

f.a.o. David Baker
Sirius Planning

(Sent via email: david.baker@thesiriusgroup.com)

Dyddiad/Date: 14th January 2020

Ein Cyf / Our ref: PA/19/0056

Eich Cyf / Your ref:

Gofynnwch am / Please ask for: David Cross

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Dear Mr Baker

RE: Proposed industrial development for the recycling and processing of plastic materials on land at Goat Mill Road.

I write in response to your request for pre-application advice and further to our meeting held on the 5th December 2019, in relation to a proposed plastic recycling and processing facility with associated office accommodation, external storage area, car parking and weighbridge. This pre-application advice has had regard to the submitted details, which includes a supporting document outlining the proposed development, indicative site layout options and indicative elevation details of the industrial units.

I can confirm that planning permission would be required and that due to the scale of the proposal, it would constitute a 'major development'. Therefore, as you are no doubt aware, a statutory pre-application consultation (PAC) exercise is required to be undertaken and a PAC report should accompany the planning application submission.

EIA Screening

The Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 sets out the need to consider whether planning applications should be accompanied by an Environmental Impact Assessment (EIA), of which Schedule 2 of the regulations sets out the appropriate thresholds/criteria for various types of development. In this instance, it is considered that the proposed development would fall within either Category 10(a) Industrial Estate Development Projects or 10(b) Urban Development Projects of Schedule 2. In both instances, the proposed development would exceed the threshold, given that the area of the development would be greater than 5 hectares. As such, it is advised that a 'screening opinion' be sought to determine whether the planning application should include an EIA.

Policy context

Whilst the Merthyr Tydfil Local Development Plan 2006-2021 currently sets out the local planning policies, it was noted in the meeting that this is expected to be superseded in January 2020 by the Replacement Local Development Plan (LDP) 2016-2031. Given that the planning application would likely be submitted after the adoption of the new LDP, reference is made only to the relevant policies within the Replacement LDP as follows:

- Policy SW4 – Settlement Boundaries
- Policy SW9 – Planning Obligations

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- Policy SW10 – Protecting and Improving Open Space
- Policy SW11 – Sustainable Design and Placemaking
- Policy SW12 – Improving the Transport Network
- Policy CW1 – Historic Environment
- Policy EnW1 – Nature Conservation and Ecosystem Resilience
- Policy EnW4 – Environmental Protection
- Policy EcW1 – Provision of Employment Land
- Policy EcW9 – District Heating
- Policy EcW14 – Waste Facilities

The following Supplementary Planning Guidance (SPG) documents would also be material considerations:

- SPG 2 – Planning Obligations, March 2012
- SPG 4 – Sustainable Design, July 2013
- SPG 5 – Nature and Development, May 2015

Principle of development

The proposed development would be located within the settlement boundary and Primary Growth Area as defined by Policy SW4 of the Replacement LDP, where new development is generally encouraged within urban areas. As such, the principle of developing the site is acceptable.

The site lies within an area that is protected by Policy EcW2 for employment uses that fall within Use Classes B1, B2 and B8. In such locations, the provision of waste management facilities can be supported where it is compatible with existing industrial and commercial activities. However, such proposals would also need to satisfy Policy EcW14. In this regard, the application would need to demonstrate that there is an identified need, that its location would not have a significant adverse effect on amenity or the environment and that it accords with the waste hierarchy.

A Waste Planning Assessment is also required for all applications relating to new waste facilities classified as a disposal, recovery or recycling facility. The purpose of the Waste Planning Assessment is to ensure that the information necessary for making a decision is provided. The assessment should be appropriate and proportionate to the nature, size and scale of the proposed development. Further advice can be found in Annex B of Technical Advice Note 21: Waste, 2014.

The land at Goatmill Road is identified by Policy EcW9 of the Replacement LDP as a Heat Priority Area where major development proposals will be expected to incorporate, where viable and technically feasible the infrastructure for district heating and to connect to existing systems where available. The use of combined heat and power (CHP) and combined cooling, heat and power (CCHP) systems is also encouraged. In this regard, it is acknowledged that there is an intention for the facility to be serviced by a dedicated CHP unit, which would provide hot water and electricity for use in the various processes. The above considerations should be set out in an Energy Strategy, which should be provided with the application.

