

WASTE PLANNING ASSESSMENT: PROPOSED PLASTICS RECYCLING & PROCESSING FACILITY

GOATMILL ROAD | MERTHYR TYDFIL | CF48 3TD



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1. INTRODUCTION

1.1 THE PROPOSAL

- 1.1.1 Jayplas, a trading name of J & A Young (Leicester) Ltd, is seeking planning permission to construct and operate a plastics recycling and processing facility on land off Goat Mill Road, Merthyr Tydfil.
- 1.1.2 The proposal will include two industrial warehouse units with internal office accommodation which will be used for the recycling and processing of plastic materials, a reserved expansion area for a third warehouse unit, an external storage area, car parking, weighbridge, combined heat and power unit, surface water lagoon, lighting and landscaping.
- 1.1.3 The proposed site, when fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum. The proposal 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 facility will provide a closed loop cycle and sustainable approach to materials management which will help the transition to a zero-waste economy for Wales.

1.2 WASTE PLANNING ASSESSMENT

- 1.2.1 This Waste Planning Assessment has been prepared by Sirius Planning to demonstrate how the proposals at Goat Mill Road will contribute towards meeting Wales' overriding objectives for dealing with waste. This assessment has been completed in accordance with Technical Advice Note 21: Waste.
- 1.2.2 The report is structured as follows:
- **Section 1:** Introduction;
 - **Section 2:** Outlines relevant policy and waste management guidance;
 - **Section 3:** Details of the development; and
 - **Section 4:** A signed declaration



2. WASTE POLICY STATEMENT

2.2 NATIONAL PLANNING POLICY

Planning Policy Wales Edition 11

- 2.2.1 Planning Policy Wales (PPW) published in February 2021, sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs) and Welsh Government Circulars which together with PPW provide the national planning policy framework for Wales.
- 2.2.2 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...”*.
- 2.2.3 Figure 2.1 below is extracted from PPW and shows the Waste Hierarchy

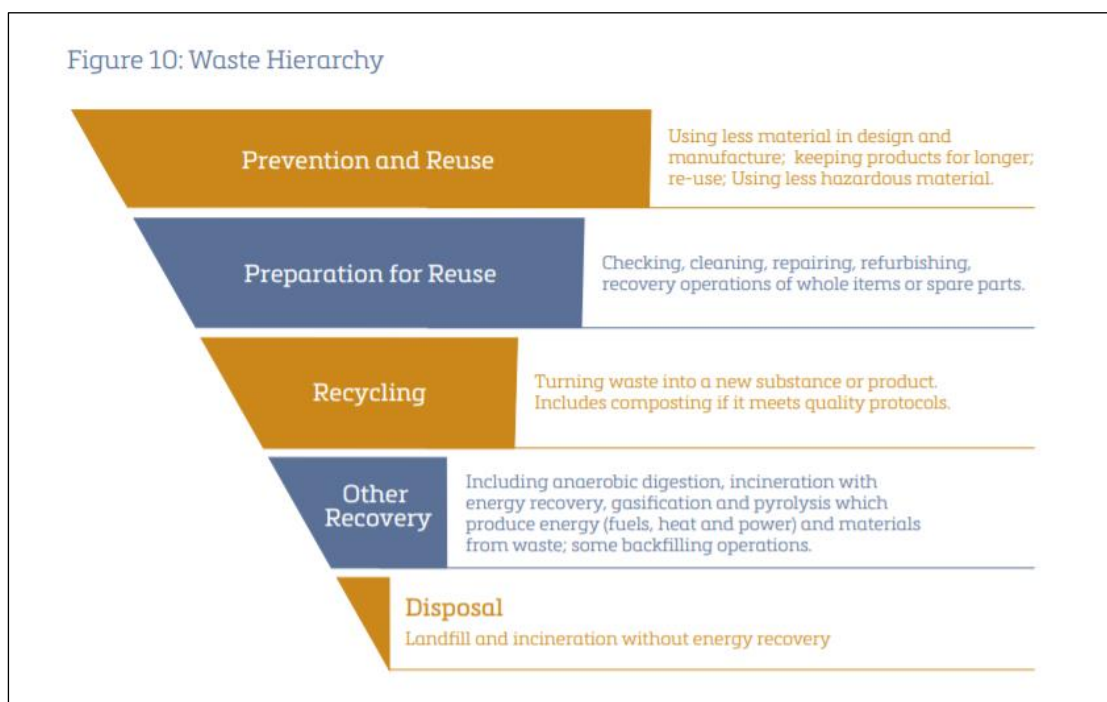


Figure 2.1: Waste Hierarchy (PPW, page 104)

- 2.2.4 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”*.
- 2.2.5 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”*.

