

Change Of Use to Asbestos Waste Transfer Station

Waste Planning Statement

Doc. Ref: 11099 WPS



Land at Units 1-3 Sirius Drive
Seaway Parade Industrial Estate
Baglan Energy Park
Port Talbot
SA12 7BR

30th June 2022

Land at Units 1-3 Sirius Drive, Seaway Parade Industrial Estate, Baglan Energy Park, Port Talbot, SA12 7BR

Waste Planning Statement

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Cover Photograph:

View west across the site.

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1 Introduction

1.1 Background

101 This Waste Planning Statement (WPS) accompanies a planning application submitted by Technia Environment and Planning Limited on behalf of ARTICO Environmental Limited to permit a change of use to an Asbestos Waste Transfer Station.

102 The Applicant is a licensed asbestos removal contractor that operates largely within the Neath Port Talbot County Borough area.

1.2 Proposed Development Site

103 The site is located at:

Land at Units 1-3 Sirius Drive
Seaway Parade Industrial Estate
Baglan Energy Park
Neath Port Talbot
SA12 7BR

104 For identification purposes the application site is approximately centred at Ordnance Survey grid reference SS 74352 92339. The location of the site is shown on Drawings 11099-000-A and 11099-000-B.

105 The application site lies within an existing industrial development and comprises an area of 1,043.71 m².

1.3 Existing Use

106 The site is currently used for storage of plant and equipment.

1.4 Proposed Development

107 The proposed development is for:

“Change of Use to Asbestos Waste Transfer Station”

108 The Applicant proposes to change the use of the site to an Asbestos Waste Transfer Station in order to facilitate the receipt, bulking and secure storage of asbestos waste prior to its transfer off-site for disposal at suitably licensed waste management facilities.

109 The proposed development is small-scale, with capacity to service a local catchment around Port Talbot. As such, it comprises a small concrete pad area on which two lockable secure

containers will be sited for the storage of asbestos. The total weight of asbestos to be stored in the containers will be 10 tonnes.

1.5 Need for the Development

110 The Applicant has identified a shortfall in local capacity for the bulking and transfer of asbestos waste to meet their own needs, and those of other local asbestos removal contractors.

111 The development will increase the efficiency of the Applicant’s business operations by reducing the need for vehicles to carry small quantities of asbestos waste directly to a licensed landfill in Merthyr Tydfil. Consequently, the development will reduce unnecessary transport miles and their associated environmental impacts.

1.6 Purpose of This Document

112 This document has been prepared in order to meet the requirements of TAN21: Waste (2017) whereby a Waste Planning Assessment should be submitted with all applications for a waste facility classified as a disposal, recovery or recycling facility. The purpose of the Waste Planning Assessment is to ensure that the information necessary for making a decision is provided by the applicant when a planning application is submitted.

113 TAN21 indicates that the Waste Planning Assessment should be appropriate and proportionate to the nature, size and scale of the development proposed and the contents of this document have been prepared accordingly.

1.7 Planning Application Documentation

114 In addition to this document, the planning application is supported by a suite of documents which include:

- Planning application forms;
- PAC Report; and
- Planning application drawings.

This document should be read in conjunction with the associated submitted material to gain a full understanding of the proposed development. Together these documents provide comprehensive details of the proposals and their potential impacts. They demonstrate the diligent approach taken by the Applicant in their approach to delivering a safe, sustainable, efficient waste management facility that maximises recycling rates and contributes positively to Welsh Government and local waste policy, objectives and targets.

2 Policy Context - Waste

2.1 Introduction

201 This section considers the requirements of waste policy, including targets for waste recovery and diversion from landfill, and establishes the policy context to which the proposed development should adhere.

2.2 National Waste Management Strategy and Policy

2.2.1 Towards Zero Waste, One Wales: One Planet (June 2010)

202 The Welsh Assembly Governments' objectives and policy for waste management are outlined in *Towards Zero Waste, One Wales: One Planet* the overarching waste strategy for Wales.

203 The strategy proposes that by 2025 all sectors in Wales will recycle at least 70% of their waste - this includes businesses, households and the public sector.

