

PLANNING STATEMENT: PROPOSED PLASTIC RECYCLING & PROCESSING FACILITY

GOAT MILL ROAD | MERTHYR TYDFIL | CF48 3TD



PREPARED BY



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DRAWING SCHEDULE

Drawing Number	Drawing Title	Scale
JAY1001/04/01	Site Location Plan	1:2500 / 1:50000
JAY1001/04/02	Existing Topographical Survey and Planning Application Boundary	1:2500
JAY1001/04/03	Aerial Photograph	1:2500
JAY1001/04/04	Development Platform Earthworks Isopachytes	1:2500
JAY1001/04/05	Site Sections	1:2000 / 1:4000
JAY1001/04/06	Site Layout	1:2500
JAY1001/04/07	Swept Path Analysis	1:2500
JAY1001/04/08	Building 1 Elevations	1:500
JAY1001/04/09	Building 1 Floor Plan	1:500
JAY1001/04/10	Building 2 Elevations	1:500
JAY1001/04/11	Building 2 Floor Plan	1:500
JAY1001/04/12	Fire Tank Details	1:125
JAY1001/04/13	Combined Heat and Power Unit Details	1:100
JAY1001/04/14	Car Park Details	1:250
JAY1001/04/15	Typical Cycle Shelter Details	1:50
JAY1001/04/16	Charging Point Details	1:10
JAY1001/04/17	Weighbridge Details	1:50, 1:100, 1:250
JAY1001/04/18	Proposed External Finishes	NTS
JAY1001/04/19	Security Fence and Gate Details	1:2500
JAY1001/04/20	Close Boarded Fence Details	1:2500
JAY1001/04/21	Post and Rail Fence Details	1:2500
JAY1001/04/22	Proposed Bale Storage Details	NTS
JAY1001/04/23	Landscape Masterplan	1:2500

APPENDIX SCHEDULE

Appendix No.	Title
A	First Pre-Application Advice (ref. PA19/0056), January 2020
	Second Pre-Application Advice (ref. PA/21/0063), November 2021
B	Screening Opinion, February 2020
C	Landscape and Visual Assessment and Figures
D	Ecological Appraisal
	Ecological Addendum

	Ecological Response to LPA
E	Construction Landscape and Ecological Management Plan
F	Japanese Knotweed Strategy
G	Arboricultural Impact Assessment
H	Heritage Assessment
I	Flood Consequence Assessment
J	Surface Water Management and Drainage Strategy
	SAB Pre-Application Response
K	Noise Assessment
L	Geo-technical Phase 1 Site Investigations Report
M	Air Quality Assessment
N	Transport Assessment
	Travel Plan
O	Lighting Assessment
P	Waste Planning Assessment
Q	Energy Statement
R	Pre-Application Consultation Report



1. INTRODUCTION

1.1 PURPOSE OF THIS STATEMENT

- 1.1.1 This planning statement has been prepared by Sirius Planning on behalf of Jayplas, a trading name of J & A Young (Leicester) Ltd, in support of an application for planning permission to construct and operate a plastics recycling and processing facility on land off Goat Mill Road, Merthyr Tydfil.

1.2 OUTLINE DESCRIPTION OF THE SITE AND PROPOSALS

- 1.2.1 The application site covers an area of 14.6ha and comprises a vacant, previously disturbed site situated off Goat Mill Road which is designated for employment use within The Merthyr Tydfil Replacement Local Development Plan.
- 1.2.2 The site is situated within an industrial setting with an established industrial estate located to the north of the site. The A4060 runs along the eastern boundary of the site beyond which lies an opencast coal mine and the Fofs-y-fran Land Reclamation Scheme. Residential areas are located beyond Goat Mill Road to the west of the site and beyond Mount View to the south. The site is accessed via two spur roads leading off roundabout junctions on Goat Mill Road, which in turn can be accessed off the A4060.
- 1.2.3 The proposed development is for the construction and operation of a plastics recycling and processing facility and associated infrastructure. The facility will be capable of accepting waste rigid plastics and film from commercial, industrial and the public sector to recycle and process. The proposed site, when fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum. The facility is designed with the objective of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill.
- 1.2.4 The closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste ecology.

1.3 BENEFITS AND OPPORTUNITIES

- 1.3.1 The proposed development will provide the following benefits and opportunities:
- £39 million capital investment
 - 110+ direct employment opportunities;
 - 44 indirect chain jobs;
 - Enhance 'zero waste to landfill' targets;
 - Reduce the carbon footprint for Wales (150k tonnes annual carbon saving, equivalent to 62,249 cars taken off the road);
 - Reduce the need to export waste plastics externally out of the UK; and
 - Provide an additional source of recycled packaging to Wales.

1.4 THE APPLICANT

- 1.4.1 Jayplas is the UK market leader in post-consumer recycling with their core business being collecting, sorting and processing of a variety of used plastics. This provides a closed loop cycle by taking both 'businesses' and consumer waste plastics materials, and returning in a re-useable form. Jayplas are an established industry leader in the Rigid Plastics recycling (mixed bottles and pots, tubs and trays (PTT's)) and have increased the process of plastic film recycling to become the leading supplier of 'Bags for Life' to UK retailers.

1.5 PRE-APPLICATION DISCUSSIONS

- 1.5.1 Initial pre-application advice was sought from Merthyr Tydfil County Borough Council regarding the key issues of the proposal. Pre-application advice (ref. PA19/0056) was provided in January 2020 and is presented in **Appendix A part 1**.

- 1.5.2 A Screening Opinion, presented in **Appendix B**, issued by Merthyr Tydfil Council in February 2020 considered the proposal to be non-EIA development, and therefore no Environmental Statement has been provided as part of the planning application.
- 1.5.3 Due to the Covid-19 Pandemic which has ensued since March 2020 and given lockdown restrictions and 'baseline' surveys not being representative of true conditions, further advice has been sought from relevant parties within Merthyr Tydfil Council regarding the approach / scope of the various environmental and technical assessments that accompany this planning application.
- 1.5.4 A second pre-application request was sought from Merthyr Tydfil County Borough Council in October 2021 regarding the detailed proposals including the full draft planning application documents. Pre-application advice (ref. PA/21/0063) was provided in November 2021 and is presented in **Appendix A part 2**.

1.6 PRE-APPLICATION CONSULTATION

- 1.6.1 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, requires pre-application consultation to be undertaken for all planning applications for 'major' development. Given the planning application area is larger than one hectare the proposal falls within the 'major' development category therefore pre-application consultation is required.
- 1.6.2 Pre-application consultation was undertaken between October and November 2021. A pre-application consultation report, presented in **Appendix R**, details the community engagement activities undertaken.

1.7 SCOPE AND FORMAT OF PLANNING STATEMENT

- 1.7.1 This Planning Statement has been organised into the following chapters:

- The Site and Surroundings;
- The Proposed Development;
- Environmental Considerations;
- Planning Policy Appraisal; and
- Summary and Conclusions.

1.8 OBTAINING INFORMATION

- 1.8.1 Electronic copies of all documents submitted to Merthyr Tydfil County Borough Council in respect of the planning application are available at the following website:

<http://publicaccess.merthyr.gov.uk/online-applications/>

- 1.8.2 Paper format copies of the planning application and supporting information are available on request.

- 1.8.3 All requests for hard copy information should be addressed to the following:

Jayplas
c/o Sirius Planning
4245 Park Approach
Thorpe Park
Leeds LS15 8GB



2. THE SITE AND SURROUNDINGS

2.1 INTRODUCTION

2.1.1 This chapter provides a description of the site in terms of its location, history, and surrounding land uses.

2.2 LOCATION

2.2.1 The site is located on land off Goat Mill Road to the west of the A4060 and to the east of Pen-Y-Darren centred on NGR 306142, 206982. The location of the site is shown on Drawing No. **JAY1001/04/01** and Figure 2.1 below.



Figure 2.1: Site Location

2.3 SITE AND SURROUNDINGS

2.3.1 The application site has a total area measuring approximately 14.6 hectares. The land is currently vacant with the sites surface comprising of mainly open sparsely grassland gravel and is relatively flat delineated with mature vegetation along its boundaries. To the east of the site is the shoulder of an embankment supporting the A4060 road.

2.3.2 Significant historical development has been undertaken within the site and surrounding area associated with coal and ironstone mining during the Nineteenth Century and first half of the Twentieth Century including rail lines, reservoirs and soil heaps. A large ironworks slag heap (The Great White Tip associated with Dowlais Iron Works formerly to the immediate north) was also present on the northern half of the site.

2.3.3 Opencast mining was undertaken on the majority of the site in 1996; this removed The Great White Tip

and the majority of former mining features. The opencast was backfilled upon completion, with the site restored to its current condition.



Figure 2.2: View of the site looking north

- 2.3.4 The site is situated within an industrial setting with an established industrial estate located to the north of the site. The A4060 runs along the eastern boundary of the site beyond which lies an opencast coal mine and the Fofs-y-fran Land Reclamation Scheme. Residential areas are located beyond Goat Mill Road to the west of the site and beyond Mount View to the south.



Figure 2.3: Drone aerial image of the site and surrounding area

2.4 SITE ACCESS

- 2.4.1 The application site is accessed by two spur roads leading off roundabout junctions on Goat Mill Road, a well-established route for large vehicles and lorries frequently using the industrial estate to the north, which in turn can be accessed off the A4060 providing good links to the wider road network. This existing access will be utilised during both the construction and operational phase.

2.5 IDENTIFIED RECEPTORS AND DESIGNATIONS

- 2.5.1 The nearest residential receptors to the site are located to the west beyond Goat Mill Road and south beyond Mount View.
- 2.5.2 The nearest statutory ecological designation is Cwm Gloa Glyndyrys located approximately 1.9km to the south-west of the site. The nearest locally designated site is Merthyr Common Central located approximately 440m south-east of the site. Given the intervening A4060 between the site and the non-statutory designated site, no negative impacts are anticipated.
- 2.5.3 The nearest Listed Building is the Bethania Independent Chapel located approximately 550m to the north of the site. The nearest Scheduled Monument is the Sam Howell Pond and Watercourses located approximately 1.4km to the east of the site.
- 2.5.4 The site is located within Flood Zone A which is deemed as being at little or no risk of fluvial flooding.
- 2.5.5 Under the adopted Merthyr Tydfil Replacement Local Development Plan Proposals Map, the site is allocated as within the settlement limit, allocated as an Employment Site (EcW-1.3) and located within a Heat Priority Area. A small area along the northern boundary of the site is located within an Archaeologically Sensitive Area (ASA6).

2.6 SITE HISTORY

- 2.6.1 From a review of the planning application search facility on Merthyr Tydfil Council's website, the only previous applications relevant to the application site were associated with former coal and ironstone mining operations.



3. THE PROPOSED DEVELOPMENT

3.1 INTRODUCTION

3.1.1 This section provides a description of the development, operational layout, equipment and structures proposed within the site.

3.1.2 The proposed development is for the installation and operation of a plastics recycling and processing facility and associated infrastructure. The facility will be capable of accepting waste rigid plastics and film from commercial, industrial and the public sector to recycle and process. The closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste ecology.

3.2 GENERAL ARRANGEMENT

3.2.1 The proposed plastics recycling facility will be located on approximately 14.6ha of land off Goat Mill Road. The proposed site layout is shown on Drawing No. **JAY1001/04/06** and Figure 3.1 below.

3.2.2 The proposed site, when fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum. The facility is designed with the objective of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill.