Design and landscaping

The design of the development should have particular regard to Policy SW11, which seeks to ensure development contributes to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. The pre-application submission presents a number of layout options for the industrial units, either located along the western boundary of the site or along the eastern boundary.

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The plans then suggest various configurations to the external storage areas and the circulation of traffic within the site. It is not entirely clear at this early stage how the local context has informed the general layout of the development in response to any site constraints or to minimise any potential impacts on the surrounding environment. Once the necessary survey work has been carried out, this will provide a greater understanding of the site and its surroundings and the measures that need to be put in place to enable the successful integration of the development. Whilst it is difficult to advise on any specific layout to the proposal at this stage, the comments below set out a few design principles that should be taken into consideration.

Although the site is reasonably well screened by trees and vegetation along its boundaries, there remains a number of vantage points where the development would be highly visible, particularly adjacent to the existing entrances into the site and from the adjoining land to the north and south. It is acknowledged that you intend to submit a Landscape and Visual Impact Assessment, which will help identify the extent of any potential impacts. There are some concerns with the potential visual impact that the external storage areas may have on the surrounding area, particularly in the southern half of the site, closest to the residential environment. It is suggested that the industrial units could be appropriately positioned to offer clear frontages at the principal entrances, which in turn may assist in screening some of the views of the external storage areas. A comprehensive landscaping scheme could also be presented to provide suitable planting within the site and along the boundaries to further screen the external storage areas where possible. This may include a mixture of mature trees and hedgerows to better establish the screening in key areas. It appears on the layout plans that there are various parts of the site that are essentially left-over spaces, for example in between the industrial units. If there are no particular functions for these areas, it is advised that they should be landscaped. This would not only reduce the amount of hard-surfacing across the site, but would also help soften the industrial environment and offer some ecological mitigation/enhancement.

The indicative elevations of the proposed industrial units illustrate that they would be of typical portal-framed design, which takes into account the need to provide large open spaces to accommodate the various recycling processes. Once the final layout of the development has been determined, further consideration should be given the external appearance of the buildings in order to appropriately respond to their context. The existing industrial units along Goatmill Road, nearest to the site, have been designed to have a modern appearance, utilising a modern cladding system and appropriate fenestration to clearly define the main entrances and provide natural light into the building. Some of the other units in the area also incorporate brickwork on the lower parts of the building with modern cladding on the upper sections to help break up their mass.

Whilst the buildings need to be designed so that they are functional, their scale and mass, together with the use of the same corrugated cladding system on the elevations and roof, would have the potential to appear bulky and monotonous. It is considered that the use of different materials and the introduction of features to the elevations would help emphasise the key frontages and enhance the overall appearance of the development.

The land is currently used on a regular basis for informal recreation (e.g. dog walkers), which is evident by the numerous tracks across the site in various locations. Whilst these tracks are not legal rights of ways, there is a clear benefit to the wellbeing of the local community. It has been advised by our Landscape Architect that there is a long term objective to establish a footpath/cycle route in a north/south direction through the eastern embankment, which is crucial to improving accessibility from the northeast part of the County Borough to the wider cycleway network. The provision of a pedestrian/cycle route along the eastern part of the site would help to mitigate for the loss of existing tracks within the site. This could effectively link to tracks around the proposed water lagoon with access from Goatmill Road.

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This would likely require a legal agreement to be secured to ensure that the pedestrian/cycle route is implemented within agreed timescales and remains accessible to the public at all times. With appropriate landscaping around the water lagoon, this part of the site could provide an interesting feature that enhances the character of the area and continues to provide a valuable area for recreation, as well as provide opportunities to enhance the biodiversity of the area.

