

# PRE-APPLICATION CONSULTATION REPORT: PROPOSED PLASTICS RECYCLING & PROCESSING FACILITY

GOATMILL ROAD | MERTHYR TYDFIL | CF48 3TD



**PREPARED BY**



Sirius Planning | 4245 Park Approach |  
Thorpe Park | Leeds | LS15 8GB

**PREPARED FOR**



Jayplas | Unit 15 |  
Saxon Way East | Oakley Hay Industrial Estate |  
Corby | NN18 9EX

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**WRITTEN & PREPARED BY**

Francesca Wray | Senior Planner

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**REVIEWED & APPROVED BY**

David Baker | Development Director

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**AUTHORISED BY**

*Sirius Planning*

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### APPENDIX SCHEDULE

| Appendix No. | Title                                                                                                  |
|--------------|--------------------------------------------------------------------------------------------------------|
| A            | Site Notices                                                                                           |
| B            | Copies of letters sent to Adjoining Landowners, Local Residents, Councillors and Specialist Consultees |
| C            | Consultation Area, Drawing No. JAY1001/18/01                                                           |
| D            | Specialist Consultee Responses                                                                         |



## 1. INTRODUCTION

## 1.1 INTRODUCTION

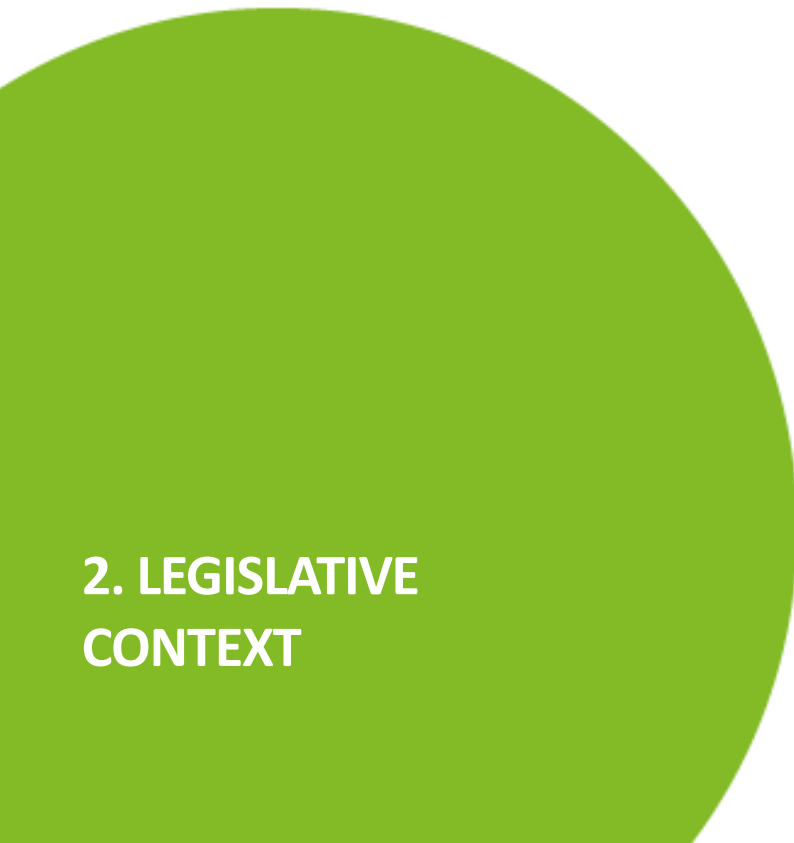
- 1.1.1 This Pre-Application Consultation Report has been prepared by Sirius Planning on behalf of Jayplas, a trading name of J & A Young (Leicester) Ltd, in support of an application for planning permission to construct and operate a Plastics Recycling and Processing Facility on land off Goat Mill Road in Merthyr Tydfil.

## 1.2 PROPOSED DEVELOPMENT

- 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 object of recovering value from materials destined for landfill and thus reducing the amount of waste being disposed by landfill.

## 1.3 PRE-APPLICATION CONSULTATION REPORT

- 1.3.1 This report summarises community engagement activity undertaken prior to the submission of the proposed Plastics Recycling and Processing Facility on land off Goat Mill Road in Merthyr Tydfil.
- 1.3.2 The report is structured as follows:
- **Section 1:** Introduction;
  - **Section 2:** Outlines relevant legislation for the pre-application consultation procedure;
  - **Section 3:** Sets out the consultation process undertaken; and
  - **Section 4:** Examines the feedback received.



## 2. LEGISLATIVE CONTEXT

## 2.1 INTRODUCTION

2.1.1 This section provides an overview and outline of legislative policy regarding public consultation.

## 2.2 LEGISLATIVE CONTEXT

2.2.1 With the introduction of the Town and County Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, the requirement to undertake pre-application consultation applies to all planning applications for 'major' development.

2.2.2 Major developments are defined as:

*"major development means development involving any one of more of the following:*

- 1. The winning and working of material of the use of land for mineral-working deposits;*
- 2. Waste development;*
- 3. The provision of dwellings where:*

*The number of dwellinghouses to be provided is 10 or more; or*

- i. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph;*
- ii. The provision of a building or buildings where the floor space to be created by the development is 1,000 square meters or more; or*

- 4. Development carried out on a site having an area of 1 hectare or more".*

2.2.3 Given the planning application area is larger than 1 hectare the proposal falls within the 'major' development category therefore pre-application consultation is required.

2.2.4 The guidance on pre-application consultation states that the developer must undertake the following publicity/consultation procedures:

- *"Display a site notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days before submitting the application for the proposed development;*
- *Write to the owner or occupier of any land adjoining the land to which the proposed application relates;*
- *Make the draft planning application information available publicly;*
- *Consult community and specialist consultees before applying for planning permission; and*
- *Submit a pre-application consultation report (PAC) as part of the planning application".*

2.2.5 Section 3 below sets out the pre-application process that was undertaken. It is considered that an appropriate level of pre-submission consultation has been undertaken with the local community.



### **3. COMMUNITY INVOLVEMENT**

### 3.1 APPROACH

- 3.1.1 Jayplas are committed to an open and honest dialogue and engagement with the local community and stakeholders regarding its development proposals. The main aims of the consultation activities undertaken were to inform the local community, elected representatives and interested parties about the proposals, and respond to feedback.

### 3.2 PRE-APPLICATION ENGAGEMENT

- 3.2.1 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. A screening request was sought in February 2020 confirming that given the scale and nature of the proposal the facility would not constitute 'EIA development', and therefore no Environmental Impact Assessment would be required. The Screening Opinion. A second pre-application request was sought from Merthyr Tydfil County Borough Council in October 2021 alongside the pre-application consultation regarding the detailed proposals including the full draft planning application documents. Pre-application advice (ref. PA/21/0063) was provided in November 2021.
- 3.2.2 In line with the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, the relevant procedures, outlined in paragraph 2.2.4 above, have been followed.
- 3.2.3 The formal pre-application consultation period ran from 18<sup>th</sup> October 2021 to 15<sup>th</sup> November 2021. Draft planning application documents were made publicly available online at <https://merthirtydfilplasticrecyclingfacility.wordpress.com/> for the full 28-day consultation period. Paper copies of the draft planning application documents were available to view in Dowlais Library and Merthyr Tydfil Central Library during this time.
- 3.2.4 The pre-application consultation period was published in the following ways:
- Site notices, in English and Welsh, providing details of the consultation website address, were put up at the site entrances and along Goat Mill Road.
  - Letters were sent, in English and Welsh, to the following adjoining land owners containing information on the proposal, a site location plan, the consultation website, a Schedule 1B form and contact details should they require further information or wish to make any comments:
    - Merthyr (South Wales) Limited
    - Merthyr Tydfil County Borough Council
  - Letters were sent, in English and Welsh, to surrounding local residents and business owners, as identified on the Consultation Areas Drawing (**JAY1001/18/01**) presented in **Appendix C**, containing information on the proposal, a site location plan, the consultation website, a Schedule 1B form and contact details should they require further information or wish to make any comments.
  - Emails were sent to the following Councillor's on 15<sup>th</sup> October 2021, containing letters in English and Welsh providing information on the proposals, a site location plan, the consultation website address, a Schedule 1B form and contact details should they require further information or wish to make any comments:
    - Councillor Julian Amos (Dowlais Ward)
    - Councillor David Hughes (Dowlais Ward)
    - Councillor Tony Rogers (Dowlais Ward)
    - Councillor Declan Sammon (Dowlais Ward)

- Councillor Andrew Barry (Town Ward)
  - Councillor David Jones (Town Ward)
  - Councillor Kevin O'Neill (Town Ward)
  - Councillor John Thomas (Town Ward)
  - Emails were sent to the following specialist consultees, as listed in Schedule 4, providing information on the proposals, a site location plan, the website address, a Schedule 1C form and contact details should they require further information or wish to make any comments:
    - Cadw
    - Glamorgan-Gwent Archaeological Trust (GGAT)
    - Health and Safety Executive
    - South Wales Fire & Rescue Service
    - The Coal Authority
    - The Natural Resources Body for Wales
    - Welsh Water
- 3.2.5 Copies of the site notices (with accompanying photographs) can be found within **Appendix A** and a copy of the letters sent to adjoining landowners, Councillors and specialist consultees can be found within **Appendix B**.



## 4. CONSULTATION RESPONSES

#### 4.1 INTRODUCTION

- 4.1.1 The aim of the consultation was to provide the local community with information and the opportunity to comment on the proposals. The feedback would identify any concerns that might otherwise have been missed and to make any further suggestions to improve the scheme.

#### 4.2 SUMMARY OF PUBLIC CONSULTATION FEEDBACK AND RESPONSES

- 4.2.1 The publication consultation exercise received 36 responses. Of the responses received, 4 were considered supportive and 16 objected to the proposal. The remaining number of respondents were considered neutral about the proposal but asked a range of questions relating to the proposed development and the planning application, all of which are explored below.

- 4.2.2 Table 4.1 below provides a summary of the comments and in response how the proposal will address the issues raised.