3.2.3 The proposed facility consists of the following elements:

- Two individual warehouse units (enclosed steel portal frame), with the first building including an internal office/administration area;
- Reserved expansion area for the provision of a third warehouse unit;
- External storage area in the form of an impermeable hardstanding area;
- Car parking (including electric charging points) and bike racks;
- Weighbridge;
- Combined Heat and Power Unit;
- Fire water storage tank;
- Surface water attenuation area;
- Landscaping; and
- Lighting

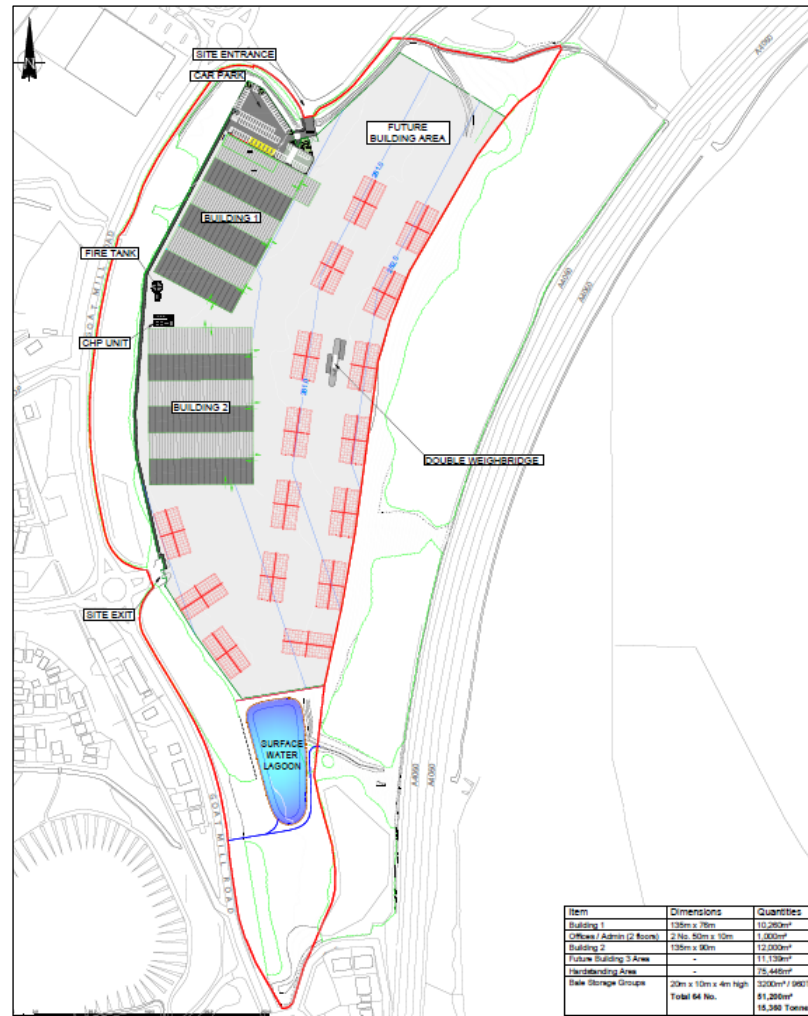


Figure 3.1: Proposed Site Layout

- 3.2.4 The largest structures on site will be the warehouse units. The northern most building (building 1) is approximately 14m to eaves and 16m to ridge and measures approximately 135m x 76m, having a floor space of 10,260m² and the southern building (building 2) is approximately 12m to eaves and 14m to ridge and measures approximately 135m x 90m, having a floor space of 12,000m². The buildings will be constructed using a steel portal frame design and clad with galvanised steel powder coated profile cladding. Each unit will contain welfare facilities and building 1 will include an integral administrative office, covering 2 floors measuring in total 1,000m² (50m x 10m per floor). Drawing No's. **JAY1001/04/08** and **JAY1001/04/10**, and Figures 3.2 and 3.3 illustrates the building elevations and dimensions.
- 3.2.5 The buildings have been sized to accommodate the internal plant required for the recycling and processing operations. The detailed design of the internal plant within the two proposed buildings is still being undertaken, however indicative internal floor plans are shown on Drawing No's. **JAY1001/04/09** and **JAY1001/04/11**.

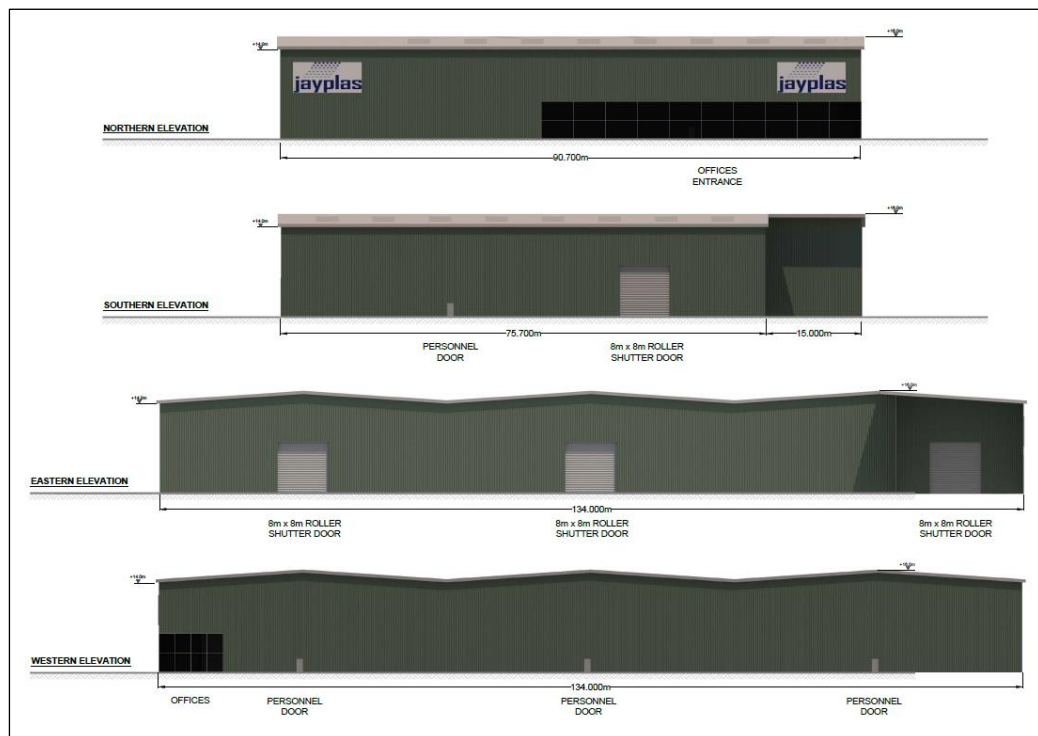


Figure 3.2: Building 1 Elevations

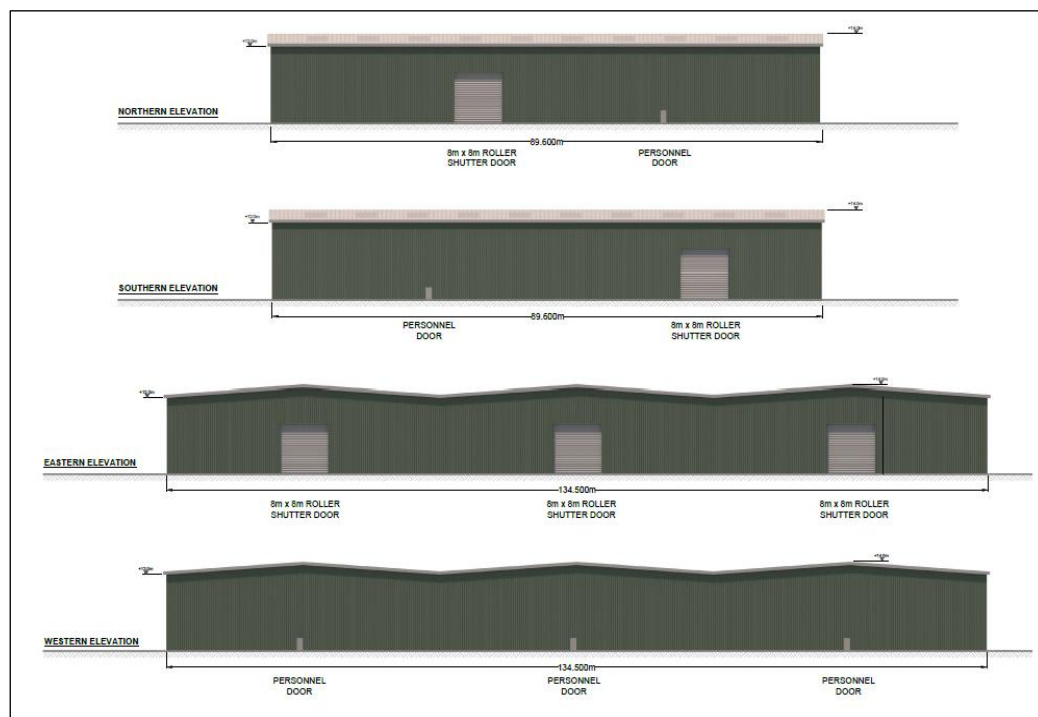


Figure 3.3: Building 2 Elevations

- 3.2.6 A reserved expansion area has been illustrated on the proposed site masterplan for a potential third warehouse unit if market conditions dictate in the future. In the meantime, it is anticipated that this reserved area will be used as additional open storage when necessary.
- 3.2.7 The external storage yard measures approximately 75,446m² and will provide open storage for incoming plastic materials and processed final products. Processed plastic grades will be stored

externally in 'bales' prior to onward removal for further processing. The bales (approximately sized 2m x 1m x 1m each) will be stored in units of four quadrants separated by a 5m high concrete push wall of a maximum size of 20m x 10m x 4m as illustrated on Drawing no. **JAY1001/04/22**. Forklift trucks / telehandler are to be used in the storage yard to load and unload bales.

- 3.2.8 A double weighbridge is located within the centre of the storage yard. HGVs will be weighed into and out of the site with the weighbridge fitted with a vehicle recognitions system so that the tonnage and vehicle details will be automatically recorded. All HGVs transporting waste to site will be delivered through pre-agreed contracts. Drawing No. **JAY1001/04/17** provides the weighbridge details.
- 3.2.9 A combined heat and power (CHP) unit will be located between the two buildings on site, as illustrated on Drawing No. **JAY1001/04/06**. The CHP unit will be used for Building 2 to provide power and hot water for the washing processes. Indicative details of the CHP unit are shown on Drawing No. **JAY1001/04/13**. At present, the CHP details are indicative as the wash plant for Building 2 has not yet been fully designed and therefore the actual required sizing and final details of the proposed CHP unit will be confirmed prior to the development of Building 2.
- 3.2.10 The fire storage tank and associated pumps will be located between the two buildings and will provide water supply to an automatic sprinkler system which will be installed throughout the buildings. The tank will be capable of supplying fire hose water and sprinkler water in accordance with the calculated flow rates and durations defined in the relevant design codes, without support from existing mains. The proposed fire tank would hold 230,000 litres of water. Drawing No. **JAY1001/04/12** provides the fire tank details.

3.3 GENERAL PROCESS DESCRIPTION

- 3.3.1 The proposed plastic recycling and processing facility consists of two individual warehouse units, with a reserved area for a third building. The building will house various plant and machinery equipment to enable recycling and processing of different types of plastic in order to produce 'close loop' products. All plant and machinery processing operations will be undertaken within the buildings.
- 3.3.2 The detailed design of the internal plant within the two proposed buildings is still being undertaken and will be based on updated market conditions, however the proposed buildings on site are likely to house the following plant, equipment, machinery.

Phase 1

- A Plastics Recycling Facility (PRF) to sort incoming rigid and film plastics into different polymer types and colours;

Phase 2

- Polymer Wash Plants where caps, labels and other contaminants are removed, and materials baled.



Photograph of mixed rigid plastics at the start of the process



Photograph of the plastics, recycled and baled, at the end of the process

Figure 3.4: Images illustrating incoming plastics and processed baled plastics

- 3.3.3 Phase 1 of the proposed development includes a Plastics Recycling Facility (PRF) which will take in the mixed rigid and film plastics collected by waste collection operators, such as local authorities. The PRF then separates and sorts the plastics into different types of plastics (for example HDPE, PET, PP etc.) and for HDPE and PET separates further for colour. Other plastics fractions (e.g. black trays) will be segregated and baled for onward treatment at other Jayplas sites or by a third party.
- 3.3.4 Materials are then transferred into Building 2 which includes the polymer wash plants where caps, labels and other contaminants are removed, and materials baled and either transported to another Jayplas site or sold onto the open market.
- 3.3.5 Figure 3.5 below illustrates an indicative Process Flow Diagram for the facility once fully operational.

