



**Retention of extension and changes to recycling centre
at
Llantrisant Recycling Centre, Pontyclun**

Planning Statement
On behalf of Llantrisant Recycling Centre Ltd

DRAFT FOR PRE-APPLICATION CONSULTATION

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1.0 Introduction

- 1.1 This Planning Statement is prepared on behalf of Llantrisant Recycling Centre Ltd (“the applicant”) to accompany a full planning application submitted to Rhondda Cynon Taf County Borough Council (“the LPA”) for:

“Partially retrospective application for the retention of extension and changes to recycling centre; including changes to layout and surfacing, the provision of a weigh bridge, additional buildings, and attenuation pond and drainage amendments, change to the type and quality of materials being processed to include green waste, timber and glass, drying of material, operation of Biomass Boilers, DMR processing, Glass processing, composting & Green Waste, Wood Shredding, nappies Bulking, and operation of the Recycling Shop, plus a change to approved working hours.”

- 1.2 This Statement should be read in conjunction with the following accompanying documents:

- Design and Access Statement;
- PAC report prepared by Have Your Say;
- Drainage Strategy report prepared by CD Gray;
- Ground Conditions and Coal Mining report prepared by RGS;
- Phase I Ecology report and surveys prepared by Soltys Brewster;
- Highway Statement prepared by Corun Associates;
- Noise Report prepared by Hunter Acoustics;
- Air Quality, Dust and Odour Assessment prepared by Air Quality Consultants;
- Landscape and Visual Impact Assessment prepared by Aspect;
- Landscaping Strategy prepared by Aspect;
- Environmental Impact Assessment prepared by Mango Planning covering Water Quality and Biodiversity, with technical inputs from CD Gray and Soltys Brewster.

- 1.3 Section 2 of this report describes the application site, while Section 3 describes the application proposal. Section 4 sets out the planning policy context, against which the application falls to be considered. Section 5 considers the planning matters

associated with the proposal. Finally, Section 6 provides a summary and our conclusions.

2.0 The application site

Site context

- 2.1 The application site extends to an area of land covering approximately 2.75 hectares and operates as a community recycling facility for use by members of the public, as well as an open yard used for the storage, sorting and processing of recycling waste.
- 2.2 The site comprises the use of two distinct areas of land that are grade separated. The first area sits at the western end of the site and comprises an open yard with a ramp structure that provides an elevated platform for the filling of recycling skips by visiting members of the public. Public parking is also provided, and small kiosk provides for the sale of recycled goods.
- 2.3 At the eastern end of the site, elevated above the community site is an open yard with two storage buildings along its western edge. This area is accessed from the community recycling facility area via a reception area comprising weighbridge, single storey offices and parking operated by Tom Prichard Holdings for the reception, sorting and distribution of recycled materials.
- 2.4 The southern storage building is used for the sorting and drying of recycled materials. The second storage building is partly enclosed and contains two biomass boilers that generate heat and electricity for the operation of the facility. The boilers are internal to the building save for ventilation plant affixed to the external wall and two chimneys that extend above the roof line.
- 2.5 The site also includes perimeter landscaped bunding to the east and south, and a settlement pond for the management of surface water.
- 2.6 The majority of the site benefits from a historic planning permission for the current uses (Ref: 12/0037). The proposed application is necessitated by the extension of the recycling yard and the reconfiguration of the site, including regrading works to

land adjoining Nant Muchudd. These works have been undertaken without the necessary planning consent.

- 2.7 The site area also includes an approximately 6-metre strip to the west of the northern waste/biomass building to accommodate landscape screening.
- 2.8 The proposal involves the reception, sorting and repackaging of up to **350,000** tonnes of recyclable material a year. This comprises aggregates, kerbside recycling materials, timber and green waste, road sweepings, glass fines and nappies. As a recycling operation, there is very little waste from the site. Unrecyclable materials comprise less than 10% of materials received and sorted on site.
- 2.9 The site is located to the north and east of the Llantrisant Business Park centred on NGR ST 04153 85177, to the east of Pantybrad Lane, from which all access is gained.
- 2.10 To the south, the site is bounded by Nant Muchudd, while to the east and north is unimproved agricultural land.
- 2.11 At the north western edge of the site, adjoining the community recycling facility and site access, is Glanmychudd Fach Farmhouse. Further west is the Royal Mint.
- 2.12 Further to the south, across Nant Muchudd, are units within the Business Park.

