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Planning Department
Caerphilly County Borough Council
Ty Penallta, Tredomen Park
Ystrad Mynach, CF82 7WF

Dear Sir/Madam,

**RE: PLANNING APPLICATION FOR PROPOSED WASTE TRANSFER FACILITY AND ASSOCIATED
EXTERNAL STORAGE AREA– LAND AT FORMER CAE GLAS MINE, FOCHRIW, RHYMNEY**

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Boardman Planning Ltd on behalf of Mr. T. Rowe in support of a planning application for the change of use of an existing building and associated land at the former Cae Glas Mine, Fochriw, to a waste transfer facility with associated external skip storage.
- 1.2 The proposal seeks to utilise an existing industrial building and associated operational yard formerly connected with mining activities at the site. The development would facilitate the receipt, sorting, separation and transfer of non-hazardous waste materials and would contribute towards Welsh Government objectives relating to sustainable waste management, resource efficiency and the circular economy.
- 1.3 The proposal represents the beneficial re-use of an existing building that already benefits from planning permission for the storage and maintenance of mining machinery, company vehicles and plant. The development will secure a viable long-term use for the building and associated hardstanding whilst supporting employment opportunities and investment within the Heads of the Valleys Regeneration Area.
- 1.4 The application is supported by the following documentation:
 - Planning Statement;
 - Waste Management Assessment;

- Green Infrastructure Statement;
- Noise Assessment;
- Transport Statement;
- Site Location Plan;
- Proposed Site Layout Plan; and
- Other supporting plans and documentation.

1.5 This Planning Statement provides a detailed assessment of the proposed development against the relevant provisions of the Development Plan, national planning policy and all other material planning considerations.

2.0 SITE DESCRIPTION AND CONTEXT

- 2.1 The application site comprises an existing industrial building and associated yard located within the former Cae Glas Mine complex to the west of Fochriw. A site location plan showing the position of the application site is shown below at Figure 1.



Figure 1 – Site location plan (site edged red)

- 2.2 Historically the site formed part of a substantial mining operation. Whilst the wider mining activities have ceased and much of the former infrastructure has been removed, an existing industrial building remains together with associated hardstanding, retaining structures, access roads and operational land.
- 2.3 The building is a large portal framed structure finished in profiled metal cladding and possesses a distinctly industrial appearance. The surrounding yard areas comprise extensive hardstanding capable of accommodating commercial vehicle movements and operational activity.
- 2.4 Access to the site is obtained via an established private access road connecting directly to the public highway network. The access arrangements are capable of accommodating commercial vehicles and have historically served the operational requirements associated with the former mining use.
- 2.5 The site occupies a relatively contained position and is screened by existing landform, retaining structures, boundary treatments and the building itself. Whilst the site lies within the open countryside, it does not possess the characteristics typically associated with undeveloped rural land. Instead, the site retains the appearance and function of a former industrial complex.
- 2.6 The nearest residential properties are located within the settlement of Fochriw. Due to the separation distances involved, intervening landform and existing topography, the site benefits from a degree of physical separation from sensitive receptors.
- 2.7 The site lies within the Heads of the Valleys Regeneration Area and represents a previously developed brownfield site.

3.0 RELEVANT PLANNING HISTORY

- 3.1 The site has an extensive planning history associated with mining activities undertaken at the former Cae Glas Mine.
- 3.2 Whilst many of the historic permissions relate directly to mineral extraction activities, the most relevant planning history relates to planning permission reference 21/0850/NCC.
- 3.3 Planning permission 21/0850/NCC authorised the removal of a condition requiring the eventual removal of the existing building and allowed the permanent retention of the structure for the storage and maintenance of mining machinery, company vehicles and plant.
- 3.4 The officer's assessment associated with that permission acknowledged the potential for future alternative uses of the building once mining operations had ceased. Importantly, the decision established the principle that the building should remain permanently and continue to serve a productive function.
- 3.5 The permanent retention of the building is an important material consideration in the determination of the current application and demonstrates that the Local Planning Authority has already accepted the long-term retention of the structure for operational and employment-generating uses.

