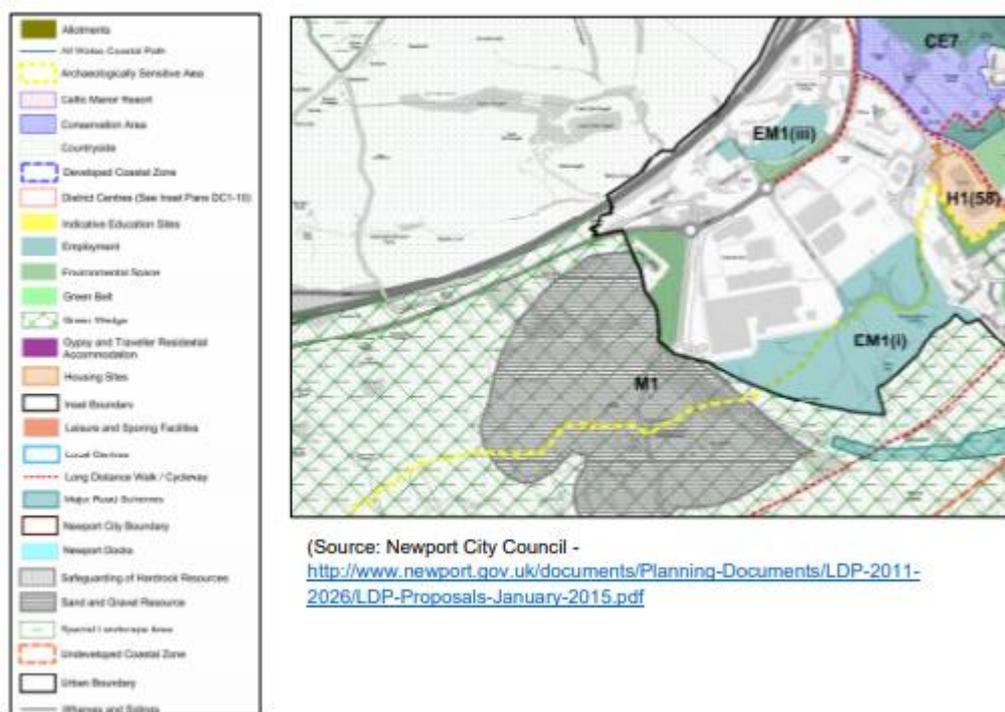
7.19 Technical Advice Notes ('TANs') supplement the policy principles of PPW and add further detail on issues which might affect development potential of the site. TANs which are currently considered relevant to the proposal are:

TAN	Title	Summary
TAN 11	Noise (1997)	Provides advice on how the planning system can be used to minimise the adverse impact of noise without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business.
TAN 12	Design (2016)	Further detailed guidance on the objectives of good design as set out in PPW within the categories of Access; Character; Community Safety; and Environmental Sustainability
TAN 15	Flood Risk (2004)	Document currently under review, moving away from a precautionary framework to one that is risk based addressing all sources of flood risk and incorporating a source-pathway-receptor model. The final revised TAN 15 was due at the end of 2020
TAN 18	Transport (2007)	Describes how to integrate land use and transport planning including advice on transport related issues when planning new development including integration between land use planning and transport, location of development parking and the design of development.
TAN 23	Economic Development (2014)	Provides guidance on proposed developments that seek to generate wealth, jobs and income.
TAN 24	The Historic Environment (2017)	Provides guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building (LBC) applications specifically in relation to World

		Heritage Sites, Scheduled Monuments, Archaeological remains, Listed buildings, Conservation areas, Historic parks and gardens, Historic landscapes, Historic assets of special local interest.
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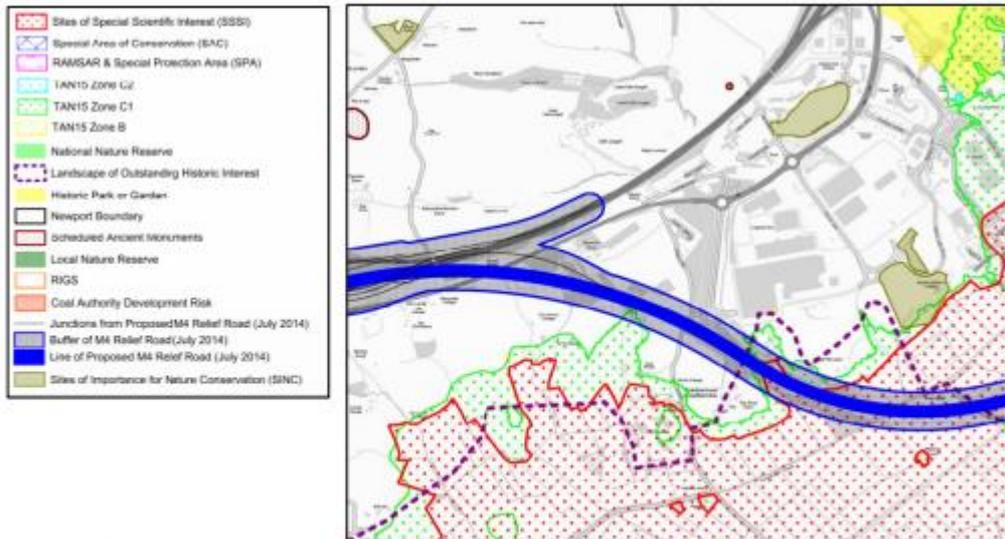
The Local Development Plan

- 7.20 Imperial Park lies in the administrative authority of Newport City Council. The adopted Local Development Plan ('LDP'), which covers the period from 2011 – 2026, was adopted in January 2015 and guides development in Newport over the plan period with the main focus being on regeneration and growth through the sustainable use of land.
- 7.21 As illustrated on the below LDP Proposals map snip, the site is located within the defined settlement boundary of Newport and is immediately adjacent to the 95 acre Duffryn B1, B2 and B8 employment allocation to the south of the site. The site is adjacent to an area designated in the LDP as Countryside and Green Wedge to the west. To the south of the site the LDP designates an "Archaeologically Sensitive Area" and a "Special Landscape Area".



