



Land at Berth 31

Port of Barry.

Planning application for change of use to a Wood Processing Facility

9th July 2024



Notice

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1 Introduction

- 1.1 South West Wood Products Limited (SWWP), the Applicant, seek a change of use to a wood processing facility at Berth 31 in the Port of Barry, (the Site).
- 1.2 This planning statement has been produced to support the application, which is also accompanied by further technical assessments and an Environmental Statement.

Background

- 1.3 SWWP is an established wood processor in South Wales and South West England with a network of sites. SWWP source waste wood from various suppliers, including many Welsh Councils, for whom they ensure that any waste wood is correctly recycled. They have supply contracts for their wood products to major fibreboard manufacturers and energy plants. A network of facilities is essential to maintaining continuity of supply for their customers, representing critical infrastructure for the economy.
- 1.4 SWWP need sufficient site capacity to provide accommodate fluctuating demand and supply chains. SWWP have been trying to bring forward additional capacity to ensure they can maximise their wood recycling operations with a resilient supply chain. They currently operate three sites in South Wales: Swansea Docks, Newport Docks; and, Llangyfellach. The latter two sites are compromised going forward due to lease issues and site conditions. An additional site was being pursued at Newport Docks but due to global changes impacting shipping the additional Newport Dock site is no longer available and SWWP only have a limited lease on the existing Newport site. Associated British Ports (ABP) who are responsible for Newport and Barry Docks, as well as other Welsh ports, have offered SWWP the site at Berth 31 in the port of Barry as a replacement site noting the Berth 31 has previously had an Environmental Permit for wood recycling operations.
- 1.5 This site will become a part of SWWP's network. Operations at Barry will be the same as at its other sites, processing wood so that it can replace "virgin" or "primary" wood products. SWWP's operations will remove waste wood from landfill or general incineration with other waste streams. Processing allows the wood to be moved up the waste hierarchy and has been a developing and growing part of society's general drive to less disposal of materials that can offer further uses.
- 1.6 This facility will utilise the Port location, reducing HGV movements that would otherwise be associated with recovering and recycling this wood. The Port location also allows a greater range

of customers for the wood products SWWP create. This facility will provide SWWP with the security it needs to be able to supply its existing customers such as Margam power plant and Kronospan fibreboard factories as well as being able to ship materials around the UK and wider afield. The processed wood also supports local farming by supplying high quality animal bedding.

- 1.7 The site at Berth 31 was originally developed as part of South Wales coal industry operations with coal stored and loaded onto ships for export. There have been a variety of dockside uses since and the most recent activity here has been with a similar wood processing operation on the western side of the site and a metals recycling operation on the eastern part of the site. Loading ships on the docks is an established 24hr practice at the Port of Barry and would likely be occur for any future use of this site. Ships are subject to restriction on tide, weather and the movement of other ships.
- 1.8 At the time of writing SWWP are considering commencing operations on the site under Permitted Development rights associated with the use of the site as a dock. Those operations cover broadly the same area and are unlimited in terms of tonnages or operational hours. The change of use to a wood recycling facility, rather than dependence on permitted development rights is required to provide flexibility in processing and transporting the wood waste. It also allows the Local Planning Authority to condition the use of the site.
- 1.9 In 2015 the site was accepted through the planning process as being suitable for an external incinerator bottom ash (IBA) processing facility and although that was not constructed, this proposed development can be considered to have less likely impacts from its operations.

2 Site and Surroundings

Location

- 2.1** The proposed site is part of the Port of Barry estate and, although now vacant, until recently it was in use in part for a similar operation to that sought in this application and a metals recycling operation. The site has an area of 4.25ha. It is located in an industrial area which is allocated as employment land. The site is accessed off Wimborne Road, which is the main access to the docks and which links directly to Fford y Mileniwm, the town of Barry's eastern by pass and distributor road.
- 2.2** The site is bounded on the northwest and south west by an existing screen bund, up to 8m in height and planted with what are now maturing trees. The south eastern boundary is with the doc. The site occupies relatively flat land at an elevation of around 7m to 9mAOD.