Heritage impact

The proposed site lies within the Merthyr Tydfil Landscape of Outstanding Historic Interest in Wales. There are also a number of historic assets within 1km of the site, which include Grade II listed buildings and conservations areas to the north and west. Within 2km of the site there are Scheduled Ancient Monuments, namely the Ynys Fach Iron Furnaces to the south-west and the Deserted Iron Mining Village and Sarn Howell Pond and Watercourses to the south-east.

Policy CW1 of the Replacement LDP states that the integrity of the historic environment assets will be conserved and enhanced. Development proposals will then only be permitted where it can be demonstrated they would preserve or enhance the architectural quality, character or the historic or cultural importance of the historic environment assets.

It is acknowledged that the site is reasonably well screened with trees and vegetation, particularly along the majority of the western and eastern boundaries, which helps limit the views into the site from the nearby highways. However, the site would remain quite visible from the north and south where there are a number of informal tracks used by pedestrians/dog walkers. Taking into account the topography of the area, the existing landscaping and the intervening buildings it is expected that the development would have limited inter-visibility with the surrounding historic assets.

Given the location of the development in a historic landscape, together with the scale and nature of the proposal, it is considered appropriate for an Assessment of the Significance of the Development on the Historic Landscape (ASIOHL2) be submitted with the planning application. This would assist in identifying any potential impacts and help inform any appropriate mitigation measures and the proposed landscaping scheme i.e. areas where additional screen planting may be necessary.

The Engineering and Traffic Group Leader has indicated that the area for development was created following the completion of the East Merthyr Phase II (EMII) (Great White Tip) reclamation scheme. As such, it is not anticipated that there would be any archaeological remains within the site of any significance. Notwithstanding this, the advice from Glamorgan Gwent Archaeological Trust would be sought as part of the planning application process.

Ecological implications

The site comprises a flat area of reclaimed land, which our Ecologist anticipates to be nutrient-poor with a high pH level and may contain heavy metals as part of its make-up. It may therefore qualify as Calaminarian grassland, being an uncommon habitat type. The on-site habitat is also classified as 'Open Mosaic Habitat' on previously developed land, being a Section 7 Priority Habitat as specified under the Environment (Wales) Act 2016.

The site itself hosts a number of features, including trees, scrub, grassland and watercourses, which may help support/sustain a variety of priority and protected species or habitats. Within 2km of the site are a number of Sites of Importance for Nature Conservation (SINC), the nearest located to the southeast being Merthyr Common South (SINC 4), Glynmil (SINC 5) and Merthyr Common South (SINC 24).

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There are also records for a range of priority and protected species including, but not limited to bats, birds, invertebrates, Great Crested Newts, Hedgehogs, Otters, reptiles and Devil's Bit Scabious (larval food plant of Marsh Fritillary Butterfly).

Policy EnW1 sets out the requirement for proposals to promote the resilience of ecosystems. In particular, proposals are required to maintain and enhance biodiversity interests unless it can be demonstrated that the 'need' for the development clearly outweighs the biodiversity value of the site, and; the impacts of the development can be satisfactorily mitigated and acceptably managed. It should be demonstrated, as part of the planning application, what measures have been taken to avoid an adverse impact on biodiversity and what mitigation measures will be undertaken to minimise those impacts. It is nearly always possible to provide biodiversity enhancements on development sites. The level of enhancement should be commensurate with the level of adverse impact and the scale of the development.

In the first instance, it has been advised by our Ecologist that a Preliminary Ecological Appraisal (PEA) of the site be undertaken. The results of the PEA will inform whether further surveys are required and establish the need for and extent of any mitigation or compensation measures. Notwithstanding this, it has been noted by our Ecologist that it is likely that the following further survey work would be requested:

- Phase 2 NVC level assessment of the onsite habitat
- Full Invertebrate survey
- Bat activity transect surveys coupled with automated/static activity surveys
- Reptile presence or likely absence survey
- Breeding bird survey

The site is expected to be valuable to foraging and commuting bats and therefore external lighting will likely be a major consideration to maintain dark corridors and minimise the impact on nocturnal species.