4.0 DESCRIPTION OF DEVELOPMENT

- 4.1 Planning permission is sought for the use of the existing building as a waste transfer facility together with associated external skip storage. The facility would receive non-hazardous household, commercial and industrial waste. No hazardous waste would be accepted at the site.
- 4.2 Waste received at the facility would be sorted and separated within the existing building before being transferred to appropriately authorised recycling, recovery and disposal facilities. All sorting operations would occur within the building. The proposal also includes the external storage of empty skips within the existing yard area. The facility will employ approximately five full-time members of staff.
- 4.3 Operating hours are proposed as follows:
 - Monday to Friday: 07:00 – 19:00
 - Saturday: 07:00 – 13:00
 - Sunday and Bank Holidays: Closed
- 4.4 The proposal requires no extension to the building and no significant engineering operations. The development therefore represents the re-use of an existing industrial building and associated hardstanding with only limited physical intervention.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

National Planning Policy

Future Wales – The National Plan 2040

- 5.2 Future Wales establishes the national spatial strategy for Wales and supports sustainable economic development, regeneration, resource efficiency and the transition towards a circular economy.
- 5.3 The proposal supports the objectives of Future Wales through the productive re-use of an existing brownfield site and by contributing towards the infrastructure necessary to support sustainable waste management.

Planning Policy Wales Edition 12

- 5.4 Planning Policy Wales (PPW) promotes sustainable development, resource efficiency and the transition towards a circular economy. PPW recognises the important role that waste management infrastructure plays in diverting waste from landfill, increasing recycling rates and supporting the efficient use of resources.
- 5.5 PPW also promotes the re-use of previously developed land and buildings and encourages development that contributes positively towards environmental, social and economic well-being.

Technical Advice Notes (TAN)

- 5.6 The following Technical Advice Notes are considered relevant to the proposal:
- TAN 11: Noise;
 - TAN 12: Design;
 - TAN 18: Transport; and
 - TAN 21: Waste.
- 5.8 TAN 21 is of particular relevance and provides detailed guidance regarding waste management facilities and their role in delivering Welsh Government waste objectives.

Caerphilly County Borough Local Development Plan

- 5.9 The following policies are relevant to the assessment of the proposal:
- SP1 – Development within the Heads of the Valleys Regeneration Area;
 - SP5 – Settlement Boundaries;
 - SP6 – Place Making;
 - SP9 – Waste Management;
 - SP10 – Nature Conservation;

- CW1 – Sustainable Transport, Accessibility and Social Inclusion;
- CW2 – Amenity;
- CW3 – Design Considerations: Highways;
- CW4 – Natural Heritage Protection;
- CW5 – Protection of the Water Environment; and
- CW15 – General Locational Constraints.

6.0 PLANNING ASSESSMENT

Principle of Development

- 6.1 The application site lies outside of a defined settlement boundary and consequently Policy CW15 represents a key consideration in the determination of the application. Criterion C(iv) of Policy CW15 specifically recognises that waste management facilities may be acceptable outside settlement boundaries where they cannot reasonably be located elsewhere. The proposal clearly falls within the category of development envisaged by the policy and the principal consideration is therefore whether the application site is suitable for the proposed use.
- 6.2 The application seeks the re-use of an existing industrial building and associated operational yard located within the former Cae Glas Mine complex. The site benefits from established access arrangements, extensive areas of hardstanding, an existing industrial character and physical separation from nearby residential properties. The proposal does not therefore introduce industrial activity into an undeveloped countryside location but instead secures the continued productive use of a previously developed brownfield site that has historically accommodated operational and employment-generating activities.
- 6.3 The site lies within the Heads of the Valleys Regeneration Area where Policy SP1 seeks to encourage sustainable economic regeneration, investment and employment creation. The proposal directly supports these objectives through the continued use of an existing employment site and the provision of jobs associated with the operation of the facility. The development will also ensure the continued productive use of a building that the Local Planning Authority has previously accepted should remain permanently on the site.
- 6.4 Policy SP9 seeks to ensure an adequate network of waste management facilities is available to support Welsh Government waste objectives. The proposal contributes directly towards these objectives by providing infrastructure necessary for the receipt, sorting, separation and transfer of waste materials. The facility performs an important role within the wider waste management chain and will assist in diverting waste away from landfill and towards recycling, recovery and re-use operations.
- 6.5 The proposal also accords with the placemaking principles contained within Policy SP6. Existing buildings, access arrangements and operational infrastructure will be utilised, thereby minimising environmental impacts and avoiding the need for new development on greenfield land. The proposal therefore represents an efficient and sustainable use of existing resources and accords with the overarching objectives of sustainable development promoted by national planning policy.

- 6.6 Wales has established ambitious targets in relation to waste reduction, recycling and resource efficiency. Delivery of those objectives requires a comprehensive network of waste management facilities capable of receiving, sorting, separating and transferring waste materials. The proposed development would contribute towards the provision of that infrastructure and support the delivery of Welsh Government waste objectives. The Waste Management Assessment submitted with the application provides further information regarding need, capacity, market demand and the role of the facility within the wider waste management network.

