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Croesawn alwadau yn y Gymraeg
We welcome calls in Welsh



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

f.a.o. Mr David Baker
Sirius Planning Ltd

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

Dyddiad/Date: 25th February 2020

Ein Cyf / Our ref: DAC/Screening Req/Op 2020
Eich Cyf / Your ref:

Gofynnwch am / Please ask for: David Cross
Llinell Uniongyrchol / Direct Line: 01685 724632
e-bost / e-mail: David.cross@merthyr.gov.uk

Dear Sir

**RE: SCREENING OPINION – PROPOSED PLASTIC RECYCLING FACILITY ON LAND OFF
GOATMILL ROAD, DOWLAIS.**

I refer to your email received on the 3rd February 2020 regarding the above mentioned proposal.

I have attached this Council's screening opinion, which concludes that an Environmental Impact Assessment (EIA) is not required.

If you have any further queries on this matter do not hesitate to contact David Cross on the above details.

Yours faithfully

JUDITH JONES
CHIEF OFFICER PLANNING & NEIGHBOURHOOD SERVICES

Merthyr Tudful
... lle i fod yn falch ohono

Merthyr Tydfil
... a place to be proud of

Croesawn ohebu yn Gymraeg a fydd gohebu yn y Gymraeg ddim yn arwain at oedi. Rhwch wybod inni beth yw'ch dewis iaith e.e Cymraeg neu'n ddwyieithog.
We welcome correspondence in Welsh and corresponding with us in Welsh will not lead to a delay. Let us know your language choice if Welsh or bilingual.

TOWN AND COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT)
(WALES) REGULATIONS 2017

PROPOSED PLASTICS RECYCLING AND PROCESSING FACILITY
ON LAND OFF GOATMILL ROAD, DOWLAIS, MERTHYR TYDFIL

SCREENING OPINION

A formal Screening Opinion has been sought by Sirius Planning on behalf of Jayplas in relation to a proposed plastics recycling facility with associated external storage area, which would provide a closed loop cycle and sustainable approach to materials management.

Given the nature and scale of the development, which would essentially result in the expansion of the Goatmill Road Industrial Estate, the proposal is considered to fall within Category *10(a) industrial estate development projects* of the 2017 Regulations. The site area would measure approximately 22 hectares with the development area covering 11.5 hectares. Therefore, the proposal would exceed the applicable threshold for EIA development of 5 hectares.

The screening opinion has taken into consideration the characteristics of the development, having particular regard to the criteria set out in paragraphs (a) to (g) of Section 1 of Schedule 3 of the 2017 Regulations.

Consideration has also been given to the environmental sensitivity of the site and the potential impacts the proposal would have on the site itself, or any area likely to be affected by the development, with regard to the matters set out in Section 2 of Schedule 3 of the 2017 Regulations.

The potential significant effects of the development have also been considered with particular regard to the matters set out in paragraphs (a) to (h) in Section 3 of Schedule 3 of the 2017 Regulations.

Below sets out the Screening assessment:

Characteristics of the development	
(a) The size and design of the development	The site area would be approx. 22 hectares with the development carried out over an area of land of approx. 11.5 hectares. The site has been subjected to past historical development, including Dowalis Great White Tip associated with the Dowlais Iron Works. The proposal would comprise two industrial buildings totalling circa 20,000sqm, which would accommodate plant equipment for the

	processing/recycling of plastic materials. The maximum height of the buildings would be 13m. It is anticipated that approx. 150,000 tonnes of plastic materials would be processed per annum. An external concrete hardstanding area would be constructed across the majority of the land to be developed and would be utilised for the storage of baled plastics. Associated infrastructure would include the provision of a car parking area for 40-50 vehicles, a weighbridge, a combined heat and power system, fire water storage tanks, a surface water attenuation area and external landscaping works.
(b) The accumulation with other existing development and/or approved development	The development would essentially form an expansion (to the south) of the existing Goatmill Road Industrial Estate, which accommodates a number of industrial uses that generally fall within the B2 and B8 Use Classes. Permission (P/17/0283) has been granted for an office building and 9 industrial units on land to the north of the site. This would reinforce the expansion of the industrial estate and would link well with the proposed development.
(c) The use of natural resources, in particular land, soil, water and biodiversity	A surface water attenuation area would be provided possibly in the form of a small lagoon to support a sustainable drainage scheme.
(d) The production of waste	Welfare facilities would be provided in each of the industrial units. Water is utilised in the processing of plastic material and would part of combined heat and power unit.
(e) Pollution and nuisances	The development would increase the potential for fuel/oil leaks across the site on the hardstanding areas and car park, which has the potential to leach into nearby water courses. There would be an increase in vehicle emissions, particularly from delivery lorries and forklifts in the service yard areas. There would be potential for additional noise and disturbance in the area arising from the operations of the recycling facility, which may continue into the evening, particularly given its 24 hour use. This has the potential to cause