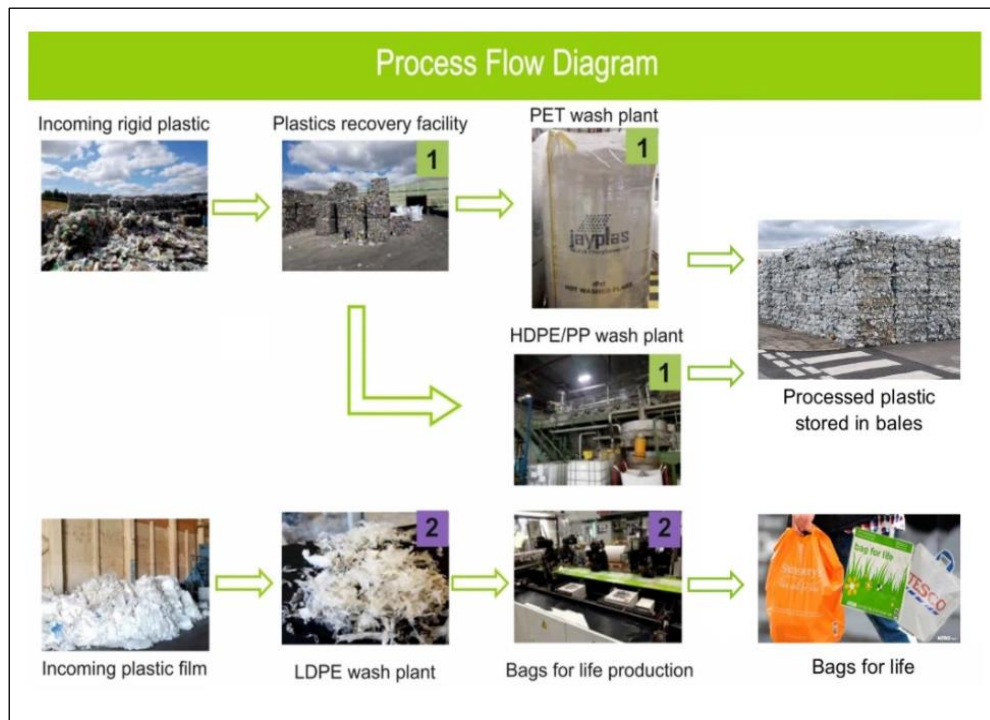


Figure 3.5: Indicative Process Flow Diagram of the Proposed Plastics Recycling & Processing Facility

3.4 ENGINEERED DEVELOPMENT PLATFORM

- 3.4.1 The existing site area is a relatively flat area comprising former opencast backfill material. There will be a requirement to undertake some earthworks in order to create a development platform, in advance of construction of the buildings and the external impermeable surface storage yard.
- 3.4.2 Drawing No. **JAY1001/04/04** shows the proposed final development platform surface, illustrating the 'cut and fill' earthworks areas required to create a level surface across the site. It is anticipated that a surplus of approximately 17,000m³ of material will be removed offsite.

3.5 SURFACE WATER MANAGEMENT

- 3.5.1 Currently on site, there is an unnamed surface watercourse along the northern boundary, flowing to the west. There are drainage ditches along the eastern boundary of the site, and along the eastern embankment of the A4060 road which discharges into the surface watercourse to the north of the site. In addition, a smaller watercourse runs to the west within the southern area of site. These surface water ditches appear to convey surface water from the opencast landform to the east, of the A4060 road and discharge to a point to the west of the site.
- 3.5.2 The SuDS proposals for the site can be summarised as follows:

Collect for Re-Use

- Rainwater harvesting system incorporated into Building 2 which contains the wash plants. The SAB full application will include details of the rainwater harvesting once the detailed internal design of the buildings has been finalised.

Discharge to a Surface Water Body

- Attenuation storage in a surface water lagoon with a capacity of ~8,000m³, 2.60m deep with 300mm silt allowance and 300mm freeboard with restricted discharge via a vortex flow device to watercourse.

- 3.5.3 It is proposed that the surface water runoff from the impermeable areas of the site will discharge to a new surface water lagoon to be located to the south of the site, before discharging into a watercourse, to the west off the site, at a restricted runoff rate of 166.30 litres/second.
- 3.5.4 There will be a diversion of the existing watercourse downstream of Morlais B off-site outfall running across the southern part of the application site, which will be around the proposed surface water lagoon as indicated on Drawing No. **KRS.0297.021.01**. Surface water runoff will be directed to the drainage system through channel drainage across the hardstanding areas. The remainder of the site that is not formally drained, i.e. landscaped areas will be permeable.
- 3.5.5 A post and rail fence is proposed to secure the lagoon as detailed on Drawing no. **JAY1001/04/21**.
- 3.5.6 The size of the surface water lagoon has been calculated such that the development has the capacity to accommodate the 1 in 100-year rainfall event, including a 30% increase in rainfall intensity that is predicted to occur as a result of climate change.
- 3.5.7 A pre-application response has been received from the Sustainable Drainage Approving Body (SAB) (presented in **Appendix J Part 2**) confirming the principle of the surface water scheme is acceptable. Construction details of the surface water lagoon and a detailed surface water management scheme will be submitted to the SAB Authority for approval.

3.6 BOUNDARY TREATMENT

- 3.6.1 The site will be secured by a 2.4m high Paladin security fencing with matching vehicular/pedestrian access gates, around the entire site. Drawing No. **JAY1001/04/19** provides details on the security fencing proposed for the site.

3.7 LIGHTING

- 3.7.1 Once commissioned the development would operate on a continuous 24/7 basis. During hours of darkness, there will be a need for external lighting commensurate with Health and Safety requirements to ensure a safe external working environment for operatives on site.
- 3.7.2 An exterior lighting strategy plan has been prepared and provided within **Appendix Q**. The exterior lighting design has considered appropriate optic settings for the development layout ensuring (as practicable as possible) light is only provided where required. In addition, light pollution (vertically and horizontally) has been minimised as much as possible through careful luminaire selection and shielding (optically and column mounted).
- 3.7.3 Columns close to ecological sensitive areas have rear shields proposed to further reduce rear light spill. In addition, to reduce the impact of lighting on Bats present in the woodland corridors, all proposed lighting utilises an LED light source to avoid light sources with high UV content. Optics have carefully been selected to avoid glare and light spill as much as possible whilst achieving the required lighting levels.

3.8 HOURS OF OPERATION

- 3.8.1 It is envisaged that the plant and internal operations of the recycling operation will operate continuously 24 hours per day, 7 days a week. External operations, when the facility will generally accept delivery and dispatch of plastics, will be operational during day-time working hours, which are:

External Operations, when the facility will generally accept delivery and dispatch of plastics

Monday – Friday 06:00 to 18:00; and

Saturday 06:00 to 13:00

Plant and Internal Operations

Sunday – Saturday 24hr working

- 3.8.2 The delivery and dispatch of plastics on Sundays, Public or Bank Holidays will require prior approval from the Local Planning Authority.

3.9 EMPLOYMENT

- 3.9.1 Once fully operational the facility would provide direct employment for 110+ full time workers. As the internal operations at the facility would operate on a 24hr / 7day basis, the site operatives would work on a shift pattern. In addition, there would also be the potential for circa 44 indirect chain jobs during both the construction and operational phases associated with the supply of materials and for servicing and maintenance of the facility.

3.10 VEHICLE MOVEMENTS

Construction Phase

- 3.10.1 Estimated average vehicle movements associated with the temporary construction phase of the facility will be 50 daily movements.
- 3.10.2 HGVs and LGVs will largely act as a means of transport to the site for the workforce, however sustainable transportation will be encouraged. The extent of LGV movements will vary at different stages of the construction work in response to the activities taking place at any given time.

Operational Phase

- 3.10.3 Estimated average vehicle movements associated with the fully operational facility is 84 vehicle movements (two-way) during the AM peak period and 69 vehicle movements (two-way) during the PM peak period. From information provided by the applicant, it is expected that the site will generate in the order of 10 HGV movements per hour. OGV movements would likely to be in the order of 11 trips (two-way) in the AM peak and 3 trips (two-way) in the PM peak; equating to roughly 1 OGV trip per 5-6 minutes / 20 minutes in the AM and PM peaks, respectively. Drawing No. **JAY1001/04/07** shows typical HGV movements around the site. Further details of the AM and PM peak movements are provided in **Appendix N**.

3.11 CAR PARKING

- 3.11.1 During construction it is expected that the existing site will provide sufficient available land for temporary parking, welfare facilities and a lay-down area for the construction phase.
- 3.11.2 Once fully operational, employees and visitors will park in the car park to the north of Building 1. The proposal provides the provision of a total of 90 standard car parking spaces (73 spaces plus 17 overflow spaces). 6 disable parking spaces and 4 motorcycle parking spaces are also provided along with 7 electric vehicle charging spaces and a further 4 passive charging spaces. In addition, 8 cycle parking spaces will be located in proximity to the office within Building 1. Drawing No. **JAY1001/04/14** illustrates the car park layout.

3.12 LANDSCAPEING AND BIODIVERSITY ENHANCEMENTS

3.12.1 Approximately 10ha of land is proposed to be lost to the proposed development. The bulk of this developable area is formed by Open Mosaic Habitat (OMH) land of low quality. It is proposed that three areas (north and south of the developable area respectively) of OMH will be retained and enhanced as part of the proposals. In total these three areas will retain c.1.7ha of OMH (c.0.45ha and 0.25ha in the north and c.1ha in the south). Whilst being smaller in area to that which is being lost, the retained areas will be managed such that their condition will be maintained in the long term. This is something that cannot be assured with the current land use/management of the site.

3.12.2 Opportunities exist within the scheme for general biodiversity enhancements to be undertaken; the following are recommended for this site:

- The plantation woodland on the outer boundaries of the site will be retained. Trees within the retained woodland will be selectively thinned to promote the development of the woodland and to allow individual trees to reach maturity. Any wood produced from tree management will be retained on site as habitat piles.
- The established grassland adjacent to the boundary woodland will also be retained and will form a functional link to the two areas of retained OMH in the north and south of the site.
- Areas both north and south of the proposed development will be retained and managed as OMH. Small volumes of cut material taken from the development footprint will be spread in the retained OMH areas.
- Scrub will be managed in the two retained OMH areas to prevent encroachment and succession.
- Additional tree planting to take place upon the southern boundary to screen internal views into the site and to compensate for lost scrub planting following the construction of the surface water lagoon.
- Additional tree planting to take place upon the northern boundary to screen views from employment areas to the north and future LPA 'Active Travel Route'.
- The retained OMH areas will be subject to managed disturbance. Grasslands will be rotationally cut or rotavated, but not uniformly. Cutting will always retain some areas of longer swards to ensure heterogeneity. Rocky substrate and earth will be rotationally moved around the two retained OMH areas to prevent total succession into grassland. The maintenance of areas of bare ground will be prioritised.
- A new surface water lagoon will be constructed in the south of the site. It will be encompassed by the southern retained area of OMH. It would be recommended that this lagoon is designed in a manner that does not preclude biodiversity. The edges should be sloped in a manner which allows terrestrial animals to enter and escape. Native aquatic and riparian planting will be provided to enhance the value of this feature. To ensure early establishment plants and seeds will be collected from the wet ditches already present on site. Detailed design of SW pond will be included in the separate SAB application.
- Close boarded timber fence to be added along the southern boundary to screen views into the outdoor storage areas.
- Additional feathered and standard sized native tree planting to be implemented in the area between the lagoon and southern boundary.
- Both the retained woodland, grassland and OMH will continue to provide foraging and nesting

resources for birds. Additional habitat including the surface water lagoon will increase both food resources available on site for birds. A nest box and bat box scheme is detailed within the CLEMP (construction and landscape ecological management plan) presented in **Appendix E**.