204 Zero waste by 2050 is an aspiration of the strategy and is defined as *"an aspirational end point where all waste that is produced is reused or recycled as a resource, without the need for any landfill or energy recovery."* It goes on to state that *"we will as a minimum reduce the impact of waste in Wales to within our environmental limits (which we define as one Wales: one planet levels of waste, roughly 65% less waste than we produce now), aiming to phase out residual waste through enhanced actions on waste prevention and sustainable consumption and production and ensuring that all waste that is produced is reused or recycled."*

205 The strategy proposes that:

- Waste will be reduced significantly
- There will be a strong economy in resource management
- Residual waste will be minimised
- Landfill will be eliminated as far as possible
- Legacy wastes will be tackled

206 It indicated that *"To reduce Wales' greenhouse gas emissions and make the most of our valuable resources we need to divert waste from landfill. The best way to treat most wastes diverted from landfill is for them to be recycled. In particular, diverting food waste to anaerobic digestion, and waste paper, card and metals from landfill sites to recycling will have the greatest benefits. Landfilling of all wastes will be phased out as far as possible in the period up to 2025...."*

207 However, the strategy recognises that there *"will be some materials and products which cannot be easily recycled, and the only way of managing them is to dispose of them. Alternative ways of treating these will be found, and efforts will be made to ensure that they do not become problematic legacy wastes in the future."*

208 Asbestos is classified as a legacy waste, a term used for waste that is often hazardous. It is not currently feasible to recover or recycle asbestos and therefore the waste cannot be returned to any beneficial use. The only current option is disposal and this is likely to continue to be the case in the future.

209 In support of Towards Zero Waste the Welsh Government has published the following sector plans:

- **Construction and Demolition Sector Plan (March 2012)** - Considers waste produced in the building industry and how to manage this;
- **Collection, Infrastructure and Markets Sector Plan (July 2012)** - Considers what happens to waste once it has been put out for collection and how Wales deals with its waste without sending it to landfill;
- **Industrial and Commercial Sector Plan (December 2013)** - Considers waste in business, retail and manufacturing and how to reduce and manage this.
- **Public Sector Waste and Resource Efficiency Plan (September 2015)** - Considers waste produced by the public sector and how to reduce and manage it.
- **Municipal Sector Plan (March 2011, last updated 2020)** - which considers waste collected by local councils and includes household waste and recycling.

2.2.2 Beyond Recycling (March 2021)

210 Since the publication of Towards Zero Waste, 2010, Wales has gained further responsibility for more areas of policy relevant to the circular economy. This has led to ensuring that the circular economy features as a key component of major strategies and plans when considering waste in Wales.

211 Therefore, the Welsh Assembly Governments' objectives and policy within Beyond Recycling sets out a commitment to transition to a circular, low carbon economy. Beyond Recycling and the accompanying Strategic Assessment represent the latest updates to the overall waste policy.

212 The Plan builds on *"the foundation of successful action over the last 20 years; taking the next steps towards a more circular economy, eliminating waste and addressing the climate emergency"* by moving *"from making and disposing of things to re-using and recovering*

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products and materials wherever possible. This requires a fundamental shift in how everyone thinks of and acts with the products we make and use."

- 213 The strategy is not relevant to asbestos as a circular economy approach cannot be adopted for hazardous wastes with no viable route for reuse or recycling. There is however a commitment within the strategy to ensure the reduction and safe management of hazardous waste produced in Wales by providing business support programmes and through the regulatory work of Natural Resources Wales, working in conjunction with Defra and the other devolved administrations.

2.2.3 Collections, Infrastructure and Markets Sector (CIMS) Plan (July 2012)

- 214 The CIMS Plan considers the management of all waste in Wales and suggests where improved recycling is needed. It seeks to create a sustainable approach to resource management by:
- Ensuring that a high volume of clean recycling is separated at source and is collected and delivered to reprocessors (based in Wales as far as possible); and
 - That markets are developed for the recycled material (within Wales as far as possible).
- 215 This plan aims to ensure, as far as possible, that the economic value of the recycled material stays in the Welsh economy.
- 216 The plan identifies that hazardous waste is stringently controlled and the consignee, the carrier and the co-signer all have responsibilities in respect of reporting the production, movement and treatment/disposal of hazardous waste under various regulations.
- 217 However, for *"businesses producing hazardous waste, the largest quantities of hazardous waste are produced by a small number of companies, and a much larger number of small producers produce small amounts. Two very different forms of collection are therefore apparent within the hazardous waste production sector. For the larger producers, it is common to have frequent repetitive loads that are transported to either a single or a small number of different management options, including recycling."*
- 218 The plan states that *"around 255 thousand tonnes of hazardous waste were produced in Wales in 2010, generated from over 9 thousand businesses. Around 46% of the hazardous waste produced in Wales in 2010 was recycled, with most of the remainder being either treated (around 20%) or disposed of to landfill (6%)."*
- 219 While the overall hazardous waste generation in Wales has fallen generally over the past years, the most recent years have seen an increase in generation. *"The greatest increases have occurred in thermal process waste, organic chemical process waste construction and demolition waste and asbestos waste"*.
- 220 Further consideration to C&D waste is given in the Construction and Demolition Sector Plan (2.2.4).

