

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 used for any other purpose.

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2 Application Background

2.1 The Application Site

The application 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)

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

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 plant to EM6 0 841.92 595.32 r1.624 reW* n /P <</MCI 0.479981 0 C		

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

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

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

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

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

4 Planning Policy Framework

4.1 The Development Plan

Section 70(2) of the Town and Country Planning Act 1990³ and Section 38(6) of the Planning and Compulsory Purchase Act 2004⁴ 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 2040⁵ 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 and Economic Action Plan⁶ which supports the delivery

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

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

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

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 SPG¹⁸ 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.

¹⁸ https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Planning/Access_CarParking_SPG.pdf

BBNPA – Light Pollution & Obtrusi7 0.667 0.887 0.881e-ETQ2iq99.264 29.16 326.9

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 1995²⁵ 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.

²⁵ <https://www.legislation.gov.uk/ukpga/1995/248/section/61>

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 li 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

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 publicB29(PO)-9(R)-4(T)5(S)TJETQ

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

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 P_{RoW} 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

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**.

relationship with European designated sites (Usk Bat Site SAC and Cwm Clydach SAC) which is provided in **App 0 0 1 1uJTJETd48UE**

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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

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 0 1 180.29 400.01 Tm0 g0 G(Geot)5(e)4(c)-5(h)-3(n)-3(n)BT5**