- Further details of the management recommendations described above are found in the accompanying CLEMP (**Appendix E**).

3.12.3 Specific landscape and visual mitigation proposals are shown on the site Landscape and Ecological Masterplan illustrated on Drawing No. JAY1001/04/23.

3.13 CONSTRUCTION PROGRAMME

3.13.1 Subject to the granting of planning permission, construction activity for the development would last approximately 12 months, with the scheme being constructed in a phased manner. The construction programme will be confirmed prior to commencement of works on site along with further details on the construction methodology.

3.13.2 The programme for the construction works would typically include:

- Site Establishment;
- Civil works including ground remodelling, foundations and below ground works;
- Ongoing building works including mechanical and electrical installations; and
- Commissioning and finishing of building civil works.

3.13.3 A secure temporary set-down area will be established within the landholding for the construction phases as required. The set down area will accommodate site materials for the construction works and will also be a car park for site construction operatives.

Construction Working Hours

3.13.4 Construction is expected to take place during the hours of 0700 to 1800 (Monday to Friday) and 0800 to 1700 hours (Saturday).

Employment During Construction

3.13.5 Levels of employment will vary throughout the construction period however; it is likely that there will be approximately 50-100 employees engaged during the construction period. Where appropriate, the principal contractor will be encouraged to source employment, construction materials, plant and equipment locally.

3.14 MANAGEMENT SYSTEMS

3.14.1 In addition to planning permission, it is acknowledged that further consents will be required to enable the proposed development to operate. In particular, an Environmental Permit will be required from the Natural Resource Wales that will control the day-to-day operation of the facility.

3.14.2 The basic purpose of the Environment Permitting regime is to introduce a more integrated approach to controlling pollution from industrial sources. It aims to achieve a high level of protection of the environment taken as a whole by, preventing or, where that is not practicable, reducing emissions into the air, water and land. The main way of achieving this aim is by determining and enforcing permit conditions based on Best Available Technology (BAT). The Environmental Permit will detail controls and limits for all aspects of the waste treatment process.



4. ENVIRONMENTAL CONSIDERATIONS

4.1 INTRODUCTION

- 4.1.1 This section sets out and briefly summarises the environmental assessments that have been carried out in support of the proposed development. Those environmental topics not requiring detailed consideration due to the likely negligible effects have also been referenced.

4.2 SPECIFIC ENVIRONMENTAL AND TECHNICAL ASSESSMENTS

- 4.2.1 The following environmental and technical assessments have been undertaken:

- Landscape and Visual Impact Assessment;
- Extended Phase 1 Ecological Appraisal and protected species surveys;
- Construction Landscape and Ecological Management Plan
- Japanese Knotweed Strategy;
- Arboricultural Impact Assessment;
- Heritage Assessment;
- Flood Consequence Assessment and Surface Water Drainage Strategy;
- Noise Impact Assessment;
- Phase 1 Geo-Technical Assessment and Coal Mining Risk Report;
- Air Quality Assessment;
- Traffic Assessment and Travel Plan;
- Lighting Assessment;
- Waste Planning Assessment; and
- Energy Statement.

- 4.2.2 These environmental and technical assessments are provided in full within **Appendices C - Q** respectively, but are summarised below.

Landscape and Visual Impact Assessment

- 4.2.3 A Landscape and Visual Impact Assessment (LVIA) has been undertaken by Sirius Planning and is presented in **Appendix C**.
- 4.2.4 The LVIA has demonstrated that the proposed development can be assimilated within the local landscape of the site and the study area without any substantial landscape effects. The site is concluded to be of a low landscape value and low importance and rarity at a local scale with its value being influenced by its former uses; open cast mining and associated steel works. There is currently no defined public access to the site area, although the site is well used informally by dog walkers.
- 4.2.5 It is considered that the local landscape of the site and immediate surrounds could accommodate the development without a substantial change in character as it contains no landscape characteristics that would be vulnerable to the proposal. Retention of the established perimeter vegetation will aid the integration of the development, retaining the established local green infrastructure, whilst also mitigating potential visual effects. In addition, due to the existing presence of surrounding industrial land users, the retention of surrounding vegetation and tree cover, the LVIA considers that the proposed development would not lead to a characterising effect upon the landscape of the local area outside of the site boundary and immediate adjoining areas.
- 4.2.6 The visual assessment concluded that no receptors would experience visual effects of a substantial nature. The assessment has established that (in general) there would be extremely limited visibility to the site area and development proposals from the residential receptors within the study area. There remains the potential for more extensive visibility from individual properties, aligned with open views towards the site. However, overall, considering the urban context and separation distances, even if the development is visible, it is considered that the effects would remain at a not substantial level.

- 4.2.7 The viewpoint assessment undertaken demonstrates that the main visual changes would be focussed to the site entrance, as expected substantial visual effects were concluded as the public highway passes beside the site and proposed buildings. It is however noted that the buildings are not seen out of context due to the presence of existing warehouse type buildings in the local area. The proposed building roofs / upper sections are visible from the wider study area, but again these are seen within the context of the existing warehouse buildings and set within an established vegetated fringe of mature tree cover, backed by the road corridor and the operational mining areas beyond. All remaining viewpoints are considered to experience effects of a 'not substantial' nature.
- 4.2.8 The LVIA concludes that the proposed development could be successfully integrated into the surrounding landscape without causing substantial harm to the landscape character and visual amenity in the local area.

Ecological Appraisal and Protected Species Surveys

- 4.2.9 An Ecological Appraisal has been undertaken by FPCR and is presented in **Appendix D**. Extensive ecology surveys were conducted in 2019 and 2020 for habitats and botanical interest, badger, bats (manual and automated surveys), breeding and wintering birds, great crested newt and reptiles. In addition, following the second pre-application response from Merthyr Tydfil County Borough Council and comments from the Council's Ecologist, an Ecological Addendum, Ecology Response and Construction Landscape and Ecological Management Plan (CLEMP) have been prepared.
- 4.2.10 Two statutory designated sites, The Cwm Glo A Glyndyrys SSSI 1.9km south-west and the Cwm Cadlan SAC 9.3km to the north-west, were located within the search areas. Both sites were primarily designated for their extensive selection of protected habitats. On the basis of their reason for designation, as well as their significant distance from the site, the Ecological Appraisal concluded that the proposed development will have no significant negative effect on the surrounding statutory designated sites.
- 4.2.11 Three non-statutory designated sites were located within the 2km survey area, with the nearest being approximately 440m east of the site, all of which were SINCs primarily designated for their heath and grassland habitats. Given that the non-statutory protected sites are not connected to the proposal site, the Ecological Appraisal concluded that the impact on any single protected site will likely be negligible.
- 4.2.12 The site comprised an open mosaic of sparsely vegetated substrate, grassland and marshy grassland surrounded by broadleaved woodland plantation. Small pockets of scattered scrub, bare ground scattered trees were located centrally within the site. A stream with running water borders the north and eastern boundary of the site.
- 4.2.13 The site qualifies as Open Mosaic Habitat due to the industrial history of the site and the mix of habitat present. Detailed botanical surveys have identified that the site is in a deteriorating condition with scrub encroachment and grassland establishing across the site. Under current management, the Open Mosaic Habitat is likely to be lost to established permanent grassland and scrub.
- 4.2.14 No reptiles, great crested newt or badger were recorded on site, and the breeding bird assemblage comprised only of small numbers of common and widespread species. The bat assemblage included a wide range of species typical for South Wales, including lesser horseshoe which was assessed as district value.
- 4.2.15 The proposed scheme retains the majority of broadleaved woodland plantation and a significant area of grassland. Open Mosaic Habitat will be retained, managed and enhanced both in the north and south of the site. Key bat habitat features will be retained and subject to restricted lighting. Based on the mitigation within the scheme, the effect of the proposals is likely to be insignificant on bats.
- 4.2.16 A surface water lagoon will be provided as part of the proposals, giving ample opportunities for aquatic

habitat creation and enhancement. Further enhancements have been proposed including the management of the retained woodland, and a bat and bird box scheme. Further details are presented in the accompanying CLEMP (**Appendix E**).

Japanese Knotweed Mitigation Strategy

- 4.2.17 A Japanese Knotweed Mitigation Strategy has been undertaken by FPCR and is presented in **Appendix F**. A total of seven viable stands of Japanese Knotweed were identified within the southern part of the site, all of which appeared to have been previously treated with some showing signs of regrowth. Four of the stands were located within a dry ditch along the south-west of the site. A further two stands were identified on the banks of dry ditches and the other stand was located on land in scrub bordering broadleaved woodland within the western part of the site. Figure 1 within the Mitigation Strategy in **Appendix F** illustrates the location of the stands.
- 4.2.18 The strategy details the removal of all strands of knotweed. Due to the nature of the scheme, it is considered that chemical treatment or manual control cannot be effectively undertaken. Therefore, excavation and storage in a treatment bund followed by on-site burial of the Japanese Knotweed is considered the best practicable option. The key actions and strategy of removal and treatment is outlined in section 5 of the Mitigation Strategy.
- 4.2.19 It is recommended that monitoring of the receptor area for the Japanese Knotweed contaminated material and the area from which the Japanese Knotweed has been removed, should be undertaken twice yearly for a period of five years. If at any time signs of Japanese Knotweed regrowth are noted, immediate treatment will be undertaken.

Arboricultural Impact Assessment

- 4.2.20 An Arboricultural Impact Assessment has been undertaken by FPCR and is presented in **Appendix G**. A tree survey in accordance with BS5837 (2012) was conducted on site with no individual trees being picked out as being noteworthy during the survey. 13 groups of trees were recorded, of which six were deemed to merit a moderate (Category B) classification. The remaining seven groups were deemed to be low value (Category C).
- 4.2.21 The primary value attributed to all trees on site was amenity, with those on the boundaries of the site deemed to be worth relatively higher owed to their visibility from offsite. To a lesser extent the trees provided structural habitat for nesting birds.
- 4.2.22 The proposals see the retention of the majority of all moderate value tree stock, by virtue of their locations on the boundaries of the site and their separation from the proposed development. Six of the seven Category C groups will see some or all of their tree stock removed. The Assessment concludes that through this approach the primary arboricultural value of the site will be maintained post development. Losses will be limited to internal groups of trees, the visual impact of which from offsite will be minimal.

Heritage Assessment

- 4.2.23 An Assessment of the Significance of Impact of Development on the Historic Landscape (ASIDOHL2) has been undertaken by Archaeology Wales and is presented in **Appendix H**. The proposed development site lies within the Merthyr Tydfil Landscape of Outstanding Historic Interest in Wales (HLW (MGL) 2). This landscape is further subdivided into individual Historic Landscape Character Areas (HLCA). The application site lies wholly within HLCA 078: Dowlais Great Tip.
- 4.2.24 Previous assessments of the area have been undertaken by The Glamorgan Gwent Archaeological Trust (GGAT). These include an assessment of Archaeologically Sensitive Areas (ASA) in the region which identified that the northern tip of the application site lies within the ASA 6: Dowlais Ironworks.