- 7.22 As illustrated below, the LDP Constraints Plan (January 2015) confirms that a corridor of land to the south of the site is safeguarded in the adopted LDP under Policy SP16 "Major Road Schemes" for the

now abandoned M4 Relief Road proposals. Additionally, the site is in proximity to the Gwent Levels SSSI and a “Landscape of Outstanding Historic Interest”



(Source: Newport City Council - <http://www.newport.gov.uk/documents/Planning-Documents/LDP-2011-2026/LDP-Constraints—Jan-2015.pdf>)

- 7.23 As demonstrated by the below Development Advice Map from Natural Resources Wales, the western third of the site sits in Zone B of TAN 15 (2004) as it is known to have been flooded in the past as evidenced by sedimentary deposits. According to TAN 15, Zone B is used as part of a precautionary approach to indicate where site levels should be checked against the extreme (0.1%) flood level. If site levels are greater than the flood levels used to define adjacent extreme flood outline there is no need to consider flood risk further.
- 7.24 TAN 15 confirms at Paragraph 11.6 that when a local planning authority receives an application which is within Zone C, or in some cases in Zone B, they should undertake appropriate internal consultation in relation to their own flood defence responsibilities as well as consulting the Environment Agency (now Natural Resources Wales). Where appropriate, standing advice should also be considered. Planning authorities should also, where relevant, consult with Internal Drainage Boards on developments within internal drainage districts and outside where it would have an impact in them.



(Source NRW: https://maps.cyfoethnaturiolcymru.gov.uk/Html5Viewer/Index.html?configBase=https://maps.cyfoethnaturiolcymru.gov.uk/Geocortex/Essentials/REST/sites/Flood_Risk/viewers/Flood_Risk/virtualdirectory/Resources/Config/Default&layerTheme=2)

- 7.25 Due to the nature and type of the proposal and the existing units within the site, the development is classed as ‘less vulnerable development’ and therefore it is considered that the proposed development will neither be at risk of flooding nor increase the risk of flooding elsewhere.
- 7.26 According to the Welsh Government’s historic environment service, Cadw, the site abuts a Registered Historic Landscape, as illustrated below: -



(Source: Cadw <https://cadw.gov.wales/advice-support/cof-cymru/search-cadw-records>)

- 7.27 TAN 24 The Historic Environment states at paragraph 7.8 that “*proposed developments within a registered historic landscape that require an Environmental Impact Assessment may require an*

appropriate assessment of the impacts as part of the Environmental Statement. The Welsh Ministers must be consulted, through Cadw, on such developments”.

7.28 The LDP is supported by a number of Supplementary Planning Guidance (SPG) documents, of which Sustainable Travel (2020); Planning Obligations (2020); Air Quality SPG (2018); Archaeology and Archaeologically Sensitive Areas SPG (2015); and Parking Standards (2015) are of relevance to the proposals at this site.

- 7.29 Adopted LDP policies to be considered of relevance to the proposals include, but are not limited to:
- Policy SP1 – Sustainability – requires development proposals to contribute to sustainable development by concentrating development on brownfield land within the settlement boundary and establishes the various considerations against which proposals will be assessed, including; the efficient use of land, re-use of previously development land, minimising the risk of and from flooding and encouraging economic diversification
 - Policy SP3 – Flood Risk – development should be directed away from where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere;
 - Policy SP4 – Water Resources – expects development proposals to minimise water consumption and avoid any net increase in surface water runoff through the implementation of sustainable drainage systems
 - Policy SP9 – Conservation of the Natural, Historic and Built Environment – The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals;
 - Policy SP13 – Planning Obligations – enables contributions to be sought from developers that will help deliver infrastructure which is necessary to support development;
 - Policy SP17 – Employment Land – Provision will be made for approximately 172 hectares of employment land for the period 2011-2026;
 - Policy SP18 – Urban Regeneration – states that proposals which assist the regeneration of urban areas will be favoured, especially where proposals contribute to the provision of business opportunities in the urban area and reuse derelict sites.
 - Policy GP2 – General Developments Principles – General Amenity – Development will not be permitted where it has a significant adverse effect on local amenity in terms of noise, disturbance, overbearing, light, odours and air quality. Development will not be permitted which is detrimental to the visual amenity. Proposals should seek to design out crime and anti-social behaviour, promote inclusion and provide adequate amenity for future occupiers;

- Policy GP3 – Service Infrastructure – states that development proposals must be able to provide necessary and appropriate service infrastructure and there is capacity in the existing foul sewer or sufficient capacity could be provided.
- Policy GP4 – General Development Principles – Highways and Accessibility – Development should provide appropriate access for pedestrians, cyclists and public transport along with appropriate car parking and cycle storage. Development should not be detrimental to the highway, highway capacity or pedestrian safety and should be designed to enhance sustainable forms of transport and accessibility;
- Policy GP5 – General Development Principles – Natural Environment – Proposals should be designed to protect and encourage biodiversity and ecological connectivity and ensure there are no negative impacts on protected habitats. Proposals should not result in an unacceptable impact on water quality or the loss or reduction in quality of agricultural land (Grades 1, 2 and 3A). There should be no unacceptable impact on landscape quality and proposals should enhance the site and wider context including green infrastructure and biodiversity;
- Policy GP6 – General Development Principles – Quality of Design – Good quality design will be sought in all forms of development. In considering proposals, a number of factors are listed which should be considered to ensure a good quality scheme is developed. These include consideration of the context of the site; access, permeability and layout; preservation and enhancement; scale and form of the development; materials and detailing; and sustainability.
- Policy GP7 – Environmental Development Principles – Environmental Protection and Public Health – Development will not be permitted which would cause or result in unacceptable harm to health;
- Policy CE1 – Routeways, Corridors and Gateways – Development proposals should protect and enhance the appearance and connectivity of existing and future main route corridors and gateways into the city;
- Policy CE4 - Historic Landscapes, Parks, Gardens and Battlefields - Sites included in the register of landscapes, parks and gardens of special historic interest and identified historic battlefields should be protected, conserved, enhanced and where appropriate, restored. Attention will also be given to their setting.
- Policy CE8 – Locally Designated Nature Conservation and Geological Sites – proposals affecting locally designated sites will only be permitted where there would be no overall loss of the nature conservation resources for which the site has been designated; there would be no

significant adverse effect on the geological interest of the site; and appropriate mitigation or compensatory measures can be achieved.

- Policy T4 – Parking – development will be expected to provide appropriate levels of parking.

Other Material Considerations

Planning Obligations Supplementary Planning Guidance (August 2015)

- 7.30 The Planning Obligations Supplementary Planning Guidance (SPG) identifies what, and when, the Local Planning Authority will expect from developers in terms of planning obligations. PPW and the LDP (policy SP13) support the use of planning obligations on new developments which are proportionate to the proposed development, such as highway network improvements and enhancements to the natural or historic environment.
- 7.31 The Local Planning Authority will require contributions from any development, regardless of size or type, where there is a requirement to improve existing, or construct new, highway infrastructure, either in order to provide safe access to a new development, or, as a result of the additional traffic impact associated with the development. This contribution could be required in addition to contributions to other travel modes such as the provision of cycle routes, footpaths of public transport infrastructure.
- 7.32 Developers will be required to produce a Travel Plan where Traffic Impact Assessments (TIAs) identify that a proposed development could have a detrimental impact upon travel movements on the existing highway network.
- 7.33 It is noted that the pre-application enquiry response from the local planning authority indicated that planning obligations may be sought for the proposed development, particularly in relation to proposed pedestrian improvements along Celtic Way.