2.2.4 Construction and Demolition Sector Plan (November 2012)

- 221 The Construction and Demolition Sector Plan supports Towards Zero Waste, detailing outcomes, policies and delivery actions for organisations, companies and individuals involved with the construction and demolition sector in Wales. The sector plan does not extend to construction waste materials generated by householders arising from work carried out by traders, which is collected by Welsh Local Authorities – this is specifically dealt with under the Municipal Sector Plan.
- 222 66% of C&D waste arises in the Civil Engineering sub-sector, 18% in Construction, 12% in Demolition and 4% in General Building. The composition of the waste comprises 48% aggregate, 40% soils, 3% wood, 2% hazardous waste, 1% each for metals, insulation and gypsum, mixed waste, biodegradable waste, plastic, paper/cardboard and 0.1% each for glass and WEB (Waste Electrical and Electronic Equipment (WEEE), End-of-Life Vehicles (ELV), Batteries).
- 223 Almost 200,000 tonnes of hazardous waste was generated from site clearance, contaminated land remediation and refurbishment activities in the C&D sector. The Civil Engineering sector generated 81% of hazardous waste. The most common hazardous waste types were asbestos and contaminated soil. Asbestos accounted for around 21,000 tonnes of hazardous waste generated in Wales in 2005-06.

2.3 Assessment of the Proposal in Accordance with National Waste Management Strategy and Policy

- 224 The proposed development seeks permission for the change of use to an Asbestos Waste Transfer Station providing capacity for the bulking and storage of asbestos prior to off-site transfer to suitably licensed waste management facilities.
- 225 In the absence of recycling options for asbestos, the waste will be sent to landfill. This approach is in accord with the principles of the waste hierarchy.
- 226 The Waste Transfer Station will store asbestos waste generated largely within Neath Port Talbot County Borough area. By storing waste from within a local catchment, the proposed development adheres to both the proximity and self-sufficiency principles.
- 227 The development provides waste collection capacity in accordance with the requirements identified in Towards Zero Waste and related sector plans, and supports the provision of an integrated and adequate network of waste management facilities across South Wales.
- 228 The development supports the objectives and targets set by Welsh Government in the current waste strategy and policy.

3 Policy Context - Planning

3.1 National Planning Policy

301 National planning policy guidance of relevance to this proposal is contained principally in the following documents and summarised in the following sections:

- Planning Policy Wales (Version 11, February 2021)
- Technical Advice Note (TAN) 21: Waste (Welsh Government, February 2017)
- Future Wales: the National Plan, 2040 (Welsh Government, February 2021)

3.1.1 Planning Policy Wales (Version 11, February 2021)

302 The primary objective of Planning Policy Wales (PPW) is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

303 PPW recognises that there is likely to be a significant change in the nature and type of infrastructure needed to support a transition in waste management towards the circularity of materials, where facilities will need to support high efficiency and high-quality reuse and recycling. It further states that:

304 *"a circular economy is one which aims to keep materials, products and components in use for as long as possible. There are environmental, social and economic benefits of taking such an approach, most notably the increased value and productivity of materials, financial savings for the construction sector and the prevention of waste", and*

305 *"the principles of the circular economy represent a move away from the current linear model of make, use, dispose, towards the reuse, repair and recycle of wastes which arise during development."*

306 Planning Policy Wales requires that for all wastes, suitable locations for sustainable waste management development should be identified in development plans as well as criteria by which applications for such developments will be determined, recognising that the most appropriate locations will be those with the least adverse impact on the local population and the environment and with the best potential to contribute to a broad infrastructure framework.

3.1.2 Technical Advice Note (TAN) 21: Waste

307 TAN 21 supplements the policies of Planning Policy Wales, providing further guidance on how the land use planning system should contribute towards sustainable waste management and resource efficiency, reflecting the new waste management drivers at a European Union and Wales level.