Figure 1: Location Map (nts, for information only)



Surroundings

- 2.3** The immediate surrounds are the docks themselves with various dockside operations and other industrial operations together with large areas of open, unused land and the open water of the docks themselves.
- 2.4** To the immediate north-west of the site is a small construction yard utilised as a mobile plant training area. Beyond this, and to the west and south-west of the site, is an extensive area of

waste ground also within the employment land allocation. To the north of the site, and north of Wimborne Road, there is a Site of Importance for Nature Conservation (SINC) known as the Cadoxton Wetlands. This is an area of restored wetland comprising tall herb, scattered scrub and grassland habitat, together with two small lakes and a reedbed.

- 2.5 Further to the west and north of the site, the nearest residential properties are located to the west ~260m from the site boundary. It is understood that planning for residential properties at the former sidings, Ffordd y Mileniwm, was granted in March 2023 and is currently (February 2024) seeking approval of reserved matters.

Application Site

- 2.6 The proposed wood recycling facility area extends to 4.25 hectares, the majority is composed of an extensive concrete area. The remainder is currently hardstanding. Existing infrastructure on site includes a water storage tank, lighting columns, offices, weighbridge, and ancillary structures.
- 2.7 The site is secured and within the area controlled by Associated British Ports (ABP). The application area includes the tracks of the port railway which will be retained and are in use.

Planning History

- 2.8 The most recent permission for the site is Planning Permission 2015/00360/FUL which covers a similar operational area and was granted on 4th Sept 2015 for "*Facility for the recycling of incinerator bottom ash (IBA) to produce aggregates (IBAA) and the recovery of metals*". Whilst a variety of operations have been undertaken prior to this it is believed that these would have done so under extensive permitted development rights for dockside operations.
- 2.9 An application was made to the Vale of Glamorgan Council in 2017 for a Lawful Development Certificate (ref: 2017/00806/LAW) to establish the use of the part of the land subject to this application for the handling, storage and distribution of pre-processed wood. That was refused on 3rd April 2020, as the LPA was not satisfied that the use had been for 10 years continuously.
- 2.10 Earlier planning consent is noted as: 1995/00170/FUL : Excavation of materials for re-use under the Barry No. 1 Dock Regeneration Contract (Planning application Nos. 94/00207/FUL and 94/00208/FUL).

Site Constraints and Designations

- 2.11 The site does not fall within any landscape, national or international conservation or heritage. Sully Island component of the Severn Estuary (Wales) Ramsar and Special Protection Area is within 3.6 km of the site. There are two SSSI within 2km but both are designated for geological rather than ecological reasons (Bendrick Rock and Barry Island). The nearest non statutory conservation site is a Site of Importance for Nature Conservation (SINC) known as the Cadoxton Wetlands as noted above. This is an area of restored wetland comprising tall herb, scattered scrub and grassland habitat, together with two small lakes and a reedbed.
- 2.12 In terms of heritage designations, the former Dock Offices to the north-east of Number 2 Dock (Grade II* listing) , the former Customs House and Mercantile Marine Office at the southern end of Dock View Road (Grade II listing) and Cadoxton Court, off Gladstone Road, 500m north-west of the site (Grade II listing) are those in proximity to the site.
- 2.13 Reference to the Natural Resources Wales (NRW) online Development Advice Maps indicates the property to be located within Flood Zone B: *Areas known to have flooded in the past*. Review of the Flood Map for Planning indicates the property to be partially affected by tidal flooding. No public rights of way cross the site nor are found nearby.

Environmental Permitting

- 2.14 The site is covered by environmental permit no. EPR/DB3196HH, issued by Natural Resources Wales, which is Standard Rules permit, SR2011 No4 for the treatment of waste wood for recovery. In the event of planning permission being granted the Permit will be varied to be a bespoke permit reflecting the greater annual throughput.
- 2.15 The Bespoke Permit will control all aspects of the operations with a suite of bespoke site specific documents including an Environmental Management System (EMS), Fire Prevention and Management Plan (FPMP), noise and dust management plans. These detail, amongst other things, the types of waste wood allowed on site, control how it is accepted (or rejected) stored, processed and handled, limits the scale of storage and the amount of wood on site at any one time.

3 Development Proposals

Description of Development

- 3.1 The proposal is for a change of use to a wood processing facility. Ancillary to this there will be HGV parking. The existing office and welfare facilities will be updated with temporary modular accommodation. The existing water tank, wood retention blocks and weighbridges will also be retained and used.