Wildlife and Development SPG (August 2015)

- 7.34 The Wildlife and Development SPG encourages developers to incorporate the findings of survey work into the design proposals.
- 7.35 The SPG establishes the preferred hierarchy for resolving potential impacts on wildlife from development; avoid, mitigate and compensate. Where avoidance or mitigation of an impact is not achievable, compensation a net gain which will be discussed on a case by case basis with the local planning authority.

- 7.36 In addition to mitigation and compensation, development proposals are expected to incorporate measures which enhance biodiversity. It is recognised that enhancement measures will be considered by the local planning authority on a site by site basis.

Trees, Woodland, Hedgerows and Development Sites (January 2017)

- 7.37 This SPG provides guidance to help create high quality and sustainable urban and rural landscapes where trees, woodlands and hedges are a key element. The SPG states that the positive use of trees, woodlands and hedges within a development site can help create truly sustainable development.
- 7.38 The SPG requires that a tree survey carried out in accordance with British Standards accompanies planning applications for development which may affect trees. The expectations of the tree survey and accompanying information is set out in detail in the SPG.

Parking Standards SPG (August 2015)

- 7.39 The Parking Standards SPG is a material consideration for decisions on individual planning applications. The SPG establishes parking standards for five Parking Zones. The proposed development is situated within Zone 5: Countryside, which the SPG characterises as having limited public transport services, but often capacity for vehicle parking.
- 7.40 The parking standards for Zone 5 include:
- For Office use of less than 1000m² in zone 5, the standards recommend 1 space/25m².
 - For a storage warehouse in zone 5, the standards recommend 1 space/500m².
 - Disabled parking should be within 50m of the facility served by the car park and be 5% of the total car park capacity.
 - Short stay cycle parking for offices is recommended at 1 stand per 200m²
 - Short stay cycle parking for industrial warehouses and storage centres is recommended at 1 stand per 500m², there is no requirement for long stay cycle parking.
 - 5% of total parking should be for motorcycles.
- 7.41 It is recognised that the parking standards presented in the SPG represent the maximum provision.
- 7.42 The SPG notes that reductions in proposed parking provision is acceptable if the site is situated within 800m of a bus stop on a regular bus route. The factors which will be considered by the LPA when assessing parking requirements for development proposals include:
- accessibility to, and the service provided by, the public transport system;

- the availability of private buses or the extent of car pooling;
- the relative proportions of full time / part time / local catchment of labour;
- accessibility by walking and cycling;
- the existing and possible future congestion in streets adjacent to the development; and
- accessibility to and the availability of public and/or private car parking space in the vicinity.

7.43 The SPG expects cycle parking should be located in safe, secure and convenient locations.

Sustainable Travel SPG (July 2020)

7.44 The SPG supplements policies in the adopted Newport Local Development Plan relating to sustainable travel within new development and surrounding links.

7.45 It recognises that sustainable travel is about moving from A to B, but valuing the environment and looking after our natural resources at the same time. It states that walking and cycling are the most obvious forms of sustainable travel, followed by public transport such as buses and trains. Travel by ultra-low emission vehicles can also have an important role to play, particularly in rural areas with limited public transport. Single occupancy travel in private motor vehicles is unsustainable and the general premise of this SPG is to move people away from this type of travel to more sustainable forms.

7.46 The benefits of sustainable travel, from environmental advantages to health and well-being benefits are well documented. The SPG aims to promote sustainable travel in new developments and is primarily designed to be used by planning applicants, developers, sustainable transport providers and local planning authority planners.

7.47 It encourages place makers to integrate sustainable travel as a foundation component of new development and its surrounding areas. In a truly connected travel network, sustainable travel routes and options should not be limited by site boundaries. The local authority, developers and sustainable transport providers must work together to ensure safe and continuous sustainable travel networks exists across the City of Newport and beyond.

Air Quality SPG (February 2018)

7.48 The purpose of this SPG is to help ensure consistency in the way in which air quality is dealt with through the planning system.

7.49 The SPG sets out the circumstances when an assessment for air quality purposes is required and clarifies the appropriate minimum amount of information required for the air quality assessment.

Mitigation measures and off-setting of impacts through compensation are also provided. This SPG is focussed on the impact to human health.

- 7.50 Development which is considered likely to result in harm to human health as a result of air pollution will be required to evidence, justify and where relevant, mitigate its impact on air quality. A development must not result in unacceptable harm to human health because of air pollution; this principle is backed up by national and local planning policy.

Archaeology and Archaeologically Sensitive Areas SPG (August 2015)

- 7.51 The SPG recognises that Newport City Council has a rich and diverse archaeological heritage with in excess of 1,400 archaeological sites within its administrative area. The SPG seeks to protect the archaeological heritage and its setting by advising how development proposals can best take account of archaeological issues.
- 7.52 Importantly, it states that the presence of archeological remains does not necessarily preclude development.
- 7.53 The SPG states that Glamorgan Gwent Archaeology Trust (GGAT) Curatorial is the Council's archaeological advisors and the applicant is liaising with this consultee.

8.0 PLANNING POLICY ASSESSMENT

Approach to the Assessment

- 8.1 In the context of the decision-making framework, the following section provides an assessment of the proposed Development against the relevant local planning policies of the Development Plan and other material policy considerations.

Principle of Development

- 8.2 The proposed development seeks to construct two modern data centre buildings at Imperial Park.
- 8.3 The use is well established in the area and the proposed development is suited to the site and its surroundings.
- 8.4 The application site comprises previously developed land and is situated inside of the settlement boundary for Newport. The redevelopment of this vacant site for the proposed use would be in accordance with policies SP1, SP17 and SP18 of the Newport LDP.
- 8.5 Paragraph 2.70 of policy SP17 notes that employment will be sought on urban regeneration sites but occasionally sites adjacent to existing employment uses would be most appropriate. The proposed development would meet both of these expectations.
- 8.6 The proposals would create new high skilled jobs in the region and constitute economic development which would contribute to long-term economic well-being, and so should be supported and encouraged in accordance with Planning Policy Wales.
- 8.7 The introduction of Microsoft to the area will continue to demonstrate that Newport can be the focus of high tech industry, with IQE and Boeing locating nearby in recent years. The expansion of other neighbouring facilities reinforces Newport's status as a key regional hub for high tech companies.
- 8.8 The proposed development would deliver further, significant investment in Newport's high tech industry which would directly contribute to Newport City Council's Local Plan Objective 3 Economic Growth which seeks to enable a diverse economy for Newport and the wider region, and policy SP1 as far as it would encourage economic diversification.
- 8.9 It is anticipated that the operational development would create approximately 130 full time equivalent jobs. These high quality jobs would contribute to the 7,400 new jobs forecast during the plan period as set out in paragraph 1.27 of the LDP.