	adverse impacts on residential properties in close proximity to the site.
(f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge	The development does not include the use of hazardous materials or involve any operations that may otherwise indicate the potential for major accidents and/or disasters. There are risks associated with the storage of baled plastics, which can present a potential fire hazard. Fire water storage tanks would be provided on site.
(g) The risk to human health (for example due to water contamination or air pollution)	An increase in vehicular traffic may have a slight impact on air quality in the area. However this is not likely to pose a risk to human health.
Location of development	
(a) The existing and approved land use	The site comprises an area of land that has been subjected to past historical development, which has since been reclaimed and landscaped. The site does not benefit from planning permission and is currently used informally for recreational purposes. However, the site is allocated for employment/industrial use in the Replacement LDP 2016-2031. It is also identified as a suitable site for waste management facilities.
(b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground	The site consists of reclaimed, compacted, blast furnace slag, which has remained undisturbed for a period of more than 20 years. It is nutrient-poor and of high pH which may contain heavy metals as part of its make-up. It may therefore qualify as Calaminarian grassland, being an uncommon habitat type found in the north and west of GB. The onsite habitat may also be classified as 'Open Mosaic Habitat on Previously Developed Land' – a Section 7 Priority Habitat as specified under the Environment (Wales) Act 2016. There are seven Sites of Importance for Nature Conservation (SINCs) within 2km of the site. They are found to the north, west and south of the site. The site may represent an important stepping-stone habitat for certain species. Six out of the seven SINC sites have records of devil's bit scabious (the larval food plant of the Marsh Fritillary butterfly). The onsite habitat may therefore be important for maintenance of the Marsh Fritillary butterfly metapopulation.

	There are records for a range of priority and protected species within 2km of the site including, but not limited to bats, birds, invertebrates, great crested newt, hedgehog, otter, reptiles, devil's bit scabious. The existing watercourses crossing the site link to the Ffos Y Fran open cast mine and form part of its restoration strategy. The ground conditions also likely impede the drainage within the site, which would require some form of attenuation to avoid exceeding the capacity of existing watercourses.
(c) The absorption capacity of the natural environment, paying particular attention to the following areas: i. Wetlands ii. Coastal zones and the marine environment iii. Mountain and forest areas iv. Nature reserves and parks v. European sites and other areas classified or protected under national legislation vi. Area in which there has already been a failure to meet environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered there is such a failure vii. Densely populated areas viii. Landscapes and sites of historical, cultural or archaeological significance	The site in the main comprises a large flat grassed area with a steep embankment and woodland along the eastern boundary of the site that slopes up to the A4060. The embankment was planted with pioneer species at the time of the reclamation of the site in 1998. Whilst this woodland is superficial (i.e. will never make a lasting woodland in its current form) it does provide an important amenity landscape and backdrop to the development. Due to the open nature of the site, the development would likely be visually prominent, particularly from the north and south where the site is more exposed. The topography of the site would likely limit the views of the development from the east. The existing woodland along the western boundary of the site would likely provide some screening of the development in the immediate vicinity. The scale of the buildings and associated structures, hardstanding areas and external storage would likely result in a significant change to the local landscape character/quality. The development would be seen within the context of a built environment, with an established industrial estate to the north and residential properties to the west and south. These areas are interspersed with green open spaces and woodland environments. There is potential capacity for the development to be accommodated within the landscape, without significant impacts on the wider surroundings. The development would be largely bound by existing surrounding development and naturally curtailed within the settlement limits by the woodland area and A4060 to the east.

Types and characteristics of the potential impact	
(a) The magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)	Whilst the proposed site area would measure 22 hectares, the land to be developed would measure approximately 11.5 hectares. The woodland areas along the boundaries and a portion of land in the northern and southern parts of the site would be retained as part of the development. However, it is highly likely that the area of land to be developed would result in the loss of a significant proportion of grassland which may be of ecological value. Due to the relatively enclosed nature of the site, the landscape character and visual impacts are likely to be limited to the local surroundings and to a lesser extent long distant views across the site from the north, west and south. The potential impact on residential amenity, in terms of noise and disturbance, would likely affect a small number of properties closest to the site, adjacent to Goatmill Road.
(b) The nature of the impact	The introduction of large industrial buildings with associated hardstanding and car parking would inevitably mean the permanent loss of the current onsite grassland habitat. The provision of a significant hardstanding area and car park will likely increase the rate of surface water runoff and increase the potential for leaching of oils/fuel into nearby watercourses. The use of external lighting across the site may have implications for nocturnal species. In the absence of any ecological surveys of the site, there is potential for direct and indirect impacts on a variety of protected species, through the loss of habitats and the increased activity, lighting and pollution levels. The 24 hour operation of the recycling facility has the potential to increase the level of noise and disturbance at unsocial hours i.e. traffic movements to and from the site or around the external storage areas, running engine noises and reversing beeps etc. The development would greatly alter the open landscape character/quality of the site. It would separate the woodland area on the eastern