Policy CW15 and Existing Lawful Use

- 6.7 Policy CW15 represents the principal policy consideration in the determination of the application. Waste management facilities require specific operational characteristics including suitable access arrangements, adequate separation from sensitive receptors, sufficient operational land and buildings capable of accommodating waste management activities.
- 6.8 The application site possesses all of these characteristics. The site contains an existing industrial building capable of accommodating internal waste sorting operations without requiring substantial new construction. Extensive areas of hardstanding exist for commercial vehicle movements and operational activity whilst established access arrangements have historically served the operational requirements of the former mining complex. The site also benefits from physical separation from nearby residential properties and existing screening provided by landform, retaining structures and boundary treatments.
- 6.9 Significant weight should be afforded to the fact that the proposal utilises a previously developed brownfield site rather than requiring development on an alternative greenfield location. The proposal therefore represents a logical and sustainable use of an existing industrial building and operational yard.
- 6.10 A further important material consideration relates to the lawful use of the building. Planning permission 21/0850/NCC authorised the permanent retention of the building for the storage and maintenance of mining machinery, company vehicles and plant. The building therefore benefits from a lawful commercial use capable of generating vehicle movements, operational activity, employment and associated noise.
- 6.11 Whilst the proposed waste transfer facility differs operationally from the existing authorised use, the proposal would continue the productive use of the building and associated yard for commercial purposes. The proposal therefore represents a continuation of the site's established employment and operational function rather than the introduction of a wholly new use within the countryside.

TAN 21, Waste Hierarchy and Circular Economy

- 6.12 Technical Advice Note 21 establishes the framework through which waste management proposals should be assessed and recognises that the delivery of Welsh Government waste objectives requires an integrated network of facilities capable of receiving, sorting,

separating and transferring waste materials. The proposed development forms part of that network and will provide infrastructure necessary to support the sustainable management of waste within the region.

- 6.13 Waste received at the facility will be sorted and separated before being transferred to appropriately authorised recycling, recovery and treatment facilities. The proposal will not operate as a landfill site or final disposal destination. Instead, the facility has been specifically designed to maximise opportunities for recycling and recovery and therefore operates towards the upper end of the waste hierarchy.
- 6.14 The waste hierarchy sits at the heart of Welsh Government waste policy and prioritises waste management activities in the following order: prevention, preparing for re-use, recycling, other recovery and disposal. Through the separation of recyclable and recoverable materials from mixed waste streams, the proposal enables resources to remain in productive use for longer and reduces reliance upon disposal as a waste management solution.
- 6.15 The proposal also contributes directly towards Welsh Government objectives relating to the circular economy. Waste transfer facilities perform a critical role within the circular economy because they allow materials to be identified, separated and directed towards appropriate recovery and recycling operations. The development therefore supports resource efficiency, reduces waste sent to landfill and assists in delivering the wider objectives of Planning Policy Wales and TAN 21.

Landscape and Visual Impact

- 6.16 The application site lies within the Northern Rhymney Valley Visually Important Local Landscape. However, the proposal does not involve any extension to the building, any engineering operations or significant alterations to the appearance of the site. The only notable visual change relates to the storage of empty skips within the existing compound area. Furthermore, skips will only be stacked a maximum of 3 high which has limited overall height.
- 6.17 The proposed skip storage area is located between the retained building and existing retaining structures and will therefore be highly screened from the wider landscape. Any visual impacts will be highly localised and experienced within the context of an existing industrial building and operational yard. The wider landscape character of the Visually Important Local Landscape will remain unchanged and the proposal is therefore considered compliant with Policy CW4.

Residential Amenity

- 6.18 A detailed Noise Assessment accompanies the application and considers the potential effects of the development upon nearby residential properties. The assessment concludes that the proposal can operate without giving rise to unacceptable impacts upon residential amenity. Furthermore, the site benefits from significant separation distances, existing topography and physical screening which further reduce the potential for adverse impacts.

Subject to the recommendations contained within the Noise Assessment, the proposal accords with Policy CW2.

