

CiNER Glass Ltd.

**CiNER Rassau – Dragon Glass  
Bottle Manufacturing Facility**

**Planning Statement**

DRAGON-ARUP-ENVZ-XX-RP-T-000007

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This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 273927-00

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**ARUP**

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# 1 Introduction

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## 1.1 Background

Ove Arup & Partners Limited ('Arup') has been commissioned by CiNER Glass Ltd to prepare a Planning Statement for the Dragon Glass Bottle Manufacturing Facility ('the proposed development') located at the Rassau Industrial Estate ('RIE') in Blaenau Gwent. This Planning Statement has been submitted in support of an application for full planning permission to Blaenau Gwent County Borough Council ('the Local Planning Authority').

The proposed development is described as follows:

*'Construction and operation of a purpose-built glass bottle manufacturing facility, and associated works'.*

The proposed development would provide buildings with a floorspace exceeding 1,000sqm and a site area exceeding 1ha. As such, the proposed development constitutes 'major development', as defined in The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 (as amended)<sup>1</sup> ('DMPWO'). Subsequently, the planning application has been scoped to accord with the requirements for a major development, as prescribed by these Regulations.

An application pursuant of full planning permission was submitted to the Local Planning Authority ('LPA') on 22 September 2021 following pre-application consultation (PAC).

This Planning Statement has been updated in support of re-consultation undertaken by the LPA on the planning application in April 2022.

## 1.2 The Applicant

CiNER Glass Ltd ('the Applicant') falls within the ownership of the CiNER Group, a Turkish conglomerate established in 1978 with business interests including: mining, energy, glass, chemicals, media, maritime and tourism. The Applicant is a world leader in glass manufacturing and production of natural soda ash. The Applicant constructed a similar glass manufacturing facility in Bilecik, Turkey in 2013 and added a second manufacturing line to that facility in 2015.

## 1.3 Overview of the proposed development

The proposed development would cover a site area of approximately 14.4 ha on a wider land parcel extending to 21.5 ha. The proposed development would host a three-part operational facility for the manufacturing of glass bottles; handling of raw/recycled material; manufacturing of glass containers, and product inspection and packing areas.

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<sup>1</sup> <https://www.legislation.gov.uk/wsi/2012/801/article/12/made>

The proposed development would be situated on a land parcel located at the eastern side of the RIE, within the Ebbw Vale Enterprise Zone (‘EVEZ’). The RIE is accessed from the A465 Heads of the Valleys Road to the south east of the site.

Figure 1 illustrates the built form of the proposed development from the north of the site. A detailed development description is provided in Section 3.2 of this Planning Statement.



Figure 1: Artist’s impression of the proposed development from northern boundary of the site.

## 1.4 Purpose of this Planning Statement

This Planning Statement outlines the context within which the planning application is submitted, rationale for the proposed development, detailed assessment of the national and local planning policy considerations pertinent to the proposed development and justification for why planning permission should be granted by the LPA.

This Planning Statement is structured as follows:

- Section 2 provides a description of the application site. This includes a description of the existing and surrounding uses; the proximity of the site to receptors; land use designations; and pertinent extent planning permissions;
- Section 3 provides a detailed description of the proposed development and rationale for the scheme;
- Section 4 reviews the relevant national and local planning policies pertinent to the proposed development;
- Section 5 considers the key planning issues relevant to the proposed development; and
- Section 6 provides a summary conclusion.

## 2 Application Background

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### 2.1 The Application Site

The application site ('the site') is located at the eastern extent of the of the RIE (National Grid Reference SO158128) to the north of Rassau, Blaenau Gwent.

The site is situated at the head of the Ebbw Valley, approximately 3.5km north of Ebbw Vale and 35km north of Cardiff. The site is accessed via the A465 Head of the Valleys Road, a strategic route which links to the A470 at Merthyr Tydfil and provides access to Junction 32 of the M4 motorway 25km to the south.

The site is approximately 21.5ha in area and comprises a vacant plot within the RIE, currently within the ownership of Welsh Government and Blaenau Gwent County Borough Council.

The surrounding occupiers/landowners predominantly consist of B1, B2 and B8 land uses. The northern boundary is shared with the National Grid 400kV Rassau sub-station and EnviroWales Limited comprising warehousing, transformers and overhead electricity infrastructure to the north west. The western boundary is shared with the existing RIE road network and Sear Seating manufacturing (Use Class B2) with undeveloped land and the Carno Reservoir to the eastern boundary. The southern boundary is shared with TechBoard (Use Class B2) and a wind turbine (77m tip height).

The RIE is situated immediately north of the A465 Head of the Valleys Road and is comprised of purpose-built industrial/manufacturing units, sitting within the EVEZ. Tall structures and buildings are well-established features of the RIE, including electricity pylons, wind turbines and industrial units with associated chimney stacks.

Vehicle access to the RIE is provided from the south west via the A465 Head of the Valleys Road and access to the site provided to the west of the land parcel via a roundabout junction.

The proposed development would be constructed over two discrete land parcels. Firstly, the majority of the development would take place on a cleared plateau within the RIE which is designated as employment land (EMP1.4 and EMP1.5) under the Local Development Plan (LDP) and safeguarded for B1, B2 and B8 uses. These designations are the final plots of the RIE to be developed. Parts of the land accommodating these allocations have become overgrown with vegetation, whilst the site has been vacant (late 1970's/1980s). The remainder of the development is proposed on undeveloped land to the east of the allocation which is required to achieve suitable access, parking and onsite ecological mitigation and enhancement.

A tributary of the River Ebbw (Afon Ebwy) bisects the site between the two land parcels which has been previously diverted around the northern extent of the RIE. The River Ebbw is part of the South East Valleys catchment which eventually flows into the Usk Estuary.

The topography of the site is generally sloping, ranging from 390m above ordinance datum (AOD) at the southern extent to 427.5m AOD at the northern boundary.

The site is situated on the slopes of Mynydd Llangynidr Site of Special Scientific Interest (SSSI), approximately 400m south of the Brecon Beacons National Park (BBNP). The site is situated 1km south west of the Usk Bat Sites Special Area of Conservation (SAC).

Figure 2 illustrates the **Site Context Plan**, providing the geographical location of the application site in comparison to adjacent land uses and settlements.



Figure 2 Application site context, relative to adjacent land uses and Rassau.

## 2.2 Pre-Application Advice

Arup, on behalf of the Applicant has undertaken pre-application communications with Mr Steve Smith, Mrs Stephanie Hopkins and Ms Ellie Fry of the LPA regarding the proposed development.

The Applicant will continue to engage with the LPA during the determination of the full planning application. The Applicant will work proactively to achieve an acceptable scheme which delivers social, economic and environmental benefits.

The proposed development constitutes ‘major development’, as prescribed under the DMPWO and was therefore subject to PAC from 22 July to 19 August 2021. The Applicant has achieved accord with all the statutory requirements and consulted with specialist consultees, community councils, landowners/occupiers and non-statutory consultees, as set out in the **PAC Report** submitted with the planning application. Consultation responses from specialist consultees have been

considered and have informed updates to the full planning application, as described in this Planning Statement.

## 2.3 Relevant Planning History

The planning applications listed in Table 1 are considered to be relevant to the determination of this application and have been considered during the design of the proposed development.

Table 1: Overview of planning applications relevant to the proposed scheme.

LPA Reference	Description of Development	Decision	Date of Decision
C/2000/0225	Extension for solvent recovery plant.	Approved	06/11/2000
C/2001/0172	Ink blending facility and separate workshop.	Approved	25/07/2001
C/2001/0390	Extension to provide storage and new vehicular access.	Approved	14/02/2002
C/2001/0400	Proposed 1400m sq. extension to existing production unit.	Approved	14/02/2002
C/2002/0083	Extension to existing factory & detached two storey office block.	Approved	30/04/2002
C/2002/0230	Factory Extension.	Approved	19/08/2002
C/2003/0427	Installation of exhaust stack for environmental equipment.	Approved	11/11/2003
C/2004/0037	Factory Extension.	Approved	02/06/2004
C/2005/0158	Proposed Battery / Metal Plant.	Approved	21/06/2005
C/2005/0307	Extension and conversion of existing factory unit.	Approved	13/07/2005
C/2005/0610	Business Park Comprising of B1, B2 and B8 uses.	Withdrawn	21/03/2007
C/2005/0655	Single Storey Industrial Units with Associated Yards and Parking B1, B2 & B8 Use Class.	Approved	10/03/2006
C/2005/0656	Single storey sub-zero cold storage warehouse.	Approved	25/01/2006
C/2006/0559	Installation of a 750kw Wind Turbine.	Appeal against Non-Determination - Allowed	22/11/2007
C/2006/0623	Factory Extension.	Approved	26/02/2007
C/2006/0628	Proposed Factory Extension.	Approved	02/03/2007
C/2007/0294	Single Storey Industrial Units with Associated Yards and Parking B1, B2 & B8 Use Class.	Approved	25/06/2007
C/2007/0402	Extension B1, B2 and B8 purposes.	Approved	16/12/2010

LPA Reference	Description of Development	Decision	Date of Decision
C/2011/0013	Proposed extension to existing factory unit 12.	Approved	11/03/2011
C/2011/0111	New 10,000 sq. ft industrial unit.	Approved	07/10/2011
C/2012/0204	Proposed new 7m x 17m storage building used to store armoured auto products.	Approved	17/09/2012
C/2013/0062	Circuit of Wales motorsports facility (comprising: high performance circuit; motocross circuit; karting circuit; four-wheel drive circuit; riding academy; innovation centre; hotels; retail showrooms; ancillary retail; industrial and business uses; driver training area; solar park; camping; parking; landscaping and associated uses).	Outline Granted	25/09/2013
C/2014/0134	Proposed factory extension (2118sqm) to provide warehousing, loading area, revised access arrangements, relocated car park, retaining walls and landscaping, to include excavation of bank adjacent to the existing carpark/site boundary.	Approved	15/07/2014
C/2014/0227	Construction of a standing reserve power plant comprising of 48 diesel generators with office and storage buildings, fencing, acoustic barrier enclosure and ancillary structures.	Approved	08/07/2015
C/2014/0276	Construction and operation of a 16MW Short Term Operating Reserve (STOR) generating plant to include the construction of a new building with exhaust flues to house an engine generator and the provision of external plant to include outdoor cooler radiators, gas reception kiosk, security fencing, car parking, new access and landscaping scheme.	Approved	23/02/2015
C/2015/0299	Installation of roof mounted and ground mounted 250kW photovoltaic solar panels.	Approved	09/10/2015
C/2015/0419	Construction of a standing reserve power plant comprising 14 gas reciprocating engine generators with an office & storage building, security & acoustic fencing, other ancillary structures/plant, associated landscaping, vehicular access & car parking.	Approved	31/03/2016
C/2016/0011	Extension to existing industrial unit.	Approved	07/03/2016
C/2016/0158	Erection of two buildings for B1/B2/B8 use with new pedestrian and vehicular access and associated parking.	Approved	15/09/2016
C/2016/0248	Protection two storey extension to factory Unit 11.	Approved	29/09/2016

LPA Reference	Description of Development	Decision	Date of Decision
C/2017/0090	Construction and operation of a 16MW Short Term Operating Reserve (STOR) generating plant to include the construction of a new building with exhaust flues to house an engine generator and the provision of external plant to include outdoor cooler radiators, gas reception kiosk, security fencing, car parking, new access and landscaping scheme.	Variation of Condition Approved	15/05/2017
C/2017/0331	Change of use from warehousing to a manufacturing unit.	Approved	23/02/2018
C/2018/0155	Proposed new building for storing processed slag produced by authorised use on site.	Approved	09/07/2018
C/2018/0272	Circuit of Wales motorsport facility (comprising: high performance circuit; motocross circuit; karting circuit; four-wheel drive circuit; riding academy; innovation centre; hotels; retail showrooms; ancillary retail; industrial and business uses; driver training area; solar park; camping; parking; landscaping and associated uses).	Pending	Pending
C/2018/0293	Erection of 1 wind turbine and associated infrastructure.	Approved	19/07/2019
C/2019/0009	Construction of new business units (Class B1/B2/B8 and ancillary uses) and associated parking areas and external works.	Approved	04/04/2019
C/2019/0326	Full application for the construction of 2no. Battery storage containers and associated works to store.	Approved	22/01/2020
C/2020/0059	Erection of a Synchronous Condenser, plant control building and auxiliary equipment, access, landscaping and associated works.	Approved	20/04/2020

## 3 The proposed development

### 3.1 Rationale and Need for Development

The Applicant is a Turkish based family business headquartered out of London and is owned by the CiNER Group. The proposed development represents the company's largest investment outside of Turkey to date and forms part of a significant expansion programme spanning across Europe and the USA. The Applicant is one of the largest producers of natural soda ash, a key material in the production of glass bottles. The proposed development is required to bring the production of glass bottles to the UK market, reducing the carbon footprint associated with transportation.

The proposed development seeks to construct the proposed glass manufacturing facility within the RIE, utilising two vacant employment land allocations and an undeveloped land parcel within the site, making effective use of the A465 strategic road network to facilitate distribution. The site comprises two vacant LDP employment land allocations (EMP1.4 and EMP1.5) which have been safeguarded for B1, B2 and B8 uses. The proposals would deliver development upon safeguarded land while delivering significant employment opportunities within the local area.

Socio-economic data indicates that Blaenau Gwent has an unemployment rate of 4.3% (0.6% greater than the national average), with 6no. of the most deprived lower super output areas (LSOAs) in Wales within the Borough. The proposed development would create approximately 670 jobs associated with the operational running of the facility and up to 450 jobs during construction (at peak), as well as providing apprenticeship and training opportunities within the local labour market.

The development has been established with the Well-being of Future Generations Act (Wales) 2015<sup>2</sup> (WBFG Act) goals in mind to harness the social value associated with this significant development in the local area. Table 2 below outlines how the proposed development accords with the goals of the WBFG Act.

Table 2: Summarises how the proposed development contributes towards achieving the seven objectives set out in the Act.

Well-being Goals	Project Opportunities
A Prosperous Wales	The proposed development would provide approximately 670 jobs associated with the operation and running of the facility for local communities in an area of socio-economic deprivation. And up to 450 jobs during construction at peak times.
A Resilient Wales	The proposed works would include on and off-site mitigation landscaping which would provide ecological resilience. On site attenuation ponds further demonstrates the schemes ambition to adapt to climate change through surface water drainage management.

<sup>2</sup> <https://www.futuregenerations.wales/about-us/future-generations-act/>

Well-being Goals	Project Opportunities
A Healthier Wales	The proposed development would include landscape mitigation and enhancement providing green infrastructure designed to increase health and wellbeing of local residents, employees and biodiversity.
A More Equal Wales	The proposed development would contribute towards lowering the above national average unemployment rate and overcome barriers to full time employment opportunities in Blaenau Gwent through apprentice opportunities.
A Wales of Cohesive Communities	The proposed development would provide direct and indirect employment opportunities which would serve to retain an economically active community in Blaenau Gwent.
A Wales of Vibrant Culture and Thriving Welsh Language	The proposed development has been sympathetically designed to respect the natural landscape of the Brecon Beacons to the north and reduce visual intrusion on the PRoW network. Recruitment and signage proposals will be bilingual to provide equal opportunities for all and further the Welsh Language.
A Globally Responsible Wales	The proposed development would utilise recycled glass cullet to reduce the requirement for local, regional and national primary resources, demonstrating responsible manufacturing processes. The production of glass bottles at the proposed development would bring carbon savings associated with transportation costs when compared to bottles produced in Europe and transported to Wales and the UK.