Technical Advice Note 21 Waste

- 2.2.6 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.

- 2.2.7 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”*.

Towards Zero Waste 2010

- 2.2.8 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.
- 2.2.9 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.
- 2.2.10 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.”*

2.3 LOCAL PLANNING POLICY

Merthyr Tydfil Replacement Local Development Plan

- 2.3.1 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.
- 2.3.2 Policy EcW14 refers to waste facilities and states that:
- “Waste treatment facilities will only be permitted where:*
1. *There is an identified need;*
 2. *They are situated in locations where they would not have significant adverse effect on amenity of the environment;*
 3. *They accord with the waste hierarchy and the proximity principle;*
 4. *They provide comprehensive restoration and aftercare of the land for a beneficial re-use, where appropriate; and*
 5. *They provide a Waste Planning Assessment.*

The following locations are identified as preferred areas of search for waste management facilities:

- Goat Mill Road...”.

2.3.3 A full assessment of the acceptability of the proposal in line with both national and local planning policies is contained within Chapter 5 of the Planning Statement.

2.4 ASSESSMENT

Description of how the proposals will contribute to the relevant provisions of ‘Toward Zero Waste’ and the Collections, Infrastructure and Markets Sector Plan

2.4.1 The proposed development will accept and process c. 150,000 tonnes of plastic materials per annum. The proposal will contribute to the Zero Waste Strategy through the facilities objective of recovering value from plastic materials destined for landfill and thus reducing the amount of waste being disposed by landfill.

2.4.2 The facility will increase the amount and types of recyclable material that can be processed and moved up the waste hierarchy which is fundamental to the aims of the Waste Strategy. The closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy.

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

2.4.4 It is considered that the proposed plastics recycling and processing facility will significantly contribute to recycling in Wales and Merthyr Tydfil progressing towards zero waste targets. As a result, it is considered that the proposal forms a sustainable part of the established Waste Hierarchy.

Statement of compliance with policy related to need & location requirements & calculation of existing and projected future demand

2.4.5 Paragraph 6.7.120 of the Replacement Local Development Plan states that *“The need for further waste facilities will be informed by Welsh Government’s waste management goals set out in ‘Towards Zero Waste’ and the Collections, Infrastructure and Market Sector Plan”*.

2.4.6 Paragraph 6.7.122 of the Replacement Local Development Plan goes on to state that *“In a manner that follows the waste hierarchy established in national policy (which seeks to maximise the reduction of waste in the first place and thereafter reusing, recovering and recycling options before the disposal of waste material is considered) the Plan must:*

1. *Support sustainable collection and recycling methods for Municipal Waste by maintaining and improving an integrated network of facilities in the County Borough.*
2. *Facilitate an integrated network of commercial and industrial sustainable waste management facilities consistent with the needs of the South-East Wales area”*.

2.4.7 The latest Waste Planning Monitoring Report for South-East Wales is the 2016 report. Paragraph 2.3.2 of the report states that the region, on average, fell slightly short of the recycling targets in 2014/15.

2.4.8 ‘Beyond Recycling – A strategy to make the circular economy in Wales a reality’ was published in 2021 and includes the aim of building on Wales’s recycling record. Figure 2.2 overleaf illustrates the target trajectory for 100% recycling rates by 2050.

2.4.9 The strategy states that Wales’s municipal waste recycling rate was 65.14% in 2019-2020 which exceeded the 64% statutory target. The recycling rate for industrial and commercial waste was 67% in 2018 (Beyond recycling, page 22). The zero-waste target by 2050 would effectively mean a 100% recycling or preparation for re-use rate from all sectors.

2.4.10 Key actions set out in the beyond recycling strategy include to *“develop additional infrastructure to*

collect and recycle household materials not currently widely recycled such as...plastic film, rigid non-packaging plastics...", to *"Invest in handling, sorting and reprocessing infrastructure in order to address priority materials including ... plastics"* and to *"work with the private sector to improve the processing capacity within Wales..."*. It is considered that the proposed plastics recycling and processing facility on land off Goat Mill Road will increase the amount of waste that can be reused, recycled or recovered in the region, in line with the requirements of the waste hierarchy and help to achieve the 100% recycling target rates