- 4.2.25 Direct physical impact of the proposed development has been assessed in absolute relative terms and landscape terms. The assessment concludes that the overall magnitude of the direct physical impact on the HLCA 078 is considered to be Slight. This is due to the fact that the potential for sub-surface archaeological remains is low following open cast mining over much of the site and the East Merthyr Landscape Reclamation Scheme.
- 4.2.26 Indirect impacts of the proposed development has been assessed in terms of indirect physical impacts and indirect visual impacts. Due to the fact that the entire proposed development area was re-landscaped during the East Merthyr Land Reclamation Scheme; and no physical or visual traces of its former historic character survive above ground, the overall magnitude of indirect impact on HLCA 078 was scored as Slight. It was assessed that the proposal will also have a slight or very slight direct or indirect (visual) impact on any neighbouring HLCA.
- 4.2.27 An evaluation of the relative importance of the HLCA, and the parts within them that are affected by the proposal has been assessed with the overall value of the HLCA 078 being Moderate. The assessment of the overall significance of the impact of the proposal on the HLCA 078 has been assessed as Slight.
- 4.2.28 Overall, the expected potential scale, character and preservation of any potential sub-surface archaeological resource is low following open cast mining of the site and the subsequent East Merthyr Land Reclamation Scheme means there is no physical or visual traces of former historic character above ground. The assessment concludes that the overall significance of the impact of the proposed development on the HLCA 078 is Slight.

Flood Consequence Assessment and Surface Water Drainage Strategy

- 4.2.29 A Flood Consequence Assessment and Surface Water Drainage Strategy / SuDS Design Report is provided within **Appendices I & J**.
- 4.2.30 The site is located within Flood Zone A. The Flood Consequence Assessment demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of TAN 15. The assessment concludes that the development should not be precluded on the grounds of flood risk.

Drainage Strategy

- 4.2.31 The SuDS proposals for the site can be summarised as follows:

Collect for Re-Use

- Rainwater harvesting system incorporated into Building 2 which contains the wash plants. The SAB full application will include details of the rainwater harvesting once the detailed internal design of the buildings has been finalised.

Discharge to a Surface Water Body

- Attenuation storage in a surface water lagoon with a capacity of ~8,000m³, 2.60m deep with 300mm silt allowance and 300mm freeboard with restricted discharge via a vortex flow device to watercourse.
- 4.2.32 It is proposed that the surface water runoff from the impermeable areas of the site will discharge to a new surface water lagoon to be located to the south of the site before discharging to the west off the site to the watercourse at a restricted runoff rate of 166.30 litres/second. There will be a diversion of the existing watercourse downstream of Morlais B off-site outfall running across the southern part of the application site around the proposed surface water lagoon as indicated on Drawing No. **KRS.0297.021.01**.
- 4.2.33 It is considered that diverting the existing watercourse is a more sustainable option than for the site to

take the discharge from the Ffos y Fran area as the site would have to rely on the management of this upstream system which could potentially cause issues. In addition, this catchment area may be developed in future and therefore separating the flows from the site and the existing outfall from the Ffos y Fran area would avoid any known effect on the sustainability of the current proposals.

- 4.2.34 Surface water runoff would be directed to the drainage system through channel drainage across the hardstanding areas. The remainder of the site that is not formally drained, i.e. landscaped areas will be permeable.
- 4.2.35 The size of the proposed surface water lagoon has been calculated such that the development has the capacity to accommodate the 1 in 100-year rainfall event including a 30% increase in rainfall intensity that is predicted to occur as a result of climate change.
- 4.2.36 The adoption of the proposed SuDs features for the site represents an enhancement from the current conditions as the current surface water runoff for the site is uncontrolled, untreated, unmanaged and unmitigated. The SuDs features will reduce the risk of flooding to the site and off-site locations and reduce peak flows, the volume of runoff and slow down flows. In adopting these principles, it has been demonstrated that a scheme can be developed that does not increase the risk of flooding to adjacent properties and other development further downstream.
- 4.2.37 Regarding pollution prevention measures, proprietary systems to include silt traps and oil interceptors will be used, to treat surface water runoff in order to protect the surface water lagoon from excess silt or oil contamination.
- 4.2.38 A pre-application response has been received from the Sustainable Drainage Approving Body (SAB) (presented in **Appendix J Part 2**) confirming the principle of the surface water scheme is acceptable. Construction details of the surface water lagoon and a detailed surface water management scheme will be submitted to the SAB Authority for approval.

Noise Assessment

- 4.2.39 A Noise Assessment has been undertaken by NVC Consultants Ltd and is presented in **Appendix K** which assesses the noise impacts associated with the proposed development. Typical noise levels for the type of facility proposed have determined the noise contribution from the proposal at the nearest residential properties. The most relevant noise criteria for the facility is BS4142:2014+A1:2019 and to achieve a low impact, the rating noise levels should not exceed the background sound level or lower.
- 4.2.40 Background sound measurements were undertaken adjacent to the nearest sensitive receptors over a 24-hour weekday period to establish typical representative background sound levels. It should be noted that baseline levels have been measured under Covid-19 restrictions, which would effectively reduce road traffic noise on the local road network compare with typical road noise generation. The representative background sound was shown to vary between 48dB to 55dB LA90 during the daytime period at nearest sensitive receptors. Night-time periods show representative background sound levels to range between 34dB to 42dB LA90.
- 4.2.41 Noise levels have been considered and assessed during the operational phase of the proposed development with consideration also afforded to the construction period.

Construction Phase

- 4.2.42 In regard to the construction phase, the results of noise calculations of the highest likely noise levels generated during the construction phase of the development shows that during peak noise periods noise levels are unlikely to exceed reasonable threshold levels for short term temporary noise sources at nearest residential receptors. Best practicable means would be applied during the construction works, as outlined in section 6 of the Noise Assessment, to control and minimise noise.

- 4.2.43 In terms of construction vibration, with the implementation of best practice means, the levels of vibration are expected to be below the level of perceptibility and therefore insignificant.

Operational Phase

- 4.2.44 Predicted noise levels from the operation of the proposed development including the combined heat and power unit and HGV and mobile plant movements show that the site noise level would not exceed representative background sound levels and therefore likely to result in a low impact.
- 4.2.45 The noise contribution level from the proposal during night-time periods would be between 29dB to 39dB L_{Aeq} which according to BS8233:2014, would fall within relevant guidance relating to internal levels within sensitive rooms of residential dwellings. In addition, the predicted noise contribution at the nearest residential receptor from the operation of the proposed development shows a level ranging between 29dB(A) to 43dB(A) L_{eq} during the daytime and night-time periods which are well below typical residual sound levels that would provide good masking of any site attributable noise.
- 4.2.46 Any increase in road traffic noise would be negligible based on the additional vehicle movements generated by the proposed development.

Summary

- 4.2.47 The Noise Assessment concludes that the proposed operation of the site, with the implementation of appropriate mitigation measures as set out in section 6 of the Noise Assessment, would generate noise and vibration levels within relevant noise standards and guidelines at nearest sensitive receptors and would therefore not be significant or generate any adverse impacts.

Phase 1 Geo-Technical Assessment and Coal Mining Risk Report

- 4.2.48 A Preliminary Geotechnical Appraisal and Coal Mining Risk Report has undertaken by Sirius Geotechnical and is presented in **Appendix L**. The appraisal identified that the site and surrounding area were affected by coal and ironstone mining during the Nineteenth Century the first half of the Twentieth Century, with several mine entries, soil heaps, mineral railways and reservoirs present. A large ironworks slag heap (The Great White Tip) was also present on the northern half of the site. Opencast coal mining was undertaken on the majority of the site in 1996; this removed The Great White Tip and probably the majority of the former mining features. The opencast was backfilled upon completion, with the site restored to its current condition, and a road embankment constructed in the eastern part of the site.

Contamination

- 4.2.49 The preliminary conceptual site model indicates that pollutant linkages are possible to a variety of receptors. Potential heavy metals, inorganic compounds, organic compounds and asbestos may pose potential risks to human health, controlled waters and construction materials. Risks related to these potential linkages are currently considered moderate.
- 4.2.50 A Phase II (intrusive) geo-environmental / contamination investigation should be undertaken to confirm the presence or otherwise of possible contaminants sources and quantify the risks to identified receptors.

Mining Risk Assessment

- 4.2.51 The site can be zoned into two areas in relation to stability risks from historical coal and ironstone mining:
1. Within the former opencast mining area
 2. Outside the former opencast mining area

- 4.2.52 There are historical underground mine workings in several coal and ironstone seams below the site and surrounding area. Within the former opencast mining area, these workings, and mine entries into them, there is evidence to suggest these have been stabilised below the base of the opencast. However, the opencast mine only went as deep as the Lower Four Feet coal seam and there is known to be historical pillar and stall mine workings below this level.
- 4.2.53 Outside the former opencast mine, there is potential for unrecorded shallow coal and ironstone workings and mine entries, as well as roadways / levels to deeper historical mine workings to the east of the site, to be present.
- 4.2.54 The proposed buildings on site in the western half of the development area are likely to straddle the former opencast mine highwall.
- 4.2.55 Targeted trial trenching and rotary probe hole drilling are recommended to expose the western edge of the highwall of the former opencast mine and to further investigate the condition of coal and ironstone seams and mine workings. Any treatment works necessary on coal mine entries, and construction of the proposals within the zone of influence of the mine entries will be agreed in advance with the Coal Authority.

Summary

- 4.2.56 The appraisal considers that ground investigation work is required to allow foundation design and determination of any potential contamination constraints including trial pitting and targeted trial trenching, rotary probe hole drilling, soil testing and a ground gas risk assessment. It is proposed that the recommended further site investigation works is controlled by way of a suitably worded planning condition.

Air Quality Assessment

- 4.2.57 An Air Quality Assessment has been undertaken by Air Quality Assessments Ltd and is presented in **Appendix M** which assesses the air quality impacts associated with the operation of the proposed development. The application site is not located within an Air Quality Management Area.
- 4.2.58 All of the processing operations would take place within buildings and the risk of odour effects on the surrounding area would be low. In addition, the facility would operate subject to the conditions of an Environmental Permit, which would ensure that odour would not have any impact on the local area.
- 4.2.59 The effect of traffic generated by the proposed development on the local air quality has been assessed. The development will not increase traffic above the level of the IAQM/EPUK screening criteria for areas outside an AQMA; therefore, detailed air quality assessment should not be necessary.
- 4.2.60 The assessment shows that the proposed CHP unit would have a negligible impact on annual mean NO₂ concentrations. Therefore, it is considered that the proposed CHP unit would have an insignificant effect on health receptors. The impact on sensitive habitats due to the operation of the CHP plan would be insignificant.
- 4.2.61 The Air Quality Assessment has shown that the air quality impacts of the proposal will be insignificant.

Transport Assessment and Travel Plan

- 4.2.62 A Transport Assessment and draft Travel Plan has undertaken by Sandersons Associates and is presented in **Appendix N**.

Transport Assessment

Site Access

- 4.2.63 The application site has two existing points of access off Goat Mill Road, these being a 4-arm

roundabout junction with Goat Mill Road to the north and south of the site. Goat Mill Road is a two-lane single carriageway that is subject to a speed limit of 30mph and predominantly serves existing industrial development to the north of the site, but also serves a cluster of residential development to the south and south-west of the site.

- 4.2.64 Goat Mill Road is directly accessed off the A4060 to the east which features a dual carriageway with central reservation. The A4060 effectively serves as the eastern bypass to Merthyr Tydfil and provides a connection between the A470 to the south and the A465 to the north.
- 4.2.65 There are no inherent accident issues on the local highway network in the vicinity of the site that would give rise to any highway safety concerns. There are no highway safety problems that would be exacerbated by the proposed development.
- 4.2.66 The sites' location also provides reasonable level of opportunity to travel sustainably.

Trip Generation

- 4.2.67 The TRICS database has been utilised to estimate the multimodal and vehicle trip generation potential of the proposed development. Based on the TRICS assessment, the proposal could be expected to generate in the order of 84 vehicle movements (two-way) during the AM peak period and 69 vehicle movements (two-way) during the PM peak period; roughly equating to 1-2 vehicle movements per minute during network peaks. OGV movements would likely to be in the order of 11 trips (two-way) in the AM peak and 3 trips (two-way) in the PM peak; equating to roughly 1 OGV trip per 5-6 minutes / 20 minutes in the AM and PM peaks, respectively.
- 4.2.68 Further to the trip generations identified above based on a TRICS assessment, anticipated vehicle movements have been provided by Jayplas which allows for a comparative assessment of OGV movements to be made on first principles.