Planning history

- 2.13 The Llantrisant Recycling Centre was granted planning permission by the LPA on 24th March 2014 under reference 12/0037/10 (“the 2014 planning permission”).
- 2.14 Since that approval the level of recycling within the LPA area has increased and consequently the facility has been extended and reconfigured. A planning application (Reference 18/1347/10) has been submitted to retrospectively secure planning consent for the changes that have occurred at the site. However, following

further discussions with officers it has been agreed that a new application is to be made that takes account fully of matters raised by officers and consultees in response to application 18/1347/10 (“the 2018 planning application”).

- 2.15 A request for a Screening Opinion was submitted to the Council on 7th February 2020 under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

- 2.16 The Council responded on 30th March 2020 to confirm that an EIA was required to support the resubmission, focussing on the key areas of impacts on water quality and biodiversity, as the drainage at the site is considered to be a complex issue. Copies of this correspondence are reproduced at **Appendix 1**.

3.0 The proposal

- 3.1 The majority of the subject site benefits from existing and historic planning permission for the uses that take place. As outlined above, the proposed application is necessitated however by the extension of the recycling yard and the reconfiguration of the site, including regrading works to land adjoining Nant Muchudd.
- 3.2 These works have been undertaken without the necessary planning consent. The majority of the site, extending to 2.24 hectares, has an implemented planning permission for the same use as that proposed. The increase in area of 0.5 hectares represents an uplift of approximately 22%.
- 3.3 Secondly, the proposals will ensure that for the avoidance of doubt, the site has in place a comprehensive planning permission. The site has evolved in an ad-hoc manner and, as such, a comprehensive permission will provide certainty to both the applicant and the Council as to what is permitted and where.
- 3.4 The application proposals are illustrated on the Proposed Site Plan enclosed at **Appendix 2** and further details are provided within the Design and Access Statement, submitted to accompany the application.
- 3.5 There are between 12 and 15 staff on site at any time, who control the mixed waste that comes into the site, together with the recycled materials that leave it. It is presently open from 7.30am to 16.00, Mondays to Friday, and 7.30am to 13.30 on Saturdays and closed on Sunday.
- 3.6 This application seeks to extend these hours across the site to allow the facility to operate from 6.30am to 18.30pm, seven days per week (apart from Christmas and New Years Day). The impacts of extending these hours is provided within the submitted Noise Report prepared by Hunter Acoustics.

4.0 Policy and other material considerations

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”) requires that when making a determination on a planning application a local planning authority must make that determination in accordance with the development plan, unless material considerations indicate otherwise.

4.2 In this case, the Development Plan comprises the Rhondda Cynon Taf County Borough Council Local Development Plan (adopted 2011) (“LDP”). We first turn to consider the development plan before reviewing other material considerations.

Rhondda Cynon Taf County Borough Council Local Development Plan 2006-2021 (adopted 2011)

4.3 The Local Plan was adopted in 2011 and therefore represents the most recent expression of the Council’s strategy for the Llantrisant area for the period up to 2021.

4.4 The application site falls beyond the development boundary of the Business Park, in the countryside as defined in the current adopted Plan.

4.5 Policy CS2 “Development in the South” sets out criteria for achieving sustainable growth, including, promoting development within defined settlement boundaries and promoting the reuse of under used/previously developed land.

4.6 Policy AW2 “Sustainable locations” supports development in sustainable locations and includes sites that are within the defined settlement boundary and would not unacceptably conflict with surrounding uses

4.7 Policy AW5 “New Development” identifies a set of criteria against which new development should be considered, with emphasis on amenity and accessibility.

- 4.8 Policy AW6 “Design and Placemaking” confirms that development proposals will be supported where satisfy a series of criteria such as a high standard of design and are appropriate to the local context.
- 4.9 Policy AW7 “Protection and Enhancement of the Built Environment” seeks to protect Public Rights of Way from development proposals unless its loss can be replaced.
- 4.10 Policy AW8 “Protection and Enhancement of the Natural Environment aims to protect the distinct and natural heritage of Rhondda Cynon Taf.
- 4.11 Policy AW10 “Environmental Protection and Public Health” confirms that development proposals will not be permitted where they would cause or result in a risk of unacceptable harm to health and/or local amenity because of air; light; water and noise pollution and contamination; land instability and flooding.
- 4.12 Policy AW11 “Existing Employment and Retail Uses” seeks to retain employment uses within existing employment sites.

