



DRAFT FOR PAC

RW/220092/L0002

21<sup>st</sup> March 2024

#### VIA PLANNING PORTAL

Monmouthshire County Council  
Monmouthshire County Council Planning Department  
County Hall  
Rhadyr  
Usk  
Monmouthshire  
NP15 1GA

Dear Sir/Madam

#### On behalf of Nisbets Plc:

**An application for a temporary planning consent to install a storage building at Nisbets Plc, Severn Link Distribution Centre, Newhouse Farm Industrial Estate, Mathern, Chepstow, NP16 6UP**

#### PLANNING PORTAL REF: PP-12911845

On behalf of Nisbets, please find enclosed a planning application for a temporary planning consent to install a storage building at the above site. The application is submitted via the Planning Portal and comprises the following:

- Application Forms and Certificate B, duly completed and signed;
- Site Location Plan (1:1250);
- Block Plan;
- Existing site plan for the whole site;
- Existing site plan;
- Proposed site plan;
- Proposed floor plan
- Proposed roof plan;
- Proposed elevations;
- Indicative visuals;
- Transport Note prepared by Corun Associates; and
- Flood Consequence Assessment prepared by Vale Consultancy.

The requisite application fee of £XXX will be paid via online transaction by Nisbets.

#### Site History and Background

Newhouse Farm Industrial Estate is situated alongside Junction 2 of the M48 Motorway and immediately adjacent to the Severn Bridge which provides direct access to the M4/M5

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interchange approximately 6 miles to the east. Chepstow is situated 1 mile north and provides local amenities. Cardiff is approximately 33 miles to the west and Bristol 12 miles to the south east. The estate is therefore well positioned to service both south Wales and the south west of England, this is why a number of storage and distribution uses are located within the estate.

The application site itself is located on the eastern edge of the estate. The site includes a large distribution building that is currently occupied by Nisbets since 2023, the unit is surrounded by a yard area to the north and south, these areas are part of their demise. The works are proposed to take place in the southern yard, in between the existing grass verge and the landscaping that forms a buffer between the Nisbets site and the railway line. This yard area is currently only used as an overflow trailer park for the Nisbets use, with trailer parking usually adjacent to both sides of the building to allow goods to be moved in and out.

The site therefore has a well established distribution centre use. I summarise the planning history of the unit as follows, this summary is based on the document available on the LPA's online planning database:

- DC/2012/01094 - Temporary change of use of part of former B8 warehouse to B1 use as a television studio and associated offices, stores and car parking – approved 13<sup>th</sup> February 2013;
- DC/2013/00802 - Temporary change of use of remaining B8 warehouse to B1 use as television studio and associated offices, stores and car parking – Approved 5<sup>th</sup> November 2013; and
- DM/2020/01386 - Storage of hazardous substances: The storage of LNG and LIN and the filling of vehicles associated with the operation of the site for distribution purposes – approved 12<sup>th</sup> March 2021.

Unfortunately there is no planning record for the original construction of the unit available to view on the online planning file. However it is clear there's a longstanding use here as a Class B8 distribution site. This is reaffirmed by consent DC/2012/01094 and DC/2013/00802, Condition 2 of both decisions set out that:

*“When the premises ceases to be used as a television studio, the use shall revert to a B8 warehouse use.”*

Therefore, the lawful use of the whole site is Class B8, we submit this application for temporary planning consent to allow additional Class B8 floorspace at Severn Link Distribution Centre, Newhouse Farm Industrial Estate, Mathern, Chepstow, NP16 6UP.

## Proposal

Nisbets Plc has over 30 stores currently in operation nationwide. Nisbets was established in 1983 on the basic principle of providing affordably priced high quality catering equipment to catering businesses. The Chepstow Distribution Centre forms a base to distribute goods for their stores in the region, it is also a vital part of their nationwide operation. The business currently employ 38 members of staff on site, Nisbets are now a major employer in the locality.

Nisbets are proposing to install a temporary 4,200 sq m structure in the rear yard of the site. This is proposed to be placed on existing hardstanding located between the grass verge and

the landscaped boundary to the south. No permanent physical works to the site is proposed, with all greenery and landscaping remaining as existing. The proposed location ensures that the existing landscaping on the southern boundary of the site forms a buffer and protects any views of the new structure from the south.