Local amenity

The proposed development would be situated in close proximity to a number of residential properties located on the opposite side of Goatmill Road, including Incline Top to the west and Bradley Gardens to the southwest. Some of these properties would be within approximately 20m of the boundaries to the site and close to the southern roundabout, which would serve the development. There appears to be adequate room within the site to ensure that there is sufficient separation between the proposed industrial units and the neighbouring properties to avoid any adverse overbearing impacts. The retention of the landscaping along the western boundary of the site would also help to reduce any significant visual impacts when viewed from the residential areas.

However, due to the scale and nature of the development in close proximity to these properties, it will be necessary to fully consider the potential impacts on residential amenity in terms of noise and disturbance, during both the construction and operational phases of the development. In this regard, it is understood that the plant at the recycling facility would operate continuously 24 hours per day and 7 days a week, while the external operations, which includes the delivery and dispatching of plastics, would be restricted to hours during the day (i.e. 06:00 to 18:00). To assess the potential impacts, Environmental Health have requested that a Noise Assessment be carried out. As part of this, consideration should also be given to the potential disturbance that may be caused by traffic movements, including other nuisance sounds, such as beeping from forklift trucks or idle running engines. It was suggested in the meeting that a system could be set up where staff enter/exit the site from the northern entrance (away from residential properties, particularly in the night) and that delivery vehicles may enter the site from the north and exit from the southern entrance.

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It would be helpful as part of the application if an Operational Management Plan for the external area could be provided setting out the traffic management and any other measures that may be put in place to ensure minimal disturbance to nearby residents. Additionally, details of the proposed external lighting should be provided, together with a Lux Lighting Plan, to help assess any potential lighting effects on the neighbouring properties. This could link into the ecological assessment, for example the need to maintain dark corridors for nocturnal mammals.

It has been requested by Environmental Health that an Air Quality Assessment be carried out. However, it is understood from the meeting that there are no flues/emissions associated with the plastic recycling processes. Therefore, such an assessment would appear to be unnecessary. However, it would be appropriate to provide a Construction Management Plan, which would address matters such as dust during the construction phase.

Transport considerations

There are two points of access via separate roundabouts at the northern and southern parts of the site that form part of Goatmill Road. The northern access would be along a spur road that serves other nearby industrial units and extends over an existing watercourse. The southern access would be directly off the junction to the roundabout. The existing highway already serves a number of industrial uses and is of an adequate standard to accommodate heavy goods vehicles, with good links to the A470 and the A465 (Heads of Valleys) via the link road (A4060) to the south. It is anticipated that the existing highway can suitably accommodate the likely traffic generated by the development. However, given the scale of the development, it would be appropriate for a Transport Assessment to be submitted with the planning application so that the potential highway implications can be fully considered.

The final layout of the scheme will likely be informed by the constraints of the site, pending further survey work and consideration of the potential impacts on the surrounding area. Notwithstanding this, there appears to be adequate room within the site to accommodate the necessary traffic movements and to ensure vehicles enter the highway in a forward gear. As part of the application full details of the access arrangements should be provided, including a plan of the traffic circulation within the site, visibility splays onto the highway, tracking details to ensure appropriate turning areas are provided and details of the gradients where there are any notable changes in levels. Furthermore, the weighbridge should be suitably positioned so not to cause any tailback onto the highway.

In terms of the necessary on-site parking provision, the CSS Wales Parking Standards 2008 sets out the requirements for 'Industry' and 'Industrial Warehousing' in edge of town locations (Zone 4). In this instance, it is considered that the proposal primarily falls within the 'Industry' development type, with elements of storage and offices. As such, the guidance suggests that a minimum of 2100m² of service yard space (10% of Gross Floor Area) should be provided as part of the operational area. Additionally, one parking space per 120m² would be required, which would equate to approximately 177 spaces. It is understood from the pre-application submission that the proposal would create approximately 120 full time jobs, with staff working in shifts, which suggests that there could be an over-supply of parking. In this respect, the proposal only seeks to provide 40-50 parking spaces, which is considerably lower than that advised in the parking guidance. As part of the application, appropriate justification should be provided to demonstrate that adequate parking could be wholly accommodated within the site that reflects the operations of the development.

