
From: Lade, Natasha
Sent: 30 March 2022 12:42
To: Cross, David
Cc: Watkins, Craig
Subject: P220064 - proposed plastic waste recycling facility
Attachments: P220064 - plastic waste recycling plant, Goat Mill Road.docx

Good afternoon David,

I trust you and yours are doing well.

I attach Policy Team comments on the above proposal.

Kind regards

Natasha

Natasha R Lade BA (Hons)

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INTERNAL MEMORANDUM

To: David Cross - Development Control Case Officer

Reference: P22/0064

From: Planning Policy and Implementation Section

Please ask for: Natasha Lade

Extension: 6220

Date: 30th March 2022

Observations in respect of the request for policy advice on planning application number P22/0064 on land to the east of Goat Mill Road, Dowlais, Merthyr Tydfil.

Proposed Development

The application submitted is for the construction and operation of a plastics recycling and processing facility. The proposal includes two warehouse units with internal office and warehouse facilities (with land reserved for a third warehouse unit); an external storage area; a fire water storage tank and a combined heat and power unit. Also included are car parking with bicycle facilities; a weighbridge; a surface water lagoon; associated infrastructure; lighting and landscaping, on 14.6h of vacant reclaimed land, to the east of Goat Mill Road, Dowlais, Merthyr Tydfil.

Development Plan Framework

National Planning Policy

Future Wales – The National Plan 2040

Future Wales – The National Plan 2040 is the national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system. Matters relevant to this application include:

Waste - pages 93, and 102 (Policy 19), Heat networks – pages 93 and 94 (Policy 16)
Economy – page 34 and Transport Infrastructure – page 42.

Planning Policy Wales (Edition 11, December 2018)

Planning Policy Wales provide guidance on matters relevant to this application, namely:

- Strategic & Spatial Choices: (Paragraph 3.5, 3.13 & 51) and previously developed Land (page 37).
- Active and Social Places: Sustainable Transport (Paragraphs 4.1.10, 29, 33, 34 & 38).
- Productive & Enterprise Spaces: Economic Development (Paragraphs 5.4.2 & 18), Making Best Use of Material Resources and Promoting the Circular Economy (Paragraph 5.11); 5.13 Sustainable Waste Management Facilities (Paragraph 5.13) and District Heating (Paragraphs 5.4.18, 5.9.12,
- Distinctive and Natural Places: Integrating Green Infrastructure and Development (Paragraph 6.2.5), Framework for Addressing Air Quality and Soundscape (Paragraphs 6.7.6, 7, 14, 15, 21 & 24) & and Lighting (Paragraphs 6.8.3 & 4).

Technical Advice Note TAN 18: Transport (March 2007).

Technical Advice Note 21: Waste (February 2014).

Technical Advice Note 23: Economic Development (February 2014).

Technical Advice Note 12: Design (March 2016).

Technical Advice Note 24: Historic Environment (May 2017)

Local Planning Policy

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (2016 - 2031)

The relevant LDP Objectives are -

- *LDP Objective 4 - Regeneration: To promote the suitable reuse of previously developed land and the continued regeneration of local communities.*
- *LDP Objective 6 - Sustainable Design: To promote high quality, sustainable and inclusive design and support measures, which mitigate the predicted effects of climate, change.*
- *LDP Objective 7 - Transport: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links*
- *LDP Objective 9 - Heritage and cultural assets: To protect, enhance and promote all heritage, historic and cultural assets and*
- *LDP Objective 12 - Economic Development: To provide and safeguard appropriate land for economic and skills development.*
- *LDP Objective 16 Renewable Energy: To promote renewable and low carbon energy.*
- *LDP Objective 18 - Sustainable Resources & Waste: To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities*

The following local development plan policies would apply: -

- *Policy SW4: Settlement Boundaries.*
- *Policy SW9: Planning Obligations.*
- *Policy SW11: Sustainable Design and Placemaking.*
- *Policy SW12: Improving the Transport Network.*
- *Policy CW1: Historic Environment.*
- *Policy EnW1: Nature Conservation and Ecosystem Resilience.*
- *Policy EnW4: Environmental Protection.*
- *Policy EnW5: Landscape Protection.*
- *Policy EcW1: Provision of Employment Land.*
- *Policy EcW2: Protecting Employment sites.*
- *Policy ECW 9: District Heating and*
- *Policy EcW14: Waste Facilities.*

The following Supplementary Planning Guidance is also applicable: -

- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 2: Planning Obligations (March 2012).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 4: Sustainable Design (July 2013).*
- *Merthyr Tydfil Local Development Plan Supplementary Planning Guidance Note 5: Nature and Development (May 2015)*

Policy Considerations

The Council formally adopted The Merthyr Tydfil County Borough Council Replacement Local Development Plan (RLDP) (2016 - 2031) in January 2020. The development proposal is considered against the policies contained within it.

The proposed application site is located within the Goat Mill Road allocated employment site (EcW1.2) that lies within the Primary Growth Area and settlement boundary where Policy SW4 applies. Here new development can be considered acceptable in principle subject to proposals being compatible with the Plan's other policies and all other material considerations.

Policy EcW1 supports the development of a net area of 14.75 hectares of employment land at Goat Mill Road for the following uses include amongst other things—

- B2 –industrial process (other than one falling within class B1) and
- B8 (Storage or distribution).

Paragraph 6.7.11 states that “*Whilst there is no identified regional land requirement for future waste management facilities, existing and allocated employment sites where B2/B8 class uses would be acceptable are identified as potentially suitable locations for waste management facilities. These sites have been identified to*

support the development of a network of integrated waste management facilities as set out in the Welsh Government Collections, Infrastructure and Markets (CIM) Sector Plan (2012). Whilst these are likely to fall under employment type uses it is possible future large-scale single users serving a regional role could reduce the land available for the local employment market”.