The temporary structure is a steel framed skeleton with a stretched dark grey PVC fabric forming the walls and roof. There are proposed to be two main goods entrances into the unit, from the north eastern corner and the western edge. With further staff entrances proposed along all elevations.

Nisbets proposed to use the structure for additional dry storage for bulky items (fridges/freezers) enabling more efficient transfer of goods from dock to distribution. This supports a white goods next day delivery service. This currently takes place from a smaller site in Doncaster, Nisbets are seeking to relocate this service to the Chepstow site. Alongside this, the structure is proposed to support the ability to grow business sales but also allow the ability to react to supply chain issues arising from global issues outside of their control, Coronavirus, Suez canal blockages, Ukraine War, Red Sea issues etc.

Nisbets are only seeking a temporary structure at this stage as part of a study to determine if additional Class B8 floorspace is feasible on site, a 5 year temporary permission for the temporary structure will allow them to consolidate additional services from the Chepstow site in the short term while they complete plans for a longer term permanent solution. Such permanent solution will of course be subject to a separate planning permission, if applicable.

Nisbets anticipate that an additional 29 employment opportunities will be created by the proposal, this is based on providing the additional services at Chepstow. It would bring the total employment figure at the site to 67.

## Design and Access

It is a statutory requirement for a DAS to accompany major planning applications in Wales. This DAS has been prepared in accordance with the relevant guidance contained in Technical Guidance Note 12 ('Design') and guidance provided by the document 'Design and Access Statements in Wales' published by the Design Commission for Wales 2017. This chapter should be read alongside the accompanying chapters within this letter.

### Character

The proposal is located on existing hardstanding, with no physical permanent works included as part of the application. It will be a 4,200 sq m temporary structure that will be used for storage purposes (Class B8) alongside the much larger main building that is currently operated by Nisbets themselves.

The scale and layout has been determined by designing the structure to fit into the existing layout of the yard, this ensure that no greenery or landscaping has to be removed for the structure. The ridge height of the building is 10.58m which, this conforms with the surrounding buildings in the locality.

The temporary structure is a steel framed skeleton with a stretched dark grey PVC fabric forming the walls and the roof. There are proposed to be two main goods entrances into the

unit, from the north eastern corner and the western edge. With further staff entrances proposed along all elevations.

### **Access and Movement**

Access into the wider site is through the junction on the western edge of the site, this proposal does not amend this arrangement. The internal road arrangement has been designed to ensure that movement is maintained with loading and unloading areas being specifically demarked. The Transport Note prepared by Corun Associates demonstrates that there is sufficient space for HGVs to move in and around the site in forward gear.

Two shuttered access points will be provided into the proposed new unit (one located in the north west and north east corners of the proposed unit respectively). Swept path analysis identifies that there is sufficient operational space provided within the site for a max legal articulated vehicle (16.5m) to safely access each of the proposed unit access points, manoeuvre within the site, and then exit the site in a forward gear. Alongside this there are 12 staff/pedestrian access points a floor level which allows access to all.

### **Environmental Sustainability and Ecology**

The proposal has been designed to ensure that it's entirely located on existing hardstanding with no requirement for any permanent works. In addition to this, it does not impact on any greenery on site or established landscaping areas. There is no requirement to dig any foundations at all, therefore the only building work required is assembling the structure on site.

Nisbets are only seeking a temporary structure at this stage as part of a study to determine if the permanent additional Class B8 floorspace is feasible on site. Therefore in terms of sustainability, the proposal ensures that they are not completing permanent works that could have environmental/sustainability impact without the guarantee that permanent floorspace is required.

### **Community Safety**

Anyone accessing the site will use the existing entry arrangement that are part of the Nisbets operation. Entry to the site is to be via the existing secured gates which are to be monitored 24/7. The secure control point ensures that there's no access to the wider site without passing these gates. The existing external lighting scheme for the rear yard area is sufficient to ensure the security of staff at any time of day or night.

### **Planning Policy**

The Monmouthshire Local Development Plan 2011-2021 (adopted February 2014) forms the development plan for the site.