- 8.10 The proposals will provide construction jobs and subsequent increased expenditure, all of which will increase the GVA of the local economy.
- 8.11 The proposal would be classed as economic development and therefore in accordance with National Policy, the proposal is encouraged and supported as a development which would generate economic prosperity and regeneration.
- 8.12 The proposal would support policy SP18 - Urban Regeneration, which favours development that seeks business opportunities within the urban area and on vacant, underused or derelict land. The proposal is encouraged and supported at policy levels in terms of location and as a development which would generate economic prosperity and regeneration.

Design

- 8.13 Policies SP9- Conservation of the Natural, Historic and Built Environment, CE1- Route ways, Corridors and Gateways, GP1- Climate Change, GP2- General Amenity and GP6- Quality of Design of the Adopted LDP 2011-2026, seek to ensure that the development proposals are of a good quality of design and reflect the scale and context of the locality. Schemes should also be sensitively designed to mitigate any adverse impact upon the protected built environment (listed buildings and conservation areas), gateway routes through Newport and wider landscape features.
- 8.14 The visual impact of the scheme is primarily with respect to the scale and height of the proposed building, its siting and ground level infrastructure i.e. parking and how it will relate to the existing buildings within the industrial site as well as the protected countryside to the south.
- 8.15 The proposed building is situated to the south east of the existing two storey IQE building and owing to its scale and height would have a marked impact upon the immediate landscape and would be visible from locations to the south and west of the site. However, the proposed building is designed as a modern employment building relating to the existing use and character that surrounds it. It is of a more functional appearance at the rear with external plant, and a contemporary and detailed aesthetic to the front. Located within an industrial park, there are a number of other large-scale buildings within the vicinity.
- 8.16 The proposals are considerably smaller than the existing buildings on site, with a reduction in height further improving the setting of the local area.
- 8.17 There are no immediate residential neighbours to the site that would give rise to any concerns of neighbours impacts. The nearest neighbours are Powis Close to the South East at a distance of approximately 300 metres and to North East Heol Edmundsbury at a distance of approximately 400 metres. Both are separated by existing employment uses, roads, established vegetation and landscaping.

- 8.18 As such, despite the large scale and height of the building there are no significant concerns with respect to the building being overbearing, impacting upon privacy or resulting in a loss of light to the nearest residential amenity.
- 8.19 As such, it is considered that a landscape and visual impact assessment is not required as confirmed in the list of deliverables highlighted in the pre-application advice.

Heritage Impact and Archaeology

- 8.20 Environmental Resources Management ('ERM') has been commissioned by the applicant to undertake an archaeological desk-based assessment ('DBA') to support a planning application for the proposed development.
- 8.21 A previous DBA of the Site was prepared by Archaeology Wales Ltd for Gensler Ltd, as part of a pre-purchase Site Due Diligence investigation. The current assessment is aimed at updating our understanding of the archaeological potential and identifying potential impacts at the Site.
- 8.22 The Site lies within a landscape of generally high archaeological potential and partly within the northern boundary of The Gwent Levels Historic Landscape of Outstanding Historic Interest. The Glamorgan Gwent Archaeological Trust Historic Environment Record (HER) lists 31 undesignated heritage assets within 1 km of the site, many of which were identified during previous archaeological work in advance of development. The Project Area's fen edge location is ideally suited for prehistoric settlement and there is evidence for Bronze Age, Iron Age and Roman settlement within 500m of the proposed development.
- 8.23 Within the Site itself there has been significant below ground disturbance associated with industrial development. Previous investigations at the Site in the 1990s failed to identify any archaeological remains. Recent ground investigation works have, however, identified alluvial and peat deposits within the Project Area. These deposits are themselves of palaeoenvironmental interest and may contain significant archaeological remains. The presence of thick alluvial deposits within the Site means that there remains some potential for buried archaeological remains within the area.
- 8.24 In summary, this desk-based assessment finds there is a moderate potential for encountering prehistoric (Mesolithic to Iron Age) and Roman archaeology. If present, these are likely to be found in the deposits (including peat) associated with the former Nant-y-Moor Reen watercourse that are known to survive in the central west portion of the Site. Historical mapping also suggests there remains some potential for more recent archaeological remains to survive within the Project Area.
- 8.25 The impact assessment identified one potential significant effect upon the Gwent Levels Historic Landscape of Outstanding Historic Interest. This potential impact pertains to potential direct physical

removal of buried deposits during groundworks associated to the former location of the Nant-y-Moor Reen that runs through the centre west part of the Site.

- 8.26 Potential, though not significant, effects have also been identified on two further assets: the former location of Duffryn Cottage and the possible location of a Roman road.
- 8.27 The Historic Landscape Character Area of Duffryn area includes mainly industrial and business parks including Cleppa Park on the north side of the A48 and Celtic Park/Celtic Lakes on the south side of this road.
- 8.28 There are also modern hotels within the business parks and late 20th century residential development in the south eastern and north western corners. The former hamlet of Duffryn was located in the western edge of this HLCA (Historic Landscape Character Area); it is now within the industrial estate known as Celtic Park and no trace of the original hamlet has survived.
- 8.29 A second small hamlet at Coedkernew is still present in the south west corner of the HLCA. To the east of here is Great Pencarn, once the seat of a manorial holding but now disused land within which the remaining farm buildings have been recently demolished. This is separated from Coedkernew by a new road which is currently not in use.
- 8.30 Overall this HLCA is assigned a negligible value; the only part retaining any historic character is around Coedkernew.
- 8.31 The submitted DBA confirms, that subject to a written scheme of investigation, the proposals will likely have a negligible impact on the history of the site or any heritage assets and therefore complies with the relevant policy at a local and national level.

