



PLANNING STATEMENT

PROPOSED WASTE MANAGEMENT FACILITY AT UNIT C, MAERDY INDUSTRIAL ESTATE, RHYMNEY, TREDEGAR, NP22 5PY

**On behalf of
Mekatek Ltd**

Our Ref: 0097.b
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Prepared by: JDE

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1.0 INTRODUCTION

1.1 JCR Planning has been instructed by Mekatek Ltd (the Applicant) to prepare and submit a planning application for a Waste Management Facility at Unit C, Maerdy Industrial Estate, Rhymney.

1.2 This Planning Statement therefore forms part of the submissions of the planning application to be considered by the Authority and provides information on the following points:

- A brief description of the site and surrounding area
- A description of the proposed development
- Consideration of relevant planning policy

2.0 SITE DESCRIPTION

2.1 THE SITE

2.1.1 The site in question measures some 8.93 acres, is generally level in nature and can be described as previously developed land. The focus of the site is then around a large industrial style unit (Photographs 1 and 2) with associated offices and has a total floor area of just under 10,000 square metres.



Photograph 1



Photograph 2

2.1.2 The buildings have multiple vehicular and pedestrian access points, although in terms then of the larger element (rear element), its points of access tend to be on the southern elevation. The external finishes of the buildings in question are then a mix of brickwork, glazed elements and steel profile sheeting.

2.1.3 Around this central building then are a series of hardstanding areas, together with a weigh-bridge and a separate smaller storage building (Photograph 3) at the site's entrance.



Photograph 3

- 2.1.4 The site's main and only point of access (for pedestrian and vehicular traffic) is at the southern boundary, where it leads on to the public highway. Each of the site's boundaries are currently well defined (largely in the form of wire or steel fencing measuring over 2m in height). The site then contains no areas of standing or running water, nor does its operational element contain any areas of vegetation.
- 2.1.5 We understand that the site was previously used for a form of B2 Use. This took the form of a company (Excel Industries) that manufactured fibre-based building products using waste for the construction, road and quarrying industries. We understand that the facility employed 60 staff during its 10 year period of operation. However, the company ceased trading from the site in 2014.

2.2 THE SURROUNDING AREA

- 2.2.1 In the immediate sense, other existing commercial properties and activities can be found to the north, south and west of the application site, with a rail line dissecting the latter from the application site. To the east then lies a series of residential properties, which are largely separated from the site by a heavily landscaped embankment (Photograph 4).



Photograph 4

2.2.2 In the wider sense, the site forms part of the settlement of Rhymney, which contains a range of land uses, community facilities and local services. In terms of access, the settlement benefits from a rail station and is served by a number of regular bus services providing good access to nearby larger settlements. It is then also well linked to the main road network, being a short distance from Heads of the Valleys Road (A465).

3.0 THE PROPOSED DEVELOPMENT

3.1 The proposal seeks planning permission for the change of use of the site and its associated buildings from a B2 Use to a waste management facility (sui generis). The following information provides an outline of the various elements of the proposed development and should be read in conjunction with the accompanying drawings and information.

Development Rationale

3.2 The Applicant has a long standing history operating within the waste industry and currently own and manage a successful and permitted waste management facility of a similar nature in Pontyclun. However, through this experience, they have identified that the demand by existing and potential customers for recycled/re-use of waste of the nature in question is growing at a rate that the current facility is incapable of meeting. As a result, the application site has been identified as being capable of serving this increase in demand through its scale and locational position with regard to sources and end-users.

3.3 The proposal will only serve commercial and public body clients (via licenced carriers) and not members of the public in terms of the importation and exportation of waste it is to deal with. The non-organic forms of waste to be handled by the facility will include the following:

- Paper
- Plastics
- Wood
- Scrap metals
- Cardboard
- Electrical goods (e.g. televisions, white-goods (de-gassed), monitors etc.)

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- 3.4 Due to the nature of some of the above streams, an element of hazardous waste (e.g. batteries) will be generated by the operations, which will then involve some modest on-site storage of such substances. However, such storage will not exceed the thresholds of any specific hazardous substance as set out by the *Planning (Hazardous Substances) (Amendment) (Wales) Regulations 2010*.
- 3.5 Through the provision of this service, the facility will make a valuable contribution to local and national targets for reducing the amount of waste being deposited at landfill sites and increasing the amount that is then instead recycled.
- 3.6 In terms of external finishes of the existing buildings and boundary treatments of the site, these will remain as existing, as the proposal is in effect for only a change of use of the property.