- 4.2.3 In summary, the key themes were:

- Concerns over impact on air quality;
- Queries on whether incineration was part of the process;
- Impact on local roads;
- Proposed operating hours;
- Lack of public consultation;
- Concerns over noise associated with the proposal;
- Queries on the process of recycling plastics;
- Queries regarding external plastic bales;
- Concerns over the risk of fire;
- Queries regarding the purpose and use of a surface water lagoon;
- Proximity principles and the availability of another site;
- Impact on local wildlife;
- Effects on green space;
- Local community benefits;
- Consideration towards dog walkers;
- Wales carbon footprint;
- Effects on neighbour amenity;
- Queries regarding construction;

- 4.2.4 Responses received after the 28-day response period have also been considered.

- 4.2.5 The comments identified in Table 4.1 have been considered and where appropriate addressed through the ongoing iterative design process.

Table 4.1 – Comments and the Applicant’s Response

| Consultation Comments Key Themes                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicant response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <p><b><u>Air Quality</u></b></p> <ul style="list-style-type: none"> <li>- Will air quality be affected?</li> <li>- Will there be air pollution caused from the proposal?</li> <li>- What are the air survey stats?</li> <li>- How is gas managed</li> <li>- How will odour be managed</li> <li>- Health concerns as a result from pollution</li> <li>- Vehicle (HGV) pollution</li> <li>- Dust issues</li> </ul>                                                | <p>As with most modern recycling facilities, the processing operations will be undertaken within buildings therefore offering greater controls over any potential negative impacts. The facility will operate subject to the conditions of an Environmental Permit regulated by Natural Resource Wales. These regulatory consents manage and permit the operations, to ensure that odour and dust nuisances will not impact on the local area.</p> <p>The only emissions generated by the development will be associated with the Combined Heat and Power Unit which will provide power and hot water to the buildings, and from traffic using the site.</p> <p>An Air Quality Assessment has been prepared to assess the effects of traffic generation and the Combined Heat and Power Unit. The assessment concludes that the air quality impacts of the proposal will be insignificant.</p>                                                    |
| <p><b><u>Incineration</u></b></p> <ul style="list-style-type: none"> <li>- Will there be an incineration on site?</li> <li>- Will the burning of plastics be part of the process?</li> <li>- Will there be smoke, emissions or fumes?</li> <li>- What pollutants will be emitted to the atmosphere?</li> </ul>                                                                                                                                                  | <p>The development is for a plastics recycling and processing facility. There will be no incineration or burning of plastic.</p> <p>The facility will be powered by a gas fed Combined Heat and Power (CHP) system, which is designed to produce high efficiency heat and electricity simultaneously. A flue stack is used to remove gas engine exhausts.</p> <p>The Combined Heat and Power Unit comprises a gas-powered combustion engine to generate electricity whilst also capturing useable heat that is produced in the recycling process, therefore negating vast amounts of heat being wasted. By generating heat and power simultaneously, the proposed Combined Heat and Power unit will reduce overall carbon emissions compared to the separate means of conventional generation via a boiler and power station.</p> <p>The Air Quality Assessment concludes that the air quality impacts of the proposal will be insignificant.</p> |
| <p><b><u>Traffic</u></b></p> <ul style="list-style-type: none"> <li>- Too much traffic already</li> <li>- How many vehicle movements?</li> <li>- What times will vehicles be coming to and from the site, will it be 24hr?</li> <li>- Where are the vehicles coming from?</li> <li>- Vehicles should only use the A4060</li> <li>- Concern over pollution from HGVs</li> <li>- Will any pedestrian safety / traffic calming measures be put in place</li> </ul> | <p>The site has been identified by Merthyr Tydfil CBC for employment uses given its prime location close to the A470, and direct connection to the local road network.</p> <p>Vehicle delivery movements will be over a 12-hour period between 06:00 and 18:00 Monday to Friday and 06:00 and 13:00 on Saturday. No deliveries are to be made on Sundays and Bank Holidays unless otherwise agreed with the Council.</p> <p>HGV’s will access the site off the A4060 which connects to the A470 to the south and the A465 to the north. The plastic materials will be sourced from local and regional, industrial and public sector markets.</p>                                                                                                                                                                                                                                                                                                  |