Environment

Biodiversity

- 8.32 The results of the accompanying BNG report shows that there will be a 250.61% net gain in biodiversity habitat units on-site. The number of habitat units on-site will increase from 12.20 to 42.69, predominantly due to the reduction of hardstanding / bare ground and the planting of grassland, woodland, and scrub habitats as well as the creation of three ponds. Hedgerow units will also increase from 0.40 to 2.88 units (a 620.86% increase) due to additional hedgerow planting.
- 8.33 The Proposed Development will secure measurable biodiversity net gain, providing greater ecological value and species diversity across the whole of the Site, which broadly accords with national planning policy as set out in Section 6 of the Environment (Wales) Act 2016 and local planning policy.

Ecology

- 8.34 ERM was appointed to complete Ecological Impact Assessment (EclA) at the former Quinn Radiator site in Newport, Wales.
- 8.35 The report details the findings of necessary protected species surveys, specifically bats and great crested newt (*Triturus cristatus*) (GCN). The results of these surveys have been used to inform necessary mitigation and / or protected species licencing requirements to address any potential ecological impacts from the Proposed Development, taking into account relevant planning policy and legislation.
- 8.36 An extended Phase 1 Habitat survey was also previously undertaken at the site by BSG Ecology in June 2021. ERM's Phase 1 update survey was undertaken to update the findings of the June 2021 survey and identify the presence, or likely presence, of ecological constraints for proposed works on the site, including the presence of legally protected and/or otherwise notable habitats and species.
- 8.37 Habitats found on site are common and widespread and do not qualify as Habitats of Principal Importance. Habitats lack particular ecological value owing to their collective amenity character. The construction of purpose-built data centre buildings with associated infrastructure and landscaping will result in the loss of the majority of habitats on site.
- 8.38 A Preliminary Ecological Appraisal (PEA) of the Site was undertaken in June 2021 with an Ecological Impact Assessment completed in October 2023. Following the recommendations in the initial Extended Phase 1 Habitat survey, great crested newt (GCN) surveys were undertaken in 2021 on five ponds within 250 m of the site and no GCNs were found to be present in any of the ponds. The site was also categorised as being of low value for foraging and commuting bats. An extended Phase 1 habitat survey was undertaken in May 2023, to confirm that no significant changes in habitat had occurred since the initial assessment and report. Bat transect surveys and static bat loggers were undertaken in Spring, Summer and Autumn.
- 8.39 The site is not considered to be of ecological interest owing to its developed, fragmented, and amenity character. No priority habitats were recorded. None of the trees or buildings are considered to have potential to support roosting bats. The potential for protected and priority species was limited to commuting bats, small numbers of widespread reptiles, and common nesting birds.
- 8.40 One statutory designated site (The Gwent Levels – St Brides SSSI) was identified within 2 km of site. Direct impacts (e.g., removal or modification) of habitats associated with the SSSI are not anticipated as a result of development of the Site, due to the distance. However, indirect impacts (e.g., pollution effects) through run-off during construction through storm drains into adjacent reen systems, may result

in degradation or physical damage of habitats and / or impacts to protected species associated with the SSSI.

- 8.41 No direct adverse impacts to statutory or non-statutory designated sites are expected providing pollution prevention measures outlined in a scheme Construction Environmental Management Plan (CEMP) are employed during demolition, pre-commencement and construction. Potential indirect adverse impacts to habitats associated with nature conservation designated sites via air emissions will be addressed in an Air Quality Impact Assessment report.
- 8.42 No adverse impacts to protected or priority species are expected providing precautionary measures outlined in a scheme CEMP are employed. A precautionary working method statement will be provided to the GC which will include the presence of an Ecological Clerk of Works (ECoW) during pre-commencement and construction. A sensitive lighting strategy will be produced to ensure light spill to the south and south-east of the site is minimised, thereby avoiding potential disturbance to commuting bats.
- 8.43 The Proposed Development will seek to enhance biodiversity by creating a more ecologically diverse landscape in line with national policy. This will include the planting of native trees, hedgerows, wildflower meadows, woodlands, and ponds which can be controlled by an appropriately drafted Landscape Environmental Management Plan.

Arboriculture

- 8.44 Following guidance set out in the Trees, Woodland, Hedgerows and Development Sites SPG, a tree survey following British Standards has been prepared for the trees to be retained and removed, the survey accompanies this planning application.
- 8.45 None of the trees proposed for removal are considered aged or veteran and therefore there is no reason for refusal of an application on these grounds.
- 8.46 The soft landscaping proposals detail a significant commitment to the creation of new landscaping, habitat creation and tree planting. The Proposed Development will result in a medium – long term increase in canopy cover across the site.
- 8.47 The resulting additional species will also provide much needed diversity among tree species for futureproofing against pests, diseases and the effects of climate change.
- 8.48 Further, due to the location of retained trees, future growth of trees is not considered to be an issue to the Proposed Development.

- 8.49 Full details of tree protection measures including construction methods, schedule of arboricultural supervision and specific forms of tree protection would be provided within a detailed Arboricultural Method Statement following any planning approval.

Air Quality

- 8.50 An Air Quality Assessment has been submitted as part of the proposals, taking into account the construction phase effect and operational development. The report covers emissions assessment and regulator notification and engagement actions in the event of a major, unplanned power loss at the facility resulting in the requirement that a significant number of standby diesel generators are required to operate
- 8.51 As set out in the accompanying report, continuity of electrical power is critical for the data centre to ensure that there is no data loss. As such, one of the key design elements of the data centre is the provision of back-up power to provide electricity in the event of mains grid failure. Standard data centre design is to provide diesel engine generators.
- 8.52 The proposals will have 31 diesel backup generators which will be installed to provide emergency power in the event of a grid supply failure. In order to ensure that the generators will operate correctly, routine testing of engines is undertaken on a periodic basis. This testing encompasses operation of single engines and multiple engines. The engines will be tested separately using three types of tests. All the different tests and potential emergency power scenarios have been included in the impact assessment.
- 8.53 It has been concluded that the development is predicted to have a negligible impact on both neighbouring residents/properties and also the local environment. As such the proposals are not considered to have a significant impact on air quality and is in compliance with local policy., notably LDP policies GP2 and GP7.

Noise

- 8.54 The site is located on an industrial site, previously Quinn Radiator Factory. Buildings remain in place but unused. The land to the north is currently occupied by the NHS. To the east is the continuation of the industrial estate.
- 8.55 The site is bounded by the M4 approximately 700 m to the north and a mainline railway approximately 1 km to the south. A48 also lies to the north of the site, in between the site and the M4.
- 8.56 To the east lies the town of Duffryn with the closest residential properties on its western outskirts situated at a distance of approximately 450 m to the proposed Development. To the South, there is open land

with dense vegetation, which appears to be unofficially used by the public (including the use of motorbikes).