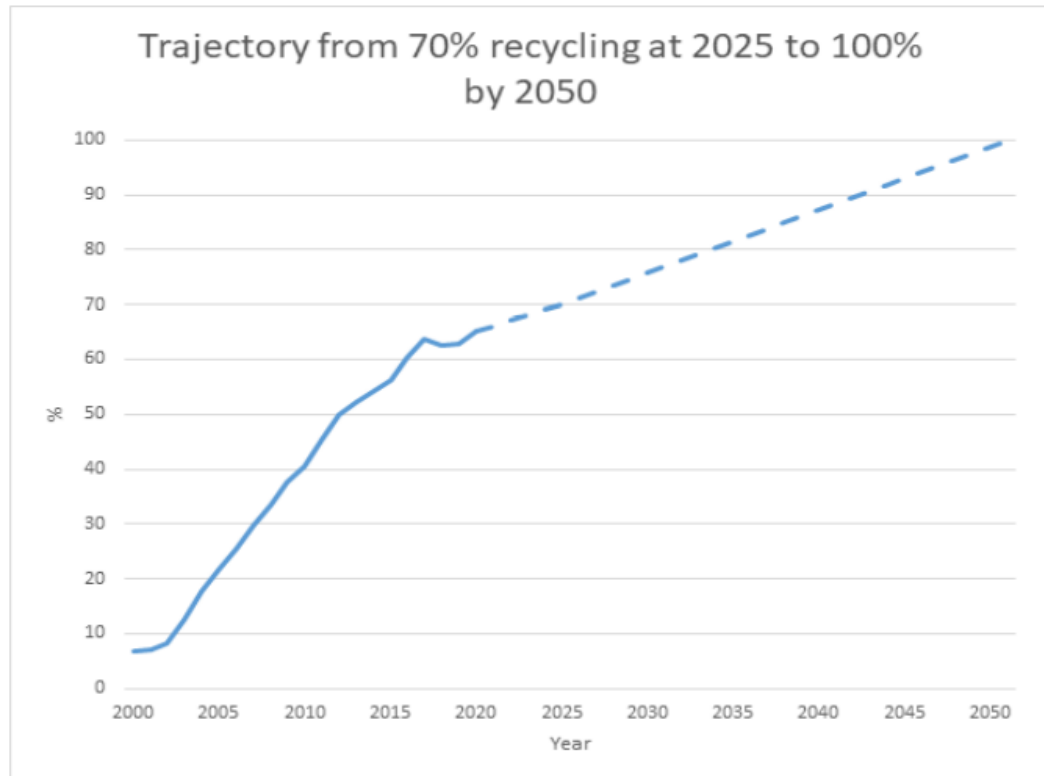


Figure 2.2: Trajectory for recycling (Beyond recycling, page 23)

- 2.4.11 The application site is located within the settlement limits of Merthyr Tydfil and is allocated as an employment site (ref. EW1.2) under the adopted Local Development Plan. Policy EcW14 of the adopted plan states that land at Goat Mill Road is identified as a preferred area of search for waste management facilities.
- 2.4.12 The site is located on previously disturbed land which is currently vacant 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.
- 2.4.13 In addition, due to the sites close proximity to one of the primary routes serving the area (A4060), together with being within east access to the M4, the application site is positioned in a sustainable location to serve both the local and regional markets.

Identify the markets that will be served by the proposed development

- 2.4.14 The Applicant, 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. Jayplas currently operate nine recycling and recycled product manufacturing sites across the UK.
- 2.4.15 The waste rigid plastics and film from the commercial, industrial and the public sector markets will be accepted to recycle and process and returned to the market in a re-useable form.

Description of the consultation undertaken by the applicant

- 2.4.16 The proposals have been subject to statutory pre-application consultation which took the form of:
- Erecting site notices up near to the site;
 - Notifying those adjacent landowners to the site;
 - Notifying relevant Community Councils and Ward Members;
 - Notifying relevant statutory consultees; and
 - Project website containing information on the proposals, the draft planning application, ways to make comments / provide feedback on the proposals and details of the project team for any queries.
- 2.4.17 A pre-application consultation report describing the community engagement activities undertaken and summary of comments received accompanies the planning application at Appendix R.



3. DEVELOPMENT

- 3.1.1 The proposed development is for the installation and operation of a plastics recycling and processing facility and associated infrastructure. 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.
- 3.1.2 The facility consists of two individual warehouse units, with a potential expansion area for a third building, housing various plant and machinery equipment. The proposed buildings on site will house the following facilities / plants:

Phase 1

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

Phase 2

- A High-Density Polyethylene (HDPE) / Polypropylene (PP) wash plant to take separated rigids from the PRF, wash clean and produce HDPE/PP granules;
 - A Polyethylene Terephthalate (PET) wash plant to take separated PET and from PRF, wash, clean and produce recycled PET flake ready for use in food and non-food grade products;
 - A Low-Density Polyethylene (LDPE) wash plant to take separated film, wash, clean and produce LDPE granules;
 - An extrusion and print plant turning LDPE granules into items such as 'Bags for Life'.
- 3.1.3 A full description of the proposed development and facilities process is presented in Chapter 3 of the accompanying Planning Statement.