308 TAN 21 indicates that *"When considering development proposals for all types of waste management facilities, planning authorities should take into account their potential contribution to the objectives, principles and strategic waste assessments set out in Towards Zero Waste and the relevant waste sector plans and the relevant development plan for the area. The extent to which a proposal demonstrates this contribution, in environmental, economic and social terms, will be a material planning consideration."* It also indicates that the Waste Hierarchy, *"is a central pillar to inform decisions on waste management options."* It provides further detail regarding the structure and interpretation of the Waste Hierarchy before highlighting areas of Article 16 of the Waste Framework Directive including the need for an Integrated and Adequate Network of waste facilities in order to achieve sustainable waste management, that waste should be disposed of or recovered in one of the nearest appropriate installations and the principle of self-sufficiency in waste recovery and disposal through the provision of an integrated and adequate network of facilities. There are several reasons why it is important to manage such waste close to where it arises. These include reducing any detrimental environmental impacts associated with the transportation of waste and retaining the intrinsic value of waste as a resource.

309 TAN21 indicates *"It is expected that adequate landfill capacity will continue to be required in the longer term for legacy wastes such as asbestos and other such wastes where landfilling remains the best overall environmental outcome."*

3.1.3 Future Wales: The National Plan, 2040 (February 2021)

310 Future Wales is the Welsh Government's national development framework and applies the key principles of Planning Policy Wales, establishing where in Wales development should take place and how these places should grow and change.

311 The plan provides the framework for planning the change and development needed over the next two decades.

312 Future Wales holds Development Plan status. When determining a planning application, decision makers are required to make their decision in accordance with both the Local Development Plan and Future Wales.

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313 Small scale developments of local, rather than regional or national significance, are likely to be determined by Local Planning Authorities, with the Local Development Plan policies providing the detailed development management framework. Future Wales is focussed on national and regional spatial issues and as such, whilst its policies will need to be considered, it will generally only impact larger development.

3.2 Local Planning Policy

3.2.1 Neath Port Talbot County Borough Council Local Development Plan 2011-2026

314 The current Development Plan for the Neath Port Talbot Local Planning Authority area is the Neath Port Talbot County Borough Council Local Development Plan (LDP), which was adopted on 27th January 2016.

315 The Vision of the LDP is *“The natural beauty and environmental importance of Neath Port Talbot’s waterfront and coastal corridor area will be protected and conserved while previously developed, underused and unsightly former industrial and commercial areas are redeveloped, transforming the function and appearance of the whole coastal belt.*

Key sites at central Port Talbot, Baglan Bay, Coed Darcy and the Swansea University Science and Innovation campus coupled with the area’s good and improving transport and communication links will help deliver a competitive, knowledge-based economy. New and expanded settlements will provide sustainable housing and employment to meet the needs of the local communities and the wider area.....

Benefits from natural resources will be maximised and the cultural, historic and natural heritage will be supported and enhanced. Economic growth and community cohesion will be promoted by concentrating development in key areas to provide benefits to a wider hinterland.”

316 The LDP Vision is to be delivered through a series of 25 objectives which address the key issues facing the County Borough. Four objectives are considered to be overarching, two are area-based and the nineteen remaining objectives grouped under the following themes that are identified in the Wales Spatial Plan:

- Building Healthy, Sustainable Communities;
- Promoting a Sustainable Economy;
- Valuing Our Environment;
- Achieving Sustainable Accessibility; and
- Respecting Distinctiveness.

317 The strategy focuses on providing sustainable, prosperous communities and creating social and economic opportunities.

3.3 Assessing the Proposal in the Context of the Adopted LDP

318 Relevant LDP policies are summarised in Table 1 along with a summary assessment of the development’s adherence to the policy. Accompanying assessments in combination with the subsequent sections within this document provide further detailed information.