The site is within the Chepstow settlement boundary, as defined by Policy S1 (Development Boundary) of the development plan. The site is also within a Protected Employment Site, Policy SAE2 of the development sets out that:

*“The following existing sites as indicated on the Proposals Map are protected for industrial and business development (classes B1, B2 and B8 of the Town and Country Planning Use Classes Order 1987):*

- *Newhouse Farm, Chepstow”*

The supporting text explains that:

*“A number of the sites listed in connection with Policy SAE2 are within or partially within flood zone C and development proposals may, in accordance with TAN15, require a flood consequences assessment to demonstrate that the risks and consequences of flooding can be acceptably managed. The sites in question are: SAE2a, Mill Street; SAE2k Newhouse Farm, Chepstow; SAE2l Wonastow Road, Monmouth; SAE2m Mayhill/Hadnock Road, Monmouth; SAE2p Severn Bridge, Caldicot; SAE2q Cheeseman’s Industrial Estate, Rogiet; SAE2r Progress Industrial Estate, Rogiet; SAE2s Former Railway Goods Yard, Usk; SAE2v Mamhilad; and SAE2x Woodside Industrial Estate, Usk.”*

Policy E1 seeks to protect existing employment land, with specific protection for Class B8 uses. Policy S8 (Enterprise and Economy) explains that:

*“Development proposals that seek to deliver the Council’s vision for sustainable economic growth will be permitted.”*

Policy S17 (Place making and design) of the development plan states that:

*“Development shall contribute to creating high quality, attractive and sustainable places. All development proposals must include and promote high quality, sustainable inclusive design which respects local distinctiveness, respects the character of the site and its surrounding in order to protect and enhance the natural, historic and built environments and to create attractive, safe and accessible places.”*

Policy G1 seeks to:

*“Maintain, protect and enhance Monmouthshire’s diverse green infrastructure network by:*

- *Ensuring that individual green assets are retained wherever possible and integrated into new development. Where loss of green infrastructure is unavoidable in order to secure sustainable development appropriate mitigation and/or compensation of the lost assets will be required.”*

## Assessment

### Principle

The key planning policy consideration in this case is the acceptability of the installation of the temporary storage building on the existing Class B8 site. Policy SAE2 of the development plan specifically supports Class B8 uses on the site, with job creation also being at the heart of the development plan. The installation of the temporary structure for 5 years will allow Nisbets to expand their offer at their Chepstow unit in the short term while they complete their

feasibility assessment for a permanent floorspace solution in the future. Nisbets anticipate it will create an additional 29 employment opportunities on site.

With the proposal being for additional temporary Class B8 floorspace on a site that's protected for Class B8 uses, the proposal is fully compliant with the development plan.

## **Design**

The temporary structure is proposed to be located on existing hardstanding, with no permanent physical works proposed. The hardstanding is currently an underutilised space within the yard that's only rarely used as overflow trailer parking. An existing grass verge is located to the north of the proposed structure and a mature landscaped belt is located to the south, the landscaping provides a screen between the structure and views from the south.

Further to this, as seen on the submitted visuals, the structure is modular in nature. This design fully complements the surrounding buildings in the locality, where most of these are large modular warehouse structures used for distribution purposes. Alongside this, in comparison to the size of the buildings within the estate, this will be a minor temporary addition that will not have a negative impact on visual amenity and it respects local distinctiveness, the character of the site and its surroundings.

## **Flooding**

The application is supported by a Flood Consequence Assessment prepared by Vale Consultancy. Their report sets out that the NRW Development Advice Map shows the site to fall within Zone C2. Only 'Less Vulnerable' development is permitted within Zone C2, subject to application of the justification test. They conclude that the site and proposals successfully pass the Justification test as per TAN15. The Flood Map for Planning Wales indicates the site to fall within Flood Zone 1 (Rivers), Flood Zone 1 (Surface water and small watercourses) and Flood Zone 3 (Sea). The site is served by Tidal flood defence embankments which provide a standard of protection commensurate to at least the current T200 event.

It can be concluded that Tidal flooding represents the greatest potential flood risk to the site, albeit a Low risk. The potential consequences of flooding across the 5-year lifespan of the development have been considered and are deemed to be acceptable and manageable across its lifespan. The developer wholly accepts the potential risks and inherent consequences of flooding here.

