



PLANNING STATEMENT

**PROPOSED TEMPORARY R & D FACILITY BUILDING FOR THE
PROCESSING AND CONVERSION OF RESIDUAL WASTE INTO
VALUE PRODUCT STREAMS - INCLUDING RESEARCH,
MONITORING AND ASSESSMENT**

AT LAND AT

**MEKATEK LTD., AMEX PARK, OLD LLANSTEFFAN ROAD,
JOHNSTOWN, CARMARTHEN, CARMARTHENSHIRE, SA31 3NF**

on behalf of

MEKATEK LTD.

**Our Ref: 2011.a
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Prepared by: CLJ**

1.0	INTRODUCTION AND BACKGROUND	3
2.0	SITE DESCRIPTION	6
2.1	THE SITE	6
3.0	THE PROPOSED DEVELOPMENT	9
4.0	PLANNING POLICY	13
4.1	NATIONAL PLANNING POLICY	13
4.2	LOCAL PLANNING POLICY	14
5.0	CONCLUSION	17

1.0 INTRODUCTION AND BACKGROUND

- 1.0.1 JCR Planning Ltd. has been instructed by ‘Mekatek Ltd.’ (the ‘Applicant’) to prepare and submit a planning application for a proposed temporary research and development facility building for the processing and conversion of residual waste into value product streams – including research, monitoring and assessment at Mekatek Ltd., Amex Park, Old Llansteffan Road, Johnstown, Carmarthen, Carmarthenshire, SA31 3NF.
- 1.0.2 The limited size of the proposal means that it has not been subject of any formal EIA Screening Opinion request by the Local Planning Authority (LPA). The proposed development is not an Environmental Impact Assessment form of development. It is a temporary building which is intended to evaluate the recycling of ‘residual’ waste. Currently, the residual waste would be dealt with by landfill methods but the process to be trialled at the proposed facility is intended to reduce the waste stream even further.
- 1.0.3 The proposal will be by way of a commercial venture between ‘Mekatek Ltd.’ and an established economic partner – ‘Fiberight’ - to develop a novel waste recovery process which will enable the full re-use of a significantly higher proportion of recovered materials.
- 1.0.4 Mekatek Ltd. will initially allow Fiberight to operate on a small area of the Amex Park site under strict control. The activity will be in accordance with the environmental permit of Mekatek Ltd. issued by NRW. Mekatek Ltd. will remain the operator of the site and holder of the associated permits.
- 1.0.5 The partner company, Fiberight, operates in the UK and USA. Its UK operations are presently based in East Wales, with a research facility in Southampton. The company has developed a process for the extraction of homogenous material outputs for the manufacture of high value products, which is a precursor in support of government aims to achieve a circular economy solution for waste.

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- 1.0.6 Fiberight is an experienced waste management company and is accustomed to meeting all environmental safeguards. It has an unblemished record in terms of satisfying NRW license requirements.
- 1.0.7 Currently, Fiberight's USA sister company is involved with a site at 'Coastal Resources' of Maine, Hampden, USA, where a similar process is currently operational. This plant has already demonstrated the ability to recover over 50% of the material in mixed waste into usable materials which is having a profound impact on the recycling rates of the communities that it serves.
- 1.0.8 Fiberight has managed to obtain a significant tranche of investment for the development of this novel waste conversion technology that allows the manufacture of new products from existing residual waste streams and is now looking to establish a site in the UK.
- 1.0.9 The amount of inward investment for Carmarthenshire is estimated to be a conservative £15 - 20 million and a workforce of 50 people, including both high value scientific personnel and skilled operators.
- 1.0.10 Fiberight also has strong links with several Welsh universities which will be strengthened as a result of this development. There is also potential for this venture to attract further industries to the area to exploit the raw material outputs that Fiberight will be producing.
- 1.0.11 Initially however, the first phase is the construction of the temporary R&D building at Amex Park, which will act as a test run for a larger scheme in terms of processes, materials and markets. Fiberight is confident that this proposal will be a success and further expansion plans are already being examined.
- 1.0.12 This planning statement forms part of the submitted application to be considered by the LPA 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.