Site Layout

- 3.2 A site layout plan is included that shows all fixed and some moveable aspects of the proposed use. All plant used on site will be mobile. Processing operations will be located in the south west corner, as informed by the noise assessment work and as remote from noise sensitive receptors as possible.
- 3.3 Access to the site is shown, adequate site visibility splays¹, are included, see the accompanying Transport Statement. An area for parking is provided for in the north west of the site although, if necessary, HGVs may also utilise any unused space within the site. The area shown for parking and ancillary storage is currently hardstanding and as such not used for wood processing or storage as concrete surfacing is required.
- 3.4 The site is traversed by a freight rail line, part of the wider docks activities and also benefits from a drainage system that runs almost parallel to the west of the rail line, that collects surface water run off before transferring it to the water tank on site. Chapter 8 of the ES describes the drainage and flood protection arrangements in detail.
- 3.5 The majority of the site will be used for wood storage and the precise configuration of this will fluctuate over the course of the year in response to supply and demand. The environmental permit will provide the detailed control of wood levels covering matters such as separation distances, heights and sizes of storage piles..

Site Operations

Processing Operations

- 3.6 The processing operations involve the sizing of the waste to meet set specifications dependant on the product being made. The machinery and plant involved in processing operations includes

¹ Following comments on the 2015 IBA application.

loading shovels, excavators, screeners, shredder, trommel and eddy current. The extent of the processing depends on the product specification with different specifications for different customers and products.

- 3.7 The main processing plant is specialist mobile wood shredding equipment, such as a Doppstadt, which includes magnets to remove any metals (e.g. nails) that may be in the wood. Mobile screens also form part of the processing operations grading the wood by size. The other main elements of plant are the machines used to load the processing plant and move material about site, loading shovels and 360-degree excavators.
- 3.8 There is an element of metal salvaging involved as metal is removed from the wood. This material may receive a second round of processing to remove as much wood as possible before being sent off to specialist metal recovery facilities. Mixed wood/metal from some of the applicant's other, smaller wood processing facilities may also be brought to Berth 31 for this treatment, but it makes up a very small element of the overall and is considered in the tonnages sought.
- 3.9 The "maltese crosses" are made up of separate and moveable large concrete blocks and can configured as operational requirements dictate, they form storage walls for the wood as well as dust barriers, noise attenuation and control surface water. They may have rain covers added when needed to prevent the wood from getting wet, particular if short term storage of a processed material.

Waste Type and Sourcing

- 3.10 The wood material to be processed is both virgin wood and end of life timber, e.g. manufacturing offcuts, waste wood. The wood is sourced from forestry operations, manufacturing, and construction, demolition, commercial, industrial and municipal (household) waste streams². This includes the wood collected by local authorities in their household recycling facilities.
- 3.11 No other waste materials will be accepted to site and to ensure no unacceptable material arrives at site. All suppliers are given pre-contract details to specifying the types of wood that will be accepted so only preselected wood is accepted to site i.e. any wood failing to meet this set

² Noting that online planning application form didn't allow for a mixed source of incoming materials, so at odds with the intentions.

criteria is 'rejected' and not accepted to site. This avoids any contaminated wood or general waste being accepted to site.

- 3.12 The wood is sourced primarily from South Wales and in keeping with most market commodities, SWWP seeks to minimise the distance it travels, not only to reduce their costs but also the HGVs emissions associated with its's onward travel from those who are creating or gathering the wood waste.

Throughput and Operational Hours

- 3.13 For the purposes of assessment a maximum annual tonnage of wood (and metal) is proposed of 250,000 tonnes.
- 3.14 The wood (and metal) will arrive at site in HGVs, but around 125,000 tonnes of the wood product will leave via a ship from the docks, being loaded direct from Berth 31. Shipping destinations will vary, under current contracts ships are being sent to other UK and European locations. The dockside location allows the opportunity to import wood material to meet critical supply contracts if occasions arise where there are insufficient levels locally.
- 3.15 The nature of the facilities supplied, the modes of transport (shipping being dependant on tides), the volumes required to be processed at times to meet demand and the established industrial location of the site mean that it will be potentially operational 24hrs per day and 7 days per week but this is likely to happen only on limited occasions. Processing will be restricted to 0700-2300, the noise impact of this has been assessed and is addressed in the relevant chapter of the ES.

