

DPP Planning

DESG
11-13 Penhill Road
Cardiff
CF11 9PQ

029 2066 0265
info@dppukltd.com

www.dppukltd.com



Head of Regeneration and Planning
Caerphilly County Borough Council
Tredomen House
Tredomen Park
Ystrad Mynach
CF82 7WF

Date: 24 Sep 2021

Dear Sir/Madam

On behalf of Hywel NMP Limited:**Full Planning Application for the Erection of a Sprinkler Tank and GRP Pump House at Land at Grid Ref 319235 191320 Nine Mile Point Estate, Cwmfelinfach.**

On behalf of our client Hywel NMP Limited, please find enclosed Full Planning Application for the erection of a Sprinkler Tank and GRP Pump House at Land at Grid Ref 319235 191320 Nine Mile Point Estate, Cwmfelinfach.

Application Submission

Please refer to the accompanying architectural pack as well as the following documents:

- Application Form;
- Site Location Plan (20001-040)
- Site Layout Plan (Ref. 20001-041 Rev A)
- Western Elevation Plan (Ref. 20001-042 Rev A)
- Eastern Elevation Plan (Ref. 20001-043 Rev A)
- Southern Elevation Plan (Ref. 20001-044)
- Proposed Renders (Ref. 21012)
- Drainage Layout (Ref 20001-048)
- Heritage Note
- Landscaping Plan (Ref. 20001-049)

Application Site Context

The development site is located at Land at Nine Mile Point Industrial Estate, Cwmfelinfach, Caerphilly. The site is less than a mile from the village of Cwmfelinfach, approximately 9 miles northwest of Newport and approximately 9.3 miles northeast of Caerphilly.

Cardiff

Leeds

London

Manchester

Newcastle upon Tyne

DPP One Limited
Company number 08129507
VAT number 138284595

The site forms part of the wider Planning Consent for the development of “an up to 100,000tpa Solid Recovered Fuel (SRF)/Refuse Derived Fuel (RDF) production facility” (LPA Ref: 15/0601/FULL) which is currently under construction. The proposed Sprinkler Tank and GRP Pump House is to be located at the north-eastern corner of the wider site on an underdeveloped parcel of land. This location is set back from the roads and is partially screened from Heol Tir Ton by the consented SRF building currently under construction.

There are no listed buildings or designated heritage assets on or adjacent to the site. The proposed site is not at risk from flooding from rivers, the sea, small watercourses, or surface water. However, the site is within Natural Resources Wales Flood Zone B, which highlights that the area is known to have been flooded in the past. In respect of the surrounding area, there are several allocations. The River Sirhowy Site of Importance for Nature Conservation is located to the south of Nine Mile Point Industrial Estate. To the north of the site is the Mynddislwyn Special Landscape Area.

The Proposal

Since the granting of planning approval for the facility at Nine Mile Point, Natural Resource Wales (NRW) have introduced Fire Prevention and Mitigation Guidance. This new policy introduced by NRW was brought into place in August 2017. Section 18 of the above guidance requires operators of waste processing facilities to install fire suppression systems to ensure compliance with their Environmental Permit. Recommended fire suppression systems include sprinkler systems and internal water cannons, both of which are now proposed for the facility at Nine Mile Point.

Due to the change in Environmental Permit regulations, we are now proposing to submit a planning application for a water storage tank and pump house associated with the above-mentioned fire suppression system. This application will not only ensure compliance with requirements sought by NRW but will be a betterment to the process previously approved at the site.

Principle of Development

The site lies within the settlement boundary identified within the Council’s Adopted Local Development Plan up to 2021. The proposal is for plant associated with the operation of an approved employment use and therefore will not prejudice the use of any adjacent site for its allocated land use and accords with the role and function of the settlement. The proposed Sprinkler Tank and GRP Pump House is appropriately sited within the site boundary and would not impact upon existing provision for parking and vehicular movements within the site. Although the associated buildings would be large in terms of their overall footprint and height, they would appear as relatively small structures in context with the host building and the wider industrial setting. There are no policies within the adopted policy framework outlined in Section 5 which would suggest permission should not be granted. On the contrary, the function of the Sprinkler Tank will support the operation of an approved waste facility which is contributing towards the delivery of local and national requirements to implement a sustainable approach to waste management as set out at LDP Policy SP9 and TAN21.

Amenity

Given the site’s industrial estate location, the proposed use is compatible with the surrounding land uses and would not result in any significant harm in terms of visual amenity of the surrounding area or residential amenity. The proposal is therefore acceptable in the context of Policy CW2.

Landscaping and Trees

The location of the proposed Sprinkler Tank and GRP Pump House will not impact existing trees.

The proposed Tank and Pump House are proposed to be set back from the site boundary in order that 365-degree access to the plant can be achieved without impacting on existing trees or trees consented on plan ‘20-045 L101 Landscape Proposals’ which were approved under application reference 20/0726/COND in relation to the planning permission 15/0601/FULL for the main building.

The proposed Tank is set back sufficiently far enough to allow the approved planting to have space to mature and to allow maintenance access to the soft landscaping. The proposal is therefore appropriate in the context of TAN5.

Archaeology

During the course of ground excavation carried out in relation to planning permission 15/0601/FULL a buried structure was revealed and photographed. As set out within the accompanying Heritage Note provided by EDP, in summary, the structure comprises a linear trough or remains of a tunnel, a sunken chamber enclosed by walls on its west and east sides. Its northern end is located outside of the development area to the north and its southern end is defined by a concrete fill by which it is presumably blocked (and thus the structure is likely only to be partial in terms of its original length).

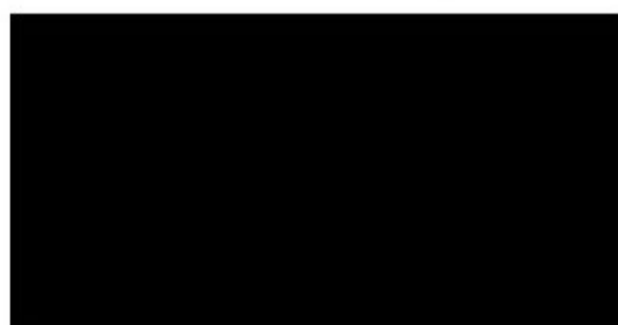
The Heritage Note concludes that the structure has very low heritage significance. It is an isolated fragment of a former colliery that is of the early 20th century, and so a later development in terms of history of the south Welsh coal industry, rather than an early feature of greater historical interest. In terms of treatment regarding appropriate remedial measures prior to its removal by development, on account of its very low heritage significance it is considered that no more than a photographic record of the structure would suffice by way of the mitigation of its loss. The record could be deposited within an appropriate archive (such as the GGAT Historic Environment Record). In this way, its appearance and location would be recorded prior to its destruction and the record appropriately conserved.

In the context of the above, granting permission for the proposed Sprinkler Tank and GRP Pump House would be consistent with TAN15 which requires a weight assessment of the loss of the structure against other factors. In this instance, the benefits to development which would better the operation of the approved SRF/ RDF facility far outweigh the value of retaining a structure considered to be of low heritage value.

Next Steps

I trust the enclosed information is sufficient to allow the prompt registration of the application. If you should have any queries or require further information, please do not hesitate to contact me.

Yours sincerely



Tom Wright

Principal Planner

DPP

E: tom.wright@dppukltd.com