A Waste Planning Assessment document also accompanies the proposal.

2.0 SITE DESCRIPTION

2.1 THE SITE

2.1.1 Amex Park is an existing complex that is host to a number of buildings already associated with waste recovery and recycling. The site enjoys good communication links to the A40 by way of convenient slip roads. It is largely surrounded by other industrial concerns and is set back a useful distance from Old Llansteffan Road. The main London-Fishguard railway line forms the northern boundary to the site and effectively creates a no-through road, which only serves the Amex Park site. The rear boundary of the complex is formed by agricultural fields adjacent to the River Towy. Amex Park forms part of the built up area of Carmarthen and has been subject of other industrial/commercial enterprises previously.

2.1.2 The exact site for the proposed temporary building sits adjacent to existing buildings within the Amex Park complex and is thus screened on two of its sides. The site is generally level in nature and can be described as previously developed land.



Fig. 1 – General aerial view of application site and adjacent land

2.1.3 The site has adequate existing vehicular and pedestrian access. The external finishes of the existing buildings on the site have a more utilitarian quality than aesthetic appeal and comprise largely corrugated cement sheet clad pitched rooves, with a mixture of panel walls.



Fig. 2 – General view of existing buildings at Amex Park



Fig. 3 – View of site of proposed temporary building

2.1.4 The frontage boundary of the site is well defined, largely in the form of wire or steel fencing of varying height. The site contains no areas of standing or running water, nor does its operational element contain any areas of vegetation.



Fig. 4 – View of site of proposed temporary building

2.1.5 The site has previously had varying forms of B2 use and the current waste treatment processes are regarded as ‘*sui generis*’.

3.0 THE PROPOSED DEVELOPMENT

- 3.0.1 The proposal seeks planning permission for the erection of a 30 metre long by 15 metre wide temporary building, to house a variety of recycling machinery that will be used to process residual waste streams.
- 3.0.2 The design ethos has produced a simple, balanced, small scale, rectangular structure that will sit lightly in this relatively large industrial curtilage. The utilitarian structure will be inconspicuous against the existing industrial complex and will not dominate views into the site. The white translucent facade and roof treatment reflects elements of both modernism and minimalism. It is proportionate in size to its function, as well as to the size of existing complex buildings.
- 3.0.3 In more detail, the temporary building comprises a hard pressed extruded alloy portal frame, to be erected on site. The building will measure 4,200mm to eaves and 6,900mm to ridge. Its walls will be constructed of double PVCu coated polyester fabric (white translucent). Likewise, the roof construction will also be double PVCu coated polyester fabric (white translucent). The structure will be finished with galvanised steel roller shutter doors. The concrete floor will assist with effective pressure cleaning. Ventilation will be natural.
- 3.0.4 Effectively, the recycling process equates to a *sui generis* use which mirrors the other current waste recycling uses operating at the site.

Development Rationale

- 3.0.5 The Applicant has a long history operating within the waste industry and currently owns and operates a number of waste management facilities. Mekatek Ltd.'s experience has led it to identify a demand for a more detailed form of recyclable waste processing that deals with residual waste. There is no other similar facility in Wales tackling residual waste. As a result, the application site has been identified as being capable of satisfying this increased demand, which can be met in terms of scale and the locational position at Amex Park.

3.0.6 The proposal will only serve commercial and public body clients (via licenced carriers) in terms of the importation and exportation of waste and not members of the public.

3.0.7 Through the provision of this service, the proposed facility will make a valuable contribution to meeting local and national targets for waste reduction. Ultimately, if the research and development aspect is satisfied with the process, less waste will be taken to landfill.