Storage

- 3.16 The majority of the site will be used for wood storage and for most of the time there will be limited activity other than the periodic movement of the wood. Moveable concrete blocks as noted above may be used to allow the flexible arrangement and rearrangement of site operations for example assisting with defining and containing some storage piles or site activities such as the processing area or processed wood storage.
- 3.17 A large storage capacity is essential to maintain a viable wood processing operation able to meet the demands of customers for a continuous supply all year round with SWWP and their operations holding an important position in the logistics chain. Typically SWWPs customers have only a limited storage capacity for their processed wood, sometimes as little as three days worth. If their supply chain is compromised it affects production of the wood products or power,

therefore SWWP, need to ensure they have stock provision to maintain continuity of supply 365 days of the year.

- 3.18 Allied to this is the seasonal element in the generation of wood wastes. Higher arisings occur during the spring and summer months. Storage capacity is required to accommodate the spring/summer arisings ensuring there is sufficient material available for processing during the autumn/winter months. This translates into a peak of storage in the summer with the converse of almost empty yards in the winter.
- 3.19 Wood is processed to contract requirements so SWWP effectively process wood to order and typically keep only limited amounts of processed wood on site at any one time. The reason for this is that processed wood can be influenced by changes in moisture levels over long storage periods and fall out of product specification. It is also good practice to minimise storage of processed wood for other reasons such as fire prevention which is strictly controlled by environmental permitting. A Fire Prevention and Mitigation Plan (FPMP) details storage arrangements to minimise the likelihood of fire incidents.

Employment

- 3.20 The direct employment created by the facility will total 20 staff and an estimated 20 HGV drivers, with indirect employment for other drivers and many associated businesses including suppliers and customers. Some of these will be new roles and others will be relocating from an existing smaller site.

Security Measures

- 3.21 The site lies within the wider Port of Barry complex. The site will not be open to members of the public and will only be used by vehicles authorised by the applicant. Site entrances will be locked when it is not occupied. There is no public or other private access at the site.

Environment and Amenity Management

- 3.22 The Environmental Statement and technical assessments addresses potential issues including noise, air quality, transport, landscape and visual impact as well as the water environment.. Additionally the application is accompanied by an ecological assessment and a site investigation of the location.
- 3.23 A Noise Management Plan (NMP) has been drafted and accompanies the ES chapter The mitigation measures include not just the location of the processing equipment, but the restriction on nighttime processing, the use of well maintained and serviced equipment.

- 3.24 Similarly, a Dust Management Plan (DMP) has been drafted with the air quality chapter of the ES. The mitigation measures include those designed into the site such as locating the shredding and screening areas on the south west corner of the site, remote from residences as well as maintaining dust suppression equipment on processing operations and use of tankers or bowzers within the site manoeuvring areas to prevent dust from the surfaces.
- 3.25 Whilst the NMP and DMP have been submitted with this application these will be matters controlled by the Permit and must be agreed with National Resources Wales before a bespoke Permit is issued. NRW will responsible for enforcing compliance with the NMP and DMP.
- 3.26 SWWP do not propose any new landscaping given it is wholly within an industrial dockside setting and the site boundaries are sparsely vegetated with overgrowth which will only be trimmed where necessary. The site falls within the wider security fence of the operational port, no new fencing is proposed. The existing lighting arrangements established for the Port will continue to be used.

Community Liaison

- 3.27 The application site is situated relatively remote from residential areas and in a long established, dockside, industrial setting. Pre-Application Consultation (PAC) has been undertaken as the site is over 1ha in area and involves management of waste PAC is automatically required.
- 3.28 SWWP operate a complaint procedure to ensure prompt action is taken in response to any complaints or concerns made to them.

4 Potential Impact Considerations

- 4.1 Waste management facilities have a number of potential environmental impacts, especially larger facilities with open yard areas, and the guidance of TAN 21 and the Local Plan Policy MD2 seek to minimise adverse impacts. The site is well located being relatively remote from residential properties and other land uses which helps minimise potential impacts.

Noise and Dust

- 4.2 Noise and dust are two of the main impacts from wood recycling operations arising primarily from the processing activities. At Berth 31 noise and dust management plans accompany this application, but as noted above are finalised in association with the Environmental Permitting regime. The mitigation measures noted in both plans are not duplicated here, but SWWP are experienced wood recyclers, with established and efficient working practices across all their sites to ensure any emissions are adequately controlled.