Highways and Access

- 6.19 A Transport Statement has been prepared by Acstro in support of the application and specifically addresses the highway matters raised by the Local Planning Authority during the pre-application process.
- 6.20 The assessment confirms that the site benefits from an established access arrangement via a private access track connecting directly to Fochriw Road and that no physical alterations to the highway network are required to facilitate the proposed development. The existing access possesses adequate visibility in both directions and has historically accommodated operational and commercial traffic associated with the former mining operation and lawful use of the retained building.
- 6.21 The proposed development will employ up to five members of staff and generate a modest level of vehicle activity. Waste materials will be delivered using 18-tonne skip vehicles before being transferred from the site via 32-tonne hook loader vehicles. The Transport Statement identifies that between five and ten deliveries and collections are anticipated per day, resulting in a maximum of approximately 40 HGV movements daily. The assessment concludes that this level of activity would not materially affect the operation of the surrounding highway network.
- 6.22 Swept path analysis demonstrates that sufficient space exists within the site to allow all vehicles to enter, manoeuvre, load, unload and exit in a forward gear without affecting the public highway. The assessment also confirms that all HGV traffic associated with the development will access the site from the north via the A465 Heads of the Valleys Road and Fochriw Road. No HGV traffic will travel through the weight-restricted roads within Fochriw village. The proposal therefore accords with Policies CW1 and CW3.

Ecology and Green Infrastructure

- 6.23 The application site comprises an existing industrial building, hardstanding and associated operational land. The proposal does not involve significant physical alterations to the site and therefore opportunities for direct ecological impacts are limited.
- 6.24 A Green Infrastructure Statement accompanies the application and demonstrates that the development has been designed in accordance with the Welsh Government stepwise approach. The proposal utilises existing developed land, avoids impacts upon surrounding habitats and provides proportionate biodiversity enhancements through the installation of bird nesting and bat roosting features on the retained building. The proposal therefore accords with Future Wales Policy 9, Planning Policy Wales Chapter 6 and Policy SP10 of the Local Development Plan.

Economic Benefits and Planning Balance

- 6.25 The proposal will support employment opportunities, facilitate continued investment in a previously developed site and contribute towards the delivery of Welsh Government waste management objectives. The development will also support wider economic activity associated with the waste management sector and secure a sustainable long-term use for an existing industrial building.
- 6.26 The proposal represents the re-use of an existing brownfield site with established infrastructure, lawful commercial use and suitable operational characteristics. The supporting technical assessments demonstrate that the development can be accommodated without giving rise to unacceptable impacts upon residential amenity, highway safety, ecology, green infrastructure or landscape character.
- 6.27 The proposal directly supports Welsh Government objectives relating to sustainable waste management, resource efficiency and the transition towards a circular economy. Having regard to the Development Plan as a whole, together with national planning policy and all other material considerations, it is considered that the proposal represents a sustainable form of development for which there is a clear policy justification. Planning permission should therefore be granted.

7.0 RESPONSE TO PRE-APPLICATION ENQUIRY SPA/25/0143

- 7.1 A formal pre-application enquiry was submitted to Caerphilly County Borough Council and a response was subsequently issued under reference SPA/25/0143.
- 7.2 The Local Planning Authority identified a number of matters requiring further consideration including compliance with Policy CW15, preparation of a Waste Management Assessment, consideration of the waste hierarchy, residential amenity impacts, highway impacts and ecological considerations.
- 7.3 The planning application has been prepared having regard to these comments.
- 7.4 A Waste Management Assessment accompanies this application and provides detailed information regarding the role of the facility, waste management need, markets served, capacity and compliance with the waste hierarchy.
- 7.5 A Noise Assessment has been commissioned and accompanies the application.
- 7.6 A Transport Statement has been prepared and accompanies the application. The assessment confirms that the proposed development can be accommodated safely on the local highway network, that sufficient space exists within the site for all vehicle manoeuvring operations, and that all HGV traffic will access the site via the A465 Heads of the Valleys Road, thereby avoiding the weight-restricted roads within Fochriw village
- 7.7 A Green Infrastructure Statement has also been prepared in accordance with national planning policy requirements.
- 7.8 It is therefore considered that the matters raised by the Local Planning Authority have been appropriately addressed through the supporting documentation submitted as part of the planning application.

8.0 CONCLUSION

- 8.1 The proposal represents the beneficial re-use of an existing industrial building and associated operational yard located within a former mining complex.
- 8.2 The development supports Welsh Government objectives relating to sustainable waste management, resource efficiency and the circular economy.
- 8.3 The proposal utilises a previously developed brownfield site possessing suitable operational characteristics, existing infrastructure and established access arrangements.
- 8.4 The development will contribute towards the provision of waste management infrastructure whilst generating economic and employment benefits.
- 8.5 The proposal accords with the objectives of Future Wales, Planning Policy Wales, TAN 21 and the relevant policies of the Caerphilly County Borough Local Development Plan.
- 8.6 For the reasons set out within this Planning Statement and supporting documentation, planning permission should be granted.