- 8.57 The closest residential properties to the site are situated to the west, on Church Lane and Church Crescent at a distance of approximately 280 m from the closest noise producing element on the site. In addition, a number of more isolated properties are situated to the south, with the closest (on a private road off Church Lane), including The Stud Farm, approximately 300 m from the site.
- 8.58 ERM were appointed to undertake an assessment of noise and vibration from the construction, operation, and decommissioning of its Proposed Development.
- 8.59 Newport City Council provided pre-application advice in September 2022 and noted that the further assessment work identified in the noise preliminary assessment report would be considered an acceptable approach with further details set out in the submitted acoustic assessment.
- 8.60 The noise baseline methodology and monitoring locations were approved by NCC in June 2023. NCC asked that the assessment include a 'worst case scenario' of data centre backup power generators activating overnight / early hours, and assessment of all applicable plant & equipment.
- 8.61 The aim of the assessment was to determine the existing acoustic climate and predict the sound levels due to three scenarios - normal operation, emergency operation (main power supply failure), and under the generator testing regime of the proposed Development, and to assess these levels against the relevant guidance.
- 8.62 Predicted noise effects from three operational scenarios have been assessed; consisting of noise due to the normal operation of the Proposed Development, noise from generator testing (worst-case), and noise during emergency scenario (main power supply failure).
- 8.63 Predicted noise from all scenarios has been found to be within the acceptable criteria and result in 'low impact, depending on the context' in terms of BS 4142 at all receptors; the external rating levels do not exceed more than 5 dB below the background during the daytime and night-time in the normal operation and generator testing scenarios, and meet the agreed criteria at all receptors.
- 8.64 Demolition and construction noise is predicted on a worst-case basis and do not exceed the lower category BS 5228-1 threshold of 65 dB(A) at any NSR. Works are only expected to be undertaken during the daytime as such only daytime assessment has been undertaken. Given the low exceedance the impact is expected to be manageable by following the best practise principles outlined in Section 8.
- 8.65 Therefore, no significant effects are anticipated from demolition/construction works of the proposed Development or from operation of the Development in the three assessed scenarios, when considering the context.

- 8.66 Results from normal operation and generator testing are within the agreed criteria of 5 dB or more below the respective background levels, given that the proposed Development is not out of context of the area, noise emitted from the Development is considered to have no significant impact on the amenity of the local residential dwellings.
- 8.67 The proposed development has been designed to avoid significant adverse effects on amenity and unacceptable harm to the health of surrounding residential properties in accordance with LDP policies GP2 and GP7.

Drainage

- 8.68 The site is a brownfield site and has an operational below ground drainage system that discharges surface water from roof and hardstanding areas via a pipe network into the pond/ditch watercourse network at the south of the site. This discharge is unrestricted with limited treatment applied to the surface water with a petrol interceptor identified on site. The foul water discharges to the public combined water sewer located at the east of the site and discharges to the sewer via a pump station.
- 8.69 A SuDs Strategy has therefore been developed for the site and a Drainage Strategy Report has been submitted as part of this planning application. The drainage strategy for the scheme relies on infiltration to ground to control the surface water run-off together with some rain water harvesting. The surface water run-off from the new building and car park area will be collected via surface water drainage and conveyed via linear pipelines to geocellular attenuation tank storage located beneath the car park area.
- 8.70 The infiltration test results indicate better than expected infiltration. The rainwater harvesting will allow collection of rain water for use within the new building including a grey water system and for use in the manufacturing process. A proportion of the surface water run-off arising from the good/service yard at the rear of the building will be directed to an attenuation pond.
- 8.71 The proposed Data Centres roof and hardstanding areas will be drained by a series of gravity systems, where surface water is conveyed via rainwater downpipes, road gullies, swales and drainage channels. These flows from the western Data Centre plot and eastern Data Centre plot are captured and treated separately, before being discharged into the SuDS bodies and discharged into the existing watercourse at the south of the site.
- 8.72 The proposed development has an impermeable area of 8.291 Ha with a maximum restricted greenfield discharge rate of 46.6 l/s. Using the Micro Drainage software quick storage estimate tool, the site requires an approximate storage volume of up to 11, 234m³ to provide adequate surface water storage for all storms up to a 1 in 100 year plus 40% climate change.

- 8.73 The surface water management has been split into two separate systems for each Data Centre plot. Both systems use swales and pipe network, which is designed to collect surface water runoff, to treat for hydrocarbons via a petrol interceptor, and to be stored within the respective retention pond which then allows for the gradual discharge of surface water from the retention ponds into external existing ponds past the site boundary at a designated discharge rate.
- 8.74 As part of the flood risk management strategy, the Drainage Strategy is required to address surface water management and measures to prevent flood risk elsewhere. This is in accordance with Section 8 of TAN15 (paragraph 8.3) which states, “*Development in one part of a catchment may increase run-off and hence flood risk elsewhere, therefore, the aim should be for a new development not to create additional run-off when compared with the undeveloped situation, and for redevelopment to reduce run-off where possible. It is accepted that there may be practical difficulties in achieving this aim.*”
- 8.75 The proposed drainage strategy, prepared by Pinnacle provides a significant betterment over the existing drainage discharge in both limiting the outfall from the site along with the quality of water discharged via a SuDS treatment train that is suitable for the level of contamination.
- 8.76 The design will ensure surface water runoff from site will not exceed existing rates of runoff as required by LDP policies SP1, SP4 and GP6.

Flooding

- 8.77 The proposed development will have a “less vulnerable” development classification which matches the current classification for the site.
- 8.78 The proposed site is partially located in Zone B of Natural Resources Wales (NRW) Development Advice Map (DAM). Zone B is defined as areas of the floodplain that are known to have flooded before, as evidenced by sedimentary deposits. The Justification Tests of TAN15 do not apply to development in Zone B, although it is advised to apply the Acceptability Criteria.
- 8.79 Zone B indicates areas which are generally suitable for most forms of development.
- 8.80 Flood Zone 2 of the FMfP of flood risk from the sea and a TAN15 defended zone encroach slightly into the southern boundary of the development site. The accompanying Flood Consequence Assessment has been prepared on a precautionary basis as advised by NRW.
- 8.81 NRW’s Flood Risk Assessment Wales maps shows the site has a very low risk of flooding from all sources of flooding. This does not take in to account the impact of climate change, therefore detailed tidal modelling has been undertaken to further consider this risk as identified in the FMfP.