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|                                                                                                                                                                                                                                                                        | <p>A Transport Assessment has been prepared to assess the traffic generation impact from the proposal on the local highway network.</p> <p>The development will generate on average 10 HGV movements (two-way, 5 in and 5 out) per hour. Further details on anticipated vehicle movements can be found in the accompanying Transport Assessment.</p> <p>The Transport Assessment concludes that the proposed development is likely to have a modest, but acceptable traffic impact at the site access junctions. The increase in traffic flows at off-site junctions is considered to be negligible and is unlikely to have an adverse impact upon the operation of the local road network.</p> <p>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-</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b><u>Operating Hours</u></b></p> <ul style="list-style-type: none"> <li>- What are the proposed operating hours</li> </ul>                                                                                                                                         | <p>All plant and internal operations will be continuous, 24 hours per day, 7 days a week.</p> <p>External operations i.e. delivery and dispatch of plastics will be during daytime working hours. Monday – Friday 06:00 to 18:00 and Saturday 06:00 to 13:00.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b><u>Consultation</u></b></p> <ul style="list-style-type: none"> <li>- No consultation with residents</li> <li>- Will there be ongoing engagement with the community going forward?</li> <li>- Where are the planning documents held to view in person?</li> </ul> | <p>A Pre-Application Consultation (PAC) exercise took place between October and November 2021, which was a formal requirement, in advance of the planning application being submitted to Merthyr Tydfil County Borough Council, as the Local Planning Authority. This was undertaken to seek views of the local community to help inform the proposed development.</p> <p>The PAC consultation strategy and extent of the resident notification letter distribution area was agreed with the Planning Authority, prior to the consultation exercise. In addition, site notices advertising the PAC were erected around the proposal site, and the consultation was advertised on the Council's social media accounts.</p> <p>All information regarding the proposed development, including all the draft planning application documents, and detailed technical and environmental assessments were provided on the project website. Paper copies of the draft planning application documents were also made available to view in Dowlais Library and Merthyr Tydfil Central Library.</p> <p>The Local Planning Authority will conduct its own public consultation exercise with local residents, once the planning application has been formally submitted.</p> <p>Jayplas values the input of the local community and as such are keen to continue their discussions about the proposed development throughout the planning process.</p> |
| <p><b><u>Noise</u></b></p> <ul style="list-style-type: none"> <li>- What are the noise stats?</li> </ul>                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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| <ul style="list-style-type: none"> <li>- What noise will be associated with the process?</li> <li>- What measures are put in place to manage noise levels?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The recycling operations will take place within the two warehouse unit buildings, which will house the processing, segregation and washing plant equipment.</p> <p>External operations will be largely confined to the storage, loading and unloading of bales of plastic by forklift trucks and telehandlers.</p> <p>A Noise Assessment has been prepared to assess noise generation from the proposed development. Predicted noise levels from the operation of the proposed development and HGV and mobile plant movements, with appropriate mitigation measures, show that the site noise level would not exceed representative background sound levels. Therefore, no adverse impacts to surrounding residential receptors are anticipated.</p> <p>Proposed mitigation measures including an acoustic fence for the Combined Heat and Power Unit and roof cladding requirements for the two buildings are listed in the Noise Assessment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b><u>Plastics Recycling Process</u></b></p> <ul style="list-style-type: none"> <li>- How are plastics processed?</li> <li>- What is the life cycle process of the facility?</li> <li>- How are strands of plastics managed?</li> <li>- Are plastics washed before brought to site?</li> <li>- What fuels are used to power the process</li> <li>- Will a DMG system from Powerhouse Energy be used?</li> <li>- Does breaking down plastics include heat and chemicals?</li> <li>- Where does contamination of plastics run off to?</li> </ul> <p><b><u>Future development area</u></b></p> <ul style="list-style-type: none"> <li>- On the plan there is an area for future development marked out, what is this for?</li> </ul> | <p>Building 1 of the development includes a Plastic Recycling Facility (PRF) which will accept mixed ridged plastics. The PRF then separates and sorts the plastics into different types. Materials are then transferred to 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.</p> <p>Plastics are not washed before they are brought to site.<br/>If you are interested in a more detailed description of the process along with flow diagram of the process.</p> <p>The proposed Combined Heat and Power Unit will be used to provide power and hot water for the washing processes in Building 2. The unit comprises a gas-powered combustion engine to generate electricity whilst also capturing useable heat that is produced in the recycling process, therefore negating vast amounts of heat being wasted. By generating heat and power simultaneously, the proposed Combined Heat and Power unit will reduce overall carbon emissions compared to the separate means of conventional generation via a boiler and power station.</p> <p>As part of a detailed surface water drainage strategy, interceptors will be installed to stop any material flowing into the surface water lagoon and being discharged offsite.</p> <p>An expansion area has been illustrated on the proposed site masterplan for a potential third warehouse unit if market conditions dictate in the future. A separate planning application would be required for a third building. In the meantime, the future development area will be used for external bale storage until a third building is required.</p> |
| <p><b><u>External Plastic Bale Storage</u></b></p> <ul style="list-style-type: none"> <li>- On average, how long are plastic bales held on site for (both waste and recycled)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>The site will operate a quick turnover so bales of waste plastic will be swiftly processed and transported off site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <ul style="list-style-type: none"> <li>- How much/many plastic bales are held on site (both waste and recycled)</li> <li>- Is there an identified specific distance between externally stored bales</li> <li>- Are there measures in place to manage litter</li> </ul>                                                   | <p>The proposed site, when fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum. It is anticipated that the external storage area has the capacity to store around 15,360 tonnes which is equivalent to approximately with 65 storage bales.</p> <p>The external bale storage layout has been designed in accordance with Natural Resource Wales (NRW) guidance on waste storage with the distance between each bale storage group in accordance with guidance for fire prevention.</p> <p>The facility will be regulated by an Environmental Permit which will be regulated by NRW which will include measures to manage litter on site.</p>                                                                                                                                                                              |
| <p><b><u>Fire Risk</u></b></p> <ul style="list-style-type: none"> <li>- Concerns over fires at other Jayplas sites</li> <li>- Is there a fire risk assessment in place?</li> <li>- What is the plan of action in case of a fire?</li> <li>- What is a fire water storage tank and what is the capacity of it?</li> </ul> | <p>The facility will be regulated by an Environmental Permit which will be regulated by NRW. A Fire Prevention Plan will be prepared for the site as part of the Environmental Permit which will set out fire prevention mitigation measures.</p> <p>The external bale storage layout has been designed in accordance with NRW guidance on waste storage with the distance between each bale storage group in accordance with guidance for fire prevention.</p> <p>As part of the fire prevention mitigation measures, a fire water storage tank and associated pump house will be located between the two buildings. This will provide water support to an automatic sprinkler system which will be installed throughout the proposed buildings. The tank will hold 230,000 litres of water and be capable of supplying fire hose water and sprinkler water.</p> |
| <p><b><u>Surface Water</u></b></p> <ul style="list-style-type: none"> <li>- Why is a surface water lagoon required?</li> <li>- What is the capacity of the lagoon?</li> <li>- Where does overspill go?</li> </ul>                                                                                                        | <p>A surface water lagoon is proposed as part of the sustainable drainage system for the site. Surface water runoff from the impermeable areas of the site will discharge to the new surface water lagoon to be located within the southern extent of the site.</p> <p>The proposed lagoon will have a capacity of ~8,000m<sup>3</sup> and 2.6m deep. The size of the lagoon has been calculated such that the development has the capacity to accommodate a 1 in 100-year rainfall event, including a 30% increase in rainfall intensity that is predicted to occur as a result of climate change.</p> <p>Full design details of the lagoon and surface water management system will be presented in a separate application to the Sustainable Drainage Approving Body for approval before construction commences on site.</p>                                   |
| <p><b><u>Site Suitability</u></b></p> <ul style="list-style-type: none"> <li>- Why this site?</li> <li>- Were there any other alternative sites?</li> <li>- Result in reduction in green space</li> </ul>                                                                                                                | <p>The site is allocated as an Employment Site (ref. EW 1.3) in the adopted Merthyr Tydfil Replacement Local Development Plan.</p> <p>Policy EcW2 in the adopted Local Development Plan refers to protecting employment sites and states that on land at Goat Mill Road (the proposal site) development will be permitted if it is an appropriate waste</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>management facility compatible with existing industrial and commercial activities.</p> <p>In addition, Policy EcW1 in the adopted Local Development Plan also states that the proposal site is identified as a preferred area of search for waste management facilities.</p> <p>The site is located in an area characterised by industrial operations and the proposal is considered to be compatible with existing industrial and commercial activities surrounding the site.</p> <p>The site is privately owned land and is currently used informally by dog walkers. As part of the proposal, the majority of key habitats will be retained, including the majority of broadleaved woodland plantation and an area of grassland. Open mosaic habitat vegetation and will be retained, managed and enhanced both in the north and south of the site. The southern area of the site will be retained and enhanced. Due to health and safety risks, no public access is proposed on site.</p>                                                                                                                                                                                                                                    |
| <p><b><u>Biodiversity</u></b></p> <ul style="list-style-type: none"> <li>- What are the potential impacts on nature and wildlife?</li> </ul>                                                                                                                                                                                                                                                                                                                           | <p>An Ecological Appraisal along with various protected species surveys has been undertaken at the site.</p> <p>The site comprises an open mosaic of sparsely vegetated substrate, grassland and marshy grassland surrounded by broadleaved woodland plantation. Small pockets of scattered scrub, bare ground and scattered trees are located centrally within the site.</p> <p>Detailed botanical surveys have identified that 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.</p> <p>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. Key habitat features will be retained as part of the proposal.</p> <p>A Construction Landscape Ecological Management Plan (CLEMP) has been prepared for the site and details the various biodiversity enhancements proposed as part of the development including a bat and bird box scheme and aquatic habitat creation as part of the proposed surface water lagoon.</p> |
| <p><b><u>Amenity</u></b></p> <ul style="list-style-type: none"> <li>- Will the development cause disturbance to local residents?</li> <li>- There will be combined effects from the mine, Biffa's landfill site and the proposal</li> <li>- The site is too close to residents</li> <li>- Will the local community receive any benefits from this development?</li> <li>- Will local companies be given the opportunity to bid to construct the development</li> </ul> | <p>The required environmental and technical assessments have been undertaken to fully understand any potential impacts from the proposed development on surrounding residential receptors and the environment. All assessments include a review of the current baseline which includes existing operational industries within the surrounding area.</p> <p>All assessments conclude that the proposed development, along with proposed mitigation measures, will not lead to adverse impacts on surrounding residential receptors or the local environment.</p> <p>The site is allocated as an employment site within the adopted Merthyr Tydfil Local Development Plan which includes appropriate waste management facilities compatible with existing industrial and commercial</p>                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>- Is there any consideration to dog walkers who use this land?</li> <li>- Concerns over issues with rodents</li> <li>- Concerns over issues with litter</li> </ul> | <p>activities. In addition, the proposal site is identified as a preferred area of search for waste management facilities.</p> <p>The proposal will provide local employment opportunities during both the construction and operational phases. Once fully operational, the facility is anticipated to provide a total of 110+ direct jobs and 44 in direct chain jobs. One of the proposal's key objectives is to reduce the amount of waste being disposed of by landfill and help the transition to a zero-waste economy.</p> <p>Jayplas always seek to work with local suppliers and contractors where possible.</p> <p>The site is privately owned land that is currently used informally, by dog walkers. Due to health and safety risks, no public access is proposed on site.</p> <p>The risk of attracting rodents and other vermin is very minimal due to continuous activity within the site. The site will operate a quick turnover so bales of waste plastic will be swiftly processed and provide less of an opportunity for rodents and other vermin to be an issue. The facilities Environmental Permit will set out measures to prevent any issues with rodents.</p> <p>The facility will be operated and control measures put in place to reduce impacts from windblown litter Measures to prevent litter with be presented in the Environmental Permit for the facility.</p> |
| <p><b><u>Carbon Footprint</u></b></p> <ul style="list-style-type: none"> <li>- This proposal does not help Wales lower their carbon footprint</li> </ul>                                                  | <p>The facilities operations will help reduces the carbon footprint throughout the whole lifecycle of plastics. The bulk of carbon savings comes from the 'avoided burden' of producing virgin plastics through the recycling process. In addition, the facility offsets transport and the need to export plastics externally out of the UK and disposal issues of plastics and the recycling prevents plastics being littered into oceans and the environment. It is anticipated that the facility operations will have an annual carbon saving of 155 tonnes which is equivalent to 62,249 cars being taken off the road.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

- 4.2.6 The project website has been updated to include a Frequently Asked Questions Page with the Applicant's comments to queries and concerns raised during the consultation with notifications sent to those who commented of the update.

#### 4.3 SUMMARY OF STATUTORY CONSULTEE FEEDBACK AND RESPONSES

- 4.3.1 Following the 28-day consultation period, responses were received by the following:

- Cadw
- The Coal Authority
- Welsh Water
- GGAT
- The Natural Resources Body for Wales

- 4.3.2 A copy of these consultation responses is provided in **Appendix D**, a summary is provided below along with commentary as to how the proposal and supporting documents have been revised, where necessary.

**Cadw**

- 4.3.3 Cadw's (ref. LC, dated 8<sup>th</sup> November 2021) had no comments to make on the proposed development. The response identified that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development, and states that *"Intervening topography, buildings and vegetation mean it is unlikely that the proposal will be inter-visible with the scheduled monuments or the registered park and garden. Therefore, it is unlikely that there will be any effect on the settings of the scheduled monuments or the registered park and garden."*

**The Coal Authority**

- 4.3.4 The Coal Authority's response (dated 3<sup>rd</sup> November 2021) raised concerns over the proposed development being located within a Development High Risk Area. The response noted that the draft Preliminary Appraisal (Desk Study) made no commitment to investigate the mine entries identified on site and suggested no build zones around mine entries.
- 4.3.5 The Geo-technical Preliminary Appraisal (Desk Study) accompanying the planning application has been updated following the Coal Authorities comments. It is considered that mine entries were very likely removed by opencast mining. However, the report has been updated to include recommendations for targeted investigation of the recorded mine entries using trial trenching and rotary probehole drilling and stabilisation of any found e.g., by filling, grouting and capping. Any intrusive site investigation of coal seams, mine workings and mine entries would be approved by the Coal Authority prior to works. It is considered that the recommended site investigation work in the Preliminary Appraisal be controlled by a suitably worded prior to commencement planning condition.

**Welsh Water**

- 4.3.6 Welsh Water's response (dated 5<sup>th</sup> November 2021) regarding sewerage states that the foul flows only from the proposed development can be accommodated within the public sewerage system. They advised that *"the flows should be communicated with/to the 225mm public combined sewer located West of the development site and adjacent to the A4102, at manhole ref no. SO05067801 as indicated on the extract of public sewer record provided"*.
- 4.3.7 The response notes that the proposal is subject to approval of SuDS features by the Sustainable Drainage Approving Body (SAB). A pre-application response has been received from SAB 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.

**GGAT**

- 4.3.8 The Glamorgan-Gwent Archaeological Trust (GGAT) response (dated 19<sup>th</sup> October 2021) highlights that the site is located within the Merthyr Tydfil Registered Historic Landscape Character Area (HLCA078). An ASIDOHL2 was undertaken and accompanies the planning application which concludes that the impact of the proposed development on the Historic Landscape will be Slight.
- 4.3.9 The response acknowledges that the majority of the site was subject to opencast coal mining before being remediated and restored to its current state which removed the Great White Tip and likely the majority of mining features. However, the response highlights that parts of the site (along the northern boundary) were not subject to the opencast and are within Archaeologically Sensitive Areas. Therefore, as recommended in the accompanying Heritage Assessment, a condition requiring the submission of a Written Scheme of Investigation is recommended.