Scale

3.0.8 The proposal is for a waste processing facility that will deal with an expected annual tonnage of 5000 tonnes. The type and tonnage of waste will be monitored by the existing NRW licensing regime, with the majority coming from existing material recovery facilities (MRFs). Residual waste is effectively that which is left after the first stages of recycling and recovery, and currently is destined for landfill.

3.0.9 In terms of employment, it is anticipated that 50 staff (mix of part time and full time) will be required, if the process is proven to be successful.

Operational Activities and Layout

3.0.10 The general activity to be facilitated at the site within the proposed temporary building will, in effect, be the importation of residual waste material which is then mixed with water to form a pulp. The mixture is then subject to several separation processes which will eventually lead to a dry product that can be used, for example, as animal bedding and biofuel pellets.

3.0.11 The process is really the micro-management of residual waste and its separation into various component materials. These materials are then recycled by means of a variety of processes of dismantling, shredding, granulating, crushing, etc. to create materials for re-use elsewhere.

3.0.12 Full details of the proposal and its associated activities can be found in the accompanying drawings, but are summarised below for ease of reference:-

- *Design and Layout* – the proposal will work within the existing site layout and buildings.
- *Processes* – material will enter the site on covered or contained HGVs before being deposited within the proposed building at points indicated on the accompanying drawings. The material will be taken to the allotted points for processing by the respective items of machinery and equipment, producing a range of base material forms.
- *Drainage* – the proposal will utilise the existing foul and surface water drainage systems.
- *Plant* – the proposal will involve the use of a range of plant and machinery.

3.0.13 All the above processes will take place within the proposed building and each process will involve systems for the collection of dust, resulting in no need for external extraction fans or vents.

3.0.14 The existing car parking areas will be retained.

3.0.15 The proposed building will operate on a daily basis in line with other existing operations at Amex Park.

Transport and Traffic

3.0.16 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 5,000 tonnes per annum will generate 3 – 4 lorry movements per day (approx.. 200 – 300 per annum).

Drainage

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

Dust

3.0.18 The proposal has a low potential to cause dust emissions as all processing of waste will be undertaken within the proposed 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
- on-site transfer of materials
- loading of processed materials onto transport vehicles.

3.0.19 In addition to the above, all processing machinery and equipment will be fitted with dust collection apparatus, which itself will be recycled.

Noise

3.0.20 All equipment will be fitted with manufacturer's recommended noise suppression elements where applicable. All equipment will be regularly maintained to ensure such apparatus is operating at maximum efficiency.

3.0.21 All equipment used in the recycling processes will be housed within the proposed building, further reducing any noise impact.

4.0 PLANNING POLICY

4.1 NATIONAL PLANNING POLICY

- 4.1.1 In terms of planning applications relating to waste management activities, overarching guidance is contained in Planning Policy Wales (PPW) and which is supported by Mineral Technical Advice Notes (MTANs) and Technical Advice Notes (TANs).
- 4.1.2 In the case of the application proposal, its principle is supported by all aspects of national planning policy. Both PPW and TAN21 ('Waste') for instance, clearly confirms that the Welsh Government recognises the valuable contribution that recycled residual material can make to the economic development of Wales and is to be encouraged.
- 4.1.3 In terms of the site itself, due to its established use, it is clearly an area of previously developed land and is close to a key transport node. The location of the application site for such a proposal adheres to the locational objectives as set out in paragraph 3.27 of TAN21. With much of the residual waste to be treated by the proposed facility coming from the immediate region, there is a recognised need for this facility and is supported by the locational principles set out in TAN21.
- 4.1.4 This in-principle policy support is not at the expense of 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. In the case of the natural environment, no particular interests have been identified because the site is an existing hard surfaced industrial area.
- 4.1.5 Whilst the proposal will generate a certain level of traffic, this would only amount to an additional 300 journeys per annum. It therefore has to be concluded that the proposal will not result in a detriment to highway safety and so will adhere to the requirements of TAN18 (*Transport*).

4.1.6 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.