## 3.2 Description of the proposed development

The proposed development would comprise the construction and operation of:

- 2no. furnaces with associated filters and 2no. chimney stacks;
- 2no. cullet buildings and stores for the storage and processing of rejected and recycled glass;
- 1no. batch and 2no. silo buildings for the storage and mixing of raw materials;
- 2no. production lines for hot and cold processing, inspection and packaging of glass bottles including workshops and storage areas within the process building;
- Office space and welfare facilities including canteen, infirmaries and changing facilities (located internally at eastern extent of the facility);
- An automated warehousing facility for the storage and distribution of glass bottles;
- Utilities building which includes plant space and workshops;
- Waste materials store;
- Liquefied Petroleum Gas (LPG) store and Regulating and Metering Station (RMS) building;
- Back up fuel storage facilities;

- Main entrance security lodges and associated weighbridge;
- External hardstanding for the storage of materials, parking and loading; and,
- Landscaping to the eastern side of the facility.

The proposed development is illustrated in **Drawings 3009 – 3220** and their geographical distribution is demonstrated in the submitted **Proposed General Arrangements Plan – 1201**.

Figure 3 below illustrates a 3-D artists impression of the proposed development. Each component of the proposed development is described below, with further information provided in the **Design and Access Statement** submitted in support of the planning application.

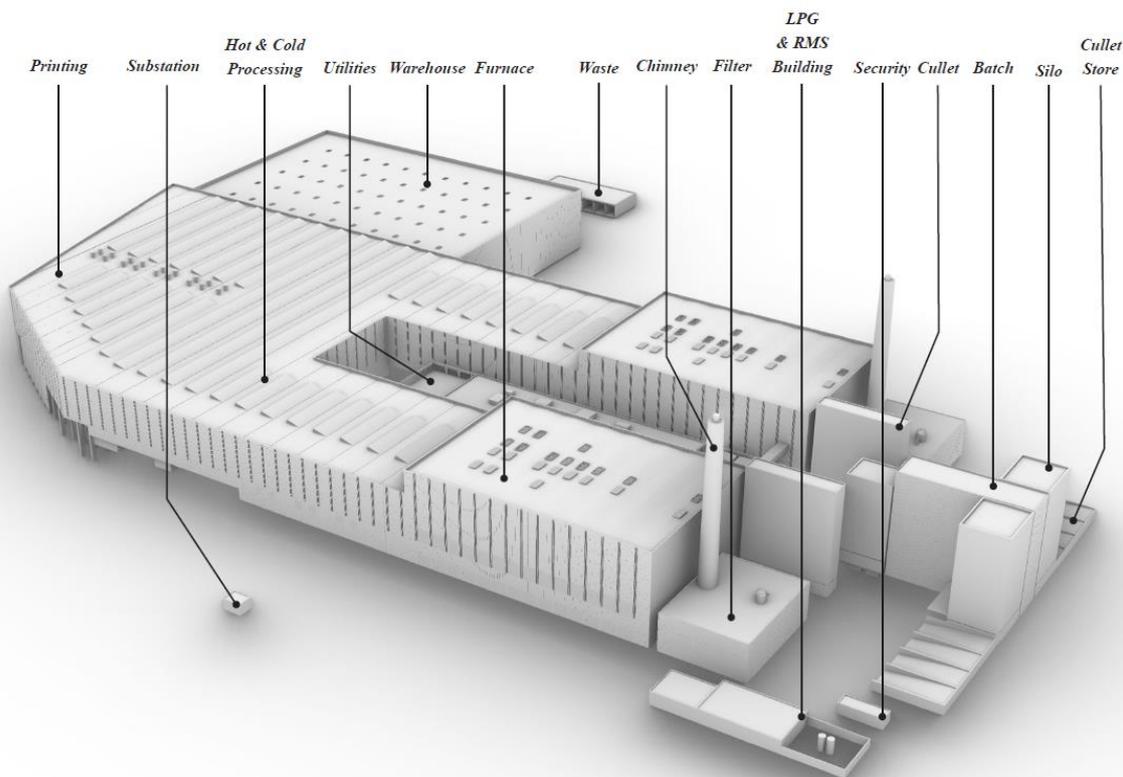


Figure 3 Artist's impression of the proposed development

## Two furnaces with associated filter buildings and chimney stacks

The proposed development would consist of two parallel processing lines, as represented in the twin track building form shown in Figure 3. Furnaces would be provided within the internal areas of the process building with filter buildings and chimney stacks situated to the western elevation, as shown above and in **Drawing 1201**.

Furnaces are required to heat raw and recycled materials as part of the manufacturing process. Filter buildings and filters are required to extract and minimise chemical concentrations within the air before elevated dispersal via the 75m tall chimneys which would bisect the filter buildings below.

Both furnaces and filters would be located internally and therefore would not be visible from external areas. The cumulative gross internal floor area associated with both furnaces and return areas would be approximately 16,500sqm. The filter buildings would measure approximately 42m in width and 31m in depth. The structure would exhibit a 15m tall flat roof structure with a parapet perimeter. The filter buildings would exhibit a concrete grey finish with 2no. roller doors to the front elevation of each building. The 2no. proposed chimney stacks would extend to a total height of 75m to adequately disperse the filtered exhaust/fumes from the furnace. Each stack would measure 7m in diameter and would be constructed of self-finished concrete with an affixed beacon light at the top in the interests of aviation safety.

Further detail appurtenant to the design and layout of the proposed filter buildings and chimney stacks is illustrated in **Drawing 3218**.

## Cullet stores and buildings

### Two Cullet Stores

Two cullet stores would be situated on the western boundary of the site, either side of the batch building and adjoining 2no. silo buildings, as illustrated in **Drawing 1201**.

The purpose of the cullet stores would be to store recycled and rejected glass products from previous manufacturing processes. Each cullet store would include 4no. bays constructed of grey coloured concrete. Bays would be three sided and provided without a roof structure. Each cullet store would measure 41m in width, 29.3m in depth and 6.3m in height.

For further details appurtenant to the cullet stores, please refer to **Drawing 1201**.

### Two Cullet Buildings

Two cullet buildings would be positioned adjacent to the filter buildings to the west of the site, as illustrated in **Figure 3** and **Drawing 1201**. The purpose of each cullet building would be for the storage and processing of rejected/recycled glass.

Each cullet building would measure 7m in width, 31.8m in depth and 40m in height. The cullet buildings would each occupy an area of approximately 370sqm and would be constructed of grey concrete up to 4.6m in height with a reflective patinated material finish to respond to the dynamic landscape and changing skies whilst minimising light spill.

The cullet buildings would have a basement level needed to enable the cullet to be processed as part of the site's operation.

Further detail appurtenant to the design, layout and materials of the cullet buildings are illustrated in **Drawing 3218**.

## Batch Building and Silo Buildings

### Batch Building

A batch building would be located upon the western boundary of the site and would be flanked by 2no. silo buildings to the north and south, as illustrated in **Drawing 1201**.

The batch building is required for the storage and mixing of raw materials required for the manufacturing process, generating a ‘batch’ of material which is transported into the process building. The batch building is comprised of two elements in a stepped down formation, as illustrated in Section 1 of **Drawing 3216** and further connected to the process building through an elevation ‘batch charge elevator’, as depicted in **Drawing 3015**. The batch building would extend to 39.5m in height, 13.8m in width and 46.8m in depth, constructed of grey coloured concrete. The batch building would have a basement level needed to enable the material to be processed as part of the site’s operation.

For further details appurtenant to the batch building, please refer to **Drawing 3216**.

### Silo Buildings

Two silo buildings would be located on the western boundary of the site, either side of the proposed batch building. Each silo building would accommodate 6no. silos for the storage of raw material, as illustrated in **Drawing 1201**.

The external dimensions of each silo building would be 39.5m in height, 19.2m in width and 17.9m in depth. Each silo building would be clad with an opaque façade to reduce the light spill from the proposed development. Each silo building would cover an area of approximately 270sqm.

As illustrated in **Drawing 3216**, an ancillary loading bay would be provided in front of each silo structure measuring 19.4m in width, 7.0m in depth and 4.7m in height (flat roof) finished in a grey coloured concrete.

For further details appurtenant to each of the silo buildings, please refer to **Drawing 3216**.

## Process Buildings

The process building constitutes the main component of the proposed development, comprising two identical process operational stages situated to the north and south of the central utilities building. As shown in **Drawing 1201**, the process buildings comprise the bulk of the facility and are centrally located to within the development site.

The process buildings would measure approximately 276m in width and 174m in depth from the southern elevation, equating to a gross internal area of the process floor would be approximately 38,000sqm. A step change in height would be provided from approximately 35.4m at the furnace to 28.2m for the remainder of the process building. Due to the topographical difference of the site and partially

submerged design, the total differential between the furnace and hot/cold processing areas would be approximately 7.2m. As assessed in the **Environmental Colour Assessment (ECA)** and set out in the **Materiality & Lighting Considerations Report**, the proposed development would achieve an exemplar design and reduce visual intrusion through the use of patinated reflective cladding. External doors would be clad in grey metal fins and louvres upon window and door installations. The northern and southern elevations would contain glazing to occupied areas to reduce the need for artificial lighting during the daytime.

At the eastern extent of the Process Building, the facility would include welfare, office space, a canteen and changing facilities which would cover a total area of approximately 10,300sqm cumulatively.

For further details appurtenant to the Process Building, please see **Drawings 1201 and 3211**.

## Warehouse Building

The warehouse building would be provided at the southwestern extent of the process building, accessible via a HGV internal access road which connects from the north western site entrance, as illustrated in **Drawing 1201**.

The warehouse building would be provided with 9no. loading/unloading bays to the southern elevation and would primarily be used for the storage and delivery of glass bottles from the site. The proposed warehouse would extend approximately 148m in width at the southern elevation and extend 108m in depth from the process building. The warehouse building would provide a gross internal area of approximately 16,000sqm. As illustrated in **Drawing 3220**, the proposed development would include 9no. HGV loading bays to the southern elevation with a large hardstanding area (approximately 6,900sqm) to facilitate HGV manoeuvres. The **Roof Plan –3015** submitted in support of the planning application confirms that 64no. sawtooth roof lights would be provided in a north east direction (away from the ‘Core Zone’ of the BBNP International Dark Skies Reserve), while also reducing internal lighting requirements. As further set out in the **Materiality & Lighting Considerations Report**, internal lighting would be suspended 3m below roof height to minimise light spill. The warehouse building would comprise reflective cladding on each elevation to reflect the landscape and sky, assisting the reduction in intrusion and massing of the structure.

Further detail appurtenant to the warehouse building is illustrated in **Drawings 1201, 3220 and 3015**.

## Utilities building

The proposed utilities building would be situated between the two process lines, as shown by the abutting nature of the process building in **Drawing 1201**.

The utilities building would extend approximately 156m in depth and 29m in width with a maximum height of 13.7m. The development would provide a gross internal area of approximately 4,000sqm and would be constructed on grey

coloured concrete at ground and first floor levels with a metal opaque materials above to prevent light spill.

The utility building would have a basement level. The basement level would be used for the running of power cables from the utility building, through to other parts of the site.

Further details appurtenant to the utilities building are illustrated in **Drawing 3215**.

## Waste Building

A waste building would be situated in the southern section of the site, as illustrated on the **Site Layout Plan – Drawing 1201**.

The waste building is required for the storage of waste material which cannot be reused within the manufacturing process. The building would be provided externally to the remainder of the facility adjacent to the southern extent of hardstanding to reduce interplay with the live manufacturing processes and to achieve efficient collection without hindering the inbound and outbound deliveries.

The waste building would measure approximately 40.3m in width, 20.7m in depth and 5.2m in height. The flat roof structure would accommodate a green roof for additional planting within the parapet structure. The building would consist of 6no. bays, covering an area of approximately 800sqm and would be constructed of grey coloured concrete with metal fencing to the northern elevation.

Further details of appurtenant to the proposed waste building are illustrated in **Drawing 3219**.

## LPG and RMS-C Building

The LPG and RMS-C building would be situated on the north western, adjacent to the site entrance and security building, as shown on the **Site Layout Plan –1201**.

The LPG building/tank is required for the storage of the LPG as a back-up fuel supply for manufacturing processes and furnaces, where the RMS-C building is required to ensure a reliable supply and control of gas provision for manufacturing processes within the wider site.

The LPG tank situated to the west of the RMS-C and would measure approximately 7.0m in width, 3.8m in depth and 7.6m in height. The RMS-C structure would measure approximately 15.7m in width and 13.4m in depth, including a 5m wide double roller door on the front elevation. The adjoining LPG building would measure 24.2m in width and 10.9m in depth, with 8no. doors at the southern elevation (front) and 4no. to the rear. Both adjoining buildings would exhibit a flat roof structure extending to 7.6m in height. The proposed development would be finished in grey coloured concrete and grey roller doors. The cumulative gross internal area of the LPG and RMS-C building would be approximately 700sqm.

For further details appurtenant to the LPG and RMS-C building, please refer to **Drawing 3219**.

### Entrance Security Lodge

A single storey security building would be constructed to the south of the site entrance in the north western extent of the site, as illustrated in **Drawing 1201**. The building will act as a checkpoint to prevent unauthorised access, limiting entry and exit to delivery and staff vehicles only.

The proposed security building would measure 16.2m in width and 5.2m in depth, with a flat roof structure measuring 4.5m in height. The front elevation of the security building would exhibit full height glazing at the western edge and grey metal cladding with a single door on the north and eastern elevations.

Further details appurtenant to the security building are illustrated in **Drawing 3217**.

### Substation Building

An electrical sub-station structure would be located at the northern most extent of the site adjacent to overhead power cables. The sub-station structure would measure approximately 7.0m in width and 5.5m in depth with a 4.2m tall flat roof structure. The wider sub-station compound would extend to an area of approximately 2,000sqm.

The proposed sub-station building would provide a single and double door on the southern elevation, 2no. doors at the rear elevation and a single door on the western elevation. The structure would be constructed using grey coloured concrete.

Further details appurtenant to the sub-station building are illustrated in **Drawing 3217**.

### Car parking and cycle parking

The proposed development would provide 389no. surface level car parking spaces, including the provision of 325no. standard spaces, 39no. ultra-low emission vehicle (ULEV) spaces, 19no. disabled spaces and 6no. visitor spaces.

The proposed development would include 22no. covered Sheffield cycle stands, with room for further expansion subject to demand from staff. For further details relating to parking arrangements, please see **Drawing 1501**.

For further details appurtenant to the access and arrangements of the loading areas, please refer to **Drawings 1501** and **3220**.

### Landscaping and compensatory habitat

Soft landscaping would be provided on the east of the site comprising outdoor amenity space for staff, tree planting, wetland and attenuation ponds associated

with retention of surface water drainage. Landscaping proposals would serve to mitigate and enhance ecology within the eastern extent of the site and provide habitats upon maturing. Pond areas would attenuate surface water flows from impermeable baseline geology and the built development which tying into the wider landscaping provision. In addition, a Great Crested Newt (GCN) pond would be provided to the south eastern corner of the plot to support protected species following consultation feedback from Natural Resources Wales (NRW), as shown in **Drawing 1501**.

As shown on **Drawing 1501**, the proposed development would include approximately 566no. new trees within the eastern extent of the scheme, demonstrating a strong commitment to green infrastructure provision which will be primarily spread across the northern and southern boundaries as well as aligning the central watercourse.

The proposed development includes compensatory habitat sites to be provided off site due to the constraints of the application site. Information appurtenant to the ecological compensatory land is outlined in **Chapter 7 of the Environmental Statement**. For further details appurtenant to landscaping, please refer to **Drawing 1501**.

### 3.3 Project programme

The proposed development would be constructed over a period of approximately four years.

The first phase of construction is proposed to commence in summer 2022, following approval of the planning application, with ecological mitigation, overhead line diversions and general tree clearance.

The main contractor would commence on site in early 2023 on infrastructure works including site setup, clearance, utilities diversions and bulk earthworks followed by the superstructure for the first furnace with the ambition it to be brought into operation by quarter four of 2024 following an 18 month build programme.

Construction of the second furnace would be undertaken in parallel although fit out of the second furnace will run sequentially with an aim of being operational by Q3 2025.