Odour, Litter and Vermin

- 4.3 The nature of the waste restricts some of the impacts that can occur at waste sites. Waste wood does not generate odour problems. Litter will not be a problem as only pre-selected material is accepted which will not contain material such as plastics or paper that could become windblown and create litter problems. The wood waste itself should not generate litter as it arrives at site unprocessed, typically in larger fragments >100mm and does not become windblown. The operations do not give rise to these flies or vermin as they do not contain wastes which attract animals such as food wastes for example.

Water Environment

- 4.4 The ES chapter 8 sets out a consideration of both the flooding potential and the management of surface water. Water from areas where wood is stored is required to be contained under the provisions of the Environmental Permit. The proposals include barriers to surface water running off the concrete and containing the water in site, utilising the existing drainage system where possible to direct it to the existing storage tank where it can be used for dust suppression or in the event of a fire. The management of areas of hardstanding will be broadly unaltered from the current arrangements.
- 4.5 The dockside location does lie within an area that could be flooded in certain weather events, a therefore the ES chapter includes a flood risk assessment and the barriers noted above to prevent surface water leaving site will also act as a barrier to flood water entering the site. The

technical assessment in the ES chapter demonstrates the acceptability of the solutions designed to ensure that the site adequately manages the water environment.

Landscape and Visual Impact

- 4.6 There are no landscape designations applicable to the site. There are no national or local landscape designations within the landscape study area, such as National Parks, National Landscapes (former AONBs), or Special Landscape Areas. LANDMAP (see the ES for a fuller description) classifies it at Level 3 as being Development/Built Land/Urban. It extends for approximately 6km across the entire extent of built form of Barry, Barry Island and Barry Docks. LANDMAP also classifies the Aspect Area that the site falls within as being low value, noting that 'Integrity' and 'Scenic Quality' are assessed as 'Low', and 'Rarity' and 'Character' are assessed as 'Moderate'. The light pollution assessment was "substantial" for this urban area.
- 4.7 The proposed development will result in some localised changes within the site but will have a very limited influence on landscape change for the remainder of this area and the potential for adverse landscape effects to be generated by this development are extremely limited. They are also limited to the site itself and its close setting.
- 4.8 The ES also looks at the impact on visual receptors, having identified representative and illustrative points around the site from where it may be viewed. Although there are several elevated receptors located in relatively close vicinity no significant visual effects are predicted due to: the wooded bund located around much of the northern perimeter of the site, the industrial setting that diminishes the receptor sensitivity and the small degree of change to what is already an industrial port-side yard. A Minor adverse level of additional visual effect may be experienced for new residents in upper storeys of a nearby consented proposed housing development.

Ecological Interest

- 4.9 In terms of ecological interest the site has no habitats for any flora or fauna. An ecological assessment was carried out in respect of the site identifying and subsequently ruling out bat roosts in the concrete structures on site. As an active industrial site in an industrial location no specific habitats would have been expected but a precautionary approach has been taken. The air quality assessment considered the risk to the SINC's at within 400m of the site are the Cadoxton Wetlands and Cadoxton River.

Traffic

- 4.10 As a docks location the site has good links to the strategic highway network. The transport assessment considers a worst case scenario of all 250,000 tonnes per annum being moved by road. This is not the intention, with ships being used for approximately 125,000 tonnes per annum but was considered the most robust approach for the purpose of identifying any unacceptable impact. The impact of the development traffic on the highway network is insignificant at less than 1% on all relevant highway links.

Site Investigation

- 4.11 A site investigation has been carried out and accompanies this application for reference. This is a report on the ground conditions and has been completed for future reference as a "Site Condition Report" is a requirement of the surrender of a an Environmental Permit and this work sets the baseline. It is a precautionary investigation as the change of use proposed in this application will not disturb the existing surfacing or disturb the underlying strata.

5 Planning Policy, Guidance and Additional Considerations

Introduction

Sustainable Development

- 4.1 The Planning Act (Wales) 2015 introduced a statutory purpose for the planning system to exercise planning functions in accordance with the principles of sustainable development as defined by the Well-being of Future Generations (Wales) Act 2015 that, “....*development and use of land contribute to improving the economic, social, environmental and cultural well-being of Wales*”.

Development Plan and Material Considerations

- 4.2 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that, “...*for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the (development) plan unless material considerations indicate otherwise*”. Thus, planning applications shall be determined in accordance with the approved Development Plan, unless material considerations indicate otherwise.