**The Natural Resources Body for Wales**

- 4.3.10 The Natural Resources Wales response (dated 17<sup>th</sup> November 2021) requested further information on the likely emissions to air from the operation of the proposed combined heat and power (CHP) unit in order to assess the impacts on the surrounding statutory protected sites.
- 4.3.11 The accompanying Air Quality Assessment has been updated to assess any impacts from the operation of the CHP. The assessment shows that the proposed CHP unit would have a negligible impact on annual mean NO<sub>2</sub> concentrations. The impact on sensitive habitats due to the operation of the CHP plan would be insignificant.
- 4.3.12 Natural Resource Wales recommends a number of conditions regarding pollution prevention in the form of a Construction Environmental Management Plan, detailed lighting plan and land contamination. These condition recommendations are considered suitable.



## 5. CONCLUSION

## 5.1 CONCLUSION

- 5.1.1 The applicant (Jayplas) has pro-actively engaged with the local community and statutory consultees, as required, to provide details of the proposed development and has provided an opportunity for members of the public to give their views on the scheme.
- 5.1.2 Comments and concerns raised throughout this process have been addressed in the planning application documents such that it is deemed the scheme can be supported.
- 5.1.3 The project website will continue to be updated as the proposal develops, and the planning application is submitted. Local Stakeholders will also be advised that they can make comments to Merthyr Tydfil County Borough Council when the application has been registered.
- 5.1.4 It is acknowledged that pre-application consultation will not always change the views of those who wish to object to a development proposal, but it ensures that there is an opportunity to openly review and discuss the proposals with the developers and their consultant team and to help shape new development.

## **Appendix A – Site Notices**

## **SCHEDULE 1B**

### **PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION**

#### **Town and County Planning (Development Management Procedure) (Wales) Order 2012**

#### **PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D**

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

**Purpose of this notice:** this notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the local planning authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development on land off Goat Mill Road, Merthyr Tydfil

**I give notice that** Jayplas (trading as J & A Young (Leicester) Ltd

Is intending to apply for planning permission for a plastics recycling and processing facility including 2 industrial warehouse units, reserved area for a future third warehouse unit, external storage area, car parking, weighbridge, lighting, combined heat and power unit, surface water lagoon and landscaping on land off Goat Mill Road, Merthyr Tydfil.

You may inspect copies of:

- The proposed application;
- The plans; and
- Other supporting documents

Online at <http://merthirtydfilplasticrecyclingfacility.wordpress.com> or at Dowlais and Merthyr Tydfil Central Library where hard copies of the planning application documents are available.

Anyone who wishes to make representations about this proposed development must write to the applicant using [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) or postal address below

Jayplas  
C/O Sirius Planning  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

From Monday 18<sup>th</sup> October to Monday 15<sup>th</sup> November 2021

Signed: F Wray

Date: 14/10/2021

## ATODLEN 1B

### CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

#### Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) Gorchymyn 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2C  
A 2D

(i'w gyflwyno i berchnogion a/neu deiliadau tir cyffiniol ac ymgynghoreion cymunedol; ac i'w arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

**Pwrpas yr hysbysiad hwn:** mae'r hysbysiad hwn yn rhoi'r cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr a'r datblygiad arfaethedig cyn cyflwyno cais cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn amharu ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir ar y ffeil gyhoeddus.

Datblygiad arfaethedig ar dir oddi ar Ffordd Felin Geifr, Merthyr Tydfil

#### **Rhybuddiaf fod** Jayplas (masnachu fel J & A Young (Leicester) Ltd

A yw'n bwriadu gwneud cais am ganiatâd cynllunio ar gyfer datblygiad ailgylchu a phrosesu plastigau gan gynnwys 2 uned warws diwydiannol, ardal a gadwyd yn ôl ar gyfer uned trydydd warws yn y dyfodol, ardal storio allanol, parcio ceir, pont bwyso, goleuadau, uned gwres a phŵer cyfunedig, lagŵn dŵr wyneb a thirlunio ar dir oddi ar Ffordd Felin Geifr, Merthyr Tudful.

Gellwch archwilio copiau o'r canlynol:

- Y cais arfaethedig;
- Y cynlluniau; a
- Dogfennau ategol eraill

Ar-lein yn <http://merthirtydfilplasticrecyclingfacility.wordpress.com> neu yn Llyfrgell Ganolog Dowlais a Merthyr Tudful lle mae copi caled o'r dogfennau cais cynllunio ar gael.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn gwblhau'r ffurflen sylwadau ar-lein neu ysgrifennu at yr ymgeisydd gan ddefnyddio

[planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) neu'r gyfeiriad post isod.

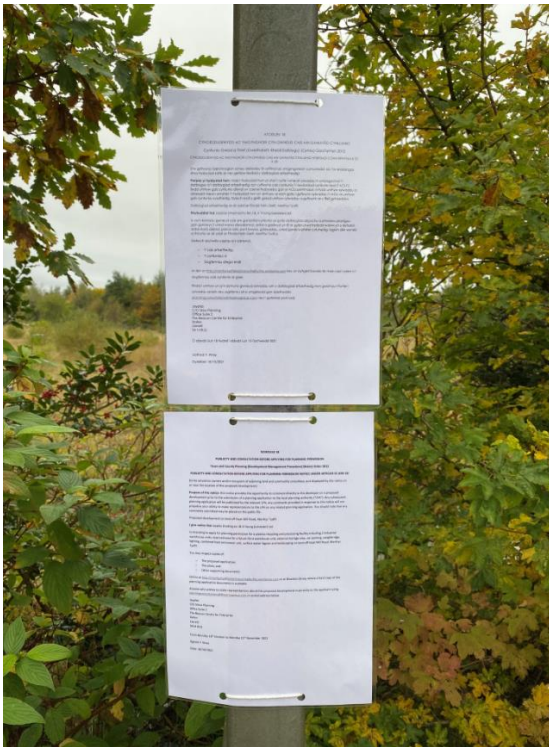
Jayplas  
C/O Sirius Planning  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

O ddydd Llun 18 Hydref i ddydd Lun 15 Tachwedd 2021

Llofnod: F. Wray

Dyddiad: 14/10/2021

## Site Entrances



## Goat Mill Road



**Appendix B – Copy of letters sent to Adjoining Landowners, Local Residents, Councillors and Specialist  
Consultees**



**Sirius Planning Ltd**  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen, Llanelli  
SA14 8LQ

01554 780 544  
[www.thesiriusgroup.com](http://www.thesiriusgroup.com)

Estates Department  
Merthyr Tydfil County Borough Council  
Unit 5 Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

Date: 15/10/2021

Our Ref: JAY1001

Dear Sir / Madam,

**PROPOSED PLASTICS RECYCLING & PROCESSING FACILITY ON LAND OFF GOAT MILL ROAD, MERTHYR TYDFIL, CF48 3TD**

We are contacting you on behalf of Jayplas, a trading name of J & A Young (Leicester) Ltd, regarding a future planning application that is currently being prepared, for a proposed plastic recycling and processing facility and associated infrastructure. The site is located on approximately 14.6ha of redundant, vacant land off Goat Mill Road on the eastern periphery of Merthyr Tydfil, adjacent to an established industrial estate to the north of the site. A site location plan is attached to this letter.

The proposed development consists of two individual warehouse units, with a reserved expansion area for a third building, an internal office area within the first building, an external storage yard, car parking, weighbridge and gatehouse, fire water storage tank, combined heat and power unit, lighting, surface water lagoon and landscaping. The proposed facility, once fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum.

The facility will be capable of accepting waste plastics (rigid and film) from the commercial, industrial and the public sectors, for recycling and processing into new products. It is anticipated that the site will be developed in several phases. Phase 1 building comprising the plastics recycling facility (PRF) which separates materials into different types of plastics fractions. Phase 2 building to include a polymer washing plant where segregated plastics from the PRF are cleaned and caps, labels and other contaminants are removed. The output of the processes will be recycling plastic pallets and flake, which are then baled ready for future processing either by Jayplas and or a third party.

There are a number of key environmental and economic benefits resulting from this proposal which will help both the local and wider economy and environment. 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 closed loop cycle is a sustainable approach to materials management and will help Wales's transition to a zero-waste economy.

Once fully operational, the facility would provide direct employment for 110+ full time workers, to be sourced locally. In addition, there would also be the potential for an additional 50 indirect chain jobs during both the construction and operational phases, associated with the supply of materials and for servicing and maintenance of the facility.

Formal pre-application consultation is being undertaken on the proposals and the draft planning application for 28 days, before the application is submitted to Merthyr Tydfil County Borough Council for consideration. In accordance with the regulations, we hereby provide formal notice of the pre-application consultation process by way of Schedule 1B attached to this letter. Copies of the draft planning application and details of the proposal can be found online at

[www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com) and computer facilities are available to view this information at Dowlais and Merthyr Tydfil Central Library. Hard copies of the draft planning application documents have also been placed in both Dowlais and Merthyr Tydfil Central Library.

The pre-application consultation phase will run between Monday 18<sup>th</sup> October and Monday 15<sup>th</sup> November 2021. Anyone who wishes to comment, should respond to Sirius Planning using [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) or via the project website ([www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com)). We are also happy to receive comments via post, using the address below.

Jayplas  
C/O Sirius Planning  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

Should you have any questions or require any more information, please do not hesitate to contact me on 07523515752 or email me at [Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com).

