2026



Planning Design and Access Statement

Units 1 & 2, Kays and Kears Industrial Unit, Blaenavon

LAUREN WALKER

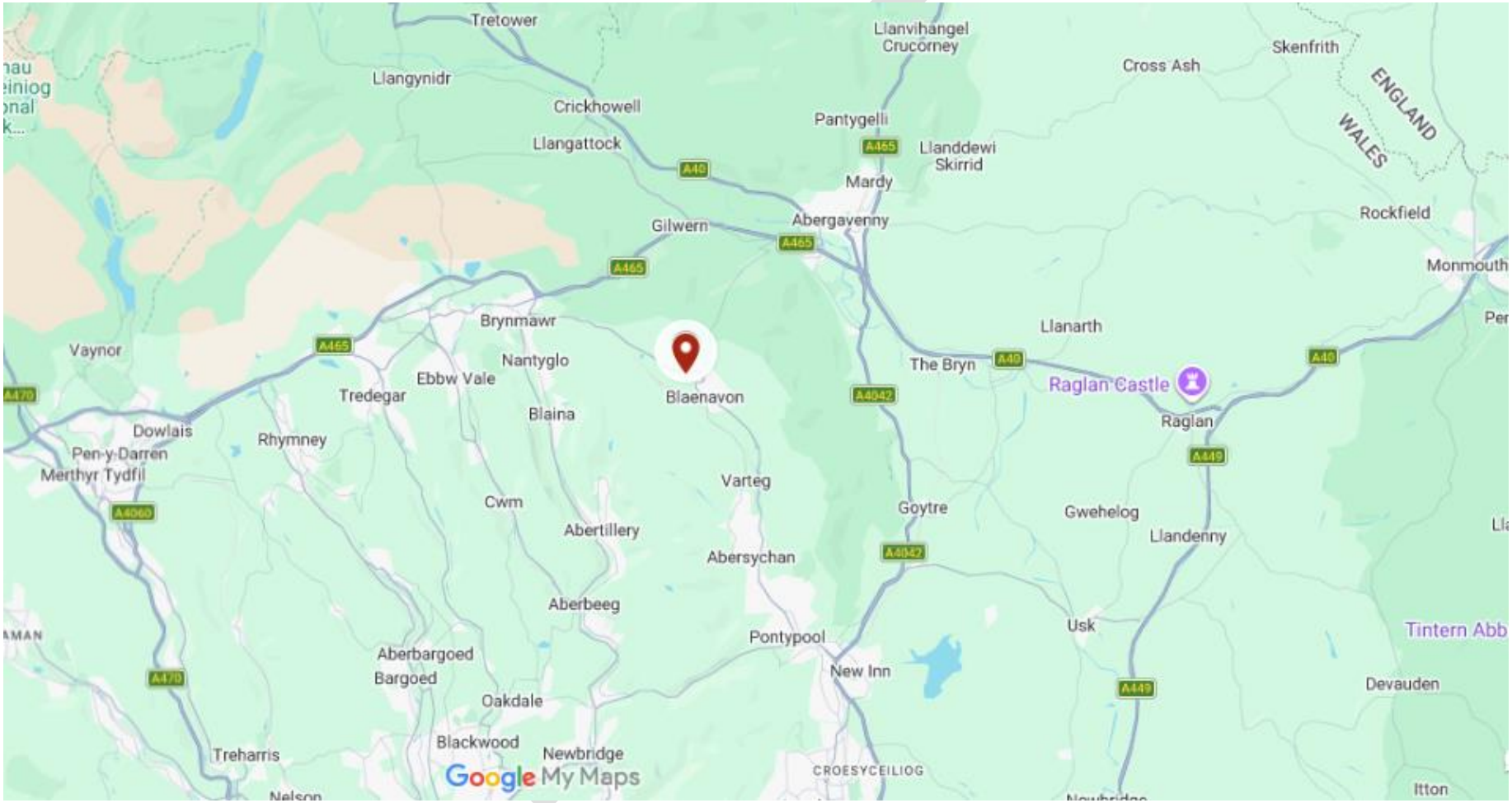
TCBC | Ty Blaen, Panteg Way, NP4 0LS

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Site in a Regional Context



Site in a Local Context



Summary of Proposal

Torfaen County Borough Council seeks full planning permission for the change of use of part of Units 1 and 2, Kays & Kears Industrial Estate, Blaenavon, to a recycling bulking facility for four years. The facility will provide essential recycling bulking and transfer capacity following the expiry of the Ty Coch lease, maintaining continuity of the Council's recycling service while a permanent recycling transfer solution is progressed.

The proposal comprises two bays: one for mixed paper and cardboard and a separate bay for glass. Materials will be received, temporarily stored and bulked before onward transfer for recycling and reprocessing. No residual, food, garden or other waste streams will be accepted, and no fixed processing or baling plant is proposed. All other waste and recycling will be delivered to the New Inn Waste Transfer Station.