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Policy Reference	Summary of Policy Provisions	Adherence of Development to Policy
STRATEGIC POLICY SP 5: DEVELOPMENT IN THE COASTAL STRATEGY AREA	Sustainable growth and development are promoted in this area to benefit the County Borough as a whole while protecting and enhancing the area's character and environment through area-specific measures; such as the safeguarding of existing employment uses and sites for employment purposes.	The site is allocated within the Coastal Corridor Strategy Area at Baglan Bay. Due to the scale of the development, this will not alter the area's character and environment.
STRATEGIC POLICY SP 11: EMPLOYMENT GROWTH	Sets out that existing employment uses will be supported and safeguarded.	Employment uses allocated within Baglan Bay consist of B1, B2 and B8. The proposal is to develop a small-scale facility to bulk asbestos. It is small scale in nature, and will have no unacceptable impact on the use of the surrounding employment use.
STRATEGIC POLICY SP 16: ENVIRONMENTAL PROTECTION	Seeks that all development should demonstrate a positive approach to maintaining and protecting air, water, ground quality and the environment wherever possible. Development must not increase the number of people exposed to significant levels of pollution.	The development will follow all applicable legislative frameworks and regulatory regimes to ensure no adverse effect on the surrounding environment and people. The facility will support the appropriate disposal of asbestos waste generated from demolition and refurbishment works in the local area.
STRATEGIC POLICY SP 19: WASTE MANAGEMENT	This policy highlights the provision made for the delivery of an integrated network of waste management facilities through a series of measures including ensuring that provision is made for waste storage.	The development proposes the storage of asbestos waste in two sealed skips. This is needed to facilitate the growing need for safe storage for hazardous waste. The development comprises waste collection, rather than treatment infrastructure and supports the provision of an integrated and adequate network of waste management facilities across South Wales.
POLICY EC2: EXISTING EMPLOYMENT	Seeks to protect existing employment areas to employment uses within Policy EC3.	The site is located in area EC2/6 Baglan Energy Park.

AREAS		
POLICY EC3: EMPLOYMENT AREA USES	In order to protect the employment function of the County Borough's employment areas, uses on certain sites are restricted in accordance with Policy EC3. The policy outlines that uses are restricted to classes B1, B2 and B8, ancillary services/facilities which support and complement the wider role and function of the primary employment use and commercial services unrelated to class B.	Baglan Energy Park is identified within the restricted uses of sites within the County Borough. The class use is therefore restricted to B1, B2 and B8 usage. The development comprises of two skips used for the storage of asbestos. This would be largely indistinguishable from a storage area in any industrial development for waste generated within the facility. No adverse impacts on the overall function of the employment area will arise from the development.
POLICY M1: DEVELOPMENT IN MINERAL SAFEGUARDING AREAS	Development proposals within mineral safeguarding areas will only be permitted where it can be demonstrated that the mineral concerned is no longer of value, can be extracted satisfactorily prior to the development taking place or that the scale and location of the development would have no significant impact on the possible working of the resource.	The nature of the development is such that it would not sterilise the future extraction of the mineral resource.
POLICY M2/1	Seeks to safeguard local amenity, environmental and cultural assets.	The site is located in M2/1, an area subject to constraints relating to surface coal operations. This is not relevant to the proposal.
POLICY BE 1: DESIGN	This policy seeks to ensure that all proposals demonstrate the context of the surrounding built environment through using its resources such as land and energy as efficiently as possible.	The proposed development comprises of two sealed skips for the storage and transfer of asbestos waste. The skips will be consistent with the industrial setting of the surrounding area and will be placed in an existing industrial yard. The siting, layout, scale and form of the development has taken into account both operational considerations and the need to be appropriate in the context of its setting.

Table 1. Relevant Adopted LDP Policies

4 Waste Policy Statement

4.1 Introduction

401 This section provides a Waste Policy Statement in accordance with Annex B of TAN21: Waste (2017).

4.2 Contribution to the Relevant Provisions in Towards Zero Waste, Beyond Recycling and the Collections, Infrastructure and Markets Sector Plan

402 The primary objective of Towards Zero Waste is for Wales to achieve one planet living by using its fair share of global resources. It aims to phase out residual waste through waste prevention, sustainable consumption and production, and ensuring that all waste that is produced is reused or recycled.

403 The C&D sector plan highlights the challenges of asbestos management and indicates the Best Practicable Environmental Option has been assessed to be double bagging and disposal to landfill. A specific objective within the plan is to ensure an adequate collection system for residual waste, including for hazardous waste, and to ensure access to an adequate network of facilities for the treatment and disposal of hazardous waste. The development supports the achievement of these objectives.

404 Considering the waste hierarchy in the context of legacy hazardous waste:

- There is no viable route for the reuse or recycling of asbestos.
- The waste will be double-bagged and landfilled as the best environmental option available.

405 It is concluded that the proposed development complies with the relevant waste policy.

4.3 Compliance with Policy Related to Need and Location Requirements

406 The proposal represents a small waste management facility bulking and securely storing asbestos waste with capacity to service a local catchment around Port Talbot.

407 Its development supports the provision of an integrated and adequate network of waste management facilities across South Wales.

408 The development will be located in an existing B2 industrial area and has been designed to minimise the area of land required, while providing suitable vehicular access and safe, secure storage of waste.