## 4 Planning Policy Framework

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### 4.1 The Development Plan

Section 70(2) of the Town and Country Planning Act 1990<sup>3</sup> and Section 38(6) of the Planning and Compulsory Purchase Act 2004<sup>4</sup> require that ‘planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise’.

The planning policy framework for the proposed development comprises national and local planning policy and guidance. Specifically, the development plan is comprised of Future Wales: The National Plan 2040 and the adopted BGCBC Local Development Plan.

The remainder of this chapter presents the planning policy framework and guidance of relevance to the planning application.

### 4.2 National Planning Policy and Guidance

#### 4.2.1 Future Wales: The National Plan 2040

Future Wales: The National Plan 2040<sup>5</sup> (‘Future Wales’) constitutes the national development framework which sets out the direction for development in Wales to 2040. Future Wales sets out the strategy for addressing key national priorities such as developing a vibrant economy and improving the health and well-being of Welsh communities.

Future Wales establishes an Economic Action Plan<sup>6</sup> which supports the delivery of ‘Prosperity for All – the national strategy for Wales’. The Economic Action Plan advocates development which builds resilience and contributes a future-proof economy. Development should support high value manufacturing sectors and should seek to import and export goods and services. Future Wales supports the sustainable location of economic land uses and economic development through the LDPs.

**Policy 1 (Where Wales will grow)** of Future Wales sets out where growth in Wales is anticipated and supported during the plan period. National Growth Areas incorporate the Valley region, including Blaenau Gwent. Policy 1 advocates the growth of employment opportunities, infrastructure and residential development.

**Policy 9 (Resilient Ecological Networks and Green Infrastructure)** requires developers to ensure the enhancement of biodiversity, the resilience of ecosystems and provision of green infrastructure. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net-benefit), the

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<sup>3</sup> <https://www.legislation.gov.uk/ukpga/1990/8/section/70>

<sup>4</sup> <https://www.legislation.gov.uk/ukpga/2004/5/section/38>

<sup>5</sup> <https://gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

<sup>6</sup> <https://gov.wales/sites/default/files/publications/2019-02/prosperity-for-all-economic-action-plan.pdf>

resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals.

**Policy 12 (Regional Connectivity)** outlines that non-residential developments in which provide car parking should seek to provide a minimum of 10% of car parking spaces with electric vehicle charging points.

**Policy 17 (Renewable and Low Carbon Energy and Associated Infrastructure)** outlines that decision makers must give significant weight to the need to meet Wales’ international commitments on targets to generate 70% of consumed electricity by renewable means by 2030.

**Policy 33 (National Growth Area – Cardiff, Newport and the Valleys)** of Future Wales further substantiates the requirements of Policy 17, advocating the provision of strategic infrastructure delivery. Policy 33 outlines that *‘the Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys’.*

## 4.2.2 Planning Policy Wales: Edition 11

For the purposes of planning, the Welsh Government defines economic development as the development of land and buildings for activities that generate long term prosperity, jobs and incomes. Paragraph 5.4.1 of Planning Policy Wales: Edition 11<sup>7</sup> (‘PPW11’) states that the planning system should ensure that the growth and output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.

Paragraph 5.4.4 outlines that planning authorities should encourage and support developments which generate economic prosperity and regeneration. It is important for LPAs to consider the economic needs of their own area and those of adjacent authorities, as well as the location of employment opportunities.

Paragraph 5.4.13 states that local authorities should co-ordinate development with all forms of infrastructure provision, support national, regional and local economic policies, align with jobs, transport infrastructure, promote the re-use of previously developed, vacant and underused land and deliver employment opportunities to disadvantaged communities.

PPW11 advocates the use of fewer resources to reduce the creation of waste. Proposals should seek opportunities to reduce or recycle waste as part of the design, construction and operation of the development.

PPW11 supports the provision of well-integrated green infrastructure into development proposals which contribute toward the LPA’s Section 6 duty to maintain or enhance biodiversity.<sup>8</sup>

<sup>7</sup> [https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

<sup>8</sup> <https://www.legislation.gov.uk/anaw/2016/3/section/6/enacted>

Paragraph 6.2.3 further outlines that green infrastructure can achieve social, economic, cultural and environmental resilience. In doing so, green infrastructure promotes positive benefits including flood management, improved air quality and visual screening.

PPW11 outlines that while green infrastructure is important, its provision must be carefully considered alongside the need to meet society's wider social and economic objectives and the needs of the local community.

Paragraph 6.3.3 states the LPAs should protect and enhance the special characteristics of landscapes, whilst paying due regard to the social, economic, environmental and cultural benefits they provide.

Local Planning Authorities should give great weight to the statutory purposes of National Parks, aiming to conserve and enhance their natural beauty, wildlife and cultural heritage.

Paragraph 6.6.5 states that the planning system should protect and improve water resources by promoting and encouraging increased efficiency and demand management of water, that supply in which businesses are dependent on are adequate without adverse impacts on environmental and human health, SUDS are integrally designed into the scheme and quantity and quality of surface/ground water is taken into account.

SUDS approval will be required for the development by virtue that the application site area exceeds 100 sqm. Approval must be sought from the SUDS Approval Body (SAB) before construction can commence.

PPW11 states that the planning system should maximise its contribution to a 'healthier Wales' by reducing exposure to air and noise pollution. Development proposals should consider existing and predicted levels of air pollution on society and the environment and mitigate its potential impacts wherever possible.

Paragraph 6.7.15 states that polluting developments should be located in areas where there is low potential for public exposure and where impacts can be minimised.

### **4.2.3 Technical Advice Note 5 (TAN5) – Nature Conservation and Planning**

TAN 5<sup>9</sup> sets out that wildlife and its habitats are of fundamental importance to our future well-being and prosperity because a rich and diverse environment supports a long-term sustainable economy and contributes to a healthier and happier society. Biodiversity is an important indicator of sustainable development. Biodiversity and geodiversity add to the quality of life and local distinctiveness.

Section 2 of TAN5 outlines that the planning system in Wales should integrate nature conservation into all planning decisions, provide a net-benefit for biodiversity conservation with no significant loss of habitats and plan to accommodate and reduce the effects of climate change.

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<sup>9</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf>

The proposed development should identify at an early stage, the nature conservation interests likely to be affected and the likely significance of impacts. It should ensure that impacts of projects likely to have a significant effect on the environment are thoroughly investigated, understood and considered.

European Sites are defined in Regulation 10 of the Habitat Regulations which include Special Protection Areas (SPAs) and Special Areas of Conservation (SAC). National designated sites include National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSI).

#### 4.2.4 Technical Advice Note 11 (TAN11) – Noise

Section 8 of TAN11<sup>10</sup> outlines that development proposals must not cause an unacceptable degree of disturbance. Proposals should also consider that intensification or change of use may greater intrusion on amenity. LPAs should consider the character of the noise and the volume levels. Sudden impulses, irregular noise which contains a distinguishable continuous tone will require specific consideration.

Section 11 outlines that measures to mitigate the source, limit and exposure of noise should be proportionate and reasonable. Reasonable methods can include engineering, configuration and administrative mitigation. Care should be taken to keep the noisiest activities away from the boundary or take measures to reduce the impact of noise.

#### 4.2.5 Technical Advice Note 12 (TAN12) – Design

TAN12<sup>11</sup> outlines that Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion. Design is defined as:

*“the relationship between all elements of the natural and built environment. To create sustainable development, design must go above and beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings”.*

Section 5.4.10 outlines that to effectively adapt to the effects of climate change, attention should be attributed to the ways in which design can minimise and manage impacts. This includes:

- An awareness and appreciation of the current and future effects of climate change;
- Responding to the effects of climate change through the structure and use of materials;

<sup>10</sup> <https://gov.wales/technical-advice-note-tan-11-noise>

<sup>11</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan12-design.pdf>

- Ensure that design solutions do not constrain current or future opportunities to adapt or a developments vulnerability to climate change; and,
- Recognise the relationship to more strategic responses to climate change such as flood risk and drainage.

Good design should achieve solutions which maximise the natural landscape assets and minimise environmental impacts on the landscape. Proposals which would impact the landscape should be considered from an early stage and should not be an afterthought.

Section 5.13.3 states that creating space for biodiversity can enhance the ability of development to adapt to changes in local environmental conditions over the lifetime of the built development which may result from climate change.

#### **4.2.6 Technical Advice Note 15 (TAN15) – Development and Flood Risk**

TAN15<sup>12</sup> provides technical guidance in relation to development and flooding and sets out the precautionary framework to guide planning decisions in respect of development in areas of flood risk. It provides guidance on how to fully assess flood consequences and how to design and implement sustainable development.

Management flooding is an important part of contributing towards achieving sustainable development. Consideration should be attributed to: guiding development to areas of little or no flood risk, making provision for future changes in flood risk and managing the consequences of flooding.

Section 8.2 of TAN15 outlines elements of the built development such as internal road layouts, buildings, roofing and car parking will create impermeable surfaces which reduces the percolation and increases surface run-off. SUDS will be required for developments which will manage surface water run-off, thus lowering flood risk and delaying discharge into adjacent watercourses.

An update to TAN15 is currently being consulted and is likely to be adopted by Welsh Government in June 2023. The TAN15 update aims to:

- Replace the development advice map with a new Wales flood map;
- Place a greater emphasis on the Local Development Plan (LDP) and the value of strategic flood consequences assessment (FCA);
- Integrate guidance on coastal erosion and flood risks issues in TAN15; and,
- Provide guidance for regeneration initiatives affecting communities in flood risk areas.

#### **4.2.7 Technical Advice Note 18 (TAN18) – Transport**

TAN18<sup>13</sup> outlines that the planning system can impact on travel patterns, by guiding location, scale, density and nature of new developments and controlling

<sup>12</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan15-development-flood-risk.pdf>

<sup>13</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan18-transport.pdf>

changes of land use. Transport and land use therefore interact and can have an effect on the emission of greenhouse gases, the health of local communities, social inclusion and congestion impacts.

Section 3.2 defines accessibility as the relative ability to take up services, markets and facilities. Accessibility is important in addressing social exclusion and for maximising choice in services and employment.

Section 3.7 outlines that the location of major travel generating uses, including employment and manufacturing sites, can influence the number the number and length of journeys and therefore appropriate locations which offer genuine and easy access should be supported, e.g. transport interchanges and major road network junctions.

Car parking should be carefully designed to ensure an efficient use of space and should not jeopardise the provision of walking or cycling infrastructure within the application site.

Section 4.4 advocates that local parking strategies and supplementary policy guidance (SPG) is adopted into the design of car parking. Proposals should consider the following in formulating parking design and provision:

- Maximum parking standards for various uses;
- Balancing on and off site parking provision and managing the effects of displaced or ‘over-spill’ parking;
- Planning obligations relating to parking management and provision;
- Local disability and cycle parking standards; and,
- Parking design and dimensions.

Section 9.18 outlines that extra trips generated by a proposed development may necessitate transport improvements in the vicinity of the application site. As such, improvements to the highway may be sought via conditions added to a planning permission, making the developments commencement or occupation subject to the completion of highways works.

Section 9.20 states that LPAs can use planning obligations to secure improvements to roads, walking, cycling and public transport systems, whether as a result of a proposal on its own or cumulatively with other proposals and where such improvements would be likely to influence travel patterns.

#### **4.2.8 Technical Advice Note 23 (TAN23) – Economic Development**

Section 1.1.2 of TAN23<sup>14</sup> describes economic development as development (new or change of use) where the resulting space will be occupied by economic activities. An economic activity, or economic land use constitutes an activity which directly generates wealth, jobs and income. The generation of jobs includes

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<sup>14</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan23-economic-development.pdf>

providing or sustaining existing jobs, as well as creating new employment opportunities.

The economic benefits associated with development may be geographically spread out far beyond the area whether the development is located. As a result, the planning system should recognise and give great weight to the economic benefits associated with new development. PPW11 advocates that the planning system should provide land that the market requires unless there are overriding reasons to the contrary.

Section 2.1.2 outlines that economic development may cause environmental or social harm which cannot be fully mitigated. In such circumstances, careful considerations should be attributed to the economic benefits of the proposed development.

Where a proposed development would cause adverse environmental or social harm, demand should be steered to an alternative location, unless harm is outweighed by the additional benefit of development at the original site.

#### 4.2.9 The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generational (Wales) Act 2015<sup>15</sup> (WBFG Act) sets out to improve the social, economic, environmental and cultural well-being of Wales in a coherent and joined-up approach. A goal of the Act focusses on ‘A Prosperous Wales’, which is defined as:

*‘An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work’.*

As set out in Table 2 of this Planning Statement, there are 7no. well-being goals associated with the WBFG Act and 5no. prescribed ways of working to achieve the overall aims. The advocated ways of working include; long term outlooks, public body integration, public involvement, collaboration and problem prevention.

### 4.3 Local Planning Policy

#### 4.3.1 Blaenau Gwent County Borough Council LDP

The Blaenau Gwent County Borough Council Local Development Plan<sup>16</sup> (LDP), sets out policies to guide the development for the plan period of 2012-2021. The LDP was formally adopted on 22 November 2012.

<sup>15</sup> <https://www.futuregenerations.wales/about-us/future-generations-act/>

<sup>16</sup> [https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Written\\_Statement\\_\\_without\\_appendices\\_.pdf](https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Written_Statement__without_appendices_.pdf)

The LDP is accompanied by supporting Supplementary Planning Guidance (SPG). Those relevant to the proposed development have been considered and reviewed, to inform the development of the scheme and in undertaking the planning assessment.

### Site allocation

The application site comprises two employment land allocations at the eastern extent of the RIE, allocated under the LDP as EMP1.4 to the west and EMP1.5 to the east, as illustrated in Figure 4.

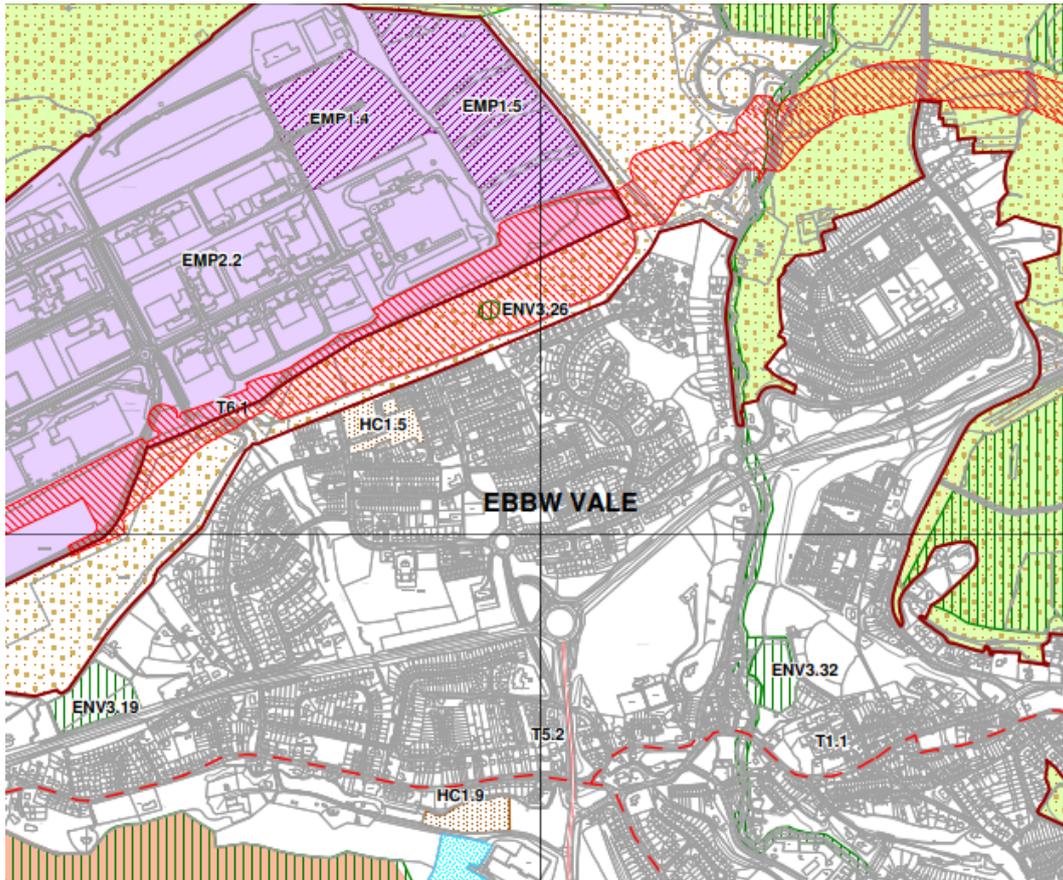


Figure 4 Blaenau Gwent County Borough Council LDP Allocations Map.