Scale

- 3.7 The proposal is for a processing facility that will deal with up to 75,000 tonnes of waste per annum. This is envisaged to at most then generate up to 26 commercial vehicle movements per day. Approximately 97% of the imported waste will then be recycled into component materials, with only 3% then being forwarded on to landfill sites.
- 3.8 In terms then of employment, it is anticipated that 30 staff (mix of part time and full time) will be required in the first 12 months of operation, with this then possibly rising to double this figure after 2 years.

Operational Activities and Layout

- 3.9 The general activity to be facilitated at the site will in effect be the importation of the forms of solid dry waste outlined above and breaking them down to their component materials. These will then be recycled through various processes of dismantling, shredding, granulating, crushing etc. to create materials for re-use elsewhere. Some of these materials however will also be recycled for use in the construction of concrete blocks at the site itself.

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- 3.10 All of the above processes will take place within the existing building or in adjoining covered areas and each process will involve systems for the collection of dust, resulting in no need for external extraction fans or vents. All dust will then be reused in the construction of the aforementioned concrete blocks. A full list of equipment to be used in the processes to take place at the site accompanies this Statement.
- 3.11 As a result of the above, the majority of the processes and storage will take place within the main existing building or adjoining covered areas, with the existing office and canteen areas continuing to be used for these purposes. Some storage (e.g. concrete blocks and finished recycled material) will occur on the existing hardstanding surrounding the building. However, any external storage will be done so in accordance with NRW permit requirements. The existing car parking areas will then be retained and the existing storage building at the entrance to the site will then be used solely for the purposes of the storage of any batteries, where they would await collection by an authorised handler.
- 3.12 The site will operate on a 24 hour basis, 7 days a week.

Transport and Traffic

- 3.13 The Applicant will operate a small fleet of commercial vehicles from the site. Based on the anticipated level of waste being imported to the site, it is expected that the proposed change of use will generate up to 26 commercial vehicle movements per day, but often far lower than this. This combined with those generated by staff working from the site will then be comparable to that of the previous use of the site.

Drainage

- 3.14 The application scheme will utilise the existing foul and surface water drainage systems.

Dust

3.15 The site application proposal has a low potential to cause dust emissions as all processing of the waste will be undertaken within the existing building. However, attention will be given to the following to ensure that dust is kept to a minimum:

- The processing operation through from loading to stockpiling
- The on-site transfer of materials
- The loading of processed materials onto transport vehicles.

3.16 In addition to the above, all processing machinery and equipment will be fitted with dust collection apparatus, which in itself will be recycled through its utilisation of the manufacture of the aforementioned concrete blocks.

Noise

3.17 As detailed previously, all equipment will be fitted with the manufactures recommended noise suppression elements where applicable. All equipment will be regularly maintained to ensure such apparatus is operating at maximum efficiency.

3.18 In addition to the above, all equipment used in the processes forming part of the proposal will be utilised within the existing building, further reducing the impact of noise generated by the proposal on the surrounding area.

4.0 PLANNING POLICY

4.1 NATIONAL PLANNING POLICY

4.1.1 In terms of planning applications relating to mineral excavation or waste management activities, overarching guidance is contained in Chapter 12 of Planning Policy Wales (PPW). This is then expanded upon and supported by Mineral Technical Advice Notes (MTAN) and Technical Advice Notes (TAN).

4.1.2 In the case of the application proposal – recycling of waste – its principle is supported by all aspects of national planning policy. In the case of PPW, Paragraph 12.1.4 sets out a series of objectives the Welsh Government has with regard to services and infrastructure, one of which the application proposal will positively contribute towards:

“to ensure that appropriate facilities are established to prevent/re-use, prepare for re-use, recycle, recover and, where necessary, safely dispose of waste, so as to meet the Welsh Government’s objectives for waste management;”

4.1.3 Furthermore and as required by 12.5.4, the application proposal also follows the principles established by the Waste Hierarchy (see accompanying *Waste Planning Statement* for further details), ensuring that it represents a sustainable approach to the management of waste.