Operations

- The site will have a throughput capacity of 150,000 tonnes per annum
- The site will operate Monday – Saturday AM (5.5 days per week) which equates to 286 full working days per year
- Deliveries will occur over a 12hour period between 6am – 6pm
- Based on the above, the site's throughput capacity is 525 tonnes per day / 44 tonnes per hour.

Deliveries In

- Material will be delivered to the site in 17 tonne payloads. These vehicles would then depart the site unladen.
- Based on an hourly throughput capacity of 44tph; this equates to less than 3 arrivals / 3 departures per hour. 6 OGV trips (two-way)

Deliveries Out

- Material will be delivered out of the site in 22 tonne payloads. These vehicles would arrive at the site unladen.
- Based on an hourly throughput capacity of 44tph; this equates to less than 2 arrivals / 2 departures per hour. 4 OGV trips (two-way)

- 4.2.69 From the above information from the applicant, it is expected that the site will generate in the order of 10 HGV movements (two-way) per hour. As the OGV traffic generation estimates based on first principles are slightly greater than those forecast by the TRICS database, these higher flows have been

used within the assessment.

- 4.2.70 Based on the predicted OGV trips, the assessment considers that even during network peak periods the volume of OGV's generated by the development (approximately 1 trip every 6 minutes) is unlikely to have any discernible impact on the operation of the highway network.

Car Parking

- 4.2.71 The proposal provides the provision of a total of 90 standard car parking spaces (73 spaces plus 17 overflow spaces). 6 disable parking spaces and 4 motorcycle parking spaces are also provided along with 7 electric vehicle charging spaces and a further 4 passive charging spaces. In addition, 8 cycle parking spaces will be located in proximity to the office within Building 1 through the provision of a cycle shelter.
- 4.2.72 The Transport Assessment concludes that the proposed car parking provisions are considered sufficient to meet the predicted parking demand generated by the proposal.

Summary

- 4.2.73 Overall, the Transport Assessment concludes that the proposed development is likely to have a modest traffic impact at the site access and egress junctions. Meanwhile, the increase in traffic flows at off-site junctions is considered to be negligible and would unlikely have an discernible adverse impact upon the operation of the local network.

Travel Plan

- 4.2.74 The draft Travel Plan sets out a series of measures that will encourage changes in the travel patterns of staff and visitors to the site. The measures set out in the Travel Plan will help to reduce the reliance on the private car, particularly single-person car trips and increase the use of sustainable forms of transport such as bicycles.

Lighting Assessment

- 4.2.75 A Lighting Assessment was undertaken by Williams Lighting Consultants and is presented in **Appendix O**. Accompanying the assessment, lighting calculations and a proposed exterior lighting strategy plan has been prepared to demonstrate proposed exterior lighting has a minimal impact on the environment.
- 4.2.76 The assessment details the principles of the exterior lighting design which are in place to ensure adequate illumination of external areas in order to facilitate safe working and movement within the storage yard.
- 4.2.77 The exterior lighting design has considered appropriate optic settings for the development layout ensuring (as practicable as possible) light is only provided where required. In addition, light pollution (vertically and horizontally) has been minimised as much as possible through careful luminaire selection and shielding (optically and column mounted). The design follows the principles set out in the ILP Guidance Notes for the Reduction of Obtrusive Light GN01:2020.
- 4.2.78 The exterior lighting design has also taken into account the ILP and BCT Guidance Note 08/18 Bats given the presence of Bats along the woodland boundaries surrounding the development area of the site, as identified in the Ecological Appraisal (**Appendix D**). All proposed lighting utilises an LED light source to avoid light sources with high UV content. Optics have carefully been selected to avoid glare and light spill as much as possible whilst achieving the required lighting levels. Columns close to ecological sensitive areas have rear shields proposed to further reduce rear light spill as much as possible whilst also achieving the required lighting levels for safe outdoor working.

Waste Planning Assessment

- 4.2.79 A Waste Planning Assessment has been prepared by Sirius Planning and is presented in **Appendix P**. The assessment demonstrates how the proposal will contribute towards the zero-waste strategy in Wales and forms a sustainable part of the established Waste Hierarchy. The assessment also considers how the proposal is compliant with related policy to need and location requirements.

Energy Statement

- 4.2.80 An Energy Statement has been prepared by Sirius Planning and is presented in **Appendix Q**. A Combined Heat and Power Unit is proposed as part of the development to be used for Building 2 to provide power and hot water for the washing processes. At present, the CHP details are indicative as the wash plant for Building 2 has not yet been fully designed and therefore the actual required sizing and final details of the proposed CHP unit will be confirmed prior to the development of Building 2.

4.3 OTHER ENVIRONMENTAL AND TECHNICAL CONSIDERATIONS

Socio-Economic

- 4.3.1 The proposed facility will bring direct and indirect economic benefits to the local communities surrounding the development. These include:
- Direct changes in demand for employees arising from construction/implementation and operational phases;
 - Indirect changes in the demand for employees due to the purchase of materials and services; and
 - Inward investment and spending of income derived from the facility.
- 4.3.2 Jayplas has a policy of employing and training local people in respect of its development projects. There will be a significant number of direct employment opportunities created as a result of the construction of the plastics recycling and processing facility, it is intended that many of these construction workers will be derived from the locality and that local contractors will be employed in many aspects of the construction/implementation programme. It is anticipated that around 50-100 new jobs will be created during the construction phase of the development.
- 4.3.3 During the operational phase, the facility has the capacity to directly support some 110+ permanent jobs, it is proposed that the workforce for the development will be recruited from the local employment market.
- 4.3.4 Following construction, the proposal will result in a well-designed and operated site which will enhance sustainable waste management practices within Merthyr Tydfil.



5. PLANNING POLICY APPRAISAL

5.1 INTRODUCTION

- 5.1.1 This section sets out the local and national planning policies as well as material considerations which are relevant, both to the application site, and the type of development proposed.
- 5.1.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 5.1.3 The proposed development site falls within the administrative boundaries of Merthyr Tydfil County Borough Council. The adopted Local Plan for the application site comprises:
- Merthyr Tydfil Replacement Local Development Plan 2016 - 2031 (Adopted January 2020)
- 5.1.4 Given the primacy of the development plan in the decision-making process, it is imperative that this Planning Statement identifies and appraises the planning policies that are of relevance in determining this planning application.

5.2 LOCAL CONTEXT

- 5.2.1 The Merthyr Tydfil Replacement Local Development Plan was formally adopted in January 2020 and provides the local planning policy framework for the area. The Plan is the basis for land use planning decisions in the County Borough.
- 5.2.2 Under the adopted proposals map, the site is located within the settlement limits, allocated as an Employment Site (ref. EW 1.3) and located within a Heat Priority Area. A small area along the northern boundaries of the site is located within Archeologically Sensitive Area (ASA6).
- 5.2.3 The following table provides an assessment of policies within the Merthyr Tydfil Replacement Local Development Plan which are considered relevant to the proposed development.

Table 5.1: Policy Appraisal – Merthyr Tydfil Replacement Local Development Plan

Policy	Commentary
<u>Policy SW4- Settlement Boundaries</u> <i>“To encourage development within urban areas, support the re-use of previously developed land, and to protect and support the functioning of our rural economy and the countryside, settlement boundaries will be defined as follows:</i> <i>Primary Growth Areas:</i> • Merthyr Tydfil...”	The proposal is for a plastics recycling and processing facility on previously disturbed land off Goat Mill Road. The site is located within the settlement boundary of Merthyr Tydfil and is allocated as an Employment Site (EW 1.3). Policy EcW14 Waste Facilities states that land at Goat Mill Road is identified as a preferred area of search for waste management facilities. The proposal is considered to be of an appropriate scale for its location with industrial uses to the immediate north of the site and will make a significant contribution to recycling in the local area. The proposal is therefore in accordance with this policy.
<u>Policy SW11 – Sustainable Design and Placemaking</u> <i>“Development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design.</i> <i>Where appropriate new development will be required to:</i>	The Landscape and Visual Impact Assessment (LVIA), presented in Appendix C, considers that the local landscape of the site and immediate surrounds could accommodate the development without a substantial change in character as it contains no landscape characteristics that would be vulnerable to the proposal. Due to the existing presence of surrounding industrial land users, the retention of surrounding vegetation and tree

Proposed Plastics Recycling & Processing Facility off Goat Mill Road, Merthyr Tydfil

1. <i>Be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density ...</i> 3. <i>Not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design</i> 4. <i>Contribute to the provision of green infrastructure, including open space in accordance with the Council's standards, sustainable drainage systems where appropriate, and ensure that the County Borough's network of green infrastructure is accessible and connected</i> 5. <i>...demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards ...</i> 8. <i>Minimise the demand for energy and utilise renewable energy resources</i> 9. <i>Provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts...</i> 10. <i>Incorporate measures to improve ground and surface water quality wherever possible</i> 11. <i>Provide adequate facilities and space for waste collections and recycling..."</i>.	cover, the LVIA considers that the proposed development would not lead to an adverse effect upon the landscape of the local area outside the site boundary and immediate adjoining areas. The visual assessment concluded that no receptors would experience visual effects of a substantial nature. The LVIA concludes that the proposed development could be successfully integrated into the surrounding landscape without causing substantial harm to the landscape character and visual amenity in the local area. Open Mosaic Habitat will be retained, managed and enhanced both in the north and south of the site. A surface water lagoon will be provided giving ample opportunities for aquatic habitat creation and enhancement. Further enhancements have been proposed including the management of the retained woodland, and a bat and bird box scheme. Full details are presented in the CLEMP in Appendix E. The SuDs proposals for the site includes rainwater harvesting in Building 2 and a surface water lagoon which represents an enhancement from the current conditions as the current surface water runoff for the site is uncontrolled, untreated, unmanaged and unmitigated. The Transport Assessment, presented in Appendix N, concludes that the proposed development is likely to have a modest traffic impact at the site access and egress junctions. Meanwhile, the increase in traffic flows at off-site junctions is considered to be negligible and would unlikely have an discernible adverse impact upon the operation of the local network. The proposed car parking provisions are considered sufficient to meet the predicted parking demand generated by the proposal. A combined heat and power (CHP) unit will be located on site to provide power and hot water for the washing processes. By generating heat and power simultaneously, CHP can reduce carbon emissions by up to 30% compared to the separate means of conventional generation. The proposed plastics recycling and processing facility will accept and process c. 150,000 tonnes of plastic materials per annum with the objective of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill. The proposal is therefore in accordance with this policy.
<u>Policy CW1 – The Historic Environment</u> <i>"The integrity of our historic environment assets will be covered and enhanced.</i>	The proposed development site lies within the Merthyr Tydfil Landscape of Outstanding Historic Interest in Wales wholly within Historic Landscape Character Area 078: Dowlais Great Tip. In addition, the northern tip of the application site lies within