The Blaenau Gwent LDP Site Descriptions document <sup>17</sup> outlines that both allocations EMP1.4 (Rassau Platform A) and EMP1.5 (Rassau Platform B) fall under the definition of primary employment sites. EMP1.4 (Rassau Platform A) comprises a vacant platform to the north eastern edge of the RIE and is split across two platforms with existing highway infrastructure. The plot extends to an area of 4.8ha and is allocated under policy EMP1 for B1, B2 and B8 uses, consistent with the remainder of the RIE. The site description document outlines that should the site be developed in isolation, 1.4ha of land should be safeguarded for screening and buffering, resulting in residual developable area of 3.4ha.

<sup>17</sup> [https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Site\\_Descriptions.pdf](https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Site_Descriptions.pdf)

Allocation EMP1.5 (Rassau Platform B) is located along the eastern boundary of the RIE with an existing access track which is dependent on access through EMP1.4 to the west. The northern half of the allocation is a triangular shaped area of grassland and the southern half comprises woodland and ditches. The plot extends to 8.0ha with a residual developable area of 3.7ha, if developed in isolation from wider land parcels.

Primary Sites, including the allocations which comprise the application site, are allocated by Policy DM10 for B1, B2 and B8 Use Classes; an appropriate Sui Generis use; or, an ancillary facility or service to the proposed employment use.

The accompanying text in support of Policy EMP1 confirms the policy's interrelationship with Policy SP8, which recognises that in order to address some of the serious socio-economic problems in Blaenau Gwent, a progressive approach must be taken in the development of land for economic purposes.

## Relevant LDP policies

The following LDP policies are relevant in determining the planning application:

**SP1 Northern Strategy Area** outlines that proposals in the Northern Strategy Area will be required to deliver sustainable growth and regeneration that benefits the whole of Blaenau Gwent. Specifically, development should support Blaenau Gwent through the attraction of both people and the provision of employment.

**SP7 Climate Change** states that the Council will seek to address climate change and reduce energy demands to improve the sustainability of the valley communities, through by: encouraging more of the County Borough's electricity and heat requirements to be generated through renewable means and low/zero carbon technologies; incorporation of decentralised heating/cooling; and, promoting the efficient use of land by giving preference to brownfield development.

**SP8 Sustainable Economic Growth** advocates the improvement and diversification of the local economy to maximise the economic potential of Blaenau Gwent. Policy SP8 outlines that 50ha of land for employment and businesses has been allocated under the adopted LDP to meet employment needs and support the sustainable development of manufacturing.

**SP9 Active and Healthy Communities** states that BGCBC will promote the Valleys Regional Park and leisure activities, protect/improve existing open space and protect natural greenspaces for all members of the community.

**SP10 Protection and Enhancement of the Natural Environment** outlines that development proposals must protect and/or enhance the natural environment including: the Mynydd Llangynidr Site of Special Scientific Interest (SSSI), Usk Bat Site Species Special Area of Conservation (SAC); Sites of Importance for Nature Conservation (SINC), and the attributes, character and quality of the local wildlife and landscape.

**SP11 Protection and Enhancement of the Historic Environment** states that BGCBC will protect and preserve heritage assets through safeguarding nationally

designated sites from inappropriate development, enhance sites of historic or archaeological value and promote heritage tourism.

**DM1 New Development** outlines the sustainable design, amenity and accessibility requirements of development proposals.

In regard to sustainable design, development proposals should achieve an energy efficient design, make efficient use of land and resources, reduce waste and associated pollution, reduce surface water runoff and reduce the net-loss of biodiversity.

Development proposals should also seek to respect the amenity of the local area through sympathetic design, minimise amenity issues on neighbouring occupiers, reduce water and air pollution, minimise high levels of noise, vibration, light and odour and considered land stability and contamination.

Development proposals should consider the safe, effective and efficient use of the existing transport network and prioritise non-motorised users as well as providing sufficient parking and operational space. A Transport Assessment should be submitted in support of this application evidencing no adverse impacts on trip generation from the RIE.

**DM2 Design and Placemaking** outlines that development proposals should be appropriate in terms of form and scale to the local context, a design which positively contributes to the local character and should include landscaping and planting to achieve a suitable visual setting.

**DM3 Infrastructure Provision** states that new development will be expected to meet the infrastructure needs that it generates, including the improvement or provision of infrastructure through means of condition or financial obligation.

**DM4 Low and Zero Carbon Energy** states that the Council will encourage major development proposals to incorporate schemes which generate energy from renewable and low/zero carbon technologies.

**DM10 Use Class Restrictions – Employment** outlines restrictions in accordance with Policies EMP1 and EMP2. On sites allocated as ‘Primary Sites’ (including Rassau Platform B) development will be permitted if it is within Use Classes B1, B2 or B8; an appropriate Sui Generis use; or, if it provides an ancillary facility or service to the existing and proposed employment use.

**DM14 Biodiversity Protection and Enhancement** sets out that development within 10km of the Usk Bat Site SAC that could cause direct or indirect disturbance to its features will be subject to the submission of a Habitat Regulation Assessment (HRA). Development will be permitted within, or in close proximity to sites designated as SINC and Local Nature Reserves (LNRs) where it maintains or enhances the importance of the designation or the need for development outweighs importance of the designation.

**DM15 Protection and Enhancement of the Green Infrastructure** outlines that development proposals will be supported where there is no loss in connectivity within the green infrastructure network (river corridors or special landscape areas), where connections are facilitated or enhancements are achieved.

**DM16 Trees, Woodlands and Hedgerow Protection** requires that development proposals demonstrate that there would be no unacceptable harm to trees, woodlands and hedgerows that have natural or heritage value and contribute toward the character and amenity of the locality.

**EMP1 Employment Allocations** states that 50ha of developable land has been allocated under the LDP, including Primary Sites EMP1.4 (Rassau Platform A) EMP1.5 (Rassau Platform B) in the Ebbw Vale Hub which comprises a developable area of approximately 3.7ha. In conjunction with policy DM10, B1, B2 and B8 land uses in this location would be permissible.

### 4.3.2 Supplementary Planning Guidance (SPG): Access, Car Parking and Design (March 2014)

The adopted SPG<sup>18</sup> outlines that car parking provision is a major influence of means of transport and accessibility.

Section 2.7 of the SPG outlines the requirements of part 3 of Policy DM1 relating accessibility, which requires that:

- The proposal has regard for the safe, effective and efficient use of the transportation network;
- The proposal ensures that developments are designed to an appropriate standard that prioritises the interests of pedestrians, cyclists and public transport before that of the private car;
- The proposal secures appropriate provision for people with special access and mobility requirements;
- Parking, appropriate servicing and operational space has been provided; and,
- Where a Transport Assessment and Travel Plan are required by national planning policy, they must demonstrate that there will be no adverse impact on trip generation and travel demand.

Parking requirements should accord with the SPG and demonstrate regard to the nature of development and sites location within Blaenau Gwent Zone 2 – Suburban or Near Urban zone.

Cycle parking provision should be provided in accordance with guidance provided in Appendix 3 of the SPG. Cycle parking should have regard to the following:

- Cycle stands/lockers should be sited in highly visible locations to maximise public surveillance;
- CCTV should be provided to increase surveillance; and,
- For employment uses, shower and locker facilities will be sought as part of the development.

Motor cycle parking provision should be 5% of the total provision for car parking.

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<sup>18</sup> [https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Access\\_CarParking\\_SPG.pdf](https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Access_CarParking_SPG.pdf)

Each parking space should meet the minimum standards of 4.8m x 2.6m. In ground parking areas, the average requirement per car including space for access is 21m<sup>2</sup>.

### 4.3.3 Ebbw Vale Enterprise Zone Strategic Plan

The application site is situated within the Ebbw Vale Enterprise Zone (EVEZ) Strategic Plan 2018-2021<sup>19</sup>, designated by Welsh Government as a strategic employment site to stimulate economic development in area. The EVEZ is comprised of 8no. sites within the surrounding area which all focus on the manufacturing sector, including the Rassau Industrial Estate.

The aim of the EVEZ is to achieve:

*“the creation of a vibrant, world class high technology hotspot for Welsh-based manufacturing companies of all sizes spanning many key sub-sectors, including foot and manufacturing, providing employment that is challenging, rewarding and valued”.*<sup>20</sup>

### 4.3.4 Brecon Beacons National Park Authority

The application site is situated approximately 400m south of the BBNP, within the RIE. Although the proposed development would be situated outside the BBNP, the Applicant has considered the adopted LDP<sup>21</sup>, Light Pollution & Obtrusive Lighting SPG<sup>22</sup> and the BBNP Management Plan<sup>23</sup>.

### Brecon Beacons National Park LDP 2007-2022

Although the site is situated within administrative boundary of BGCBC, due to the proximity and scale of the development, the Applicant has engaged with BBNPA during PAC and has considered planning policies and guidance relevant to the proposed development.

The BBNPA LDP<sup>24</sup> was adopted on 17 December 2013 and covers a plan period of 2007-2022.

The following objectives and policies of the LDP are relevant, and have been considered in the design and assessment of the proposed development:

- **SQ1 - Special Qualities** requires development proposals to conserve and enhance the special qualities of the National Park.

<sup>19</sup> [https://gov.wales/sites/default/files/publications/2019-03/ebbw-vale-enterprise-zone-strategic-plan-2018-2021\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-03/ebbw-vale-enterprise-zone-strategic-plan-2018-2021_0.pdf)

<sup>20</sup> [https://gov.wales/sites/default/files/publications/2019-03/ebbw-vale-enterprise-zone-strategic-plan-2018-2021\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-03/ebbw-vale-enterprise-zone-strategic-plan-2018-2021_0.pdf)

<sup>21</sup> <https://www.beacons-npa.gov.uk/wp-content/uploads/Brecon-Written-Statement.pdf>

<sup>22</sup> <https://www.beacons-npa.gov.uk/wp-content/uploads/Obtrusive-Lighting-SPG-.pdf>

<sup>23</sup> <https://www.beacons-npa.gov.uk/wp-content/uploads/BBNP-Management-Plan-PROOF-03-03-16-English.pdf>

<sup>24</sup> <https://www.beacons-npa.gov.uk/wp-content/uploads/Brecon-Written-Statement.pdf>

- **SQ3 – Sustainable Use of Land** advocates the development of previously developed land in preference to greenfield land.
- **SQ4 - Landscape** requires new developments to protect and enhance the beautiful and varied character and landscape.
- **SQ7 – Biodiversity** requires development proposals to conserve and enhance the rich and complex biodiversity of the National Park.
- **SQ10 – Natural Resources** states that proposals should ensure that air, water and soil resources will be used in a sustainable manner and that standards for water, soil and air quality are maintained at a high standard.
- **SP1 - Special Qualities** sets out that proposals within the National Park will be required to conserve and enhance the natural beauty, wildlife and cultural heritage of the park and provide/support the understanding and enjoyment of the special qualities in a manner which does not harm those qualities as well as assisting the economic and social well-being of local communities.
- **SP3 – Environmental Protection** outlines that development in the National Park must not unacceptably impact or prevent the enjoyment of the special qualities of the National Park, ecology and biodiversity, the water environment, geodiversity, cultural heritage, the character of the built heritage, public open spaces, soil/air quality or agricultural land.
- **Policy 3 – Sites of European Importance** states that development proposals which may have a significant effect on a European Site will not be permitted unless the proposals are required in connection with the protection of the site, proposals would not give rise to adverse effects on the conservation objectives or there are reasons of overriding public interest warranting development.
- **Policy 4 – Sites of National Importance** states that development will be permitted where works are required for the protection of the site, where the proposals would have no adverse effects on designated sites or where the needs of development outweigh the value of the site itself.
- **Policy 5 – Site of Importance for Nature Conservation** states that development on non-statutory designated sites will be permitted where the need for development outweighs the nature conservation importance of the site and where proposals accord with Policy 6 (Biodiversity and Development) and Policy 7 (Protected and Important Wild Species) of the LDP.
- **Policy 12 Light Pollution** states that proposals including lighting should include the submission of a lighting scheme. Lighting proposals should be appropriate to the intended purpose and should respect the character of the area, local residents, vehicle users, pedestrians, visibility of the night sky and dark corridors.
- **Policy 14 Air Quality** states that proposals will only be permitted where it is proven that no detrimental impact, individually or cumulatively. Proposals for development which are likely to negatively impact on air quality will not be permitted unless mitigation measures are provided.

## BBNPA – Light Pollution & Obtrusive Lighting SPG (March 2015)

The Light Pollution & Obtrusive Lighting SPG was adopted in March 2015 to provide additional guidance to LDP Policy 12 (Light Pollution). The SPG encourages developers, architects and lighting designers to provide non-obtrusive lighting when preparing proposals which incorporate outdoor artificial lighting.

Obtrusive lighting or light pollution is defined as unnecessary brightening of the night sky as a result of upwardly directed light. Obtrusive lighting specifically falls into four categories: glare, light trespass, scenic intrusion and sky glow.

The BBNP achieved International Dark Sky Reserve (IDSR) Status in 2013. The IDSR identifies four distinct zones:

- **Core Zone** – Aspirations for the Core Zone include no additional permeant illuminations as part of new developments will not be lit in a manner which increases upward spill;
- **Critical Buffer Zone** - Aspirations for no lighting to be projected from the Critical Buffer Zone. Luminaires using lamps greater than 1000 lumens will be expected to be fully shielded;
- **Buffer Zone** – the ‘Buffer Zone’ relates to all remaining areas within the National Park boundary. All lighting will be encouraged to be designed and installed to provide low glare and intensity; and,
- **External Zone** – the ‘External Zone’ relates to areas outside the National Park boundary. BBNPA will use the contents of the SPG and the IDSR Management Plan for discussions with neighbouring authorities to mitigate anticipated light pollution levels.

As shown in Figure 5 below, the application site is situated in the ‘External Zone’, by virtue that the proposed development would be located in the RIE, approximately 400m south of the National Park.

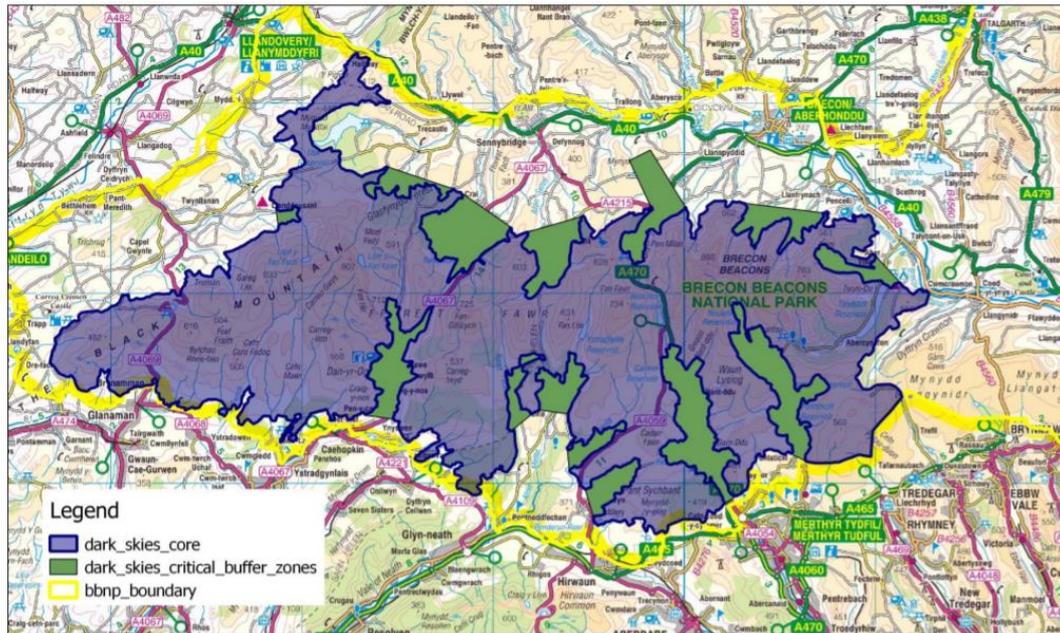


Figure 5 BBNP International Dark Skies Reserve Map.