4.1.4 Further guidance on waste management facilities can then be found in *Technical Advice Note 21 (Waste)* (TAN21). As with PPW, TAN21 advocates the use of the Waste Hierarchy in determining the priority of ways to deal with waste. As detailed above, the application proposal falls within a high category of the Hierarchy with it we understand recycling up to 97% of all waste it receives, with the small remainder then being disposed of via landfill.

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- 4.1.5 In terms then of the site itself, due to its historic use, this is clearly an area of “...*degraded, contaminated or derelict land* ...” and as a site close to key transport routes, the location of the application site for such a scheme as that proposed therefore adheres to the geographic objectives for this form of development as set out in Paragraph 3.27 of TAN21.
- 4.1.6 Guidance is then also provided with regards to the location of such facilities, advising that a form of need for a waste management proposal must be taken into consideration. In the case of the waste to be recycled and processed at the application site, we are not aware of any similar facility within the County Borough. In fact, the nearest similar facility is at Pontyclun, which is owned and operated by the Applicant. Through this experience they have an intimate and ‘hands-on’ view of what is needed in the area in question and so through this application seek to meet this currently unmet need for a facility such as that being put forward by this planning application.
- 4.1.7 Notwithstanding the above, in all cases, this in-principle support offered by TAN21 is on the basis that the economic benefits are then not at the expense of any unacceptable impacts or other interests, such as the environment or residential amenity, as detailed in the Practice Guidance document that accompanies TAN21. All such matters have been given due consideration in the preparation of this application.
- 4.1.8 In the case of the natural environment, the application site does not form part of any local or national nature conservation designation and with the proposal including no physical change to the site, any existing assets or interests will be retained, ensuring therefore that the application proposal adheres to the requirements of TAN5 (*Nature Conservation*).
- 4.1.9 In terms then of flood risk and the guidance of TAN15 (*Development and Flood Risk*), it has been identified that part of the site lies within a C2 Zone. However, during pre-application discussions with NRW (a copy accompanies this application), NRW have

advised that “*Given the nature of the proposed development as a change of use from paper recycling to electronic waste recycling (i.e. less to less vulnerable development), and in the absence of a flood consequence assessment, we consider the risk could be acceptable subject to you and the future occupants being aware of the potential flood risks, and advise the installation of flood-proofing measures as part of the development.*”. As a result, a Flood Response Plan is included for consideration to fully address the points raised by NRW and so adhere to the requirements of TAN15.

4.1.10 As detailed previously, the proposal will generate a certain level of traffic, as the site has done so historically. However, as the level of traffic will be comparable with that of the site’s previous use, it has been concluded that the proposal will not result in a detriment to highway safety and so will adhere to the requirements of TAN18 (*Transport*).

4.1.11 In addition to the environmental considerations of the proposal, there will also be clear economic benefits as a result of the proposal. PPW and TAN23 (*Economic Development*) provide definitions of economic development and its associated benefits, which are as follows:

- Economic development is development (new or change of use) where the resulting space will be occupied by economic activities
- An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income
- Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.

4.1.12 On the basis of the form of the application proposal, the contribution it will make to the local economy in terms of the service it is to provide to the local and wider economy, together with the level of employment it will generate, the application proposal clearly represents a form of economic development as defined by national planning policy and guidance. With this in mind, the guidance of Paragraph 1.2.1

must therefore be given due consideration, notably that “... *it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.*”.

4.1.13 Notwithstanding the above and the guidance of Section 2.1 of TAN23, it is still recognised that a balance must be struck between the economic, social and environmental considerations associated with a proposal. When all factors are considered, together with the accompanying information, the proposal therefore represents a fully sustainable form of development that adheres in full with all relevant requirements of national planning policy and guidance.

4.2 LOCAL PLANNING POLICY

4.2.1 In terms of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the adopted development plan for the area within which the application site is positioned is the Caerphilly Local Development Plan (LDP). It is therefore the policies of this document that have been referred to in the preparation of the proposal subject of the planning application in question, including the following:

- SP1 – Development Strategy (Development in the Heads of the Valleys Regeneration Area)
- SP5 – Settlement Boundaries
- SP9 – Waste Management
- CW3 – Design Considerations (Highways)
- CW5 – Protection of Water Environment
- CW13 – Use Class Restrictions (Business and Industry)
- CW15 – Locational Constraints
- EM2 – Employment Sites Protection