Other material considerations

National policy

- 4.13 National planning policy for Wales is set out in Planning Policy Wales (“PPW”) Edition 10 (December, 2018) with supporting technical information provided in Technical Advice Notes (“TANs”). TAN 12 provides guidance on design whilst TAN 23 provides guidance on economic development.
- 4.14 At the heart of PPW is a presumption in favour of sustainable development. Paragraph 1.17 confirms that Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise.

4.15 The reuse of previously developed (or brownfield) land is encouraged wherever possible in preference to greenfield sites. Many previously developed sites in built-up areas are considered suitable for development because their re-use will promote sustainability objectives. This includes sites in and around existing settlements where there is vacant or under-used land.

4.16 In terms of recycling facilities, paragraph 5.13.14 notes:

“As part of development plan preparation planning authorities should encourage the recycling and re-use of construction and demolition wastes as well as mineral and industrial wastes. Every planning authority should, either independently or with its neighbours, make provision for storage and processing of inert materials arising from construction, demolition and maintenance operations by the identification of preferred locations for recycling facilities in development plans. On the rare occasion, where suitable sites cannot be identified in development plans, then clear criteria should be set out to assess planning applications for recycling sites.”

4.17 Chapter 5 of PPW titled “Productive and Enterprising Places” provides specific guidance in relation to employment. It recognises that a Prosperous Wales can be achieved through increased economic activity across all sectors. Further, it acknowledges that there must be a sufficient supply of employment land to meet the needs and requirements of a range of future employment scenarios.

4.18 Paragraph 5.4.1 states that *“The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses”*.

4.19 Paragraph 5.4.4 states that *“Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration”*.

4.20 TAN 23: Economic Development (2014) provides advice on development that

generates wealth, jobs and income. At Paragraph 1.1.1 it states *“It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.”*

- 4.21 Paragraph 1.2.1 states *“The economic benefits associated with development may be geographically spread out far beyond the area where the development is located. As a consequence it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development.”*

Planning policy conclusions

- 4.22 Guidance requires the consideration of the development plan as a whole. When assessed against the aims and objectives of the development plan, national guidance and other material considerations, the application proposal is considered to be compliant.
- 4.23 We assess the proposals in the following section.

5.0 Planning Assessment

- 5.1 The application proposal must be determined in a manner prescribed under Section 38(6) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”), which requires that when making a determination on a planning application a local planning authority must make that determination in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The application site represents an existing recycling facility that has operated for a number of years. The principle of the use is therefore well established, as evidenced by the 2012 planning permission for alterations and its extension.
- 5.3 As previously detailed, since that approval the level of recycling within the LPA area has increased and consequently the facility has been extended and reconfigured. A planning application (Reference 18/1347/10) has been submitted to retrospectively secure planning consent for the changes that have occurred at the site. However, following further discussions with officers it has been agreed that a new application is to be made that takes account fully of matters raised by officers and consultees in response to application 18/1347/10 (“the 2018 planning application”).
- 5.4 This application seeks to address these issues as raised by consultees through a suite of technical reports and the submitted Environmental Statement and are also summarised below.

General Development (LDP Policy AW5)

- 5.5 LDP Policy AW5 provides a detailed list of criteria against which development generally will be assessed. Insofar as the criteria are wide ranging and apply to all forms of development, there is no requirement to comply with all criteria to satisfy the policy.
- 5.6 Of particular relevance to the application proposal are the following:

“Amenity- a) The scale, form and design of the development would have no unacceptable effect on the character and appearance of the site and the surrounding area”.

5.7 The submitted Landscape and Visual Impact Assessment prepared by Aspect Landscape Planning demonstrates that the proposal can be incorporated into the existing landscape without significant changes to the existing baseline views. The 2018 planning application was supported by a landscape assessment but this was not in accordance with LVIA methodology. This application is therefore supported by a full revised report and landscaping strategy.

5.8 The proposed Landscape Strategy details the planting proposed which has been designed to visually screen the site from surrounding view points, taking into account the drainage features such as the reed beds and ponds within the site.

“Amenity - c) There would be no significant impact upon the amenities of neighbouring occupiers”

5.9 The operations at the site has given rise to an assessment of noise and impacts on amenity. A revised Noise Assessment, undertaken in accordance with BS4142 2014 has been undertaken by Hunter Associates which provides justification that the extended operational hours can be permitted without significant additional impacts in this well established industrial location.