Yours faithfully,

Francesca Wray  
**Senior Planner**  
[Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com)  
07523515752  
For and on behalf of Sirius Planning Ltd  
Enc, Site Location Plan, Site Layout Plan

## **SCHEDULE 1B**

### **PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION**

#### **Town and County Planning (Development Management Procedure) (Wales) Order 2012**

#### **PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE UNDER ARTICLES 2C AND 2D**

(to be served on owners and/or occupiers of adjoining land and community consultees; and displayed by site notice on or near the location of the proposed development)

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- Other supporting documents

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Anyone who wishes to make representations about this proposed development must write to the applicant using [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) or postal address below

Jayplas  
C/O Sirius Planning  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

From Monday 18<sup>th</sup> October to Monday 15<sup>th</sup> November 2021

Signed: F Wray

Date: 14/10/2021



**Sirius Planning Ltd**  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen, Llanelli  
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01554 780 544  
[www.thesiriusgroup.com](http://www.thesiriusgroup.com)

Estates Department  
Merthyr Tydfil County Borough Council  
Unit 5 Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

Dyddiad: 15/10/2021

Ein cyf: JAY1001

Annwyl Deiliad,

**CYFLEUSTER AILGYLCHU A PHROSESU PLASTIGAU ARFAETHEDIG AR DIR  
GERLLAW GOAT MILL ROAD, MERTHYR TUDFUL, CF48 3TD**

Rydym yn cysylltu â chi ar ran Jayplas, sef enw masnachu J & A Young (Leicester) Ltd, ynghylch cais cynllunio yn y dyfodol sy'n cael ei baratoi ar hyn o bryd, ar gyfer cyfleuster ailgylchu a phrosesu plastig arfaethedig a'r isadeiledd cysylltiedig. Mae'r safle wedi'i leoli ar oddeutu 14.6ha o dir gwag, diangen oddi ar Goat Mill Road ar gyrion dwyreiniol Merthyr Tudful, gerllaw ystâd ddiwydiannol sefydledig i'r gogledd o'r safle. Mae cynllun lleoliad safle ynghlwm wrth y llythyr hwn.

Mae'r datblygiad arfaethedig yn cynnwys dwy uned warws unigol, gydag ardal ehangu bosibl ar gyfer trydydd adeilad, swyddfa fewnol yn yr adeilad cyntaf, iard storio allanol, lle i barcio ceir, pont bwyso a phorthdy, tanc storio dŵr tân, uned gwres a phŵer cyfunedig, goleuadau, lagŵn dŵr wyneb a thirlunio. Unwaith y bydd yn gwbl weithredol, bydd y cyfleuster arfaethedig yn derbyn ac yn prosesu tua 150,000 tonnall o ddeunyddiau plastig y flwyddyn.

Bydd y cyfleuster yn gallu derbyn plastigau gwastraff (anhyblyg a ffilm) o'r sectorau masnachol, diwydiannol a chyhoeddus, ar gyfer ailgylchu a phrosesu i greu cynhyrchion newydd. Rhagwelir y bydd y safle'n cael ei ddatblygu mewn sawl cam. Adeilad Cam 1 sy'n cynnwys y cyfleuster ailgylchu plastigau (PRF) sy'n gwahanu deunyddiau i wahanol fathau o ffracsiynau plastig. Adeilad Cam 2 i gynnwys gwaith golchi polymer lle mae plastigau sydd wedi eu gwahanu oddi wrth y PRF yn cael eu glanhau ac y mae capiau, labeli a llygryddion eraill yn cael eu tynnu. Allbwn y prosesau fydd ailgylchu paletau a fflawiau plastig, sydd wedyn yn cael eu byrnu yn barod i'w prosesu yn y dyfodol, naill ai gan Jayplas neu gan drydydd parti.

Mae nifer o fanteision amgylcheddol ac economaidd allweddol yn deillio o'r cynnig hwn a fydd yn

helpu'r economi a'r amgylchedd lleol ac ehangach. Mae'r cyfleuster wedi'i gynllunio gyda'r nod o adennill gwerth o ddeunyddiau sydd ar eu ffordd i safle tirlenwi ac felly bydd yn lleihau faint o wastraff sy'n cael ei waredu drwy dirlenwi. Mae'r cylch dolen gaeedig yn ddull cynaliadwy o reoli deunyddiau a bydd yn helpu ymdrech Cymru i ddod yn economi diwastraff.

Unwaith y bydd yn gwbl weithredol, byddai'r cyfleuster yn darparu cyflogaeth uniongyrchol i 110+ o weithwyr llawn amser, sydd i'w cael yn lleol. Yn ogystal, byddai potensial hefyd ar gyfer 50 o swyddi cadwyn anuniongyrchol ychwanegol yn ystod y cyfnodau adeiladu a gweithredol, sy'n gysylltiedig â chyflenwi deunyddiau ac ar gyfer gwasanaethu a chynnal a chadw'r cyfleuster.

Mae ymgynghoriad ffurfiol cyn ymgeisio yn cael ei gynnal yn awr ar y cynigion ac ar y cais cynllunio drafft am 28 diwrnod, cyn i'r cais gael ei gyflwyno i Gyngor Bwrdeistref Sirol Merthyr Tudful i dderbyn ystyriaeth. Yn unol â'r rheoliadau, rydym drwy hyn yn rhoi hysbysiad ffurfiol o'r broses ymgynghori cyn ymgeisio drwy'r Hysbysiad sydd ynghlwm wrth y llythyr hwn. Mae copïau o'r cais cynllunio drafft a manylion y cynnig i'w gweld ar-lein yn

[www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com) a chyfleusterau cyfrifiadurol ar gael i weld y wybodaeth hon yn Llyfrgell Ganolog Dowlais a Merthyr Tudful. Mae copïau caled o'r dogfennau cais cynllunio drafft hefyd wedi'u gosod yn Llyfrgell Ganolog Dowlais a Merthyr Tudful.

Bydd y cam ymgynghori cyn ymgeisio yn rhedeg rhwng 18/10/2021 a 15/11/2021. Dylai unrhyw un sy'n dymuno gwneud sylwadau, ymateb i Sirius Planning gan ddefnyddio [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) neu drwy wefan y prosiect ([www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com)). Rydym hefyd yn hapus i dderbyn sylwadau drwy'r post, gan ddefnyddio'r cyfeiriad isod.

Jayplas  
D/O Sirius Planning  
Ystafell Swyddfa 2  
Canolfan Menter y Goleudy  
Dafen  
Llanelli  
SA14 8LQ

Os bydd gennych gwestiynau neu os oes arnoch angen rhagor o wybodaeth, mae croeso i chi fy ffonio ar 07523515752 neu anfon e-bost ataf, [Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com).

Yn gywir,

Francesca Wray  
[Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com)  
07523515752

**Uwch Gynllunydd**

Ar gyfer ac ar ran Sirius Planning Ltd  
Amg – Cynllun Lleoliad y Safle, Cynllun o Gynllun y Safle.

## ATODLEN 1B

### CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

#### Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) Gorchymyn 2012

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO HYSBYSIAD O DAN ERTHYGLAU 2C  
A 2D

(i'w gyflwyno i berchnogion a/neu deiliadau tir cyffiniol ac ymgynghoreion cymunedol; ac i'w arddangos drwy hysbysiad safle ar neu gerllaw lleoliad y datblygiad arfaethedig)

Pwrpas yr hysbysiad hwn: mae'r hysbysiad hwn yn rhoi'r cyfle i wneud sylwadau'n uniongyrchol i'r datblygwr a'r datblygiad arfaethedig cyn cyflwyno cais cynllunio i'r awdurdod cynllunio lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir mewn ymateb i'r hysbysiad hwn yn amharu ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir ar y ffeil gyhoeddus.

Datblygiad arfaethedig ar dir oddi ar Ffordd Felin Geifr, Merthyr Tydfil

Rhybuddiaf fod Jayplas (masnachu fel J & A Young (Leicester) Ltd

A yw'n bwriadu gwneud cais am ganiatâd cynllunio ar gyfer datblygiad ailgylchu a phrosesu plastigau gan gynnwys 2 uned warws diwydiannol, ardal a gadwyd yn ôl ar gyfer uned trydydd warws yn y dyfodol, ardal storio allanol, parcio ceir, pont bwyso, goleuadau, uned gwres a phŵer cyfunedig, lagŵn dŵr wyneb a thirlunio ar dir oddi ar Ffordd Felin Geifr, Merthyr Tudful.

Gellwch archwilio copiau o'r canlynol:

- Y cais arfaethedig;
- Y cynlluniau; a
- Dogfennau ategol eraill

Ar-lein yn <http://merthirtydfilplasticrecyclingfacility.wordpress.com> neu yn Llyfrgell Ganolog Dowlais a Merthyr Tudful lle mae copi caled o'r dogfennau cais cynllunio ar gael.

Rhaid i unrhyw un sy'n dymuno gwneud sylwadau am y datblygiad arfaethedig hwn gwblhau'r ffurflen sylwadau ar-lein neu ysgrifennu at yr ymgeisydd gan ddefnyddio [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) neu'r gyfeiriad post isod.

Jayplas  
C/O Sirius Planning  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen  
Llanelli  
SA14 8LQ

O ddydd Llun 18 Hydref i ddydd Lun 15 Tachwedd 2021

Llofnod: F. Wray

Dyddiad: 14/10/2021



**Sirius Planning Ltd**  
Office Suite 2  
The Beacon Centre for Enterprise  
Dafen, Llanelli  
SA14 8LQ

01554 780 544  
[www.thesiriusgroup.com](http://www.thesiriusgroup.com)

Sent by Email: [cadwplanning@gov.wales](mailto:cadwplanning@gov.wales)

Date: 15/10/2021

Our Ref: JAY1001

Dear Sir / Madam,

**PROPOSED PLASTICS RECYCLING & PROCESSING FACILITY ON LAND OFF GOAT MILL ROAD, MERTHYR TYDFIL, CF48 3TD.**

We are contacting you on behalf of Jayplas, a trading name of J & A Young (Leicester) Ltd, regarding a planning application that is currently being prepared, for a proposed plastic recycling and processing facility and associated infrastructure in your area. The site is located on approximately 14.6ha of land off Goat Mill Road on the eastern periphery of Merthyr Tydfil, adjacent to an established industrial estate to the north of the site. A site location plan is attached to this letter.

The proposed development consists of two individual warehouse units, with a reserved expansion area for a third building, an internal office area within the first building, an external storage yard, car parking, weighbridge and gatehouse, fire water storage tank, combined heat and power unit, lighting, surface water lagoon and landscaping. The proposed facility, once fully operational, will accept and process c. 150,000 tonnes of plastic materials per annum.