409 Having assessed any potential impacts, it is concluded that the proposed development will not have any unacceptable adverse impact upon the natural environment, heritage value or the amenity and health of the local population, and that it complies with the relevant need and location requirements of national and local policy.

4.4 Existing and Projected Future Demand

410 The development will facilitate the safe and legal handling of asbestos waste prior to its transfer off-site for disposal at suitably licensed waste management facilities. This will support the Applicant's current and future business as a licensed asbestos removal contractor.

411 Whilst it is impossible to predict absolutely the future direction of waste policy beyond the horizons of current legislation, it is likely that national waste policy and legislation will continue to act to ensure the appropriate collection and treatment/disposal of hazardous waste, particularly asbestos.

4.5 Markets Served by the Development

412 The proposed development represents additional infrastructure to facilitate the safe removal and disposal of asbestos waste arising in the demolition and refurbishment sectors.

413 The Applicant has identified a shortfall in local capacity for the bulking and transfer of asbestos waste to meet their own needs, and those of other local contractors. The development will address these needs by providing a small local bulking and transfer site for asbestos waste.

4.6 Shortfall in Treatment Capacity

414 The Applicant is proposing to develop a small asbestos waste transfer station to bulk asbestos. No waste treatment will take place on site and as such, the facility solely represents collections infrastructure.

4.7 Declaration

415 This statement sets out how the waste hierarchy has been considered in developing the proposals currently forming this planning application.

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Signed:

A handwritten signature in black ink, appearing to be 'C. Jones', written over a vertical line.

Name: Christian Jones

Position: Director

Company: ARTICO Environmental Limited

Date: 30th June 2022

5 Development

5.1 Site Location

501 For identification purposes the site is approximately centred at Ordnance Survey grid reference SS 74352 92339. The location is shown on Drawing 11099-000-A and the site in relation to the surrounding area is displayed in Drawing 11099-000-B.

502 The site is located approximately 3.2km to the north-west of the town of Port Talbot.

503 The site is accessed directly from the A4241 which connects with the M4 at junction 41 approximately 1.9km south east of the site.

5.2 Site Description

504 The site is located within an industrial storage yard.

505 Drawing 11099-000-C presents a layout of the existing site.

506 The site comprises a level area of hardstand currently used for the storage of equipment.

5.3 Site Context

507 The site is located on Seaway Parade Industrial Estate, part of the Baglan Energy Park development which occupies an area largely to the east of the site.

508 Within the Visual and Sensory data in LANDMAP, the site lies within Character Area NPTVS960 Baglan Bay Works described as a “commercial and industrial development at norther extent of coastal plain. The area consists of numerous industrial units, many of high-quality design. There are also large undeveloped sites most noticeably to the north. Sites within the area have recently been significantly landscaped but this has yet to mature. At present the area feels open, exposed and in places, intimidating, due to the undeveloped areas, flat nature of the area and presence of BP works.”

509 The M4 motorway separates the site from residential properties to the east in Baglan.

510 Views into the site are limited and the site is well screened by a combination of topography, existing buildings and mature trees.

5.3.1 Residential Developments and Other Sensitive Receptors

511 The closest residential properties have been identified as:

- Properties at Burrows Road, located 315m or more to the east of the asbestos storage area. The residential properties are separated from the site by the M4 and the main Cardiff to Swansea railway line;
- Baglan Football and Cricket Club, located 315m east of the asbestos storage area. The Football and Cricket club is also separated from the site by the M4 and the main Cardiff to Swansea railway line; and
- Properties at Fenbrook Close, located 331m or more south east of the asbestos storage area.

512 A storage yard lies immediately to the west of the asbestos storage area. Other commercial and industrial businesses border the wider site.

513 The nearest significant settlement is Baglan located approximately 321m to the east

514 Ysgol Bae Baglan lies 0.42km south west of the site and Ysgol Gynradd Baglan Primary School lies 0.55km to the east of the site

5.3.2 Ecological Designations

515 The site does not lie within any ecologically designated sites.

516 There are no national or internationally designated environmental sites within 2km of the site, or locally designated sites within 1km.

5.3.3 Historical/Archaeological Designations

517 There are no registered parks and gardens or registered battlefields within 1km of the site.

518 There are no Listed Buildings within 1km of the site.

5.3.4 Landscape Designations

519 The site is not located within close proximity to any Area of Outstanding Natural Beauty (AONB) or Registered Landscape of Historic Interest in Wales (RLHIW).