<i>Development proposals will only be permitted where it can be demonstrated they would preserve or enhance the architect quality, character or the historic or cultural importance of our designated heritage environment assets.</i> <i>Development affecting undesignated historic environment assets including, Locally Listed Buildings or structures, Landscape of Outstanding Historic Interest in Wales, Urban Character Areas and Archaeologically Sensitive Areas should have regard to their special character and archaeological importance”.</i>	the Archaeologically Sensitive Area 6: Dowlais Ironworks. Overall, the expected potential scale, character and preservation of any potential sub-surface archaeological resource is low following open cast mining of the site and the subsequent East Merthyr Land Reclamation Scheme means there is no physical or visual traces of former historic character above ground. The Heritage Assessment, presented in Appendix H, concludes that the overall significance of the impact of the proposed development on Historic Landscape Character Area 078 is Slight. The proposal is therefore in accordance with this policy.
<u>Policy EnW1 – Nature Conservation and Ecosystem Resilience</u> <i>“Development proposals will be required to promote the resilience of ecosystems. In particular, proposals will be required to maintain and enhance biodiversity interests unless it can be demonstrated that:</i> <i>1. The need of the development clearly outweighs the biodiversity value of the site; and</i> <i>2. The impacts of the development can be satisfactorily mitigated and acceptably managed through future management regimes”.</i>	The Ecological Appraisal, presented in Appendix D, states that application site qualifies as Open Mosaic Habitat due to the industrial history of the site and the mix of habitats present. However, the site is in a deteriorating condition and under current management, the Open Mosaic Habitat is likely to be lost to established permanent grassland and scrub. The proposed scheme retains the majority of the broadleaved woodland plantation and a significant area of grassland. Open Mosaic Habitat will be retained, managed and enhanced both in the north and south of the site. In addition, a surface water lagoon will be provided giving ample opportunities for aquatic habitat creation and enhancement. Further enhancements have been proposed including the management of the retained woodland, and a bat and bird box scheme. Full details are presented in the CLEMP in Appendix E. The proposal is therefore in accordance with this policy.
<u>Policy EnW2 – Internationally and Nationally Protected Sites and Species</u> <i>“Development likely to have an adverse effect either directly or indirectly on the conservation value of an internationally or nationally designated site, including the area, structure and function of designated features, will only be permitted where it is demonstrated that:</i> <i>1. There is no suitable alternative to the proposed development; and</i> <i>2. It can be demonstrated that the benefits from the development clearly outweigh the special interest of the site; and</i> <i>3. Appropriate compensatory measures are secured; or</i> <i>4. The proposal contributes to the protection, enhancement and positive management of the site.</i>	An Ecological Appraisal is presented in Appendix D. Two statutory designated sites were located within the respective search areas of 10km for international and 2km for nationally designated sites. Both sites were primarily designated for their extensive selection of protected habitats. On the basis of their reason for designation, as well as the significant distance from the site, the Ecological Appraisal concluded that the proposed development would have no significant negative effect on the surrounding statutory designated sites. No reptiles, great crested newts or badgers were recorded on site, and the breeding bird assemblage comprised only a small number of common and widespread species. The bat assemblage included a wide range of species typical of south Wales, including lesser horseshoe which was assessed as district value. Key bat

<i>Development proposals likely to affect protected species will only be permitted where it is demonstrated that:</i> <i>1. The population size, range, distribution and long-term prospects of the species will not be significantly adversely impacted;</i> <i>2. There is no suitable alternative to the proposed development;</i> <i>3. The benefits of the development clearly outweigh the adverse impacts on the protected species; and</i> <i>4. Appropriate, avoidance, minimisation, mitigation, compensation and enhancement measures are provided".</i>	habitat features will be retained as part of the proposal and the exterior lighting design (Appendix O) has been produced to minimise light spill as much as possible whilst having the required standard of lighting for safe external working. Open Mosaic Habitat will be retained, managed and enhanced both in the north and south of the site. A surface water lagoon will be created giving ample opportunities for aquatic habitat creation and enhancement. Further enhancements have been proposed including the management of the retained woodland, and a bat and bird box scheme. Full details are presented in the CLEMP in Appendix E. The proposal is therefore in accordance with this policy.
<u>Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species</u> <i>"Development proposals likely to have an adverse impact on Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves, or Priority Habitats and Species will only be permitted where it can be demonstrated that:</i> <i>1. The need for the development clearly outweighs the conservation value of the site;</i> <i>2. Adverse impacts on nature conversation features or geological features can be avoided;</i> <i>3. Appropriate and proportionate mitigation and compensation measures can be provided; and</i> <i>4. The development maintains and where possible enhances biodiversity and geodiversity interests".</i>	There are three non-statutory designated sites located within 2km of the survey area, all of which were SINCs primarily designated for their heath and grassland habitats. All physical impacts of the proposal are expected to be dealt with on site once operational and subsequently no offsite impacts are anticipated. Given that the non-statutory protected sites are not connected to the proposed development site, with the nearest being 440m east, the Ecological Appraisal (Appendix D) concluded that the impact on any single protected site will likely be negligible. The proposal is therefore in accordance with this policy.
<u>Policy EnW4 – Environmental Protection</u> <i>"Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:</i> <i>• Pollution of land, surface water, ground water and the air;</i> <i>• Land contamination;</i> <i>• Hazardous substances;</i> <i>• Land stability;</i> <i>• Noise, vibration, dust, odour nuisance and light pollution; or</i> <i>• Any other identified risk to public health and safety.</i> <i>Where impacts are identified the Council will require applicants to demonstrate that appropriate measures have been incorporated to reduce, or minimise the impact identified to the lowest possible acceptable level.</i>	The SuDs proposals for the site includes rainwater harvesting in Building 2 and a surface water lagoon. Regarding pollution prevention measures, proprietary systems to include silt traps and oil interceptors will be used in addition to the proposed SuDs components to treat the surface water runoff to protect the surface water lagoon from excess silt or oil contamination. Full details will be presented in the separate SAB application. A Preliminary Geo-technical Appraisal and Coal Mining Risk Assessment is presented in Appendix L. A Phase II (intrusive) geo-environmental / contamination investigation will be undertaken. It is proposed that the recommended further site investigation works is controlled by way of a suitably worded planning condition. All of the processing operations would take place within buildings and the risk of odour effects on the surrounding area would be low. In addition, the facility would operate subject to the conditions of an Environmental Permit, which would ensure

<i>Planning conditions may be imposed or legal obligations entered into, to secure any necessary mitigation and monitoring processes.</i> <i>In respect of the water environment, development proposals will be required to incorporate measures to improve water quality where opportunities exist. With regard to flood risk, new developments will be expected to avoid unnecessary flood risk and meet the requirements of Tan 15...".</i>	that odour would not have any impact on the local area. The effect of traffic generated by the proposed development on the local air quality has been assessed. The Air Quality Assessment, presented in Appendix M, has shown that the air quality impacts of the proposal will be insignificant. The Noise Assessment, presented in Appendix K, concludes that the proposed operation of the site, with the implementation of appropriate mitigation measures as set out in section 6 of the Noise Assessment, would generate noise and vibration levels within relevant noise standards and guidelines at nearest sensitive receptors and would therefore not be significant or generate any adverse impacts. A Lighting Assessment has been prepared and is presented in Appendix O. Light pollution (vertically and horizontally) has been minimised as much as possible whilst keeping lighting to a standard required for safe outdoor working through careful luminaire selection and shielding (optically and column mounted). In addition, all proposed lighting utilises an LED light source to avoid light sources with high UV content. Optics have carefully been selected to avoid glare and light spill as much as possible whilst achieving the required lighting levels. The proposal is therefore in accordance with this policy.
<u>Policy EnW5 – Landscape and Special Landscape Areas</u> <i>"...Development proposals will be permitted where it can be satisfactorily demonstrated that:</i> <i>a) It would not cause unacceptable harm to the character and quality of the landscape setting of the County Borough ...</i> <i>c) Development respects the local distinctiveness and historic character of the landscape;</i> <i>d) Development will safeguard local landscape character and landscape features, including views, which make a significant contribution to the character, history and setting of the locality;</i> <i>e) Development secures the enhancement of the character, appearance and quality of the landscape, through restoration, management or enhancement where possible;</i> <i>f) There is no satisfactory alternative and the benefits associated with the development can be demonstrated to outweigh the harm; and</i> <i>g) Where damage to local landscape character cannot be avoided appropriate mitigation has been secured".</i>	The Landscape and Visual Impact Assessment (LVIA) (Appendix C) considers that the local landscape of the site and immediate surrounds could accommodate the development without a substantial change in character as it contains no landscape characteristics that would be vulnerable to the proposal. Due to the existing presence of surrounding industrial land users, the retention of surrounding vegetation and tree cover, the LVIA considers that the proposed development would not lead to a charactering effect upon the landscape of the local area outside the site boundary and immediate adjoining areas. Due to the fact that the entire proposed development area was re-landscaped during the East Merthyr Land Reclamation Scheme; and no physical or visual traces of its former historic character survive above ground, the Heritage Assessment (Appendix H) concludes that the overall significant of the impact of the proposed development on the Historic Landscape Character Area is Slight. The LVIA concludes that the proposed development could be successfully integrated into the surrounding landscape without causing

	substantial harm to the landscape character and visual amenity in the local area. The proposal is therefore in accordance with this policy.
<u>Policy EcW1 – Provision of Employment Land</u> <i>“To support economic development, 30.65 hectares of employment land (for B1(b), B1(c), B2 and B9 uses) is allocated at the following locations:</i> 2. Goatmill Road...”.	The application site is currently a previously disturbed vacant site which is allocated for employment (EW 1.3) under the adopted Local Development Plan. The proposal is for a plastics recycling and processing facility and will reduce the amount of waste being disposed by landfill. Policy EcW14 Waste Facilities states that land at Goat Mill Road is identified as a preferred area of search for waste management facilities. The proposed facility will provide economically sustainable jobs both directly (+110 jobs) and indirectly (44 jobs) and provide a significant amount of inward investment for the local community. The proposal is therefore in accordance with this policy.
<u>Policy EcW2 – Protecting Employment Sites</u> <i>“...At...Goatmill Road...development will be permitted if:</i> <i>• It is within Use Classes B1(b), B1(c), B2 OR B8; or</i> <i>• It provides an ancillary facility or service that supports the primary employment use; or</i> <i>• It is an acceptable complementary commercial service outside class B uses; or</i> <i>• It is an appropriate waste management facility compatible with existing industrial and commercial activities...”.</i>	The proposal is for a plastics recycling and processing facility which will accept and process c. 150,000 tonnes of plastic materials per annum. The application site is identified as a preferred area of search for waste management facilities and is located in an area characterised by industrial operations. The accompanying environmental and technical assessments demonstrate that the proposal would not provide any adverse significant impacts on amenity or the environment. The proposal is therefore in accordance with this policy.
<u>Policy EcW9 – District Heating</u> <i>“The use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged.</i> <i>Within the Heat Priority Areas listed below, major development will be expected to incorporate, where viable and technically feasible, infrastructure for district heating and to connect to existing systems where available. Developers should submit an energy strategy along with their application. The following are identified as Heat Priority Areas:</i> <i>• ...Goat Mill Road...”.</i>	District heating is not considered to be viable for the proposal. The proposed development is for a recycling and processing facility rather than energy from waste for instance, therefore by-products of the proposals process do not generate heat. A combined heat and power (CHP) unit will be located on site between the two buildings to provide power and hot water for the washing processes. The CHP will only service the facility and is not intended to provide a source for a wider district heating scheme. The proposal is therefore in accordance with this policy.
<u>Policy EcW14 – Waste Facilities</u> <i>“Waste treatment facilities will only be permitted where:</i> 1. There is an identified need;	The proposal is for a plastics recycling and processing facility which will accept and process c. 150,000 tonnes of plastic materials per annum. The facility is designed with the objective of recovering value from materials destined for

2. <i>They are situated in locations where they would not have significant adverse effect on amenity or the environment;</i> 3. <i>They accord with the waste hierarchy and the proximity principle;</i> 4. <i>They provide comprehensive restoration and aftercare of the land for a beneficial re-use, where appropriate; and</i> 5. <i>They provide a Waste Planning Assessment.</i> <i>The following locations are identified as preferred areas of search for waste management facilities:</i> • <i>...Goatmill Road...".</i>	landfill and thus reducing the amount of waste being disposed by landfill. The development will contribute to the Towards Zero Waste 2010 Strategy in achieving zero waste by 2050. The application site is identified as a preferred area of search for waste management facilities and is located in an area characterised by industrial operations. The accompanying environmental and technical assessments demonstrate that the proposal would not provide any adverse significant impacts on amenity or the environment. The facilities closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy. A Waste Planning Assessment is presented in Appendix P. The proposal is therefore in accordance with this policy.
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5.3 MATERIAL CONSIDERATIONS