The facility will be capable of accepting waste plastics (rigid and film) from the commercial, industrial and the public sectors, for recycling and processing into new products. It is anticipated that the site will be developed in several phases. Phase 1 building comprising the plastics recycling facility (PRF) which separates materials into different types of plastics fractions. Phase 2 building to include a polymer washing plant where segregated plastics from the PRF are cleaned and caps, labels and other contaminants are removed. The output of the processes will be recycling plastic pallets and flake, which are then baled ready for future processing either by Jayplas and or a third party.

There are a number of key environmental and economic benefits resulting from this proposal which will help both the local and wider economy and environment. 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 closed loop cycle is a sustainable approach to materials management and will help the transition to a zero-waste economy.

Formal pre-application consultation is being undertaken on the draft planning application for 28 days before submitting the application to Merthyr Tydfil County Borough Council. In accordance with the regulations, we hereby provide formal notice of the pre-application consultation process by way of the Notice attached to this letter. Copies of the draft planning application can be found online at [www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com).

The pre-application consultation phase will run between Monday 18<sup>th</sup> October and Monday 15<sup>th</sup> November 2021. Anyone who wishes to comment should write to Sirius Planning using [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com).

Should you have any questions or require any more information, please do not hesitate to contact me on 07523515752 or email me at [Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com).

Yours faithfully,

Francesca Wray

**Senior Planner**

[Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com)

07523515752

For and on behalf of Sirius Planning Ltd

Enc – Site Location Plan, Site Layout Plan.

## SCHEDULE 1C

### CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

Town and County Planning (Development Management Procedure) (Wales) Order 2012

### CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION

#### NOTICE UNDER ARTICLE 2D

(to be served on specialist consultees, as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012)

Purpose of this notice: this notice comprises a formal request for pre-application consultation response under article 2D of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

Proposed development on land off Goat Mill Road, Merthyr Tydfil

I give notice that Jayplas (trading as J & A Young (Leicester) Ltd

Is intending to apply for planning permission for a plastics recycling and processing facility including 2 industrial warehouse units, reserved area for a future third warehouse unit, external storage area, car parking, weighbridge, lighting, combined heat and power unit, surface water lagoon and landscaping on land off Goat Mill Road, Merthyr Tydfil.

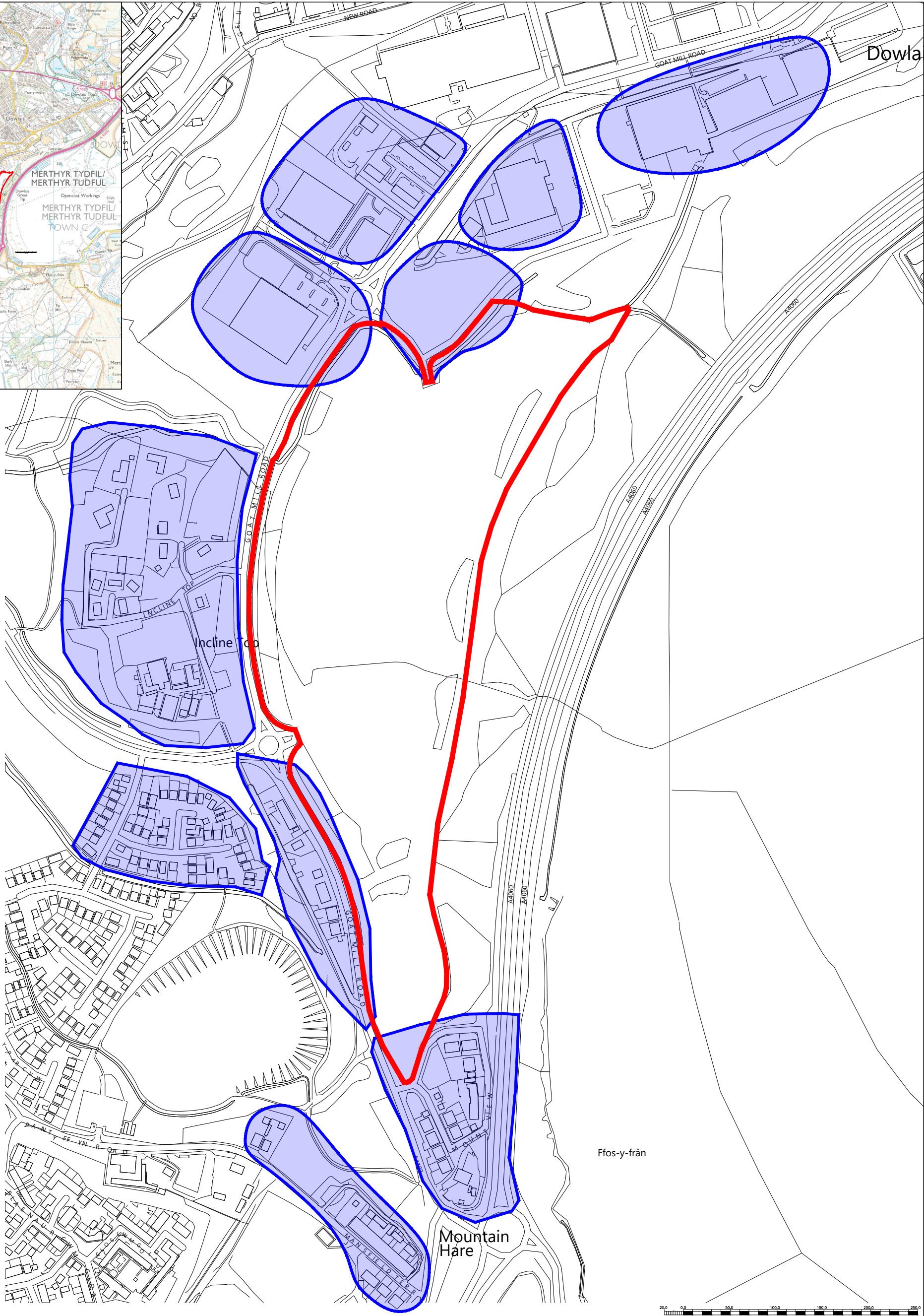
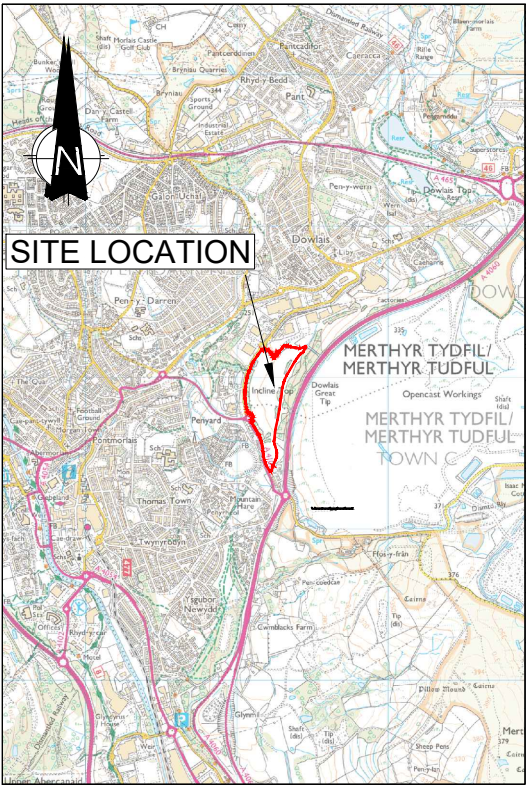
A copy of the proposed application; plans; and other supporting documents can be viewed online at [www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com)

In accordance with the requirements of article 2E of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, a consultation response must be sent to [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com) by Monday 15<sup>th</sup> November 2021.

Signed: F Wray

Date: 15/10/2021

## **Appendix C – Consultation Plan**



CLIENT

REPRODUCED FROM ORDNANCE SURVEY SUPERPLAN DATA WITH THE PERMISSION OF THE CONTROLLER OF HER MAJESTY'S STATIONARY OFFICE, CROWN COPYRIGHT. ALL RIGHTS RESERVED. LICENCE NUMBER: 10001998

JOB TITLE

GOAT MILL ROAD, MERTHYR

DRAWING TITLE

CONSULTATION AREAS

THIS INFORMATION IS CONFIDENTIAL AND THE PROPERTY OF SIRIUS. IT IS RELEASED ON CONDITION THAT NONE OF THE INFORMATION SHALL BE DISCLOSED TO ANY THIRD PARTY OR REPRODUCED IN WHOLE OR PART WITHOUT THE PRIOR CONSENT IN WRITING OF SIRIUS.

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4245 Park Approach, Thorpe Park, Leeds. LS15 8GB. 0113 264 9960

## **Appendix D – Specialist Consultee Responses**



Llywodraeth Cymru  
Welsh Government

Plas Cefn, Unit 57, Cefn Coed  
Parc Nantgarw, Cardiff, CF15 7QQ  
Tel: 0300 025 6000  
Email: [info@cadw.gov.wales](mailto:info@cadw.gov.wales)  
[www.cadw.gov.wales](http://www.cadw.gov.wales)  
0300 025 6000  
[cadw@gov.wales](mailto:cadw@gov.wales)/[cadw@llyw.cymru](mailto:cadw@llyw.cymru)  
[www.cadw.gov.wales](http://www.cadw.gov.wales)

Sirius Planning Ltd

By email:  
[planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com)

Eich cyfeirnod  
Your reference

JAY1001

Ein cyfeirnod  
Our reference

LC

Dyddiad  
Date

8 November 2021

Llinell uniongyrchol  
Direct line

0300 0256004

Ebost  
Email:

[cadwplanning@gov.wales](mailto:cadwplanning@gov.wales)

Dear Sir/Madam

### **Pre-Planning Application – Proposed plastics recycling and processing facility on Land off Goat Mill Road, Merthyr Tydfil, CF48 3TD**

Thank you for your letter of 15 October inviting our comments on the pre-planning application consultation for the proposed development described above.

#### Advice

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application. Our assessment of the pre-application is given below.