Development Plan

- 4.3 The National Plan 2040 is a 20-year national development plan that covers the whole of Wales. It has been produced by Welsh Government and seeks to provide a strategy for addressing key national priorities through the planning system. The plan covers substantial issues including the economy, housing and environment. It shows where nationally significant developments like energy, transport, water and waste projects should take place. This proposal is not a nationally significant one.
- 4.4 The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 was adopted by the Council on 28th June 2017. It sets out the vision, objectives, strategy and policies for managing development in the Vale of Glamorgan, and contains a number of local planning policies and makes provision for the use of land for the purposes of housing, employment, retailing, recreation, transport, tourism, minerals, waste and community uses. This is discussed below.

Further Guidance

- 4.5 Additionally Supplementary Planning Guidance, produced in connection with the previous Development Plan 1996- 2011, “Barry Development Guidelines” is still available.

4.6 Planning Policy Wales (Feb 2021) and the supporting technical advice notes (TAN) etc provide a national planning policy framework. Where appropriate the topic specific TANS have been referenced in the accompanying technical assessments.

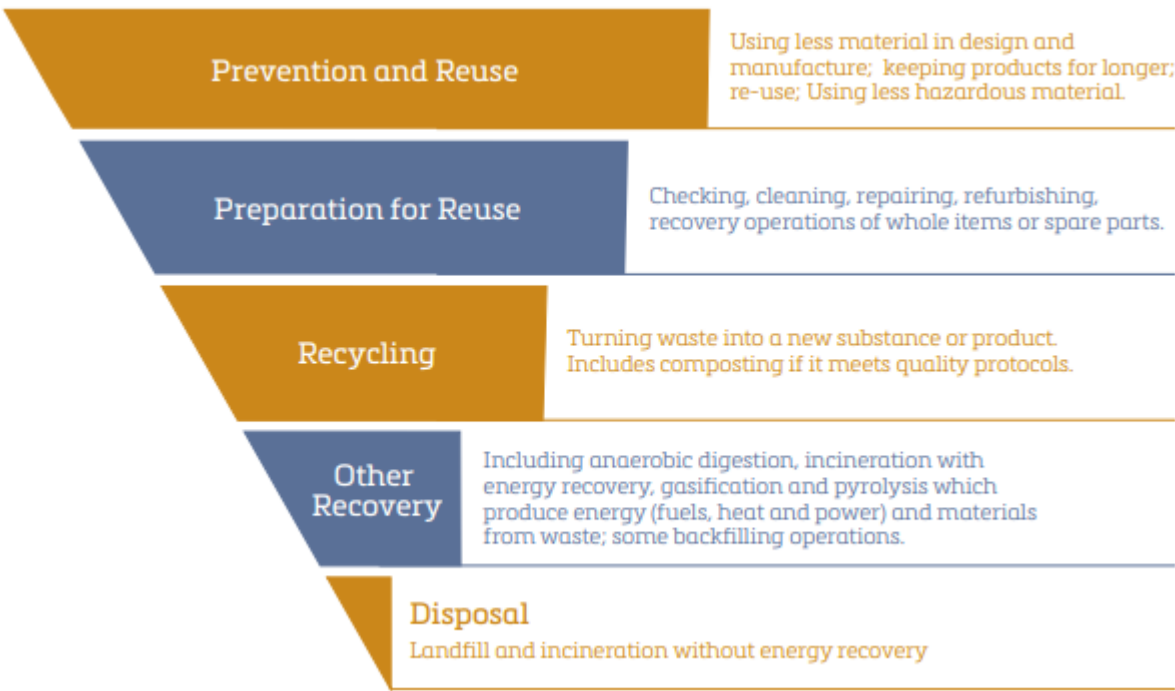
Planning Policy Wales (PPW)

4.7 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development in line with the Well-being Act, a presumption in favour of sustainable development in accordance with the development plan unless material consideration indicate otherwise. The PPW makes clear the planning system should operate efficiently, effectively and simply and where possible avoid duplicate with other statutory regimes.

4.8 The PPW states the planning system has an important role in facilitating sustainable waste management recognising the social, economic and environmental benefits when managing waste as a resource. Waste development should: minimise adverse environmental impacts; protect designated landscapes and nature conservation sites; and protect the amenity of residents, land uses and users affected by waste development.

4.9 The PPW states the planning system should support the aspirations of strategic waste policy in ‘Towards Zero Waste’ and follow the waste hierarchy, see figure 2 below.