- 8.82 Detailed tidal modelling undertaken by JBA consulting in 2022 shows that the proposed development is predicted to be flood free during both the 0.5% AEP plus climate change and the 0.1% AEP plus climate change events for the present day (2022) and 75 years development lifetime (2097).
- 8.83 The accompanying FCA has demonstrated that all acceptability criteria set out in TAN15 have been satisfied. Consequently, it is concluded on the grounds of flood risk, the proposed development meets the principles and requirements set out in TAN15 and the aims of Planning Policy Wales

Sustainability

- 8.84 In accordance with LDP policy SP1, the proposed development would use brownfield land within the settlement boundary of Newport. Furthermore, the SuDS features are incorporated into the design to achieve and will reduce runoff and peak flows from a site, reducing the risk of flooding.
- 8.85 The Design and Access Statement provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations. Sustainability is a broad concept and covers a range of environmental, social and economic considerations
- 8.86 In addition, the proposed buildings will be constructed of high quality and durable materials. In this regard, the design demonstrates accordance with LDP policy GP6.
- 8.87 Where possible, construction materials will be sourced from local sources, capitalising on the availability of locally produced steel and concrete.
- 8.88 The proposed Data Centre will be enrolled in the LEED certification programme, with the aim of achieving LEED GOLD.
- 8.89 All Microsoft Data Centres are enrolled in the LEED (Leadership in Energy and Environmental Design) programme, and while LEED is similar to BREEAM, which is more common in the UK, a LEED certification allows Microsoft to leverage the knowledge and solutions of its global portfolio.
- 8.90 LEED is the most widely used green building rating system in the world.

Lighting

- 8.91 An appropriate lighting strategy with included lighting contours has been submitted to ensure no negative impact on the neighbouring amenity.
- 8.92 At this stage of the design, a strategy has been drafted to ensure light spill to the south and south east in particular is minimised to ensure there is no disturbance to commuting bats in particular.

- 8.93 Exterior lighting during the hours of darkness will be a minimum of 10 lux in usable areas and exterior walkways will be illuminated to 30 Lux with roadways / parking between 20-30 Lux. Due to the proposed site being a rural area, calculations will ensure excessive light spill from CWL01 & CWL02 does not give out more than 0.5 to 1 lux in commuting and foraging areas to minimize local disturbance to wildlife and protected species i.e., Bats.
- 8.94 This will specifically be to the areas immediately adjacent to the Southern and Western boundaries of the site.
- 8.95 To minimise light spill into commuting and foraging areas, items on exterior luminaries such as back spill cowls can be provided along with low level bollard lighting to reduce glare and overall impact to the rural environment.
- 8.96 Lighting will largely be for security and navigational purposes with lightspill from the development itself being negligible.

Contamination

- 8.97 The proposed development site is located close to the Gwent Levels - St Brides Site of Special Scientific Interest (SSSI). The SSSI is notified for its range of aquatic plants and invertebrates associated with the interconnected reens and ditches of the drainage system.
- 8.98 In summary, the special interests of the SSSI are dependent on the water quality, water quantity, the existence of the drainage system and its continued management. Any development which has an adverse impact on any of these factors will have an adverse impact on the wildlife for which the area was notified.
- 8.99 Based on the understanding of the site and surrounding environment plus Geotechnics' assessment of their available 2021 monitoring and testing data, the risk to identified receptors from existing potential contaminants arising from historical activities is generally considered to be low.
- 8.100 The potential risk to identified ecological receptors from existing or future contaminant sources present at the site via migration in groundwater or surface water run-off has been identified within the conceptual site model. Ecological receptors include Gwent Levels St Brides SSSI and LG Duffryn Sites 1 & 2 SINCC (Site of Substantive Nature Conservation Value), all located within 200m of the site and anticipated to be positioned downgradient. They are linked to the Nant-y-moor Reen that is located immediately adjacent to the western site boundary.
- 8.101 A further phase of ground investigation and assessment will be undertaken during the demolition stage to check for any presently unidentified impacts to soil and groundwater in those parts of the site that were inaccessible during the Geotechnics 2021 investigation.

- 8.102 Further desktop studies of ground gas at the site has determined the requirement for ground gas (Radon) protection measures in proposed on-site structures.
- 8.103 Where potential impacts from current potential contaminants are identified, mitigation measures either have been or will be considered to enable the site to be developed for the proposed Data Centre use. This includes anticipated measures to be contained within a CEMP (Construction Environmental Management Plan) which can be suitably conditioned to mitigate against potential impacts arising during construction of the proposed development.
- 8.104 Once the proposed development is operational, control measures will be implemented to mitigate against the risks of accidental discharge or leakage of future chemicals held on site to underlying soils, groundwater and surface water.

Infrastructure, Utilities and Services

- 8.105 The existing private and public sewers crossing the site will be diverted with respective easement within the site to accommodate the proposed development plan.
- 8.106 The existing private foul water pumping station is being relocated within the site security fence. This pumping station will continue to serve the third-party site located north to the site.
- 8.107 A new surface water drainage system is proposed to collect the surface water runoff from various hardstanding areas and to convey via proposed SuDS system for treatment and to discharge into the existing ponds located south of the site.
- 8.108 Regarding the mains water supply, the proposed development could have a high demand for cooling water, however this is to be fully supplied via harvested rain water. A backup connection to the mains system will be in place in the event of a failure of the systems however the storage capacity on site for the harvested rain water and Process water is enough to supply the demand for an entire year.
- 8.109 All the toilets and other functions in the office building, main data centres and ancillary buildings are supplied by harvested rain water with only a small potable connection to the taps, sinks and drinks fountains for the office. While water usage on a scheme of this size may appear high it is actually lower than a standard office block of the same size as we harvest and treat the vast majority of the water we use.
- 8.110 Pollution prevention methods are proposed for each hardstanding areas appropriately to remove the contaminants from the surface water discharge. Attenuation structure and flow control devices are proposed to limit the discharge rate to greenfield runoff rate.

- 8.111 In developing the initial MEP servicing strategy for the site, consideration has been given to the proximity of any utility supplies adjacent to the site and how new supplies will be brought onto site to serve the new Data Centre.
- 8.112 Liaison with the local utilities has confirmed that there is sufficient capacity available to support the development of the Data Centre.
- 8.113 As part of the design, the following is considered:
- Rainwater utilisation for cooling;
 - Rainwater used to flush toilets within the Admin Building and provide irrigation where required;
 - waste heat recovery to recirculate hot air return from the servers back into the air handling units to preheat incoming air;
 - External lighting to minimise excessive light spill to minimise local disturbance to wildlife and protected species;
 - Roof mounted solar PV arrays.
- 8.114 Electrically, the site will be provided by two supplies. A day 1 supply of 13MVA will be provided by SSE which will re use the existing capacity of the 11kV supply, SSE have confirmed this supply has capacity and will not add any additional pressure onto the local network.
- 8.115 The day 2 supply will be a new supply from National Grid/SSE and fed from the Imperial Park substation. The day 2 supply will be at the 132kV level and will provide approximately 92MVA of capacity to the site.
- 8.116 This connection will be a new supply and will be provided at the HV 132kV level further ensuring there is no additional pressure onto the local network.