5.3.5 Air Quality Management Areas

520 The site is not located within, or within 500m of an Air Quality Management Area.

5.3.6 Public Rights of Way

521 There are no public rights of way running through or within 100m of the application site.

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5.3.7 Flood Risk

- 522 The proposed development is located within Flood Risk Zone C1 (served by significant infrastructure, including flood defences).
- 523 The proposed is for the enclosed storage of double-bagged/wrapped asbestos in lockable storage containers. This use is considered to represent less vulnerable development.
- 524 Prior to its first beneficial use, the property will be registered with Natural Resources Wales' Floodline Warning Service and appropriate warning signs erected to make staff aware of the potential risk of flooding and actions/evacuation procedures to be followed during an extreme flood.
- 525 When alerted to a potential flood event, the asbestos storage skips will immediately be removed from site to the end disposal destination, or temporarily to another secure location outside of the identified flood risk area.

5.3.8 Land Contamination

- 526 An assessment of historic Ordnance Survey maps indicates that the site was in largely agricultural use until the 1970's. The 1977/87 map is first to show development of the site in a manner consistent with its current form, including the existing hardstand and concrete surfacing.
- 527 Satellite photography suggests that the site has been used for the storage of steelwork and other materials for at least the last 20 years. One to two steel storage containers were located to the north of the site during this period.
- 528 A visual and olfactory assessment of the surface materials did not identify the possible presence of contaminating substances, although no sampling and testing has been carried out at this time.
- 529 The proposed use would not be particularly vulnerable to the presence of contamination.

5.3.9 Groundwater

- 530 The site does not lie within a Groundwater Source Protection Zone.
- 531 The underlying bedrock designation is Secondary A aquifer. This identifies the geology comprising of permeable layers that can support local water supplies.
- 532 The Superficial Layer designation is Secondary A.
- 533 Appropriate surfacing, drainage and site management approaches are proposed to ensure there will be no impacts on the underlying aquifer.

5.3.10 Coal Mining

- 534 The site does not lie within a Development High Risk Area.

5.4 Timescale

5.4.1 Lifespan

- 535 The lifespan of the development is expected to be greater than 20 years.

5.5 Types and Quantities of Wastes to be Managed

5.5.1 Estimated Annual Quantities of Waste

- 536 The storage of asbestos waste will not exceed the maximum quantity of 10 tonnes. The annual quantity of asbestos received at the facility will not exceed 120 tonnes.

5.5.2 Destination of End Products

- 229 The asbestos will be bulked and stored in secure lockable containers prior to off-site transfer to a suitably licensed landfill.

5.5.3 Operational Viability

- 537 The development is viable at, or below waste volumes currently received by the Applicant.
- 538 Although over time the amount of asbestos waste removed from older developments will decline, for such a small facility it is unlikely that the situation will arise where insufficient waste is available to sustain the development for a number of decades.

5.6 Design and Layout

- 539 Drawing 11099-000-D shows the proposed site plan.

5.6.1 Site and Facility Layout

- 540 The site design and layout has been developed considering the following:
- Vehicular access and manoeuvrability;
 - Achieving a safe and efficient operational layout;
 - To provide a development that minimises impact on the surrounding area and natural environment; and
 - To minimise impacts on adjacent land uses.

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5.6.2 Scale

541 The scale of the development follows the principles set out below:

- It should provide sufficient capacity to address local need; and
- It should reflect the operational and process requirements of the Applicant.

542 The site occupies an area of 1,043.71 m², including the access road to the highway. This is the minimum area needed to locate the two storage containers and provide space for safe access and unloading of vehicles.

5.6.3 Access

543 Access to the site will be through an existing gate and access road to the west of the site. This connects with Central Avenue, and onwards to the A4241 and M4.

5.6.4 Form and Design

544 A steel mesh reinforced concrete base >200mm thick, laid on 200mm of compacted MOT Type 1 sub base will provide a surface to locate and access the asbestos storage containers.

545 The concrete base will be graded such that surface water drains to the east of the pad where it is intercepted by a channel drain. The water then passes through a silt trap and asbestos filter before being direct to a soakaway (Drawing 11099-000-E). An application will be made to the local authority in its role as SuDS Approving Body (SAB) to approve the scheme prior to the commencement of construction.

546 Should it be shown that a soakaway-based solution could not be implemented, alternative drainage arrangements e.g. connection to a nearby sewer, would be proposed and submitted to the SAB for approval.