The SPG states that applications situated within the National Park will be expected to be supported by a Lighting Plan. By virtue that the application site is situated outside the National Park, this application is not supported by such a Lighting Plan.

However, to explain the lighting proposals for the proposed development, a **Materiality & Lighting Considerations Report** has been submitted in support of the planning application which outlines the internal and external lighting options and the justification for their inclusion in respect of the BBNP International Dark Skies Reserve.

### Brecon Beacons National Park Management Plan

National Parks contain landscapes of national and international importance and their designation gives them the highest status for the conservation of landscape and scenic beauty. The BBNP was designated in 1957 and covers an area of approximately 1,347 square kilometres.

The statutory purposes of the UK National Park Authorities are set out in Section 61 of the Environment Act 1995<sup>25</sup> which states:

**First Purpose:** To conserve and enhance the natural beauty, wildlife, and cultural heritage of the National Parks.

**Second Purpose:** To promote opportunities for the understanding and enjoyment of the special qualities (of National Parks) by the public.

<sup>25</sup> <https://www.legislation.gov.uk/ukpga/1995/25/section/61>

The BBNP Management Plan states the following special qualities which must be considered through development and management activities within the National Park.

The Applicant has considered the special qualities of the BBNP throughout the design evolution of the scheme and has engaged with BBNPA to inform assessment principles undertaken as part of the Environment Impact Assessment (EIA). Of particular relevance to the proposed development are four special qualities which were identified by BBNPA in their PAC response. Table 3 below sets out how the Applicant has considered these particularly relevant special qualities of the National Park in the design and assessment of the proposed development.

Table 2: Consideration of National Park Special Qualities in the design and assessment of the proposed development.

Brecon Beacons National Park Special Qualities	Design and assessment of the proposed development
<p>A National Park offering peace and tranquillity with opportunities for quiet enjoyment, inspiration, relaxation and spiritual renewal.</p>	<p>The application site is situated approximately 400m south of the BBNP boundary within the RIE which is allocated as for employment uses, specifically B2 (general industrial) and B8 (storage and distribution), similar to the neighbouring uses.</p> <p>Natural Resources Wales define Tranquillity, in their LANDMAP Methodology for Visual and Sensory guidance document dated 2016, to mean a feeling of sense of peace without disruptive noise or movement.</p> <p>The Environmental Statement – Chapter 10 Noise, confirms that construction and operational noise would not exceed the 5dB threshold that would not give rise to a substantial effect, reporting that the proposed development would result in unsubstantial noise impacts on the surrounding environment. In addition, intervening structures to the north of the RIE and the 400m buffer from the National Park would safeguard existing tranquillity levels within the National Park.</p> <p>LANDMAP Visual and Sensory spatial dataset was used to consider the effect of the proposed development on the special qualities of the National Park. LANDMAP provides judgements on tranquillity and peace under the heading ‘perceptual and other sensory qualities’ in their descriptions of Aspect Areas.</p> <p>In addition to noise, changes to perceived tranquillity also relate to the effects of human presence, such as human movement and traffic using terms like <i>constant stream</i> of human movement for most of the day such as town centre, motorway or busy main road to <i>frequent but interrupted stream</i> of human movement for most of the day such as busy railway or rural main road all the way to <i>occasional</i> and <i>rare</i> movement to mean only the lightest of human traffic, such as a remote hill/mountain tops or unvisited woodland.</p> <p>Aspect Areas closest to the proposed development within the Brecon Beacons that may experience change to perceived tranquillity include Mynydd Llangynidr and Mynydd Llangattock (BRCKNVS372) and Cwm Carneilw (BRCKNVS908).</p> <p>For Aspect Area Mynydd Llangynidr and Mynydd Llangattock, tranquillity is not listed as a defining quality under perceptual and other sensory qualities heading. However, the LANDMAP descriptions does set out the level of human access as <i>occasional</i>. Aspect Area Cwm Carneilw is not reported to be tranquil under perceptual and other sensory qualities heading and is reported to have an ‘infrequent’ level of human access.</p> <p>For both Aspect Areas within the National Park, there is no consideration of the existing influence of the Heads of Valleys Industrial Estates (BLNGWVS242) Aspect Area on the perceived tranquillity of the National Park.</p> <p>It is therefore assumed that this part of the National Park would not be affected by the existing ‘frequent’ level of human access present within the Heads of Valleys Industrial Estates (BLNGWVS242) Aspect Area.</p>

Brecon Beacons National Park Special Qualities	Design and assessment of the proposed development
	<p>The proposed development would not significantly increase the volume of traffic (movement of vehicles) using the local road network and would not significantly increase the level of background noise within the local environment.</p> <p><b>Due to the degree of separation (approximately 400m), intervening landform of neighbouring aspect areas and limited noise and transport impacts associated with construction or operational phases of development - the Applicant considers that the proposed development would conserve the special qualities of the National Park.</b></p>
<p>A feeling of vitality and healthfulness that comes from enjoying the Park’s fresh air, clean water, rural setting, open land and locally produced foods.</p>	<p>The Environmental Statement has considered the impacts on multiple receptors within close proximity to the application site, including areas in BGCBC and further afield in the BBNP.</p> <p>Embedded mitigation within the design of the proposed development includes 2no. 75m chimneys, associated filters and secondary abatement measures (selective catalytic reduction). This would remove particulates emitted and reduce air quality impacts associated with the proposed development. The proposed development would not give rise to substantial air quality impacts and would not undermine the special qualities of the National Park or neighbouring area to the south in BGCBC.</p> <p>In addition, the proposed development would not give rise to significant effects regarding climate change and the water environment. Due to the setting of the application site 400m south of the BBNP, it is considered that there are no hydrological pathways in which the proposed development could adversely impact on clean water.</p> <p><b>The Applicant considers that the proposed development would preserve the vitality and healthfulness of the National Park through safeguarding clean air and water. The proposed development would not undermine the character of open space or ability to grow local food by virtue of the sites location within the developed RIE.</b></p>
<p>The Park’s sweeping grandeur and outstanding natural beauty observed across a variety of harmoniously connected landscapes, including marvellous gorges and waterfalls, classic karst geology with caves and sink holes, contrasting glacial landforms such as cliffs and broad valleys carved from old red sandstone and prominent hilltops with extensive views in all directions.</p>	<p>This special quality describes the wide variety of landscape types present across the BBNP, all of which would not be directly affected by the proposed development. Any indirect effects would not be significant, as evidenced in the Environmental Statement.</p> <p>The Environmental Statement does assess the impact of the proposed development on views out from and into the National Park, recognising their value in contributing to this special quality. Chapter 13 (Visual) of the Environmental Statement concludes that the proposed development would result in a significant effect on recreational users of two localised viewpoints along the PRoW network within the National Park. In order to mitigate visual effects on the localised receptors on the southern slopes of Mynydd Llangynidr in the BBNP, the Applicant has sought to use patinated reflective cladding to reflect the surrounding landscape which would reflect the surrounding colours, textures and changing weather pattern.</p> <p><b>The Applicant considers that there would be no significant landscape effects on the BBNP, with significant visual effects in localised areas of the BBNP only being acknowledged within the Environmental Statement. Appropriate mitigation</b></p>

Brecon Beacons National Park Special Qualities	Design and assessment of the proposed development
	<p><b>has been embedded in to the scheme design to minimise these effects as much as possible, as further evidenced in the Materiality and Lighting Considerations Report.</b></p>
<p>A working, living “patchwork” of contrasting patterns, colours, and textures comprising of well-maintained farmed landscapes, open uplands, lakes and meandering rivers punctuated by small-scale woodlands, country lanes, hedgerows, stone walls and scattered settlements.</p>	<p>This special quality describes the wide variety of landscape characteristics and features present across the Brecon Beacons, all of which would not be directly affected by the proposed development. The application site is situated within an existing industrial estate which evidences a number of vertical structures including wind turbines and National Grid apparatus which serves as an intervening structure between the site and the southern boundary of the BBNP. Given the established nature of the Rassau Industrial Estate, any indirect effects would not be significant.</p> <p><b>The Applicant considers that there would be no significant landscape effects on the BBNP.</b></p>

## 5 Assessment: Planning Considerations

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It has been established through the planning history search presented in Table 1 that there are no restrictive planning permissions which would influence the future development of the site.

The following sections consider the key issues raised by planning policy in relation to the proposed development.

### 5.1 Principle of Development

The site is comprised of two employment land allocations within the LDP, under Policy EMP1. The policy supports the development of land uses on these specific site allocations for either B1, B2, B8 or Sui Generis land uses with ancillary functions. The proposed development would utilise the two remaining vacant plots within the RIE, for a proposed B2 land use which is wholly in accordance with the employment land allocation intended for the sites. In addition, existing overgrown earthwork plateaus within the RIE constitute brownfield land which would be redeveloped in facilitate development, according with paragraph 5.4.13 of PPW11.

The site is situated within the Northern Strategy Area established by the LDP, which seeks to attract both people and provision of employment to Blaenau Gwent. The principle of the proposed development is therefore clearly supported, by delivering two key employment allocations in the Council's adopted LDP and by supporting the intention of the Northern Strategy Area spatial policy of the LDP.

The adjacent land uses are consistent with the use of the proposed development, further substantiating the acceptability of B2 development on the site. As such, it is considered that the principle of manufacturing land uses on the site is sought and is well-established within the wider RIE, thus according with Policies 1 and 33 (Valleys – National Growth Area) of Future Wales and Policies SP1, DM10 and EMP1 of the LDP.

The application site also includes land to the east of the employment land allocations, situated between the Carno Reservoir and the A465. This section of the site would be developed to accommodate Sustainable Drainage Systems, internal access roads for HGV movements and outdoor amenity space for staff. This area of the application site would also support ecological mitigation and enhancement land to support the function of the site for employment. Whilst this section of the site is not allocated for a particular use within the LDP, the proposed use of this section of the site is considered necessary to deliver development through sufficient SUDS and ecological mitigation on employment land which accords with Policies SP1, DM10 and EMP1 of the LDP.

Policy SP1 of the LDP advocates the delivery of sustainable development and employment opportunities in the Northern Strategy Area. The proposed development would create up to 450 no. gross jobs during construction of the scheme and approximately 670 no. jobs associated with the scheme's operation.

Blaenau Gwent demonstrates an unemployment rate above the national average (+0.6%), evidencing the need for new employment opportunities. The proposed development would contribute to the delivery of Policy SP8 of the LDP, by providing new employment within an established manufacturing/industrial area.

In addition, the proposed works contribute towards ‘a Prosperous Wales’ and Policies 33 of Future Wales and Policies SP1, DM10 and EMP1 of the LDP. As such, it is considered that the principle of development is acceptable in this location.

## 5.2 Good Design

Policy 2 of Future Wales, Chapter 3 of PPW11, TAN 12 and Policies DM1 (New Development) and DM2 (Design and Placemaking) of the LDP, are the development management policies requiring that the proposed development would respect the character, built form and amenity of the site and local area. Policy DM1 establishes sustainable design, amenity and accessibility requirements for new development. Development proposals should seek to respect the amenity of the local area through sympathetic design and by minimising amenity issues on neighbouring occupiers. Policy DM2 requires development that is appropriate in terms of form and scale to the local context, identifying that a design which positively contributes to local character should include landscaping.

TAN 12 requires developments to consider access, character, community safety, environmental sustainability and movement, as well as advocating innovative design which maintains aesthetic quality while meeting present and future needs. A **Design and Access Statement** has been submitted in support of the planning application, which details separately how the design of the scheme has evolved to respond to these policy requirements for ‘good design’.

### Form and scale

As identified in the planning history search to support the planning application (see Table 1 of the Planning Statement), the precedent for verticality and tall structures within the RIA is well-established and considered to be acceptable. To the immediate south of the site is a wind turbine, with a 46m hub height and 77m tip height. A further turbine is situated in the west of the RIE, measuring 56m to the hub and 72m to the tip. In 2020, the LPA granted planning permission for the construction of a further wind turbine to the west of the site, with a hub height of 54m and tip height of 80m. Given the well-established precedent for structures of a vertical and dynamic form and scale within the RIE, it is considered that the verticality of the proposed chimneys would be appropriate in the local area. The proposed development would be sited on exposed and sloping topography and therefore visually prominent. Innovative measures have been adopted in the use of reflective cladding to reduce the perceptible massing of the proposed development and achieve an exemplar design within the context of the existing RIE. It is considered that the proposed development is appropriate in terms of form and scale to the local context of the Rassau Industrial Estate, and that the scheme therefore accords with Policy DM2 of the LDP.

### Amenity

The submitted General Arrangement plan provides an indication of the composition of each constituent part element of development. At the western boundary, Cullet Stores, Silo and Batch Buildings would abut the site boundary and a security building/access at the north western most extent. Silo and Batch Building structures on the western site boundary would extend to a height of approximately 39.5m. Lower elements of the Silo and Batch Buildings would be finished with grey concrete and reflective opaque façades above to reflect the lightweight steel structure of the process buildings. Accommodating initial concerns expressed by the BBNPA through the PAC process, polycarbonate facades being replaced with reflective opaque materials to reduce light spill from the site. As further set out in the **Environmental Colour Assessment**, the use of reflective cladding would support the achievement of high architectural design quality and would positively respond to the sites elevated and prominent position, mitigating the scale, height and massing. The proposed material finish would assist in reflecting the adjacent landscape of the BBNP and further reduce light emanating from the site, achieving compatibility with the character of the RIE and BBNP 400m to the north. It is considered that the proposed development directly accords with part 2a and 2b of the Policy DM1 of the LDP and responds to the ‘character’ requirements set out in TAN12.

The use of reflective cladding on this elevated site would assist the building appearing light and would break up the overall mass. A patinated finish would be provided to ensure that glint and glare would not give rise to unacceptable impacts on the landscape and undermine public safety. It is considered that proposed materials would demonstrate a sympathetic and well-informed design which is appropriate to the site context. As such, it is considered that the proposed Silo and Batch Buildings accord with the requirements of Policies DM1 and DM2 of the LDP and are acceptable.

The process and warehouse buildings would comprise the elements of development with the greatest area and massing on site. The process buildings would measure approximately 276m in width and 174m in depth. Due to the scale and topographical differences of the site, the maximum height of the structure would be 38m AOD, with a flat parapet roof structure. The process building would benefit from a uniformed patinated reflective façade with vertical windows to provide natural light into the internal occupied process areas, constituting energy efficient design. All windows would be recessed and provided with vertical fins to provide a continuous elevational design as well as reducing solar gain during the day and light spill during the night, as set out in the **Materiality and Lighting Considerations Report**. The southern elevation of the warehouse would serve outbound deliveries and demonstrate 9no. roller shutter doors adjacent to an area of hardstanding. It is considered that the proposed development would be of a scale and massing which is consistent with the industrial character and aesthetic of the wider RIE and immediate adjacent B2/B8 uses.