Figure 2: PPW Waste Hierarchy



- 4.10 The PPW looks to planning authorities to support a diverse range of waste infrastructure and the contribution of a proposal to the waste management objectives, policy, targets and assessments contained in national waste policy will be a material planning consideration. The PPW notes that achieving circularity of materials with high quality recycling will need a collaborative approach with the industry and planning authorities to ensure efficient operations.

Technical Advice Note 21 Waste inc Planning Practice Guide

- 4.11 This provides advice on how the land use planning system should contribute towards sustainable waste management and resource efficiency. Descriptions are provided in the Practice Guide of specifically the development proposed in this application ie wood operations: *The purpose of a wood treatment facility is to sort wood by grade and send it for appropriate end-uses which are dependent on the quality of the product. The end uses can include reuse, reprocessing by panel-board manufacturers, recovery as animal bedding or preparation of a fuel for energy recovery.*
- 4.12 The Practice Guide notes: *facilities which physically treat discrete waste streams can vary in size, from small operations to large facilities which manage waste streams such as waste wood (with throughputs of over 50ktpa). Also that wood operations tend to be largely external in nature.*
- 4.13 TAN 21 also confirms at para 3.2 *"In the short to medium term there will be a continued need to develop more waste treatment and recovery facilities in order to reduce reliance on landfill. That said, the requirement for disposal capacity, albeit a diminishing requirement, will remain. At the same time, the longer term aim is an infrastructure network based on higher levels of reuse and recycling."* This proposal covers both elements of this acknowledgement, as it treats the wood waste so that it is suitable for both power generation and for recycling into new products.
- 4.14 Furthermore TAN 21 also confirms at para 3.22 *"It is expected that facilities for recycling and remanufacture can be appropriately accommodated on many general employment sites, providing suitable access and transportation is available, however there may be site specific reasons for these being located elsewhere".* (emphasis added).

Collections, Infrastructure and Markets Sector Plan

- 4.15 The Collections, Infrastructure and Markets (CIM) Sector Plan describes the waste management framework to provide the best solutions to meet social, economic and environmental needs to 2050. It indicates a move towards the reduction of disposal and recovery options for treating

waste in favour of high volume source segregated collection followed by reprocessing as well as preparation for re-use and prevention. This entirely encapsulates this development proposal.

Beyond Recycling 2021

- 4.16 Beyond Recycling has replaced the Towards Zero Waste Strategy as the most up to date strategy for achieving Welsh Governments target of net zero waste by 2050. Beyond Recycling emphasises the movement towards a circular economy with actions identified to fulfil this. One of those is to support businesses to find high quality uses and markets for secondary materials derived from waste and provide investment for this through our Circular Economy Fund. This proposal seeks to make a secondary material from waste that is used in manufacturing or to provide power.

Vale of Glamorgan Local Development Plan adopted June 2017 (VoGLDP).

- 4.17 Overall, the adopted development plan allocates the Site for employment and related uses, and expressly supports proposals for waste management and renewable energy generation.
- 4.18 The most relevant policies of the VoGLDP policy are:
- Policy SP1: Delivering the Strategy sets the overarching aims of the VoGLDP in delivering a range of development required across the Plan area. It seeks to improve the living and working environment, promote enjoyment of the countryside and coast and manage important environmental assets. The proposals in this application will deliver a sustainable use of an existing employment site, without adverse impact on any environmental assets.
 - Policy SP8 : Sustainable Waste Management confirms that proposals will be favoured where they form part of a network of integrated facilities. Policy SP8 also identifies existing Class B2 'general industrial' and B8 'storage and distribution' (and similar) employment sites, as being potentially suitable locations for additional waste management facilities consistent with national planning guidance. The site subject to this application has a long history of various industrial type uses that fit with B2, B8 and similar employment sites.
 - Policy MD7 - Environmental Protection sets out the need to consider the impact on all sensitive receptors and incorporate mitigation where necessary. This statement and the additional technical reports address these points, confirming they will not result in an unacceptable impact on people, residential amenity, property or the natural environment

- Policy MD14 – New Employment Proposals – setting out support for development proposals that create new employment on existing employment sites. This proposal will secure existing employment and create new jobs.
- Policy MD16 – Protection of Existing Employment Sites and Premises – identifying the development site as an existing employment site and confirming that as a sui generis use, this proposal is acceptable as it will not lead to a material change in the nature of the docks.
- Policy MD20 addresses requirement for a Waste Planning Assessment and sets out criteria to be met for this type of development. It is considered that the information required in a Waste Planning Assessment is addressed in this planning statement and the technical assessment provided, with a summary provided alongside TAN 21's objectives summarised in relation to this project.
- The proposals map forming part of the VoGLDP confirms the site is an existing employment site and references Policies SP8 and MD16.