5.10 The site is not situated within or adjacent to and AQMA. The proposed development doesn't not result in any material increase in vehicular movements which is the principle generator of movements. It is noted however that there were concerns in relation to air quality raised in the context of the 2018 application and, as such this submission is supported by a full assessment of within a Air Quality, Odour and Dust Assessment. -

Accessibility - c) The development would have safe access to the highway network and would not cause traffic congestion or exacerbate existing traffic congestion;

- 5.11 The proposed development will not increase the volume of material handled at the site, which is limited by the site licence. The submitted Transportation Note by Vectos confirms the proposal will have no material effect on the highway network. No objections or concerns were raised in respect of the 2018 application at the site in relation to highways and transportation impacts associated with the development.
- 5.12 The proposal therefore satisfies the relevant criteria of Policy AW5.

Ecology (LDP Policy AW8)

- 5.13 The subject site lies outside but within 600 metres of the Llantrisant Commons and Pastures SSSI and a watercourse, to the east. The Rhos Tonyrefail SSSI lies 500 metres to the west. Cardiff Beech Woods Special Area for Conservation (SAC) is approximately 7 kilometres to the south west.
- 5.14 Nant Muchudd immediately to the south of the site is part of a non-statutory County designation, Site of Importance for Nature Conservation (SINC) 111. Nant Muchudd is a salmon river and its corridor is suitable habitat for otters and bats.
- 5.15 Ecological assessment has been undertaken that considers that none of the on-site habitats are of significant nature conservation value. The principal issue identified concerns potential contamination of Nant Muchudd through bank works, surface water outfall and leachates from the site.
- 5.16 The ecology of the site and the impacts of the proposed development have been considered in a Preliminary Ecological Assessment and Phase 1 assessment prepared by Solstys Brewster in June 2020, which is submitted in support of this application.
- 5.17 The stream has been surveyed, and the impacts upon biodiversity are fully assessed in the accompanying EIA.
- 5.18 It is considered that with these mitigation measures proposed in the EIA, the

proposal is compliant with LDP Policy AW8.

Environmental Protection (LDP Policy AW10)

- 5.20 The application proposal does not introduce new activity to the site that will have any materially negative change to the environmental effects of the operation in terms of noise, dust, light pollution or other pollution. This is set out in full in the Air Quality, Odour and Dust Assessment prepared by Air Quality Consultants.
- 5.21 As outlined in respect of ecology and biodiversity, the proposal also includes mitigation measures that will assist in confining the site operations such that there is a betterment in terms of reducing the risk of harm to the adjoining watercourse.

Coal Mining and Ground Conditions

- 5.13 The site is classed by the Coal Authority as being in a Development High Risk Area due to its location in an area of thick coal seam outcrops which may have been worked in the past.
- 5.19 The application is accordingly supported by a Coal Mining Risk Assessment prepared by Rhondda Geotechnical Services. The report demonstrates the proposal will have no effect on and be unaffected by coal mining resources and infrastructure.
- 5.20 This risk assessment has presented abundant evidence from comprehensive research that there is no risk to ground stability posed by coal mining legacy issues at the site. In particular, the risk of shallow unrecorded workings under the proposed development has been thoroughly examined and discounted. The report demonstrates that the Coal Authority designation is not correct, there are not thick seam outcrops in the vicinity of the site and it should not be considered a high risk area.
- 5.21 In the above context, therefore, the proposal is considered to comply with Policy AW10.

Other matters

- 5.22 As a major development this proposal has been the subject of pre-application consultation requirements. A PAC report accompanies this submission detailing how the proposal has met the statutory consultation requirements.

Jobs and investment

- 5.23 The application proposal will allow the retention of valuable employment in a sustainable location, which also serves as an important community facility. The importance of supporting local jobs is a common thread of national and local planning policy.

6.0 Conclusions

- 6.1 This report and the supporting documentation demonstrate that this proposal represents the improvement and consolidation of the existing, established, DMR waste operation at the site.
- 6.2 The proposal will provide a dry area for the storage and picking of recycled materials so that the site can better meet the current and future needs of the business and Rhondda Cynon Taff County Borough Council's waste department.
- 6.3 Our assessment has shown that the proposal is compliant with the relevant policies of the development plan. In particular, it can be accommodated without harm to interests of environmental importance, without significantly adverse landscape or amenity impacts or any increase in traffic.
- 6.4 The proposal will also support the policies of Welsh Government in respect of recycling and assist the County Borough Council to achieve its statutory recycling targets.
- 6.5 The application is therefore compliant with the development plan and there are material considerations that weigh in favour of the grant of planning permission.