Following PAC, further explanation has been provided on the design and lighting in the **Materiality and Lighting Considerations Report**. Despite the application site being located in the ‘External Zone’, sawtooth roof lights would be orientated north east away from the ‘Core Zone’ of the BBNP IDSR as well as the

installation of vertical fins to glazed areas to further minimise light spill and impacts on the BBNP. Internal artificial lighting would be suspended 3m from trusses, increasing the distance from roof lights above, creating a ‘dark zone’ between lighting and the ceiling to minimise light spill. It is considered that the proposed design has considered the amenity of the local area and respects the character and special qualities of the BBNP.

Through the use of reflective metallic facades at high levels, landscape features of the BBNP (400m to the north) will be reflected, harnessing the landscape character of the wider site and minimising visual intrusion. Consideration of the design and embedded mitigation has evolved since the inception of the project, with the evolution of design choices outlined in greater detail in the **Design and Access Statement**. The proposed development has been designed to ensure that the facility is fit for operational purpose while ensuring a sympathetic design within the RIE. As such, the proposed development would accord with Policies DM1 and DM2 of the LDP and is acceptable in terms of design.

Other buildings appurtenant to the processing, storage and security of the facility are proposed within the site. As shown on the **General Arrangements Plan**, a utilities building would be provided between both process line and would not be visible from the public realm. The ground and first floor levels would be finished in textured grey concrete and metallic opaque materials at higher levels. Due to the degree of massing and of the adjacent Process and Batch Buildings, it is acknowledged that the Utilities Building would give rise to a negligible design impact. Other buildings including the access/security, LPG & RMS, waste buildings and sub-station would all be single storey in height and set within the wider application site. Due to the limited scale and massing of these ancillary structures and their negligible impact on the character and setting of the public realm and RIE, it is considered that the proposed design is functional and in accordance with Policies DM1 and DM2 of the LDP.

### **Sustainable design**

The design of the proposed development has been carefully considered to harness natural daylight into occupied areas of the building through environmentally sustainable design solutions, as advocated in TAN12 and under parts 1a and 1b of policy DM1 of the LDP. Passive design would be achieved throughout the scheme to reduce energy demand during its operational use as further outlined within the supporting **Energy Statement**. The proposed roof profile demonstrates a flat structure with sawtooth roof light configurations which would provide natural light into the scheme. Roof light installations would improve the well-being of staff through visual connection with external conditions, as advocated within TAN12. By virtue that the proposed development would result in a continuous/uniformed elevational design and harnesses natural external elements, it is considered that the proposals would accord with Policies DM1 and DM2 of the LDP by providing an environmentally sustainable scheme and would be acceptable.

### **Local character – landscaping**

The proposed development would include landscaping proposals sought to the eastern extent, as illustrated in **Drawing 1501**. The proposed development would

include an HGV internal road network leading from the site entrance to the southern elevation of the warehouse building, passing through the landscaped area.

The proposed landscaping area would include 566no. trees, 3no. detention basins adjacent to the internal road and walkways, 1no. Great Crested Newt pond to the south east of the site, footpaths/footbridges and an outdoor amenity walking track for employees. Woodland planting would be provided upon the application site boundary to reduce the visual intrusion of the development on the surrounding landscape by virtue of its elevated and prominent position. The proposed works would constitute an enhancement of the existing overgrown area which would provide both an outdoor amenity function while also attenuating surface water runoff associated with development and existing impermeable underlying geology. As such, it is considered that the provision of landscaping and SUDS would constitute an enhancement to the existing overgrown site and would achieve a suitable visual setting for the scheme to assist the development to assimilate and achieve a clear definition between boundaries and public/private space at the eastern extent. Based on the comprehensive landscaping and boundary planting, it is considered that the proposed development would serve to achieve visually pleasing natural aesthetic at the eastern extent while maintaining the existing character of the RIE. It is therefore considered that the development accords with the design solutions set out in TAN12 and Policies DM1 and DM2 of the LDP, by providing landscaping which contributes to the character of the local area.

Overall, it is considered that the proposed development constitutes an innovative high quality architectural design which is informed by a design-led approach, integrating and adapting to the natural characteristics of the adjacent BBNP (400m to the north), where possible. It is considered that the precedent for tall structures within the local area is well-established and the scheme would be wholly in keeping with the character and aesthetic of the immediate area. As such, it is considered that the proposed development accords with the principles set out in PPW11, TAN12 (Design) and Policies DM1 and DM2 of the LDP.

### 5.3 Visual

Chapter 5 of PPW, TAN12 and Policy SP10 (Protection and Enhancement of the Natural Habitat), DM1 (New Development) and DM2 (Design and Placemaking) of the LDP require development proposals to have regard to the natural and built landscape. Specifically, Policy SP10 requires development proposals to protect and/or enhance the natural environment, including designated landscapes (including Mynydd Llangynidr).

The application site is situated approximately 400m south of the BBNP on the southern slope of Mynydd Llangynidr, at approximately 400-420m AOD. Due to the elevated and prominent position of the RIE platforms, any form of B2 or B8 development on the site would be visible from the surrounding landscape. Through the use of reflective cladding, the development would assimilate with the landscape and would demonstrate the ability to reflect back the landscape from where the structure is being perceived. By virtue that the proposed development

would be operational 24 hours a day, baseline darkness surveys have been undertaken from two locations within the BBNP. An assessment of the potential visual impact associated with the construction and operational stages of the scheme has been undertaken, with the conclusions of the assessment provided in **Chapter 13 of the Environmental Statement**. While the development demonstrates the potential to impact on receptors including those undertaking recreational activity in the BBNP, the ES finds that impacts would be limited to a small aspect of the park at Mynydd Llangynidr only.

Baseline conditions for residential areas/local communities, the BBNP and areas of recreational activities have been provided in Section 13.6 of the Environmental Statement. Local communities such as Rassau, Garnlydan, Tredegar and Beaufort are situated to the south and southeast of the site and comprise residential neighbourhoods with views limited to gaps between dwellings and along road corridors. Separation from the site by the A465 and its lateral conifer alignment further screen views, with the exception of electricity pylons and wind turbines (77m in height). Views from Beaufort Common are more open and panoramic which affords receptors views of the existing RIE.

The site is mostly screened by tree coverage, with the exception of existing tall structures. From Mynydd Llangynidr (southern slopes of the BBNP), the site is visible from the localised areas of the PRow network only, however views from the upper slopes are increasingly restrictive by virtue of intervening landforms, minimising impacts.

A darkness survey was undertaken to record the baseline levels of existing lighting at night. Baseline photography was taken from two viewpoints within the BBNP. The assessment finds that there is very little lighting visible at night, limited to streetlighting and security lighting from existing uses on the industrial estate. There are no key sources of light that dominate the view over and above residential streetlighting and any external lighting to be provided on site would be appropriately designed to prevent an upward spill. By virtue of the degree of separation, quantum of intervening structures in the RIE and indistinguishable lighting within the immediate area, it is considered that there would be no unacceptable impacts on the BBNP Dark Skies Reserve Core Zone.

Material choices have been selected to ensure a recessive appearance which limits visual intrusion and visual impacts on the BBNP to the north. The proposed development would integrate the use of metallic grey materials would reflect the surrounding landscape back toward the BBNP while creating a building of exemplar architectural quality which contributes to the character of the area. Additional embedded mitigation measures include directional lighting and north east orientation of roof lights away from the BBNP to reduce light spill and the retention of southern boundary woodland.

Mitigation measures are proposed to reduce visual intrusion on the surrounding area during construction of the scheme. The proposed development would retain as many trees as possible and advanced replanting to increase tree screening of the construction activities would be undertaken. In addition, the proposed compounds and facilities would be provided with fencing and hoardings in appropriate tonal colours to reflect the landscape.

The proposed development would operate 24 hours a day, requiring internal and external lighting. The proposed development would be partially visible at night by very few receptors using the open access land and PRoW across Mynydd Llangynidr only and would not be visible from the wider National Park.

As set out in **Chapter 13 of the Environmental Statement**, the proposed development would give rise to moderate visual effects during construction on the community of Beaufort, visitors to the BBNP and users of the B4560. There are no construction activities planned during the hours of darkness. Therefore, there would be no unacceptable impacts upon the BBNP or the Dark Skies International Reserve during the construction phase. Due to the scale of the proposed development, the ES concludes that there would be moderate and substantial operational visual impacts on local residents to the south of the A465, users of the B4560 and visitors of the BBNP in specific localised areas only.

## 5.4 Transport and Access

Policy 12 of Future Wales, Chapter 4.1 of PPW11, TAN18 and Policy DM1 (New Development) of the LDP are the development management policies relevant to considering the traffic and transport effects of the proposed development. This includes the construction and operational effects on motorised and non-motorised users.

Construction and operational effects associated with transport and access have been considered in **Chapter 12 of the Environmental Statement** and the **Transport Statement** submitted with the planning application.

### Construction

Construction of the proposed development would result in approximately 38,325 construction vehicle movements across the construction period between 2022 - 2026. Of these journeys, 20% would be made by light goods vehicles (LGV), 66% by medium goods vehicles (MGV) and 14% by heavy goods vehicles (HGV).

Peak periods of construction would require approximately 450 personnel on site, of which it is anticipated that 70% would use private vehicles (single occupancy), 15% car share and 15% using public transport or walking/cycling.

A **Construction Transport Management Plan (CTMP)** would be prepared by the appointed contractor, for approval by the LPA. The CTMP would confirm methods to further minimise impacts of construction traffic on the local highway network.

Construction traffic impacts have been assessed at 20 road network link locations, all of which registered an increase ranging from <1% to 8%, with the exception of Alun Davies Way northbound (12%). As such, the traffic impact assessment outlines that there would be no significant impacts on the local network. A negligible degree of severance is predicted by virtue that traffic flows would not exceed a 30% increase threshold during construction. Due to the alignment, existing capacity and ability to disperse traffic onto the A465, the RIE exhibits capacity in which would adequately accommodate vehicle/non-motorised users, giving rise to negligible effects on driver/cyclist delay, cyclist fear and

intimidation and pedestrian amenity. The construction phase of the proposed development would result in negligible transport impacts which would safeguard vehicle connectivity and access for existing occupants within the RIE and active transport users, thus according with paragraph 4.1.11 of PPW11, TAN18 and Policy DM1. Negligible construction transport impacts will be further mitigated through the submission of a **CTMP** and therefore it is considered that the proposed development is acceptable in terms of traffic and transport.

Vehicle movements to/from the site would be well distributed throughout the day as to avoid unnecessary stress upon the RIE road network. The **ES** and **Transport Statement** confirm that increased operational transport movements would be accommodated within the capacity of the RIE network and would not result in unacceptable congestion or traffic flow. By virtue that the site is strategically situated within 400m of the A465, traffic flows would be promptly dispersed upon the existing transport network, as advocated by Section 3.7 of TAN18 and Policy DM1 of the LDP.

## Operation

During operation of the scheme, approximately 190 two-way HGV journeys would be made each day which would provide inbound deliveries of raw materials and outbound export of finished products. Approximately 490 two-way trips would be made by staff travelling to the site for work.

The assessment undertaken to inform the ES concludes that the impact of the proposed development on the local highway network during operation would be negligible. A **Site Traffic Management Plan** has been submitted in support of the planning application, which confirms that on site operatives would be employed to appropriately manage HGV deliveries to prevent the backlog of traffic onto the RIE road network. Due to the appropriate internal road system, sufficient parking provision and management measures, there would be no unacceptable transport impacts on the road network.

In addition, to promote sustainable methods of travel to site, a **Framework Travel Plan** has been provided in Section 6 of the supporting **Transport Statement**. The Framework Travel Plan includes measures which would be incorporated into the operation of the proposed development to encourage sustainable travel behaviours.

Wider benefits to the local pedestrian and cycle infrastructure provision and uptake would be harnessed within the local area, demonstrating the social value of development on active travel within the Rassau and Beaufort communities which would enhance user experience and uptake for those employed by the proposed development and employees within the wider RIE. It is considered that the proposed development would harness the strategic location of the site and active transport opportunities, contributing towards ‘a Prosperous Wales’ and ‘a Healthier Wales’, as set out in the WBF Act, as well as fulfilling the requirements of paragraph 4.1.11 of PPW11.

The proposed development would provide 389no. on site car parking spaces (325no. standard spaces, 6no. visitor spaces, 19no. disabled spaces and 39no. Ultra-Low Emission Vehicle (ULEV) charging spaces). Operation of the scheme

would span across four shift patterns, each requiring a maximum of approximately 270 personnel to be on site. It is considered that the proposed development would therefore provide adequate provision to accommodate each of the shift patterns without giving rise to any overspill onto the local road network, as required by TAN18. Additional car parking capacity has been built into the scheme to future proof the design of the proposed development and safeguard the capacity of the local road network. The quantum of car parking spaces has been developed in collaboration with the local highway authority and is considered to be acceptable. The proposed development demonstrates direct accordance with the 10% requirements for ULEV charging points, as set out in PPW11 and Policy 12 of the Future Wales: The National Plan 2040, as well as TAN18 and the Access, Car Parking and Design SPG.

The proposed development would also provide 22no. covered Sheffield style bike stands, capable of accommodating 43no. bikes which accords with the LPA's cycle parking minimum requirements. Due to the nature of the application site, there is sufficient capacity within the site to increase this provision to meet any future active travel uptake.

PAC responses received from Welsh Government and Blaenau Gwent Highways department contained no concerns with the proposed development. A response to each of the responses made by the specialist consultees and how the Applicant has addressed matters raised is included in the **PAC Report** submitted with the planning application.

## 5.5 Biodiversity and Ecology

Policy 9 (Resilient Ecological Networks and Green Infrastructure) of Future Wales, Chapter 6 of PPW11, TAN5 and Policies SP10 (Protection and Enhancement of the Natural Environment), DM14 (Biodiversity, Protection and Enhancement), DM15 (Protection and Enhancement of the Green Infrastructure) and DM16 (Trees, Woodland and Hedgerow Protection) of the LDP collectively require development proposals to contribute towards securing the maintenance and enhancement of biodiversity, character and quality of local wildlife and landscape.

Policy DM14 states that development will be permitted within close proximity of Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs) where it maintains or enhances the designation, or where it can be demonstrated that the need for development outweighs the importance of the designation. Policy DM15 states that proposals will be supported where there is no loss in connectivity within the Council's green infrastructure network. Policy DM16 requires that development proposals demonstrate that there would be no unacceptable harm to trees, woodland or hedgerow which have natural or heritage value.

**Chapter 7 of the Environmental Statement** provides an assessment of the likely impacts arising from the proposed development on biodiversity and ecology.

### Habitats / Species

There are two SACs within 5km of the application site (Usk Bat Sites – 900m to the north and Cwm Clydach Woodlands – 4.3km to the east). In addition, there are two SSSIs within 2km of the site (Mynydd Llangatwg – 900m to the north and Mynydd Llangynidr – 1.5km to the northwest) and a further 23 non-statutory designated sites within 2km comprising 20 Sites of Importance for Nature Conservation (SINC) and 3 Local Nature Reserves (LNRs). To inform the planning application, Extended Phase 1 Habitat Surveys were undertaken, identifying 16 habitat types, as detailed in the **Preliminary Ecological Appraisal Report**.

A Habitats Regulations Assessment (HRA) was undertaken by virtue of the site's relationship with European designated sites (Usk Bat Site SAC and Cwm Clydach SAC) which is provided in **Appendix L of the ES**. None of the internationally or nationally designated sites are hydrologically connected and therefore there are no pathways for changes in water quality during construction and air quality impacts are not considered to be significant. Air quality impacts emanating from dust dispersion would not impact on ecological receptors more than 50m from the application site. As such, it is considered that there would be no significant impacts on such receptors arising from the proposed development.

Lesser horseshoe bats are a qualifying feature of the Usk Bat Site SAC, however, no suitable roosting sites were recorded within the application site. There is potential for disturbance of lesser horseshoe, Daubenton and brown long-eared bats associated with the Usk Bat SAC and Mynydd Llangatwg SSSI, however, noise and vibration at a distance of 85m or greater would be insignificant. With the implementation of construction mitigation and embedded landscape planting and habitat enhancements, the ES concludes that there would be negligible significant effects on qualifying bat species associated with the internationally and nationally designated sites.