547 Each asbestos storage container will be 5.8m long x 2.2m wide. The containers will be secured with padlocks and accessible only by authorised personnel.

5.7 Site Operations

548 All site operations will conform with the requirements of The Hazardous Waste (England and Wales) Regulations, The Environmental Permitting Regulations and The Environmental Protection (Duty of Care) Regulations.

5.7.1 Receipt of Wastes

549 Waste will be delivered to site by light commercial vehicles owned by the Applicant and local contractors.

550 All asbestos waste will be double bagged or wrapped in thick polythene sheeting with the correct hazard warnings and labelling attached.

551 Incoming waste will be visually inspected by trained members of staff to ensure compliance with the sites waste acceptance procedures and environmental permit. Any waste streams found to not be compliant with the sites waste acceptance procedure will be rejected.

5.7.2 Storage of Waste

552 Waste will be unloaded from vehicles by trained operatives and handled so as to minimise the risk of damage to the bags or sheeting. The asbestos will be placed carefully into the storage containers and locked after use.

5.7.3 Dispatch

553 When full the containers will be collected by authorised waste carriers only and transported to an appropriately licensed landfill for disposal.

5.7.4 Records

554 All records of delivery and dispatch, including copies of Hazardous Waste Consignment Notes will be maintained in the site office. These will be available for inspection by authorised officers of the Local Authority and Natural Resources Wales at any reasonable time.

5.8 Regulation and Management

5.8.1 Environmental Permit

555 The Waste Transfer Station will operate under an environmental permit issued and regulated by Natural Resource Wales.

5.8.2 Environmental Management System

556 The development will be managed in accordance with a written Environmental Management System that meets Natural Resources Wales' requirements under the site's Environmental Permit. This will be extended and updated to incorporate the new development.

557 The EMS will detail control and management measures to ensure that the site operates in a manner that minimises any impact on the environment and human health.

5.8.3 Site Personnel

558 The highest standards of health, safety and environmental consideration will be employed on the site at all times.

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559 Technically competent staff will supervise the site and ensure that it is operated in accordance with its environmental permit, EMS and prevailing legislation.

5.9 Amenity and Nuisance

5.9.1 *Compatibility with Existing or Neighbouring Land Uses*

560 The development will be located within an existing industrial development that is itself, immediately surrounded by similar industrial developments.

561 The development represents a small-scale waste management facility that would be compatible with adjacent land uses.

5.10 Air Pollution

562 No specialist treatment/recovery processes that would result in product gasses being released to atmosphere will be carried out at the site.

5.11 Socio-Economic Benefits

563 The development will increase the efficiency of the Applicant's business operations and reduce the need for local asbestos removal contractors to carry small quantities of asbestos waste directly to a licensed landfill in Merthyr Tydfil. As a result, the development will reduce unnecessary transport miles and their associated environmental impacts.

6 Conclusions

- 601 This Waste Planning Statement has been prepared in accordance with Annex B of TAN21: Waste (2014).
- 602 The Applicant proposes to change the use of the site to an Asbestos Waste Transfer Station in order to facilitate the receipt, bulking and secure storage of asbestos waste prior to its transfer off-site for disposal at suitably licensed waste management facilities.
- 603 The proposed development is small-scale, with capacity to service a local catchment around Port Talbot. It comprises a small concrete pad area on which two lockable secure containers will be sited for the storage of asbestos. The total weight of asbestos to be stored in the containers will be 10 tonnes.
- 604 The proposal will address a shortfall in local capacity for the bulking and transfer of asbestos waste to meet the Applicant's needs, and those of other local asbestos removal contractors.
- 605 The design and layout of the site has taken into account local constraints and ensures that safe and effective operations can be undertaken.
- 606 The site will operate under an environmental permit issued and regulated by Natural Resources Wales. This will ensure that there are no unacceptable impacts to the environment or to human health.
- 607 The development complies with national waste strategy and policy, and contributes towards the provision of an adequate network of waste management infrastructure to meet local need.
- 608 Having demonstrated that the proposal is in accord with national and local policy, and that this proposal is in keeping with the local area, it is respectfully requested that the Local Planning Authority grant planning consent for the proposed development.

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Drawings

11099 - 000 - A - Location Plan

11099 - 000 - B – Site and Surrounding Area

11099 - 000 – C – Site Plan (Existing)

11099 - 000 - D – Site Plan (Proposed)

11099 - 000 - E – Drainage Plan

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