	embankment from the wider network of open spaces to the west and would restrict the north/south connectivity along established trails crossing the site. Given the historical nature of the site in association with the Dowalis Great White Tip and past iron workings, there is potential for the land to be contaminated and areas at risk to ground stability issues.
(c) The transboundary nature of the impact	Due to the location of the development, there are unlikely to be any transboundary impacts.
(d) The intensity and complexity of the impact	The direct impacts of the proposal on habitats and species within the site could be adequately identified and quantified through appropriate ecological survey work. The ability to offset the indirect impacts (e.g. Marsh Fritillary) would add to the complexity of any assessment. Due to the size of the site, there may be scope to provide mitigation/compensation for the direct and indirect impacts. Given the scale of the development, there would likely to be a significant and notable change in landscape character and visual amenity, particularly along existing trails and from key vantage points. Given the proximity of the site adjacent to Goatmill Road Industrial Estate, the topography and existing landscaping, which help screen the site, the potential landscape impacts are not deemed to be particularly complex. An appropriate Landscape and Visual Impact Assessment would help to inform the design and layout of the scheme and identify key areas for proposed landscaping works. The site has been subjected to past remediation works. As such, the potential impacts relating to land contamination or ground stability issues are not anticipated to be complex. Similarly, the nature of the potential impacts on residential amenity are not deemed to be particularly complex. There would be some complexities/uncertainty in relation to the potential impact on the existing watercourse and its capacity to accommodate the development and the water runoff from the Ffos Y Fran site in the future, following the completion of the restoration scheme.

(e) The probability of the impact	Although some of the impacts of the proposal may be minimised through the design of the development, there would inevitably be a physical change to the landscape character and visual amenity. There would likely be a reduction in the ecological value of the area. In the absence of any proposed mitigation/compensation measures, the development would highly likely have a direct impact on species and habitats within the site. The development would also result in a permanent loss of open grassland. The site lies within an area identified by The Coal Authority to be at high risk to past coal mining activities. Together with the historical use of the site in association with the Dowlais Iron Works, there are likely to be constraints with the ground conditions that need to be remediated. Appropriate measures could be put in place to minimise pollution and any impacts on the water environment. The provision of a lagoon would help further reduce any likely effects. The development would likely result in an increase in the level of industrial activity in the area. The potential for adverse noise and disturbance will likely depend on the location of the external activities relative to the residential properties.
(f) The expected onset, duration, frequency and reversibility of the impact	The development of the site would have a permanent impact on the landscape character and visual amenity. Due to the scale of the proposal, it would be difficult to reverse this impact. There would be an immediate impact on species and habitats within the main area to be developed. Additionally, there may be a temporary loss of grassland in parts of the site that are used during the construction phase i.e. parking, storage of materials and site offices etc. The remaining parts of the site, which are to be retained as existing, would likely experience some indirect disturbance during the construction phase, as a result of the heightened activity. This is likely to continue during the operational phase of the development to a lesser extent.

	There would likely be greater noise and disturbance during the construction phase of the development.
(g) The cumulation of the impact with the impact of other existing and/or approved development	The drainage strategy for the site should have regard to the future restoration of the Ffos Y Fran open cast mine, which would utilise the existing watercourses crossing the site. There is potential for cumulative impacts that may result in the capacity of the watercourses to be exceeded within the site and further downstream.
(h) The possibility of effectively reducing the impact	The impacts on the landscape character and visual amenity can be minimised through the provision of additional screen/buffer planting within the site and along the boundaries. The effectiveness of this planting would also improve over time as the planting matures. The site is of a sufficient size to accommodate a lagoon to assist in attenuating surface water. There would also be scope to improve the capacity of the existing watercourses. There are likely to be areas within the site where some of the ecological impacts could be off-set, together with the potential for new habitat environments to be created or existing habitats to be enhanced. A lighting strategy would help minimise impacts on nocturnal species. It has been suggested in the screening request that a comprehensive suite of environmental assessments would be undertaken to identify the potential impacts and appropriate mitigation/compensation measures. Impacts on residential amenity could be minimised through the design of the development. Controls could also be put in place to manage the construction and operational hours of the development.

Having regard to the scale and nature of the proposed development, there are a number of likely potential adverse impacts on the landscape, ecology, residential amenity, the water environment and ground conditions. However, having considered the likely significance and complexity of the effects of the development on the environment, it is concluded that an Environmental Impact Assessment is not required for the proposed recycling facility.