Due to the degree of separation between the proposed development and nearby SACs and SSSIs, potential effects during operation would be limited to water and air quality only. By virtue that the application site and designations are not hydrologically connected, there would be no pathway for effects/changes due to water quality or quantity. The ecologically driven design includes the addition of Selective Catalytic Reduction (SCR) and ammonia removal technology to reduce air pollution would be significantly reduced, as set out in **Chapter 7 of the ES**.

Total nitrogen deposition at the Usk Bat SAC and Mynydd Llangatwg SAC would constitute 1.06% (a marginal exceedance of the 1% screening threshold). Total acidity (SO<sub>2</sub>) would be less than the 1% threshold, and by virtue that the Mynydd Llangatwg SAC is designated for its geomorphology, minor changes in air quality are not considered to affect its qualifying features. With the implementation of operational mitigation, there would be negligible significant effects on qualifying habitats of internationally and nationally designated sites.

By virtue that all ancient woodland sites exceed 50m from the site, effects from dust and vehicle emissions are considered to be insignificant on ecological receptors. Further mitigation measures are set out in the **Construction Environmental Management Plan**, which would control and further minimise the construction effects associated with the proposed development.

There are 23no. locally designated sites within 2km of the application site including SINC's and LNRs. Pollutants contained within surface run-off and groundwater flows demonstrate the potential to the River Ebbw SINC during construction. Good practice measures would be adopted to manage pollutants and therefore would be avoided, with flows re-joining the same catchment. With the implementation of construction mitigation, the ES concludes that there would be negligible significant effects on locally designated sites. It is therefore considered that the integrity of the SINC's and LNR would be maintained, according with Policy DM14.

Great Crested Newts (GCN) are a European Protected Species (EPS) under the Conservation of Habitats and Species Regulations 2017 (as amended) and protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) ('the WCA'). During PAC, NRW expressed concerns that the Habitat Suitability Index (HSI) methodologies alone are not a reliable indicator of GCN colonisation, requiring all waterbodies should be subject to further investigation for GCN. Following advice provided by NRW, the Applicant has progressed on the assumption that GCN are present on site and has prepared a **GCN Conservation Strategy** submitted in support of the planning application.

Further surveys would be undertaken in spring 2022 on all waterbodies to confirm the presence of GCN using traditional methods.

Herptile fences would be erected on the eastern perimeter of the site abutting GCN habitat to allow herptiles to leave the development area on their own accord and not allow re-entry. Installation corridors would be cleared (by hand) through the vegetation following the alignment of the fences measuring 2m in width to a minimum depth of 100mm. In addition, pitfall traps would be installed along the interior of the boundary fence at 10m intervals and bottle traps at 2m intervals along the bank. Any GCN which escape the site would be trapped through refugia, trapping or herptile fencing installations.

The layout and design of the proposed development would include features to accommodate GCN. Proposed landscaping would comprise waterbodies and one pond specifically designed for GCN with a total approximate area of 0.3ha of open water. Such waterbodies would compensate for the loss of a number of ephemeral waterbodies currently present within the site.

Measures outlined would be subject to a five year initial management plan which would be revised at 5-yearly interval for a minimum of 25 years after development. Further details relating to further survey and conservation of GCN is provided in the **GCN Conservation Strategy**.

Surveys undertaken to inform the planning application have established that the site is of limited value to other species, with few examples of notable/rare receptors, primarily attributed to the nature of the hardstanding areas of the site. As such, it is considered that the proposed development would result in no unacceptable harm to wildlife and is in accordance with Policy SP10.

The proposed development further offers opportunities for ecological enhancement which would accord with PPW11, Policy 9 of Future Wales and Section 6 of the Environment Act (Wales) 2016. Specifically, Policy 9 of Future

Wales refers to developments achieving a net-benefit for ecology. In regard to habitats, broadleaved woodland, grassland, wetland habitats and marshy grassland would be provided on site. Replacement land to compensate County valued habitats would be provided off site, including the management of 158ha of woodland and grassland across a number of LNRs. A schedule of compensatory land proposed to create net-benefit is provided in **Chapter 7 of the Environmental Statement**.

In addition to habitat enhancements, at least 30 bat and bird boxes would be provided on mature trees within and off site as well as an artificial otter holt within the Carno Reservoir to increase breeding sites. Based on the above enhancement measures, it is considered that the proposed development exceeds policy requirements to suitably off set and enhance the ecological health and diversity of the local area. As such, the proposals would wholly accord with Section 6 of the Environment Act (Wales) 2016, Policy 9 of future Wales and Policies SP10, DM14, DM15 and DM16 of the LDP.

### **Green infrastructure – trees and hedgerows**

As confirmed in the **Arboricultural Impact Assessment**, shrub and tree clearance would be required to facilitate development, primarily clearance of overgrown vegetation on the hardstanding components of the site. Existing green infrastructure would be retained adjacent to the existing watercourse and upon the southern boundary of the site.

To mitigate loss of vegetation from the site and to provide enhancement, 566 no. new trees are proposed, constituting a net-improvement. As confirmed in the **Design and Access Statement** tree native specimen tree planting would include Sorbus Acuparia, Acer Campestre, Aluns Incana and Sorbus Intermediate trees – reflecting the character of planting in the local area. The proposed development also includes the provision of new species rich grassland, native woodlands, restored marshy grassland, raingardens and wetlands to minimise landscape and biodiversity impacts. It is proposed that a detailed landscape scheme would be provided through planning conditions, following grant of planning permission.

It is considered that the proposals to mitigate loss of green infrastructure, including the provision of replacement planting and new areas of green infrastructure within the site, would accord with Policy 9 of Future Wales and Policies SP10, DM15 and DM16.

## **5.6 Climate Change**

Policy 17 of Future Wales, Policies SP7 (Climate Change), DM1 (New Development) and DM4 (Low and Zero Carbon Energy) require development proposals to reduce energy demand, achieve an energy efficient design and utilise recycled waste in production/operation. Specifically, Policy SP7 and Policy DM4 state that the Council will encourage major development proposals to incorporate schemes which generate energy from renewable and low/zero carbon technologies.

The proposed development includes measures which would harness heat from manufacturing processes generate, reducing energy demand.. Waste heat from the furnace would be recovered using a high efficiency heat recovery device which would generate Low Temperature Hot Water (LTHW). The LTHW would then be used for space and domestic water heating within the occupied areas of the proposed development. As set out in the submitted **Energy Statement**, calculations indicate that recuperating this heat would save as much as 7MW of heat during peak periods and means that no further energy would be required to heat the proposed development. The proposed development therefore demonstrates the ability to harness energy from renewable and process means, according with Policy 17 of Future Wales and Policies DM4 and SP7 of the LDP.

An assessment of climate change impacts associated with the construction and operation of the proposed development has been undertaken and included in **Chapter 6 of the Environmental Statement**. By virtue of the scale and nature of anticipated manufacturing processes, embedded mitigation measures have been proposed to increase energy efficiency and reduce emissions. The proposed development demonstrates a passive design to achieve high thermal and air tightness to minimise heating, ventilation and air conditioning (HVAC) costs. By virtue of the proposed embedded mitigation measures, it is considered that the proposed facility would contribute to offsetting climate change impacts associated with the manufacturing process and therefore contributes toward the fulfilment of Policy 17 of Future Wales, paragraphs 5.7.7, 5.8.1 and 5.8.3 of PPW11 and would accord with the principles of ‘a Resilient Wales’ and ‘a Globally Responsible Wales’ as set out in the WCFG Act.

Emissions associated with the construction phase would make up 2% of the proposed developments total emissions. Of the 169.9 ktCO<sub>2</sub>e of emissions predicted, 148.4 ktCO<sub>2</sub>e would emanate from embodied carbon within buildings and earthwork materials, 17.3 ktCO<sub>2</sub>e would be created through the transport of materials and workers during construction and 2.8 ktCO<sub>2</sub>e from construction and installation activities. Construction of the proposed facility would constitute an estimated 0.008% of the 3<sup>rd</sup> UK carbon budget, 0.007% of the 4<sup>th</sup> UK carbon budget and 0.094% of the 2<sup>nd</sup> Welsh carbon budget. As such, the degree of emissions associated with construction would not materially affect the ability of the UK and Welsh Governments to meet their carbon budgets, however is deemed as significant in accordance with IEMA guidance. By virtue that the facility would be fully operational by 2026, associated changes in climate would be minimal in comparison to current baseline conditions. As such, sufficient mitigation would be implemented during the construction programme to ensure that no significant effects are realised. It is considered that the relative construction impacts and susceptibility to climate change are minimal and would therefore accord with Policies SP7, DM1 and DM4 of the LDP.

The operational phase of the proposed development is anticipated to result in 7,541.3 ktCO<sub>2</sub>e across 60 years, which constitutes 98% of the predicted emissions associated with the scheme. Of the operational emissions, 7,544.1 ktCO<sub>2</sub>e would be associated with energy consumption from the manufacturing process and transport-related emissions associated with loss of habitat carbon sequestration. It is considered that the operational facility would not materially affect the UK

Government to meet its carbon budgets. While the emissions associated with operational use constitute 98% of total emissions, the development would contribute an estimated 0.024% of the 4<sup>th</sup> UK carbon budget, 0.039% of the 5<sup>th</sup> UK carbon budget and 0.065% of the 6<sup>th</sup> UK carbon budget. Operational phases are predicted to contribute 0.105%, 0.584%, 0.774%, 1.35% and 9.706% of Wales' Carbon Budgets 2 to 7 respectively and is not considered to materially impact on the ability to meet existing/future carbon budgets. While the development would lead to significant effects as set out within IEMA guidance, the development would accord with SP7, DM1 and DM4 of the LDP.

By virtue of the embedded mitigation measures outlined above, it is considered that the proposed development would not give rise to significant climate change risks during the 60 year appraisal of the works. By virtue that no significant risks or effects were identified during the CCR assessment due to embedded mitigation, no further mitigation is proposed, thus according with Policy SP7 of the LDP.

**Chapter 6 of the Environmental Statement** outlines the proposed greenhouse gas mitigation measures for the construction phase which include 'designing out waste' to reduce embodied emissions, selecting alternative construction materials with lower emission intensities and the use of local materials/supply chains to reduce transportation distances. The operational facility would utilise durable materials to achieve lower maintenance requirements over the lifespan, development of an energy masterplan to ensure efficient operations and further adoption of low carbon transport modes. Owing to the minimal climate change risks and insignificance of potential effects found in the ES, it is considered that the scheme would contribute towards 'a Globally Responsible Wales' and 'a Resilient Wales' as prescribed by the WCFG Act, as well as Policies SP7 and DM1 of the LDP.

## 5.7 Water Environment

Chapter 6.6 of PPW11, TAN5 and Policy SP10 (Protection of the Natural Environment), Policy DM1 (New Development) and Policy DM3 (Infrastructure Provision) of the LDP require development proposals to protect and enhance the natural environment including designated and non-designated landscapes as well as protecting water quality and quantity. This section considers potential for water contamination, flood risk and drainage.

### Water contamination

While hydrology and flooding was scoped out of the ES, **Chapter 14 of the Environmental Statement** considers the construction and operational effects on the water environment, primarily groundwater aquifers, groundwater dependent ecosystems (GWDEs) and surface water features impacted by contaminants.

The site is underlain by Devensian Glacial Till and grey clay deposits which exhibit limited permeability, resulting in high levels of surface water runoff. In regard to hydrology, the site is situated within the Severn Basin District and the South East Wales NRW Operational Catchment and there are no water framework directive (WFD) surface waterbodies within the site. The RIE was constructed in

the late 1970s – early 1980s resulting in the diversion of watercourses and culverting below the southern extent of the site and the A465.

An assessment of land contamination associated with construction was undertaken which assessed the mobilisation of existing contaminants from soil and groundwater through disturbance and dewatering activities. Due to earthwork platforms within the RIE being comprised of natural fill material rather than imported matter, there is limited opportunity for existing contaminants. Dewatering during construction may affect groundwater flows and contamination present in the zone of influence and may be drawn in the direction of the site as a result of abstraction, giving rise to potentially minor impacts. Therefore the overall effect of mobilisation of contamination during earthworks on controlled waters would not be significant, whereas dewatering would result in moderate adverse impact, and therefore would be subject to mitigation. Considering the overall low risk to the site in terms of contamination, construction has the potential to give rise to slight beneficial effects, thus safeguarding the quality of green and blue infrastructure within the site and the adjacent RIE. As such, it is considered that the proposed construction effects would accord with Policies SP10 and DM1 and are acceptable.

The proposed development does not require permanent drainage to maintain groundwater levels as basement structures are designed to be watertight. As such, neutral effects are anticipated on groundwater levels and flows during the operational use of the facility. Retaining walls and deep piled foundations may result in a barrier for groundwater flows, however, drainage solutions will be included within foundation designs to mitigate flooding/flows, resulting in negligible effects. By virtue that the adjacent receptor is of a medium value, the anticipated groundwater impacts as a result of underground structures would be a slight adverse effect. The provision of hardstanding and structures may cause a slight reduction in the recharge area of the adjacent aquifer, however, due to existing low permeability of the site, this is considered to be a negligible impact. Due to the medium value of the adjacent aquifer, the infiltration rates would give rise to a slight adverse effect on aquifer recharge.

The proposed development design would incorporate land contamination assessments and mitigation measures, resulting in slight beneficial effects during operational use. As outlined above, the proposed development would give rise to negligible impacts during the operational use of the facility and would result in impacts on the water environment indifferent to that of the baseline conditions. By virtue of the medium value associated with adjacent aquifers, slight adverse impacts would be predicted. As such, it is considered that the proposed development would give rise to acceptable impacts on the water environment, safeguarding blue infrastructure assets, thus according with Policies SP10 and DM1.

The ES has identified potential significant effects as a result of construction on a groundwater abstraction well and a GWDTE resulting from dewatering activities. It is proposed that following site specific ground investigation works that a hydrogeological impact assessment (HIA) is undertaken. Mitigation may be required should the HIA confirm the impact on groundwater dependent features.

## Flood Risk

The NRW Development Advice Map (DAM) confirms that the site is situated entirely within flood zone A and therefore a Flood Consequence Assessment (FCA) is not required to support the planning application. The site is not at risk from fluvial, reservoir or coastal flooding.

## Drainage

Measures embedded within the scheme would include a SUDS network to attenuate surface run-off across the site and buffer potentially contaminated run-off from immediate discharge.

The planning application is supported by a **Drainage Strategy Report** which confirms the current drainage within the site and the proposed foul and stormwater drainage infrastructure required for the proposed development. A Dŵr Cymru Welsh Water (DCWW) foul public drain is situated within the western estate road, adjacent to the site. DCWW stormwater apparatus crosses the entrance access road, measuring 525mm in diameter and discharges into an existing watercourse to the east of the site.

Pre-application discussions with DCWW have identified existing capacity and statutory undertaker requirements for ongoing inspection/maintenance of their apparatus, as evidenced in Appendix D of the **Drainage Strategy Report**. Engagement with DCWW has confirmed that there is sufficient capacity in their infrastructure to accommodate foul water flows from the proposed development.

Surface water drainage networks and three detention basins are proposed to attenuate surface runoff associated with the impermeable baseline ground conditions. Surface runoff would be attenuated and discharged into the existing watercourse networks, similar to existing conditions. Due to the constraints of the site, impermeable surfaces have been directed to the east of the facility where surface runoff can be treated and attenuated through SUDS. The proposed drainage is shown in drawing **DRAGON-ARUP-DRNG-XX-DR-C-300001** which would drain into the existing open watercourse channel. It is considered that the proposed development would suitably attenuate and treat surface runoff before discharging, thus according with policies DM1 and DM3 of the LDP.

## 5.8 Air Quality and Noise

Chapter 6.7 of PPW11 and Policy SP9 (Active and Healthy Communities), Policy SP10 (Protection and Enhancement of the Natural Environment) and Policy DM1 (New Development) of the LDP collectively require proposals to evidence no adverse result in airborne emissions or unacceptable noise/vibration in which would detriment human health and amenity.