Policy SW12 of the Replacement LDP states that development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport. Development that encourages a modal shift towards sustainable transport will also be supported, including enhancements of pedestrian, cycle, rail and bus facilities, in addition to any necessary road improvements.

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It is advised that a Travel Plan should be submitted with any planning application setting out the measures that can be employed to encourage sustainable transport. This may include a mixture of initiatives, for example, the provision of cycling facilities, a car share scheme and staff information relating to public transport routes/times etc.

Environmental impacts

The proposed site lies within an area identified by The Coal Authority to be at high risk from past coal mining activities, which may have some implications on the ground stability. As such, a Coal Mining Risk Assessment should be submitted with the planning application, at which time The Coal Authority will then be consulted for their advice. Furthermore, given the history of the site, it has been noted by Environmental Health that there is potential for the land to be contaminated, which will need to be investigated further. In this regard, it is noted that you intend to carry out a Geo-technical Assessment of the site.

The presence of Japanese Knotweed is evident in the southern part of the site, near the location of the proposed lagoon. Therefore, it is advised that a survey of the site be carried out to identify the locations of any invasive species and for a strategy to be submitted with the application setting out the method for its eradication.

The proposed drainage scheme for the development would be subject to a separate SAB application, the approval of which would be independent of any planning permission. Notwithstanding this, it would be appropriate for a Drainage Strategy to be submitted with the planning application setting out the various options explored and the approach to be taken. In this respect it is noted that a considerable area of hardsurfacing would be introduced to the site, which is likely to have a significant impact on surface water drainage. It is noted that you intend to provide a surface water lagoon, which is presumed to enable some water to be attenuated before being discharged in to the nearby watercourses. In the meeting it was noted that the lagoon also provides a potential water source that can be used in the event of any fires.

The proposed drainage strategy should set out the measures that would be put in place to ensure any water entering/leaving the lagoon is not contaminated, for example the use of interceptors to avoid oil/petrol entering the water environment. The capacity for the existing watercourse to accommodate the surface water from the site should be fully considered. In this regard, it should be noted that the watercourse in the southern part of the site forms part of the Ffos Y Fan reclamation scheme. As such, any calculations will need to take into account the anticipated increase in water flow following the completion of Ffos Y Fan in 2024 and any potential impacts this may have further downstream.

Application details

If you intend to submit a planning application, you will need to submit the following information:

- A fully completed application form and relevant ownership certificates (this can be found on the Council's web site www.merthyr.gov.uk)
- A site location plan (scale of 1:1250) which clearly identifies the application site (outlined in red) within the surrounding area and includes a north arrow.
- Detailed drawings (to a suitable scale) illustrating the development including site layout, landscaping plan, elevations, floor plans and existing/proposed section details.
- Any supporting assessments/survey information, to include both the assessments identified in the pre-application submission and those specified above.

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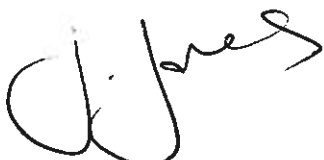
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- The appropriate planning fee would be calculated based on the gross floor space of the proposed buildings, including any mezzanines (measured to the exterior of the buildings), at £380 per 75m² or part thereof.

Conclusions

The principle of developing the site to accommodate a plastic recycling facility is deemed to be acceptable in principle. A number of key areas have been identified above that require further assessment to ensure proper consideration of the potential impact of the development on the surrounding environment, which will help inform and enhance the final design of the scheme. The above advice is made at an officer level and would therefore not prejudice any decision that may be made in the future by the Council. I trust the above is of assistance and self-explanatory. If you need to discuss this further please do not hesitate to contact David Cross.

Yours sincerely



JUDITH JONES

CHIEF OFFICER PLANNING & NEIGHBOURHOOD SERVICES

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