All other potential sources of flooding have been assessed and are concluded to be either low, residual risk or null. The area is served by a rigorous system of Flood Warnings and Alerts which would enable more than sufficient time for evacuation of the site.

The proposal will not result in an increase in flood risk elsewhere or to third party land / infrastructure. The proposal is fully compliant with the guidance and principles laid out in TAN15 and PPW. The proposal concurs with the aims and objectives of the LDP.

The level of detail and content of the FCA are at least commensurate with the requirements for the relatively small nature and scale of a temporary (5-year) 'Less Vulnerable' development. The proposal is subject to a successful SAB Application and all drainage infrastructure to be designed and constructed in accordance with national and regional policy, guidance and legislation.

The risk of flooding to the development proposal has been addressed and a balanced judgement has been applied in recognising the potential consequences of flooding.

## Highways

The application is supported by a Transport Note prepared by Corun Associates. The note concludes that the site is located within an already established industrial estate, which is a significant employment area in the south of Chepstow. The proposed development will provide an additional facility within this existing industrial estate area, and will utilise the existing access opportunities that the industrial estate offers.

The development proposal will not alter the existing access arrangements into the Nisbets site, which will remain as per existing. Two shuttered access points will be provided into the proposed new unit (one located in the north west and north east corners of the proposed unit respectively). Swept path analysis identifies that there is sufficient operational space provided within the site for a max legal articulated vehicle (16.5m) to safely access each of the proposed unit access points, manoeuvre within the site, and then exit the site in a forward gear.

Internal pedestrian routes will also be provided towards the entrance points of the proposed new unit on the site. These routes will provide connections between the existing unit on the site, and will be clearly marked for pedestrian use, and segregated from the operational areas where possible.

The proposed new unit will provide an additional facility within the existing Nisbets site. The new unit is not therefore anticipated to generate an increase in non-operational vehicle movements at the site. No additional non-operational car parking spaces are therefore proposed at the site, with the existing parking area provided at the unit sufficient for demand of these vehicles.

The proposed new unit on the site will be located on an area of hardstanding which has previously been used for HGV parking. The site offers sufficient room to safely accommodate parking for at least 10 displaced HGV vehicles, within the remaining hardstanding area located to the west of the proposed new unit. This is considered sufficient for the HGV parking requirements at this location on site.

The proposed new unit on the site would be anticipated to generate up to approximately 15 two-way HGV vehicular trips over a typical 12-hour weekday period. This equates to approximately one additional HGV trip onto the surrounding highway network every 50-minutes across the 12-hour period.

As an employment use, negligible trips would be anticipated over the weekend period at the site. Should the site be operational over any weekend period however, trips over these periods would not be anticipated to be any greater than those over the weekday period. The proposed development is therefore anticipated to generate a minimal volume of additional vehicle trips, and will therefore have a negligible impact on local highway network capacity.

A review of the accident record has identified that there are no existing highway safety issues in the local area of significant relevance for the proposed development, and the minimal

increase in traffic generated by the proposed development is highly unlikely to exacerbate the existing safety record to a significant enough level to warrant concern.

There are no reasons in highway and transportation terms why the proposed development should not therefore be consented.

## Conclusions

The key planning policy consideration in this case is the acceptability of the temporary storage building on the application site. The adopted development specifically supports Class B8 uses on this protected employment site. Allowing the proposal will create up to 29 employment opportunities at the existing Nisbets distribution site. Nisbets are only seeking a temporary structure at this stage as part of a study to determine if the additional Class B8 floorspace is feasible on site, a 5 year temporary permission for the temporary structure will allow them to consolidate additional services from the Chepstow site in the short term while they complete plans for a longer term permanent solution. Such permanent solution will of course be subject to a separate planning permission if applicable.

Granting this proposal will create up to 29 jobs on the site, the majority of which will be recruited locally. Accordingly, we believe that the proposal should be welcomed and planning permission granted.

I trust the above is in order and will enable the prompt registration of the application. In the meantime, should you have any queries, please do not hesitate to contact me using the details below.

Kind Regards

Yours faithfully,

Rhodri Williams  
**Associate**

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