Planning Policy Wales (Edition 11, February 2021)

- 5.3.1 In February 2021, the Welsh Government (WG) published an update to national planning policy in the form of the 11th edition of Planning Policy Wales (PPW). PPW sets out the land use planning policies of the WG.
- 5.3.2 Section 5.4 related to Economic Development with paragraph 5.4.4 stating that *"wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration"*.
- 5.3.3 The proposed development is for a plastics recycling and processing facility on a vacant, previously disturbed site which will provide economically sustainable jobs both directly (+110 jobs) and indirectly (44 jobs) and provide a significant amount of inward investment for the local community.
- 5.3.4 Section 5.13 relates to Sustainable Waste Management Facilities. Paragraph 5.13.1 states that *"the planning system has an important role to play in facilitating sustainable waste management by providing a framework for decision making which recognises the social, economic and environmental benefits that can be realised from the management of waste as a resource to meet the needs of society and business..."*.
- 5.3.5 Paragraph 5.13.4 goes onto state that *"The Welsh Government's policy for waste management is contained in Towards Zero Waste and associated sector plans. Planning authorities should, in principle, be supportive of facilities which fit with the aspirations of these documents and in doing so reflect the priority of the waste hierarchy as far as possible"*.
- 5.3.6 In respect of waste infrastructure, paragraph 5.13.10 states that *"Planning authorities must support the provision and suitable location of a wide ranging and diverse waste infrastructure which includes facilities for the recovery of mixed municipal waste...The extent to which a proposal demonstrates a contribution to the waste management objectives, policy, targets and assessments contained in national waste policy will be a material consideration"*.
- 5.3.7 The proposed plastics recycling facility will accept and process c. 150,000 tonnes of plastic materials per annum. The facility is designed with the objective of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill. The accompanying

environmental and technical assessments demonstrate that the proposal would not provide any significant adverse impacts on amenity or the environment.

- 5.3.8 The facilities closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy.

Future Wales: The National Plan 2040

- 5.3.9 Future Wales: The National Plan 2040 (adopted February 2021) is the national plan that sets out the direction of development in Wales to 2040.
- 5.3.10 Policy 1 Where Wales will grow states that *“The Welsh Government supports sustainable growth in all parts of Wales”*. Three National Growth Areas have been identified which includes growth in employment opportunities. The application site lies within the National Growth Area ‘Cardiff, Newport and the Valleys’.
- 5.3.11 Policy 3 Supporting Urban Growth and Regeneration – Public Sector Leadership states that:
“The Welsh Government will play an active, enabling role to support the delivery of urban growth and regeneration. The Welsh Government will assemble land, invest in infrastructure and prepare sites for development. We will work with local authorities and other public sector bodies to unlock the potential of their land and support them to take an increased development role”.
- 5.3.12 The applicant, Jayplas, are working in partnership with the Welsh Government to develop the site, improve the local economy, increase recycling in the region and progress towards zero-waste targets.
- 5.3.13 Policy 8 relates to flooding and states that *“flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported”*. The site is located within Flood Zone A which is deemed as being at little or no risk of fluvial flooding. The SuDs proposals for the site includes rainwater harvesting in Building 2 and a surface water lagoon which represents an enhancement from the current conditions as the current surface water runoff for the site is uncontrolled, untreated, unmanaged and unmitigated.
- 5.3.14 Policy 9 relates to ecological networks and green infrastructure and states that *“...action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment”*. The proposed scheme includes Open Mosaic Habitat to be retained, managed and enhanced both in the north and south of the site. A surface water lagoon will be provided giving ample opportunities for aquatic habitat creation and enhancement. Further enhancements have been proposed including the management of the retained woodland, and a bat and bird box scheme.
- 5.3.15 Policy 12 refers to regional connectivity and states that *“...active travel must be an essential and integral component of all new developments ... where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points”* A Travel Plan (**Appendix N**) accompanies the planning application and sets out a series of measures that will encourage changes in the travel patterns of staff and visitors to the site. The measures set out in the Travel Plan will help to reduce the reliance on the private car, particularly single-person car trips and increase the use of sustainable forms of transport. The proposal provides the provision of a total of 90 standard car parking spaces (73 spaces plus 17 overflow spaces). 6 disable parking spaces, 4 motorcycle parking spaces and 8 cycle parking spaces are also provided along with 7 electric vehicle charging spaces and a further 4 passive charging spaces. The proposed car parking provisions are considered sufficient to meet the predicted parking demand generated by the proposal.
- 5.3.16 Policy 16 refers to heat networks and states that *“within Priority Areas for District Heat Networks planning authorities should identify opportunities for District Heat Networks and plan positively for their*

implementation". Whilst the proposals will not provide district heating for the wider area, a dedicated combined heat and power unit will be located on site. Indicative details of the CHP unit are provided in the Energy Statement presented in **Appendix Q**.

- 5.3.17 Policy 33 is in relation to the National Growth Area 'Cardiff, Newport and the Valleys' in which the application site is located within. The policy states that *"...The Welsh Government will ... support investment...and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys"*. The proposed facility will provide economically sustainable jobs both directly (+110 jobs) and indirectly (44 jobs) and provide a significant amount of inward investment for the local community. Jayplas has a policy of employing and training local people in respect of its development projects. It is intended that many of the employment opportunities both during the construction and operational phases will be derived from the locality and that local contractors

Technical Advice Note 21 Waste

- 5.3.18 Technical Advice Note (TAN) 21 provides advice on how the land use planning system should contribute towards sustainable waste management and resource efficiency, reflecting the new waste management drivers at a European Union and Waste level. Both Planning Policy Wales and TAN 21 set out a framework for facilitating the delivery of sustainable waste management infrastructure through the planning process.
- 5.3.19 At paragraph 2.7.3 the TAN states that *"Where it is not possible to reuse materials and products or prepare them for reuse, recycling should be encouraged. Recycling can reduce the demand for resources and reduce atmospheric emissions...Priority should be given to the development of new infrastructure that promotes high quality, closed loop recycling, or upcycling where feasible, with a focus on dealing with separately collected materials"*.
- 5.3.20 The proposed development is designed with the objective of recovering value from waste materials destined for energy from waste or landfill and thus reducing the amount of waste being disposed by landfill. The closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy.

Towards Zero Waste 2010

- 5.3.21 Towards Zero Waste is the strategic Waste Strategy document for Wales. The document was published in 2010 and outlines a long-term framework for resource efficiency and waste management until 2050. The aim of the strategy is for Wales to be a high recycling nation by 2025 and a zero-waste nation by 2050.
- 5.3.22 The document sets out a number of aspirations and targets in order to meet the overall objective zero waste by 2050. The key aims are:
- By 2025, a significant reduction in waste of around 27% based on 2007 levels;
 - By 2050, achieving zero waste and 'living with out environmental limits'; and
 - In achieving zero waste by 2050, a need to reduce waste arising by around 1.5% of the 2007 baseline each year across all sectors.
- 5.3.23 In achieving the above, the document states that Towards Zero Waste means:
- *"Waste will be reduced significantly;*
 - *There will be a strong economy in resource management;*
 - *Residual waste will be minimised;*
 - *Landfill will be eliminated as far as possible; and*

- *Legacy waste will be tackled.”*

5.3.24 It is considered that the proposed plastic recycling and processing facility will significantly contribute to Merthyr Tydfil progressing towards zero waste targets.

Municipal Sector Plan 2011

5.3.25 The Municipal Sector Plan sets an agenda for the management of local authority waste for the next 15 years and beyond. It supports the aims and objectives of the waste strategy for Wales set out in ‘Towards Zero Waste’ and sets out detailed outcomes, policies and delivery actions for the municipal waste sector.

5.3.26 Chapter 2 of the document outlines an approach for reducing the impact on climate change from waste activities by sustainable consumption and production, and managing and conserving the plant’s waste resources. The plan goes on to set a number of targets with respect to waste:

- By 2024/25, a minimum of 70% of municipal waste to be reused/recycled/composted;
- By 2024/25, a minimum of 80% source separated municipal waste to be reused/recycled/composted;
- By 2024/25, a maximum of 30% of municipal waste to be sent to energy from waste facilities; and
- By 2024/25, a maximum of 5% of municipal waste to be sent to landfill.

5.3.27 It is considered that the proposed development will significantly contribute to Merthyr Tydfil Council progressing towards targets of increasing recycled waste and reducing waste to landfill.

The Well-Being of Future Generations (Wales) Act 2015

5.3.28 The Well-Being of Future Generations (Wales) Act is about improving the social, economic, environmental and cultural well-being of Wales. Its aims are to make public bodies think more about the long-term, work better with people, communities and each other and look to prevent problems and take a more joined up approach. This means that, for the first time, public bodies listed in the Act must do what they do in a sustainable way. It expects them to:

- Work together better;
- Involve people reflecting the diversity of our communities;
- Look to the long-term as well as focussing on now; and
- Take action to try and stop problems getting worse – or even stop them happening in the first place.

5.3.29 The Act details seven goals for all public bodies to work on which are as follows:

- A globally responsible Wales;
- A prosperous Wales;
- A resilient Wales;
- A healthier Wales;
- A more equal Wales;
- A Wales of cohesive communities; and
- A Wales of vibrant culture and thriving Welsh language.

5.3.30 The proposed plastic recycling and processing facility is located on a vacant, disturbed site on the

outskirts of Merthyr Tydfil and will provide a significant amount of inward investment for the local community. The facilities closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy.

5.4 CONCLUSION

- 5.4.1 The proposed development is considered to be in accordance with the Local Development Plan, National Planning Policies and material considerations all of which support recycling and sustainable waste management. In addition, the development is unlikely to generate any significant impacts.



6. CONCLUSION

6.1 INTRODUCTION

- 6.1.1 This Planning Statement describes a proposal by Jayplas who are applying for planning permission to construct and operate a plastics recycling and processing facility on vacant previously disturbed land off Goat Mill Road, Merthyr Tydfil.
- 6.1.2 The facility will be capable of taking in waste rigid plastics and film from commercial, industrial and the public sector to recycle and process. The proposed site, when fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum. The facility is designed with the objection of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill.
- 6.1.3 The closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste ecology. In addition, the proposal will provide economically sustainable jobs both directly (+110 jobs) and indirectly (44 jobs), recruited from the local employment market, and provide a significant amount of inward investment for the local community.
- 6.1.4 The proposed development will provide the following benefits and opportunities:
- £39 million capital investment
 - 110+ direct employment opportunities;
 - 44 indirect chain jobs;
 - Enhance 'zero waste to landfill' targets;
 - Reduce the carbon footprint for Wales (150k tonnes annual carbon saving, equivalent to 62,249 cars taken off the road);
 - Reduce the need to export waste plastics externally out of the UK; and
 - Provide an additional source of recycled packaging to Wales.

6.2 ENVIRONMENTAL EFFECTS

- 6.2.1 A number of environmental considerations are set out in chapter 4 of this statement and accompany this application as appendices. These consider the potential effects of the proposed development upon the application site and identified receptors within the receiving environment.
- 6.2.2 Due to the iterative design process these assessments conclude that the proposal (alongside proposed mitigation) will not lead to adverse environmental effects either locally or upon the wider area.

6.3 PLANNING POLICY

- 6.3.1 The proposal has been considered in the context of local and national policies. The application demonstrates that the proposed development will make a significant contribution to recycling within the region without causing significant harm to the environment.
- 6.3.2 The proposal is considered to be in accordance with relevant planning policy. Furthermore, material considerations in the form of the PPW, Future Wales: The National Plan and Towards Zero Waste Strategy, weigh heavily in favour of the development.

6.4 CLOSURE

- 6.4.1 It has been demonstrated that the proposal accords with relevant national and local planning policy.
- 6.4.2 It has been demonstrated that the proposals will not result in any unacceptable environmental impacts.
- 6.4.3 It is considered that no significant impacts are anticipated, and the proposals should be supported.