Our records show that there are no scheduled monuments or registered historic parks and gardens that would be affected by the proposed development.

We therefore have no comments to make on the proposed development.

The national policy and Cadw's role in the planning process is set out in Annex A.

#### Assessment

This planning application is for a Plastics Recycling and Processing Facility, Land off Goat Mill Road, Merthyr Tydfil, CF48 3TD.

Located within a 3km buffer of the application area are:

#### Scheduled Monuments

GM028 Morlais Castle  
GM222 Merthyr Common Round Cairns  
GM331 Ynys Fach Iron Furnaces

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.  
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL  
INVESTOR IN PEOPLE



GM424 Pont y Cafnau Tramroad Bridge  
GM425 Remains of Blast Furnaces, Cyfarthfa Ironworks  
GM467 Cyfarthfa Canal Level  
GM478 Gurnos Quarry Tramroad & Leat  
GM479 Tai Mawr Leat for Cyfarthfa Iron Works  
GM486 Iron Canal Bridge from Rhydycar  
GM494 Sarn Howell Pond and Watercourses  
GM495 Cyfarthfa Tramroad Section at Heolgerrig  
GM496 Deserted Iron Mining Village, Ffos-y-fran  
GM563 Morlais Hill ring cairn  
GM572 Abercanaid haystack boiler

GM573 Merthyr Tramroad Tunnel (Trevithick's Tunnel)  
GM594 Merthyr Tramroad: Morlais Castle section  
GM606 Vale of Neath railway cutting and tunnel portal  
GM607 Cwm Pit and head of railway  
GM608 Cyfarthfa balance pond and leat  
GM609 Black Pins early ironstone workings  
GM610 Cwm Glo Chapel  
GM611 Cwm Glo pit and ironstone tip  
GM624 Rhaslas Pond South Dam

#### Registered Parks and Gardens

PGW(Gm)1(MER) Cyfarthfa Castle (grade II\*)

Intervening topography, buildings and vegetation mean it is unlikely that the proposal will be inter-visible with the scheduled monuments or the registered park and garden. Therefore it is unlikely that there will be any effect on the settings of the scheduled monuments or the registered park and garden.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by the Glamorgan-Gwent Archaeological Trust [www.ggat.org.uk](http://www.ggat.org.uk)

Yours sincerely,

Laura Cooper  
Diogelu a Pholisi / Protection and Policy

## Annex A

### Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

### National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW [planning-policy-wales-edition-11.pdf](#) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

[Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

### Historic Parks and Gardens

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.



The Coal  
Authority



INVESTOR IN PEOPLE



RTPI

Learning Partner

200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG

Tel: 01623 637 119 (Planning Enquiries)

Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)

Web: [www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

For the Attention of: Sirius

[By Email: [planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com)]

3 November 2021

Dear Sir or Madam

**PRE-APPLICATION ENQUIRY: PRE-APP MERTHYR PLASTIC RECYCLING**

**Proposed plastics recycling & processing facility; land off Goat Mill Road, Merthyr Tydfil, CF48 3TD**

Thank you for your consultation letter of 15 October 2021 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

**The Coal Authority Response: Substantive Concern**

The site falls within the defined Development High Risk Area. Consequently, within the site and surrounding area there are coal mining features and hazards, which need to be considered in relation to the determination of any planning application.

The Coal Authority records indicate that there are seven recorded mine entries (shafts and adits) within, or within close proximity of the planning boundary. Our records also indicate that the site is likely to have been subject to unrecorded underground mining at shallow depth and to unrecorded underground mining at shallow depth associated with thick coal seam outcrops. The site has also been subject to past surface mining operations.

The Coal Authority notes the supporting Preliminary Appraisal (Desk Study) (August 2021, prepared by Sirius Geotechnical Ltd), the content of which has been informed by appropriate coal mining information for the proposed development site. Based on this review of information obtained the report confirms that the investigation of potential shallow coal mine workings will be necessary, along with the positions of any high walls in

order to inform foundation design. However, no commitment appears to be made within the report to investigate the mine entries, with commentary within the report confirming that those adits in the west of the site may have not been removed by the past surface mining operations.

In this regard, we also note that 'Building 2' appears to conflict with the position of adit 306206-006 and that none of the proposed bale storage groups appear to have been designed around those mine entries in the east of the site, or their respective zones of influence. Whilst we accept that these mine entries may have been partially or wholly removed by the past surface mining operations, no consideration appears to have been given to any implications posed by the mine entries potentially remaining open at the base of the former surface extraction. Consequently, should the layout remained unchanged and form the basis of a detailed planning application, along with the accompanying Preliminary Appraisal (Desk Study), then the Coal Authority will object.

The Coal Authority would expect appropriate 'no build zones' to be defined around each of the mine entries, to ensure that development does not occur above or too close to these mining hazards, in line with The Coal Authority's adopted policy:

<http://coal.gov.uk/assets/coal/whatwedo/4265-policy-for-building-over-or-within-the-influencing.pdf>

Please do not hesitate to contact me if you would like to discuss this matter further.

Yours faithfully

*Chris MacArthur*

**Chris MacArthur** *B.Sc.(Hons), DipTP, MRTPI*  
**Planning Liaison Manager**

#### General Information for the Applicant

Under the Coal Industry Act 1994 any intrusive activities, including initial site investigation boreholes, and/or any subsequent treatment of coal mine workings/coal mine entries for ground stability purposes require the prior written permission of The Coal Authority, since such activities can have serious public health and safety implications. Failure to obtain permission will result in trespass, with the potential for court action. In the event that you are proposing to undertake such work in the Forest of Dean local authority area our permission may not be required; it is recommended that you check with us prior to commencing any works. Application forms for Coal Authority permission and further guidance can be obtained from The Coal Authority's website at:

<https://www.gov.uk/get-a-permit-to-deal-with-a-coal-mine-on-your-property>

Building over or within the influencing distance of a mine entry (shaft or adit) can be dangerous and has the potential for significant risks to both the development and the occupiers if not undertaken appropriately. The Coal Authority would draw your attention to our adopted policy regarding new development and mine entries:

<https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries>

### Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

*In formulating this response The Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development The Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisers for this development in relation to ground conditions and the acceptability of development.*

Ms Francesca Wray  
Sirius Planning Ltd  
The Beacon Centre for Enterprise  
Office Suite 2 Dafen  
Llanelli  
Carmarthenshire  
SA14 8LQ

**Date: 05/11/2021**  
**Our Ref: PPA0006170**

Dear Ms Wray

**Grid Ref: 306223 206893**

**Site Address: Land off Goat Mill Road, Merthyr Tydfil**

**Development: Article 2D – Proposed Plastics Recycling and Processing Facility**

We refer to the Schedule 1C - Article 2D notice received and your formal request for a pre-application consultation response before applying for planning permission from Dwr Cymru Welsh Water as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, 15/10/2021, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development. Having reviewed the details submitted we would advise there is no objection to the proposed development and offer the following standing advice which should be taken into account within any future planning application for the development:

## **SEWERAGE**

The foul flows only from the proposed development can be accommodated within the public sewerage system. We advise that the flows should be communicated with/to the 225mm public combined sewer located West of the development site and adjacent to the A4102, at manhole ref no. SO05067801 as indicated on the extract of public sewer record provided.

As of 07/01/2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. As highlighted in these standards, the developer is required to explore and fully exhaust all surface water drainage options in accordance with a hierarchy which states that discharge to a combined sewer shall only be made as a last resort. Disposal should be made through the hierarchical approach, preferring infiltration and, where infiltration is not possible, disposal to watercourses in liaison with the Land Drainage Authority and/or Natural Resources Wales.

In addition, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.

If the development will give rise to a new discharge (or alter an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Dwr Cymru / Welsh Water. Please note that the process for applying for a Discharge Consent is independent of the planning process and an application for consent may be refused even though planning permission may have already been granted.

## **SEWAGE TREATMENT**

No problems are envisaged with the Wastewater Treatment Works for the treatment of domestic discharges from this site.

## **WATER SUPPLY**

Upon receipt of the estimated flow rates a subsequent letter will follow in due course.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.

Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at [developer.services@dwrwymru.com](mailto:developer.services@dwrwymru.com)

Please quote our reference number in all communications and correspondence.

Yours faithfully,



**Owain George**  
**Planning Liaison Manager**  
**Developer Services**

***Please Note that demands upon the water and sewerage systems change continually; consequently, the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.***

**From:** [Rob Dunning](#)  
**To:** [Planning Consultations](#)  
**Cc:** [Francesca Wray](#)  
**Subject:** RE: Proposed Plastics Recycling and Processing Facility Public Consultation  
**Date:** 19 October 2021 11:57:50

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Dear Sir,

Many thanks for the pre-planning enquiry. We have consulted the regional Historic Environment Record (HER) and note the proposal partially contained the Dowlais Great Tip and the Great White Tip. It is also located within the Merthyr Tydfil Registered Historic Landscape, specifically the Dowlais Great Tip, Trecatti, Trehir and Twyn-y-Waun Character Area (HLCA078). The area formed part of the extensive coal and ironstone workings associated with Dowlais Ironworks. The workings of the area spanned from the latter half of the 18th century, through the hay days of iron production associated with railway construction during the 1840s, and the conversion of Dowlais to steel production during the 1860s. With conversion to steel production the area's mineral workings declined, being all but abandoned by the early 1870s; a result of coal and iron ore imports from northern Spain, the local ore, rich in phosphorous and sulphur being unsuitable for steel production. By 1879, most if not all the pits and levels within the area, were probably already defunct.

As a result an ASIDOHL2 has been compiled (Archaeology Wales Report no. 1895a, dated September 2021). The assessment concludes that the impact on the Historic Landscape will be Slight.

The majority of the site was subject to opencast coal mining in 1996, before being remediated and restored. This process removed the Great White Tip and likely the majority of mining features. However, there are parts of the site that were not subject to the opencast and are Archaeologically Sensitive Areas. As such it is possible that archaeological features survive and be adversely affected by the proposed development.