In this case, the development proposal will also need to satisfy Policy EcW14. Policy EcW14 relates to sustainable waste management and waste facilities and identifies Goat Mill Road as a preferred area of search for waste management facilities that will only be permitted where:

1. there is an identified need;
2. they are situated in locations where they would not have a significant adverse effect on amenity or the environment;
3. they accord with the waste hierarchy and the proximity principle;
4. they provide comprehensive restoration and aftercare of the land for a beneficial re-use, where appropriate; and,
5. they provide a Waste Planning Assessment.

Given that, a Waste Planning Assessment has been submitted in line with Annex B of TAN 21 that demonstrates that criteria 1, 3, and 5 have are satisfied it is considered that the proposals accord with the Policy in these aspects. However, in order to demonstrate accordance with criterion 2 and 4, the proposals will also be required to demonstrate that they do not have unacceptable impacts and provide appropriate restoration and aftercare where applicable in accordance with the Plan's other design and environmental protection policies as follows.

Policy SW11 advises that development must contribute to the creation of attractive and sustainable places through high quality, sustainable and inclusive design. Where appropriate, new development will be required, amongst other things to:

- be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;
- not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design.
- incorporate resource efficient/adaptable buildings and layouts using sustainable design and construction techniques;
- minimise the demand for energy and utilise renewable energy resources;
- provide and protect relevant utility services and infrastructure without causing any unacceptable environmental impacts;
- incorporate measures to improve ground and surface water quality wherever possible;
- provide adequate facilities and space for waste collections and recycling; and
- promote the creation of healthy and active environments and reduce the opportunity for crime and anti-social behaviour.

In addition, all new development where the construction area is 100 sqm or more, is required to incorporate SuDS that meets the statutory sustainable drainage standards set by Welsh Government.

The application site lies within the Merthyr Tydfil Landscape of Outstanding Historic interest and a small area along the northern boundaries lies within the Dowlais Ironworks-Supporting Infrastructure – Dowlais Gas Archeologically Sensitive Area where Policy CW1 is applicable. Given that, an Assessment of the Significance of Impact of Development on the Historic Landscape (ASIDOHL2) accompanies the submission, the views of GGAT should be sought in this regard in order to ensure its qualities where applicable are protected and enhanced as appropriate.

Policies EnW1 and EnW5 seek to maintain and enhance biodiversity interests and provide wider landscape protection, respectively that should also be considered. Given the LVIA and landscaping proposals submitted and that, the area has been previously reclaimed and planting schemes established including woodland areas with mature trees and areas of grassland within the proposed application site the views of the Council's Landscape Architect are pertinent. In addition, given that an Arboricultural Impact Assessment, an Ecological Appraisal, a Construction Landscape and Ecological Masterplan and a Japanese Knotweed Strategy have also been submitted which include tree planning and bird and bat box installations the views of the Council's Ecologist should also be sought.

Policy EnW4 follows the 'precautionary approach' in line with PPW11 paragraph 6.7.15 and developers are encouraged to assess any impact at the earliest stage. It states that development proposals will be required to demonstrate that they would not result in an unacceptable impact on people, residential amenity, property, and / or the natural environment from either:

- Pollution of land, surface water, ground water and the air.
- Land contamination.
- Hazardous substances.
- Land stability.
- Noise, vibration, dust, odour nuisance and light pollution; or
- Any other identified risk to public health and safety.

The applicant should be required to demonstrate that appropriate measures are incorporable to reduce, or minimise the impact identified to the lowest possible acceptable level, for identified impacts. Planning conditions may be imposed, or legal obligation requested to secure any necessary mitigation and monitoring processes both during and post construction. Given this, the inclusion of Noise, Air Quality and Lighting Assessments and with the possibility of land contamination and land stability issues from previous uses, the views of the Public Health Officer and the Health and Safety Executive are relevant.

In addition, Policy SW12 supports development that encourages a modal shift towards sustainable transport. Developments should demonstrate how they intend to reduce the need to travel and encourage the use of sustainable transport. Given that, a Transport Assessment, a Travel Plan, and a Design and Access Statement accompany the application the views of the Engineering and Traffic Group Leader

and Highways and Drainage Engineer are of relevance. Particular regard should be had to an increase in traffic generation and proposals that include temporary car park provision during construction and car parking for 90 car parking spaces plus six disabled parking and 11 charging points and 12 cycle and motor cycle facilities post construction.

Policy SW9 considers the requirement for planning obligations, in accordance with this Policy no obligations are sought on this development, and Community Infrastructure Levy (CIL) is not chargeable on this use.

Finally, the application site also lies within the Goat Mill Road district heating area, where Policy ECW9 applies; here the use of combined heat and power (CHP), amongst other things, is encouraged. Major development is also expected to incorporate, where viable and technically feasible, infrastructure for district heating and to connect to existing systems where available. As the Policy identifies this area as a Heat Priority Area, the developer is also required to submit an energy strategy along with the application. The Energy Statement submitted considers that District Heating is not viable given that the nature of the proposed operation does not generate heat. However, although the proposal includes a Combined Heat and Power unit it will only service the facility and no explanation is given for this in the statement. Paragraph 6.7.89 requires more detail in an energy strategy for example projected energy demands and associated CO2 emissions, and suggests other ways of reducing these demands. Paragraph 4.82 of The Planning Statement states that more detail will be given prior to the development of Building 2. It is considered that this is a requirement in order to fully accord with this Policy.