Case for the Development

- 4.19 The proposal is for a wood processing operation the products of which will minimise the use of non-renewable resources by providing alternatives to fossil fuels and virgin wood for manufacturing. The benefits of this operation can be seen in conserving existing natural resources and helping to minimise climate change impacts as well as avoiding the high costs, financial and environmental, associated with the alternative of landfilling the waste material that the site handles. The site's operations will contribute to both the recycling targets of Beyond Waste and renewable energy targets in Wales with the Applicant having supply contracts for several power plants. Hence the development is highly sustainable, in line with the PPW for 'productive and enterprising places'.
- 4.12 The facility will be dedicated to dedicated to recycling a single waste stream which allows efficient recycling, 100% of the wood is recycled and the residue of extracted metals is also recovered from the wood and sent to a reprocessing site. The operations as a dedicated facility achieve the highest recycling rates possible. The site, in line with Beyond Waste, PPW and the waste hierarchy, is diverting waste wood from landfill and retaining the wood resource in the economy for longer.

- 4.13 TAN 21 has a number of overarching objectives for waste management development which merge with those of the VoGLDP and this is presented as a table with commentary on the proposals compliance. TAN 21 and Policy MD20 specifically requires a waste assessment to be undertaken and details for this are provided as well in support of this planning submission.
- 4.14 The thrust of planning policy, both national and local, is to direct this type of development to identified employment land and where possible previously developed land. The VoGLDP at para 7.76 recognises that there are industries that need to be located away from some urban established general employment areas and some distance from residential areas so as to avoid negative impacts. The VoGLDP notes a number of existing employment sites that are located away from residential properties, including the Port at Barry Docks and directs that available land within these areas should be investigated in the first instance.
- 4.15 The proposed location, dockside, of the proposed development is highly sustainable providing a multi transportational hub allowing both ship and road transportation of wood. Product can be transported by ship to final destination after processing and, in the event of a shortfall of local supply, wood can be imported to site to maintain supply contract critical for local energy infrastructure to keep running. Alternative sites away from the Port would involve further HGVs transport whilst still requiring a second dockside location for shipping transportation.
- 4.16 Policy SP8 notes the Port of Barry to be suitable for an “in building” waste management solution but also confirms that open air facilities such as that proposed and as previously granted planning for the IBA Recycling Facility, can be permitted at existing class B2 and B8 employment sites. Not only is the Site within an identified Employment Site in the current adopted Plan as noted above, but it has been confirmed previously as a B2 employment site. Further more considering the scale and nature of the development proposed, it is not suited to being in a building and requires a large flexible open yard space.
- 4.17 The officer’s report for determination of the IBA Recycling Facility (2015/00360/FUL) confirmed not only that the location is a B2 employment site, but that the IBA recycling operation was considered to fall within the B2 Use class and that even if it were argued not to, the principle of the development would still be acceptable considering the history of land uses and as allocated employment site. This position has not changed in the intervening years.

6 Conclusion

- 6.1 The location at Berth 31 has the ability to be used as a wood processing site under Permitted Development rights. This application to change the use to a wood recycling facility seeks to use the site in the same way, but with wood both entering and leaving the site on a mix of HGVs and by ship. The planning application provides the Local Planning Authority to condition the facility where necessary.
- 6.2 The Site has been used historically for a range of uses and has a recent history of being used for wood and metal recycling. The location is in an area suited to this scale and type of activity, as evidenced by the Local Plan. The accompanying information including Environmental Statement shows that the facility can operate without significant impact but furthermore the additional regulation by Natural Resources Wales through the Environmental Permit regulates and monitors noise, dust, fire risk and the protection of the water environment.
- 6.3 The development is considered to be highly sustainable, already helping to meet waste and renewable energy targets. Wood recycling embodies the circular economy approach by maximising the reuse of a material with minimal impacts and reducing demands on primary resources so as such the development is wholly in line with the PPW and TAN21.
- 6.4 The Applicant respectfully requests that Vale of Glamorgan Council grants planning permission for this use of the land.