Therefore, should a similar application to the one you have outlined be submitted we would be likely to recommend a condition be attached to any consent requiring the submission of a Written Scheme of Investigation (WSI). The WSI would detail the scope and methodology of the archaeological mitigation, with contingencies for unexpected remains, sampling, reporting and archiving etc.

Should you require anything further, please get in touch.

Regards,

Rob

Rob Dunning BSc MCIfA  
Archaeological Planning Officer  
Glamorgan-Gwent Archaeological Trust Ltd  
SA12 Business Centre  
Seaway Parade  
Baglan Energy Park  
Port Talbot

SA12 7BR

Tel 01792-634221

Fax 01792-474469

e-mail [rob@ggat.org.uk](mailto:rob@ggat.org.uk)

web [www.ggat.org.uk](http://www.ggat.org.uk)

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**From:** Planning Consultations <[PlanningConsultations@thesiriusgroup.com](mailto:PlanningConsultations@thesiriusgroup.com)>  
**Sent:** 15 October 2021 12:10  
**To:** Enquiries <[Enquiries@ggat.org.uk](mailto:Enquiries@ggat.org.uk)>  
**Cc:** Francesca Wray <[Francesca.Wray@thesiriusgroup.com](mailto:Francesca.Wray@thesiriusgroup.com)>  
**Subject:** Proposed Plastics Recycling and Processing Facility Public Consultation

Dear Sir / Madam,

Please find enclosed information regarding a Pre-Application Consultation for a proposed Plastics Recycling and Processing Facility on land off Goat Mill Road on behalf of Jayplas (a trading name of J & A Young (Leicester) Ltd).

Copies of the draft planning application can be found online at  
[www.merthyrtydfilplasticrecyclingfacility.wordpress.com](http://www.merthyrtydfilplasticrecyclingfacility.wordpress.com).

The pre-application consultation phase will run between Monday 18th October and Monday 15th November 2021.

Should you wish to provide comments or if you have any queries, please contact us using the contact details in the attached letter.

Kind regards,



**Sirius Planning Consultations** | Planning

T 0113 264 9960

W [www.thesiriusgroup.com/planning](http://www.thesiriusgroup.com/planning)

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Ein cyf/Our ref: CAS-169182-C3D4  
Eich cyf/Your ref: Stat Pre app

Rivers House,  
St Mellons Business Park,  
St Mellons,  
Cardiff,  
CF3 0EY

ebost/email:  
southeastplanning@cyfoethnaturiolcymru.gov.uk

[planningconsultations@thesiriusgroup.com](mailto:planningconsultations@thesiriusgroup.com)

17/11/2021

Annwyl Syr/Madam / Dear Sir/Madam,

**STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) ORDER 2012 AS AMENDED.**

**BWRIAD / PROPOSAL:** Plastics recycling and processing facility including 2 industrial warehouse units, reserved area for a future third warehouse unit, external storage area, car parking, weighbridge, lighting, combined heat and power unit, surface water lagoon and landscaping

**LLEOLIAD / LOCATION:** Land off Goat Mill Road, Merthyr Tydfil

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 15/10/2021.

**We have concerns with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding Air Quality. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.**

**We also advise that based on the information submitted to date, we would ask the planning authority to include conditions regarding pollution prevention and lighting on any planning permission granted. Without the inclusion of these conditions by the planning authority we would be likely to object to the planning permission.**

Condition 1: Pollution Prevention – Construction Environmental Management Plan

Condition 2: Lighting Plan

Conditions 3-7: Land Contamination

## Air Quality

Given the distance from the relevant statutory protected sites (Cwm Glo a Glyndyrys SSSI, 1.9km and Cwm Cadlan SAC, 9.3km) there is the potential for impacts on these sites from this development and in particular from emissions to air. We note that there is an air quality assessment included in the application documents, however this only addresses the impacts of traffic associated with the proposed development. There is mention of a Combined Heat and Power (CHP) installation as part of the development which we assume would be a gas fired combustion engine for generating both electricity and heat for use in the recycling process. However, there is no mention of associated emissions from the CHP process nor the rated input / output of the proposed installation. We would therefore request this information to allow us to assess the potential impact to the afore mentioned protected sites.

We would request further information on the likely emissions to air from the operation of the CHP plant, in order to assess the impact on the features of relevant protected sites.

## Pollution Prevention

We would strongly advise the site is not stripped for construction which would expose soil to the elements, potentially resulting in a high risk of silt pollution to watercourses. Instead you should consider a method where work is carried out in manageable sections where exposed areas can be controlled effectively to reduce pollution risk. Mitigation against pollution to watercourses and surface water drains should be put in place before construction begins. On this basis, we would request the following pre-commencement condition is secured to any permission granted.

### Condition 1: Pollution Prevention – Construction Environmental Management Plan

No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- CEMP Masterplan: details of the extent and phasing of development; design proposals and objectives for mitigation measures.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

**Justification:** A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development or phase of development or specified activity and implemented for the protection of the environment during construction.

#### Further Advice to the Applicant

Any stockpiles of earth, fuel or oil, and cement mixing area should be stored at least 10 metres from the watercourse, as detailed in GPP5: works and maintenance in or near water, and for fuels/oils and cement, areas should be on hardstanding and bunded.

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

### **European Protected Species**

We have reviewed the following information:

- *Land off Goat Mill Road, Merthyr Tydfil - ECOLOGICAL APPRAISAL* by FPCR Environment and Design Ltd, dated September 2021
- Drawing number JAY1001 04 17 R0 revision n titled *Landscape Masterplan* by Sirius Planning, dated 26/8/2021
- *Lighting Assessment Draft Report - Land off Goat Mill Road, Powys* by Williams Lighting Consultants Ltd., dated 23.08.2021

We note from the ecological appraisal report provided as part of this pre-application consultation that no structures or trees suitable for supporting roosting bats are present on the proposed development site. A number of bat species were found to be using the site for commuting and foraging, including light-sensitive lesser horseshoe and *Plecotus* sp. bats. We therefore advise the following condition is added to any planning permission granted.

#### Condition 2: Lighting Plan

Prior to its installation, full details of lighting (drawing on the *Lighting Assessment Draft Report - Land off Goat Mill Road, Powys* by Williams Lighting Consultants Ltd., dated 23.08.2021) shall be submitted to and agreed in writing by the Local Planning Authority. The Lighting Plan should include:

- Details of the siting and type of external lighting to be used
- Drawings setting out light spillage in key sensitive areas, in particular the retained woodland habitats to the east and west of the site, and the new lagoon to the south
- Details of lighting to be used both during construction and operation

The lighting shall be installed and retained as approved during construction and operation.

Justification: A lighting plan should be submitted to ensure lighting details are agreed prior to installation and to reduce the impacts of lighting in the interest of protected species, and their habitats and commuting corridors.

## **Land Contamination**

We have reviewed the following information:

- Preliminary Appraisal (Desk Study) of Land off Goat Mill Road, Merthyr Tydfil. Sirius Geotechnical Ltd, Report C8341 Rev A, August 2021.
- Land off Goat Mill Road, Merthyr Tydfil – SuDS Design Report. KRS Environmental Ltd, KRS.0297.021.R.001.B, September 2021.

We have reviewed the desk study report and agree with the report conclusions that further site investigation is required, in particular in the area of the former landfill. To ensure that these investigations are completed we request the following suite of conditions and informatives be imposed on any planning permission granted.

In addition to the planning conditions, Environmental Permits from NRW may be required (during construction and operation) and we recommend early consultation with the relevant permitting teams to ensure all permits are in place prior to commencement of development.

### Condition 3: Land affected by contamination

No development, of land known to be / suspected of contamination, shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
  - i. all previous uses
  - ii. potential contaminants associated with those uses
  - iii. a conceptual model of the site indicating sources, pathways, and receptors
  - iv. potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

*Reason:* To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

#### Condition 4: Verification Report

Prior to the operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance, and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

*Reason:* To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

#### Condition 5: Long Term Monitoring Plan

Prior to the occupation or operation of the development, a long term monitoring plan for land contamination shall be submitted and approved in writing by the Local Planning Authority. The long term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken
- Timescales for the long term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required
- Timescales for submission of monitoring reports to the LPA e.g. annually
- Details of any necessary contingency and remedial actions and timescales for actions
- Details confirming that the contingency and remedial actions have been carried out.

The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

*Reason:* A long term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on controlled waters.

#### Condition 6: Unsuspected Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning

Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

*Reason:* To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

#### Condition 7: Piling

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

*Reason:* There is an increased potential for pollution of controlled waters from inappropriate methods of piling.

#### Further Advice to the Applicant

These conditions have been recommended as Natural Resources Wales is satisfied that there are generic remedial options available to deal with the risks to controlled waters posed by contamination at this site. However, further details will be required in order to ensure that risks are appropriately addressed prior to development commencing.

Natural Resources Wales recommends that developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#)
2. Refer to '[Land Contamination: a guide for developers](#)' (WLGA, 2017) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
3. Refer to our [groundwater protection](#) advice on [www.gov.uk](http://www.gov.uk)

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [CL:AIRE Definition of Waste: Development Industry Code of Practice](#). This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

#### **Drainage**

We note that foul water will be disposed of to the existing local mains sewer network. For surface water drainage it will be collected from the impermeable surfaces and discharge to the local water courses. If this changes, please reconsult us.

### **Further Advice – Environmental Permitting**

We would like to take this opportunity to remind you that an Environmental Permit will be needed for this site. The Waste Treatment BREF and associated BAT conclusions would apply to the site and these will need to be assessed against when applying for an Environmental Permit. Finally, water sampling may be required as part of the permit requirements.

We would advise that the noise assessment will need to take into account the process and not just traffic movement to and from the site. Also, due to the proximity of residences to the West of the proposed site an odour assessment and management plan will need to be carried out.

We also note that the application states material will be stored on site and would advise a Fire Prevention and Mitigation Plan will need to be produced.

### **Other Matters**

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

**Charlotte Morgan**

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning  
Cyfoeth Naturiol Cymru / Natural Resources Wales