### Air Quality

An assessment of air quality impacts during the construction and operational phases is provided in **Chapter 5 of the Environmental Statement**. Baseline conditions indicate that the main sources of air pollution are linked with traffic along the A465 and existing industrial uses within the RIE. There are two NRW

regulated sites within 1km of the site including EnviroWales Ltd (0.2km) and GD Yuasa Battery Manufacturing UK Ltd (0.6km). In addition there are 2no. short term operating reserves (STOR) located in the RIE which comprise gas-fired generators with individual flues.

There is no declared Air Quality Management Area (AQMA) within the proximity of the site.

By virtue that the site represents brownfield land, there would be no demolition (other than the removal of the existing track road). There are no residential receptors within 100m of the site. The ES therefore considers sensitivity as low for both dust soiling and low risk to human health, resulting in negligible impacts. To further mitigate the low risks, construction works would be undertaken in accordance with the CEMP.

The proposed development would include embedded mitigation to minimise pollutants from chimneys and generators, during operation of the scheme. This includes the provision 2no. of 75m tall chimneys to disperse emissions, secondary abatement measures (selective catalytic reduction) and filtration of particulate matter from furnaces.

The ES has assessed the impacts on air quality associated with the operation of the proposed development. Long term impacts have been assessed as negligible for all pollutants, with the exception of CrVI, which has been assessed as having a moderate adverse effect at three receptors. However, this impact arises from high existing background concentrations rather than the emissions from the proposed development. Relative emissions would result in an actual change of <1% at all human receptors and is concluded to be not significant. The impacts on all ecological receptors have been determined as insignificant for all relevant pollutants and therefore accords with Policies SP10 and DM14 of the LDP.

By virtue of the minor exceedance and limited dust-borne air quality impacts, it is considered that the proposed development would adequately safeguard the health of human and ecological receptors, preserving local air quality.

While the effects from vehicular traffic are assessed within the ES to be not significant, further mitigation measures to reduce impacts further have been embedded within the scheme. This includes 39no. ULEV charging points, encouragement of sustainable staff travel movements to/from the site and working with haulage companies to increase use of efficient heavy duty vehicles.

As such, it is considered that the construction impacts of the development accord with Policy 9 of Future Wales and Policies SP9, SP10, DM1 and DM14 of the LDP.

## Noise

An assessment of the noise impacts on residential and non-residential receptors as well as noise emanating from construction and operational traffic is provided in **Chapter 10 of the Environmental Statement**. Construction activities would not result in an exceedance of noise thresholds which would indicate insignificant impacts. Demolition activities, such as breaking up the existing site road, would result in 60dB of noise during daytime hours with a duration of less than a month.

Construction noise of 48-50dB is predicted for outdoor receptors with noise levels observed as 51dB.

By virtue that the proposed construction activities would not exceed a threshold of 5dB, it is considered that the proposed works would not give rise to a significant impact on the acoustic environment. Notwithstanding the above assessment, the degree of separation of domestic dwellings from the application site would sufficiently preserve the residential amenity of occupants in Rassau and Beaufort and therefore would demonstrate accordance with Policy DM1 of the LDP.

Construction traffic would not exceed 280no. trips per day (considered to be a worst-case scenario), resulting in a 2.2-2.9dB increase along Alun Davies Way (minor), 1.8-1.9dB increase along the A4046 (minor) and a 0.6-0.7dB increase along the A465 (negligible). Due to the degree of separation of the road links from residential receptors, it is considered that noise effects from construction traffic would not be significant and would not detriment residential or environmental amenity. By virtue that the RIE is used primarily for B2 and B8 uses, it is considered that the noise associated with construction traffic in areas such as Alun Davies Way would be entirely in keeping with the nature of the industrial estate and would give rise to minor/negligible impacts only. As such, it is considered that the proposed development would not give rise to unacceptable acoustic and amenity issues, and therefore accords with policy DM1 of the LDP.

Operational noise associated with the facility would not exceed background noise levels at residential receptors during the daytime and evening periods. A slight increase of 0.3-0.5dB would be anticipated at first floor levels of one residential receptor, however, given the marginal nature of the increase and non-exceedance of the aforementioned 5dB threshold, this increase is considered to be insignificant. Non-residential receptors such as the surrounding PRow network would encounter operational noise of approximately 34.6dB, below the threshold of outdoor spaces (50-55dB). Noise effects on industrial receptors within the locality would be approximately 63dB, inclusive of a 15dB attenuation for open windows, thus constituting relative level of 48dB, similar to that of an open plan office.

The proposed operational noise impacts on PRow and industrial receptors are considered to be insignificant. Noise emanating from operational traffic (staff and deliveries) is considered to give rise to a 0.1dB-0.6dB at Alun Davies Way, A4046 and A465 during the day and 0.0dB-0.3dB at night. All anticipated noise increases associated with operational traffic are considered to be negligible and would not give rise to unacceptable impacts on the acoustic environment and neighbouring amenity levels. It is therefore considered that the proposed development would safeguard the health/residential amenity, business/industrial conditions and biodiversity receptors, according with Policies DM1, DM14 and DM15 of the LDP.

## 5.9 Socio-Economics

Policies 1 and 33 of Future Wales, Chapter 5 of PPW11, the WCFG Act and Policies SP8 (Sustainable Economic Growth) and DM1 (New Development) of the LDP outlines that development proposals should contribute toward the

regeneration and investment into the Valleys to increase prosperity and address socio-economic inequalities. To achieve this, economic development should be focused on land allocated for economic and business purposes, specifically manufacturing and industrial development, as set out in allocation EMP1 (Employment Allocations).

An assessment of the socio-economic impacts on Rassau, Beaufort and the Blaenau Gwent Local Authority area is outlined in **Chapter 11 of the Environmental Statement**. Six lower super output areas (LSOAs) in Blaenau Gwent are located within the highest 10% of deprived areas in Wales. Employment deprivation is a key issue in Blaenau Gwent, with 74% of working aged residents being economically active, below the Welsh and British average (75.7% and 78.9% respectively). Unemployment and access to jobs is considered as a key determinant for this application, further substantiated by above average unemployment rates (4.3% vs the national average of 3.7%). Where employment opportunities exist in Blaenau Gwent, the composition of the labour market demonstrates a dominance of the manufacturing industry (25%), retail/wholesale (16%) and health and social care (13.9%).

As identified in Policy 1 of Future Wales, Blaenau Gwent is situated within the Valleys National Growth Area which advocates the growth of employment opportunities, infrastructure and residential development. Policy 33 of Future Wales states that:

*'The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys'.*

It is considered that the proposed development directly accords with national and regional growth agendas, contributing to employment needs of the host and adjacent authorities, by virtue of its strategic location north of the A465.

During the construction phase of the proposed development, 200 full time jobs would be created, with a requirement for 450 personnel at peak construction periods. Due to the accessible nature of the site from the A465, a 10% leakage has been factored into construction job estimates, resulting in approximately 180 jobs being retained in the Cardiff Capital and South Powys areas. Displacement rates have also been considered which focus on direct and indirect job creation associated with the proposals, which indicate 135 full time employment (FTE) opportunities being retained also within the local area during construction.

During the operational use of the facility, it is anticipated that the development would create 671 FTE opportunities (598 on site and 73 off site). Off-site employment opportunities would primarily consist of outsourced haulage, cleaning and security roles, indicating a diversity of job roles associated with the proposed development.

The Applicant is committed to engaging with local partners such as educational institutions, BGCBC and Job Centre Plus/Careers Wales to develop opportunities

around apprenticeships and work placements for the construction and operational phases of the development. By virtue of employment deprivation in Blaenau Gwent, it is considered that the proposed development would give rise to minor beneficial impacts on the local labour market in regard to training and up skilling.

By creating significant new employment opportunities, it is considered that the proposed development directly accords with Policy 1 and 33 of the Future Wales, paragraphs 5.4.4 and 5.4.13 of PPW11 and contribute towards ‘a Prosperous’ and ‘a More Equal Wales’ as prescribed under the WCFG Act.

## 5.10 Materials and Waste

Chapter 5.14 of PPW11 and Policies SP12 (Securing an Adequate Supply of Minerals) and DM19 (Minerals Safeguarding) outlines that development proposals should demonstrate an efficient use of primary and secondary aggregates and an unacceptable strain on aggregate supply at a local, regional or national scale.

An assessment of imported and exported materials required to facilitate the proposed development is reported in **Chapter 9 of the Environmental Statement**.

Primary material resources have been considered to determine whether the proposed development would result in the sterilisation. By virtue that the site does not interplay with any minerals allocation and safeguarding sites, impacts on the site are considered to be negligible.

The design earthworks calculations state that there would be an excess of 15,000m<sup>3</sup> of materials, equivalent to 0.3% of the non-hazardous and landfill capacity of South East Wales. As such, the magnitude of effects are considered to be negligible. In a worst-case scenario, 1-2% of the identified excess waste would be classified as ‘hazardous’, which would be the equivalent of 0.008%-0.016% of hazardous landfill capacity for England and Wales. The ES concludes that in a worst case scenario, exportation of material for non-hazardous or hazardous disposal would result in neutral or slight effects and are therefore not significant.

The scale of the proposed construction is not considered to be significant in relation to regional supply chains and would not require imported construction materials on a large scale. The ES therefore confirms that there would be no significant effects associated with sourcing construction materials regionally or nationally and would therefore be acceptable.

Operation of the proposed development would require the provision of recycled/reused glass cullet and raw materials such as silica, soda ash and feldspar. The majority of raw materials need to be sourced from outside the UK due to limited domestic availability, however, materials such as dolomite, limestone, sodium sulphate and zinc selenite, would be sourced domestically. Due to a readily available supply of raw materials internationally and domestically, there would be limited sensitivity to operational materials required for the manufacturing processes. There are numerous suppliers of construction materials within the regional and national supply chain which can provide materials for

local, regional and national construction projects. As such, materials required for the construction of the proposed development are not considered to be in short supply and sensitivity is considered to be low.

During operation of the proposed development, 38% and 25% of material required for flint and amber glass (respectively) would be provided from recycled glass cullet, reducing the requirement for raw material importation. Internally rejected glass identified during the manufacturing inspection process would constitute approximately 42,000 tonnes, whilst 73,000 tonnes would be imported.

The proposed development would utilise a large percentage of recycled glass cullet, reducing the need for raw materials. It is considered that with further advances in technology and increased use of cullet, that demand for raw materials would be further reduced. By virtue that no significant impacts associated with material supply have been identified during operation, no mitigation in addition to embedded mitigation and use of glass cullet is required.

The proposed development is considered to give rise to insignificant impacts on local and regional material availability and would not alter/sterilise any minerals safeguarding areas allocated within the adopted or emerging LDP. The Applicant will further consider the re-use of excess material to reduce the quantity sent to landfill. As such, it is considered that the proposed development accords with Policies SP12 and DM19 and is acceptable.

## 5.11 Coal Mining Impacts

As set out in the **Geotechnical & Geo-Environmental Desk Study Report**, there is no evidence to indicate that the application site has been subject to coal mining in the past. As further evidenced in the EIA Scoping Report issued to the LPA on 30 April 2021, the site is situated within the South Wales Coalfield on an area where the bedrock is indicated by the geological map to be the South Wales Lower Coal Measures. No evidence of coal mining activity has been identified within the site or its close proximity and is also outside the Coal Authority development high risk area.

Pre-application consultation undertaken with The Coal Authority confirmed that there is no requirement to submit a Coal Mining Risk Assessment in support of this application. Based on the above information and consultation with the Coal Authority, it is considered that the proposed development accords with Policies SP12 and DM19 and is acceptable.

## 5.12 Summary

Based upon the information provided in this chapter and the documents submitted in support of the planning application, it is considered that the proposed development accords with the Future Wales, PPW11 and the WCFG Act and the adopted Local Development Plan.

It is therefore considered that planning permission should be granted for the proposed development.



## 6 Conclusion

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An application for full planning permission has been submitted to the LPA for the proposed construction and operation of the purpose-built glass bottle manufacturing facility, with associated development within the RIE.

The proposed development would deliver significant manufacturing and employment infrastructure upon two parcels of land safeguarded by the LPA for employment use. The proposed development (Use Class B2) would be wholly in accordance with the requirements set out under allocations EMP1.4 and EMP1.5 of the LDP and would serve to create approximately 670 jobs associated with the operation and running of the facility and up to 450 jobs during construction at peak times.

As identified within the Socio-Economics chapter of the ES and section 5.9 of this Planning Statement, Blaenau Gwent has an unemployment rate 0.6% greater than the national average and hosts 6no. of the most deprived LSOAs in Wales, where access to employment opportunities is considered a key issue. The proposed development would serve to increase access to employment and training opportunities in an area of entrenched employment deprivation.

As such, it is considered that the proposed development seeks to provide much-needed investment within the Valleys National Growth Area, therefore according with Policy 33 of Future Wales and contributes towards ‘a Prosperous Wales’ as set out in the WBFG Act:

*"An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work."*

The design of the proposed development is considered to assimilate with the wider RIE and other established and planned structures of a similar scale and form, such as wind turbines within the immediate context of the site. By virtue of the industrial character and B1/B2/B8 allocations associated within the site, it is considered that the design and appearance accords with Policies DM1 and DM2 while remaining fit-for-purpose. The proposals further evidence sustainable design through the provision of sawtooth roof lights to the process and warehouse buildings as well as vertical fins to windows to reduce solar gain. While the proposed development would be of a large scale, the principle of tall and dynamic structures within the RIE is well-established. Although visible from the BBNP and residential communities to the south of the A465, the proposed development would be wholly in keeping with the character and setting of the RIE and therefore would be acceptable.

As evidenced in section 5.4 of this Planning Statement and the accompanying Transport Statement and relevant ES Chapter, the application site is strategically located to utilise the A465 and the M4 to distribute products to consumers. Given the proximity to the strategic transport network and capacity within the RIE, it is

evidenced that there would be no unacceptable traffic or transport impacts on motorised or non-motorised users.

The proposed development would not give rise to any unacceptable impacts on internationally or nationally designated habitats as a result of dust and water quality issues during construction and insignificant impacts on all identified species. The ES does note a marginal exceedance in nitrogen deposition would be experienced within Mynydd Llangatwg SAC, however due to the marginal nature of the exceedance and the nature of the designated features (geomorphology), it is considered that the proposed development would be acceptable. As such, the Planning Statement and ES confirm that there would be no significant impacts on statutory and non-statutory designation as well as all species upon operational use. While County valued habitats would be lost, mitigation and enhancement offsite would be secured through an appropriate planning obligation between the Applicant and LPA. In addition, the proposed development would serve to achieve ecological enhancements through comprehensive planting of 566 no. trees and wider planting within the eastern extent of the site and offsite management. As such, it is considered that the ecological, green infrastructure and biodiversity impacts are acceptable.

The proposed development would not unacceptably jeopardise the ability of national governments to meet carbon budgets at either the construction or operational phases of the development. With the addition of embedded mitigation, it is considered that climate changes risks would not result in significant effects on the facility or the environment and therefore is acceptable. In addition, the proposed development would not place unacceptable impacts on groundwater or aquifer conditions by virtue of impermeable baseline conditions and mitigation proposed. As such, it is considered that there would be no unacceptable impacts as a result of climate change or upon the local water environment.

The proposed development would not give rise to a significant increase in noise and air quality impacts above that of baseline conditions. By virtue that the application site is situated within the RIE and benefits from a degree of separation from residential receptors in Rassau, there would be no unacceptable impacts on the air and noise environment in which would undermine public health and therefore would be acceptable.

The proposed development would deliver much needed employment infrastructure upon two major allocations set out by the LPA in the adopted LDP. In the absence of any significant issues within the supporting ES and key socio-economic benefits outlined, it is considered that the scheme wholly accords with national and local planning policy. It is therefore considered that full planning permission should be granted.