3.2 TIMESCALES

- 3.2.1 The proposal will have no 'stop-date' in terms of its projected lifespan.
- 3.2.2 It is planned that the site layout will allow for a phased development of the site from the northern most building (Building 1) to the southern most building (Building 2). In addition, a future expansion area has been illustrated on the proposed site masterplan for a potential third building if the market requires in the future. In the meantime, this area will be used as additional external storage when necessary.
- 3.2.3 The facilities plant and internal operations will operate on a 24-hour basis, 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:

Monday – Friday	06:00 to 18:00; and
Saturday	06:00 to 13:00

3.3 TYPES AND QUANTITIES OF WASTE TO BE MANAGED

- 3.3.1 The proposed site, when fully operational, will accept and process c.150,000 tonnes of plastic materials per annum. Waste rigid plastics and film from commercial, industrial and the public sector will be accepted to recycle and process.
- 3.3.2 Processed materials are baled and either transported to another Jayplas or third-party site or sold onto the open market.

3.4 DESIGN AND LAYOUT

- 3.4.1 Full details of the proposal and its associated activities can be found in Chapter 3 of the accompanying Planning Statement. In addition, full details of the design and layout of the proposed facility are set out in the accompanying Design and Access Statement but have been briefly summarised below for ease of reference.

- The layout has been designed as per the operational requirements for the site such as process inputs and outputs, vehicle circulation and regulatory controls;
- As with most modern waste facilities, the waste processing operations are contained within buildings, thus offering greater controls over any potential negative impacts;
- The proposed site layout has been guided by detailed assessments and an extensive design iterative process has been undertaken to minimise impact and enable the incorporation of mitigation, where necessary, and enhancement;
- The proposal has been designed to maximise the footprint upon the existing disturbed land, thereby retaining these features to provide visual barriers and landscape structure;
- The site will be accessed via the two existing access points off Goat Mill Road;
- The proposed buildings are situated within the northern part of the site to be furthest away from the residential receptors to the south and west. In addition, the buildings have been positioned so that the front of the buildings face east, towards the storage yard in order to minimise any noise emissions associated with the movement of materials in and out of the buildings; and
- The storage yard has been laid out to enable vehicle manoeuvring areas and in accordance with fire prevention guidance.

3.5 AMENITY AND NOISE

- 3.5.1 The site is located on land allocated for employment use within the adopted Local Development Plan. The proposal is set within a context of existing warehouse industrial buildings to the north of the site. In addition, due to the retention of surrounding vegetation and tree cover bordering the site, it is considered that the proposed development would not lead to a characterising effect upon the local landscape. The numerous environmental and technical assessments accompanying the planning application demonstrate that the proposal would not have any adverse significant impacts on amenity of the environment.
- 3.5.2 A Lighting Assessment including an exterior lighting strategy plan is presented in Appendix O. 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 for outdoor working. Columns close to ecological sensitive areas have rear shields proposed to further reduce rear light spill.
- 3.5.3 A Noise Assessment accompanies the planning application, presented in Appendix K. The 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.
- 3.5.4 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. Odour monitoring will take place at the site and all facility personnel will be responsible for reporting any odour problems to the Site Manager. Full records will be kept with regards to any odour incidents that may occur in the site office. A complaints procedure will be followed for any complaints received at the facility or via the regulatory bodies, including Natural Resource Wales and the Local Planning Authority. Complaints will be recorded, and further monitoring and if necessary, mitigation measures will be implemented. Full details of odour monitoring and complaints procedures will be outlined in the

Environmental Permit.

- 3.5.5 Emissions to the atmosphere generated from the proposed operations of the facility is considered to be negligible.

3.6 AIR POLLUTION

- 3.6.1 An Air Quality Assessment accompanies the planning application, presented in Appendix M.
- 3.6.2 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. The Air Quality Assessment has shown that the air quality impacts of the proposal will be insignificant.
- 3.6.3 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.
- 3.6.4 The Air Quality Assessment has shown that the air quality impacts of the proposal will be insignificant.

3.7 ENERGY EFFICIENCY

- 3.7.1 A combined heat and power unit is proposed on site located between the two buildings. The CHP unit will 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. Indicative details of the CHP unit are provided in the Energy Statement presented in Appendix Q.



4. DECLARATION

- 4.1.1 This statement sets out how the waste hierarchy has been considered in developing the proposals currently forming this planning application.

Signed: F.Wray (Agent)

On behalf of: Jayplas (Applicant)

Date: February 2022