4.2.2 The policies of the LDP are in effect split into three types – strategic, countywide and strategic area related.

Strategic Policies

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- 4.2.3 The application site lies within the defined Heads of the Valleys Regeneration Area (HOVRA) and as a result of the location and principle of the proposal (employment based use) it therefore supports and adheres to the objectives of Policy SP1. Its position within the existing settlement also then adheres to the requirements of Policy SP5.
- 4.2.4 Policy SP9 then deals with matters more specific to proposals of the nature put forward by this current planning application. The Policy outlines that the Authority will implement an integrated approach to the production, management and treatment of waste. This will then be done through a number of ways, including the use of allocated and protected class B2 industrial sites within the County Borough, of which the application site forms one. In fact, the Policy's supportive text outlines that "*The designation of all allocated and protected use class B2 industrial sites as suitable in principle for in-building waste management facilities represents a substantial choice of sites ...*". As a result, the location and principle of the form of development being put forward is supported by Policy SP9 and indeed the requirements of Policy CW13 and Policy CW15.

Countywide Policies

- 4.2.5 The second type of policy to consider are then those that are to be applied on a countywide basis. These provide guidance on matters of design and other planning related standards sought to be secured.
- 4.2.6 The first to be considered then is Policy CW3, which sets out a series of design criteria in relation to the provision of access and parking. As detailed previously in this Statement, the application proposal seeks no physical change to the site and the level and nature of activity proposed is comparable to that of the application site's previous use. With no known records of the previous use resulting in any detriment to highway safety, it is considered therefore that the application proposal will have a comparable impact and so adhere to the requirements of Policy CW3.

4.2.7 Similar to the above, the proposed change of use will utilise existing means of disposal of both surface and foul water as the previous use, ensuring then that the use of the site continues to adhere to the requirements of Policy CW5.

Area Related Policies

4.2.8 The remainder of the policies considered in the preparation of this application then relate to the specific area of which the application site lies within – *Strategic Area 1 – Heads of the Valleys*. In the opening section of this element of the LDP, Rhymney is classified as a ‘Key Settlement’. Furthermore, it also outlines that “*Rhymney also comprises a significant amount of employment land on existing industrial estates. The changing pattern of employment land requirements indicates that these sites offer the opportunity to accommodate alternative uses, whilst retaining an employment function, potentially diversifying the role of Rhymney to the benefit of the whole area.*”. The application proposal therefore supports these objectives.

4.2.9 In terms then of specific policies, Policy EM2 protects the application site and surrounding land for use for the purposes of employment uses and so any proposal should be considered in tandem with the requirements of Policy CW13. As outlined above, the application proposal clearly adheres to the requirements of Policy CW13 and so in turn also those of Policy EM2.

4.2.10 In summary and consideration of the above therefore, the application proposal adheres to all relevant requirements of adopted local planning policy.

5.0 CONCLUSIONS

- 5.1 The application is for a waste management facility at Unit C, Maerdy Industrial Estate, Rhymney
- 5.2 The application has come about through the Applicants direct knowledge of the local waste industry. Through their experience in operating a similar facility in a neighbouring Authority, they have identified that there is now an unmet need and demand for a facility that can process the form of waste in question in Caerphilly County Borough and adjoining areas along those served by the Heads of the Valley Road. This application therefore seeks to directly address this deficit in provision.
- 5.3 As detailed in this Statement and the accompanying information, the processing and recycling of waste forms a key part of the national Waste Hierarchy and the proposed facility will make a valuable contribution to both local and national targets. This contribution however, will be done without detriment to any recognised interest.
- 5.4 The proposal will generate a level of traffic that will not cause any detriment to the existing level of safety on the local highway network or its users. In addition, through using existing infrastructure and facilities with no physical change to the site, there will be then no detrimental impact on local biodiversity or nationally protected species.
- 5.5 In operational terms, the proposal will follow all good practice guidelines, will use plant and machinery that will ensure no detriment to residential amenity is incurred and will operate during acceptable and appropriate hours at all times. In addition, the proposal's operation will in turn provide direct immediate and wider economic benefits in terms of jobs on site, as well as much needed waste management services to the local and regional economy.

5.6 In view of the above and submitted evidence therefore, it is considered that the proposal adheres to all relevant local and national planning policy and so we respectfully request that planning permission is granted for the proposed development in question.