4.1.7 The proposal will make a contribution 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 (50 jobs). The proposal clearly represents an important form of economic development, as defined by national planning policy and guidance. With this in mind, the guidance of paragraph 1.2.1 of TAN23 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.*”.

4.1.8 Notwithstanding the economic benefits, it is still recognised that a balance must be struck between the economic, social and environmental considerations associated with this proposal. When all factors are considered, the proposal represents a fully sustainable form of development that fully complies 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 application site is the Carmarthenshire Local Development Plan (LDP). The following LDP policies are relevant:-

- SP12 – Waste Management
- SP14 – Protection and Enhancement of the Natural Environment
- GP1 -Sustainability and High Qualities Design
- GP2 – Development Limits
- TR2 – Location of Development – Transport Considerations
- EQ3 – Regional and Local Designations
- EQ4 – Biodiversity
- EP1 – Water Quality and Resources
- EP2 – Pollution
- EP6 – Unstable Land
- WPP2 – Waste Management Facilities Outside of Development Limits
- MPP3 – Mineral Safeguarding

4.2.2 The policies of the LDP are in effect split into three types – strategic, site specific and topic related.

Strategic Policies

4.2.3 The most relevant to the proposal is Policy SP12. This policy commits the Authority to adopting an integrated approach with regards to waste management within the county. This approach will:-

- follow the defined waste hierarchy
- use appropriate land as part of an integrated network of waste management facilities
- give due regard to the proximity principle in terms of the point of source and treatment/disposal.

At a strategic level therefore, the proposal clearly adheres to the objectives and guidance of Policy SP12.

Site Specific Policies

4.2.4 The application site is identified as existing industrial land within the development limits for Carmarthen and therefore the principle of additional industrial activity is

firmly established. In general, the LDP encourages most forms of development to be located within defined development limits.

Topic Related Policies

- 4.2.5 The remainder of the policies considered in the preparation of this application relate to specific topic areas, although not necessarily all aspects are of relevance to the nature of the proposal.
- 4.2.6 The first policy for consideration – Policy GP1 – provides an overarching set of criteria against which to assess all forms of development. Whilst many of the criteria of Policy GP1 relate to more construction related forms of development, such as housing, it is considered that the proposal complies fully with all relevant elements of the policy. The proposed development respects and takes into account existing site conditions and effectively blends into the existing industrial complex.
- 4.2.7 In addition to visual amenity, residential amenity has also been given careful consideration. There are no dwellings within proximity to the site and therefore there will be no impact. Potential dust and noise issues are already addressed as part of the existing operations at Amex Park.
- 4.2.8 The issue of surface water disposal is of only limited relevance. The proposed building will not affect surface water flow, rates or storage capacity on the site.
- 4.2.9 In summary therefore, the proposed development adheres to all relevant requirements of Policy GP1 and all aspects of local planning policy.

5.0 CONCLUSION

- 5.0.1 The proposed development comprises a proposed temporary research and development facility building for the processing and conversion of residual waste into value product streams – including research, monitoring and assessment.
- 5.0.2 The proposal has developed as a result of the Applicant’s direct knowledge of the local waste industry and it has identified that there is now a much greater need and demand for a facility that can process residual waste. At present, there is no similar facility in West Wales or indeed the country as a whole. This proposal therefore seeks to directly address this deficit in provision.
- 5.0.3 The processing and recycling of residual 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 achieved without detriment to any recognised interest.
- 5.0.4 The proposal will generate only a low level of traffic that will not cause any detriment to the existing level of safety on the local highway network or its users.
- 5.0.5 In operational terms, the proposal will follow all good practice guidelines, will use plant and machinery that will ensure no detriment to amenity is incurred and will operate during acceptable and appropriate hours at all times. In addition, the proposed development will provide direct immediate and wider economic benefits, including employment opportunities, as well as much needed waste management services to the local and regional economy.
- 5.0.6 In view of the foregoing, it is therefore considered that the proposal complies with all relevant local and national planning policy and it is respectfully requested that planning permission be granted.