Transport

- 8.117 A total of 121 car park spaces will be provided. Once completed, it is estimated that there would be 120 employees on site at any one time with an estimated 20 visitors giving a peak parking demand of 140 car parking spaces. A total of 40 cycle parking spaces will be provided for the development.
- 8.118 The proposed development has been designed such that service vehicles, including fire tenders and refuse vehicles, can circulate internally throughout the development.
- 8.119 There will be a reduction of up to 225 trips during the AM peak and a reduction of up to 209 trips in the PM peak if the site is redeveloped compared to the existing land use. As a result, it is concluded that the proposed development will have a very minor impact on traffic and further junction analysis is not required.

- 8.120 It is therefore logical to concluded that the development will have a positive impact on the local road network by reducing the number of vehicles that will use local junctions. This would result in a reduction in congestions and delays locally.
- 8.121 The submitted Transport Impact Assessment has confirmed that the proposed access arrangements would adequately accommodate anticipated levels of traffic visitation and that as such the traffic generated by the development would have no material adverse impact on the operation of all junctions modelled.
- 8.122 It has been shown by the application of recognised assessment techniques that there is a marginal uplift in traffic levels arising from the development and the distribution of resultant flows around the adjacent road network. The resulting flows and movements can be accommodated by the neighbouring junctions with marginal congestion and delays expected at these junctions.
- 8.123 The movements and improvements to the junction will ensure there are minimal traffic impacts as result of the development.
- 8.124 Accordingly, there are no reasons in relation to traffic and transportation aspects why this scheme should not be granted planning permission as it accords with TAN 18 and Local Policies SP15, T3, T4 and T5.

9.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

- 9.1 A construction management plan will be submitted to and approved in writing by the Council as the construction design is finalised.
- 9.2 Details shall include control measures for dust, noise, vibration, lighting, delivery locations, and all associated activities audible beyond the site boundary advance notification to neighbours and other interested parties of proposed works and public display of contact details including accessible phone contact to persons responsible for the site works for the duration of the works.
- 9.3 In terms of general site management, the plan will include details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- 9.4 Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of measures to ensure contaminants do not enter the existing surface water drainage network, emergency spill procedures and incident response plan.
- 9.5 The CEMP will demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of measures to ensure contaminants do not enter the existing surface water drainage network, emergency spill procedures and incident response plan. It will also make reference to pollution prevention guidance PPG 6: Working at construction and demolition sites.
- 9.6 Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details will also be provided.
- 9.7 While a contractor is not currently in place for the construction of the proposed development, a highly experienced demolition contractor is on site and a thorough demolition management plan has been submitted as part of this application.
- 9.8 This report has already been reviewed by the Council as part of the Prior Approval application for early demolition of some of the existing structures.
- 9.9 It is considered that this document not only allows for the application to be approved and a CEMP to be conditioned, but it also sets a high bar in terms of quality that will be expected from the chosen contractor.

10.0 CONCLUSIONS

- 10.1 Microsoft are seeking planning permission for the demolition of the existing principal building and remaining structures and construction of new hyperscale data centre (Use Class B8) across two main buildings plus ancillary structures and other associated works.
- 10.2 The proposal also includes the provision of emergency back-up generators, security facilities, significant levels of hard and soft landscaping, internal access roads, car parking and drainage. The existing site access from the Imperial Way roundabout will be used as well as a secondary/emergency access using the existing point accessed via a roundabout off Church Lane and Dyffryn Lane.
- 10.3 The proposal represents a major investment in the area from Microsoft who are looking to establish and grow their UK presence in the cloud based data storage sector.
- 10.4 The application site will be served by two separate connections to the national grid as well as a high speed internet connection; both are business-critical operational requirements of the proposed use and key factors in the suitability of the site. The suitability of the site is further demonstrated by the existing presence of similar operators in the immediate area.
- 10.5 The building is designed principally to facilitate the intended operational requirements of the proposed use and the building's exterior reflects the industrial nature of surrounding uses in its scale, massing, appearance and materials.
- 10.6 The proposed development, due to its location has limited potential for amenity impacts on residential properties however these neighbours have been considered from the earliest moment of the design process and consulted fully on the proposals.
- 10.7 Efforts have been made to minimise any potential impacts and to prevent unacceptable harm to health and residential amenity.
- 10.8 As demonstrated in this planning statement and the supporting Design and Access Statement, the proposals propose a greatly reduced footprint, with the structures also sitting lower than the existing buildings, presenting an improved visual appearance in the wider landscape.
- 10.9 One of the main opportunities of the site is the enhancement of the retained existing habitats, as well as the creation of new ones. The edges are seen as the best areas to create a green buffer that offers privacy, but also increases the biodiversity on site and strengthens the connections to the local SSSI and the 'Landscape of Outstanding Historic Interest'.
- 10.10 These objectives will not only be achieved through planting but also with the construction of a series of swale ponds that will provide both a sustainable drainage system, and will bring new aquatic and wetland habitats.

- 10.11 There is currently no wildlife on the site, however, ecological landscape measures will be introduced to provide habitats away from the building façade; encouraging nesting in areas that will remain undisturbed by facility operation. Boundary habitats such as semi-improved neutral grassland and scattered scrub within the Survey Area are of ecological interest due to their potential to support a range of protected species.
- 10.12 The proposal will enhance any retained habitats on site through additional planting and sensitive management, to benefit foraging bats, breeding birds, reptiles and invertebrate species. There are opportunities for new habitat creation within the development (e.g., Sustainable Drainage Scheme (SuDS) ponds or basins to be designed to benefit wetland species, aquatic invertebrates, and amphibians).
- 10.13 The proposed development will deliver significant economic investment in high tech industry in South Wales, strengthening Newport's reputation as an important employment centre and creating new high quality jobs., views to/from the site, green infrastructure, walkable neighbourhoods, transport links, density, form and open space.
- 10.14 Microsoft is committed to providing a exemplary sustainable development that greatly improves the setting of the area while providing job opportunities for the area and major investment in Newport. Microsoft looks forward to continuing to work with the Council, the local community and other stakeholders to progress the proposals to deliver the development of this important allocated site.

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