Associated development includes precast concrete block bay walls, a roof/canopy, acoustic screening, a sealed glass-handling area and drainage controls, temporary welfare accommodation, storage containers, staff parking and security infrastructure. Access will use the existing industrial estate entrance, with an internal one-way circulation system and managed vehicle manoeuvring.

The development is located on existing hardstanding within the Blaenavon Industrial Landscape World Heritage Site. Its predominantly modular infrastructure is intended to limit permanent change and allow removal when the temporary use ends. This supports the planning application and associated documents.

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The Brief and Vision

The brief is to deliver a functional, proportionate facility that makes effective use of the existing site, supports safe vehicle and pedestrian movement, and protects neighbouring amenities, the environment and the World Heritage Site setting. Infrastructure should be limited to what is necessary for operation and mitigation, using removable construction where practicable.

The vision is to maintain a resilient recycling service while Torfaen progresses a purpose-built, permanent waste transfer station at Kays & Kears. The longer-term ambition is to replace reliance on the leased, capacity-constrained, outdated Ty Coch facility with Council-owned infrastructure that supports future recycling needs and efficient material handling. The temporary facility provides continuity during this transition while limiting lasting change and avoiding prejudice to the future site layout. Any permanent development would be subject to a separate planning application.

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1. Introduction

This Planning, Design and Access Statement (DAS) has been prepared to accompany a planning application for a proposed temporary waste bulking facility at Unit 1 & 2, Kays and Kears Industrial Unit, Blaenavon. The Statement provides information to demonstrate and explain how the proposed temporary facility satisfies the relevant National and Local Planning Policy for the provision of sustainable waste management facilities.

The Statement provides contextual information in respect of design and access and explains how the proposal will address environmental considerations and any identified site constraint issues associated with the proposal. The Statement also highlights the key documents that have been prepared separately in support of the Proposal.

This DAS has been prepared within the context of National Planning Policy as set out in Planning Policy Wales (PPW) Edition 12 (2024) and the five objectives.

that should be considered when preparing a DAS, as shown in the diagram below:



Figure 1: *Objectives of Good Design*[1]

[1] Planning Policy Wales – 12th Edition

2. Site Location and Context

2.1 Location and Access

The application site comprises part of Units 1 and 2 at Kays & Kears Industrial Estate.

The site location and application boundary are shown on the Site Location Plan (SLR, 402.065983.00001.001, Rev. PA0) and Site Location and Boundary Plan (SLR, 402.065983.00001.002, Rev. PA0).

- Site Name: Kays & Kears Industrial Estate
- Address: Kays & Kears Industrial Estate, Blaenavon, Pontypool NP4 9AZ
- Grid Reference: SO 24519 09441
- Lat, Long: 51.77853, -3.09548
- Lifespan of operations: 4 years
- Proposed Use: Bulking of glass, mixed paper and card
- An S2 exemption permit has already been approved by NRW for the waste operations.
- Site Area: 2,635 m², comprising the car park and space for operations and traffic
- Ownership: Site owned by Torfaen County Borough Council

The site is located 1km to the north-west of Blaenavon town centre, in Torfaen County Borough, as shown in Figure 2. The A465 Heads of the Valley Road is located around 4km to the north of the site. Access to the industrial estate is off the B4248 Garn Road located some 80m north and off North Street some 400m southeast. Estate Road, winds through the industrial estate, which is formed at two levels, a lower level containing the majority of the buildings within the industrial estate, and an upper level comprising of the site and its associated buildings. Access to the site is via an unnamed road off Estate Road, to the south of the site. The yellow box in Figure 2 highlights the location of the site for the proposed recycling bulking facility.

Blaenavon developed as an industrial town following the establishment of Blaenavon Ironworks in 1789. Its local supplies of iron ore, coal and limestone supported rapid growth in ironmaking, mining and associated transport networks during the nineteenth century. Workers' housing and community buildings developed alongside these industries, shaping the town and surrounding landscape.

Coal mining subsequently became a major industry, with Big Pit remaining operational until 1980. In 2000, the Blaenavon Industrial Landscape was inscribed as a UNESCO World Heritage Site, recognising the surviving ironworks, mines, quarries, transport routes and settlements as exceptional evidence of the Industrial Revolution.

The site falls within the Blaenavon Industrial Landscape World Heritage Site and the Blaenavon Landscape of Outstanding Historic Interest. These heritage designations are considered in Section 3.3.3. Garn Lakes Local Nature Reserve is located within 500 m of the site.

Figure 3 shows an aerial view of the site with the current infrastructure in place. The proposed temporary bays would be located in the site car park highlighted in the red box. The nearest receptors to the site are a cottage 150m northwest and a

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row of terraced houses 100m to the southeast.



Figure 2: *An aerial photography of Blaenavon*

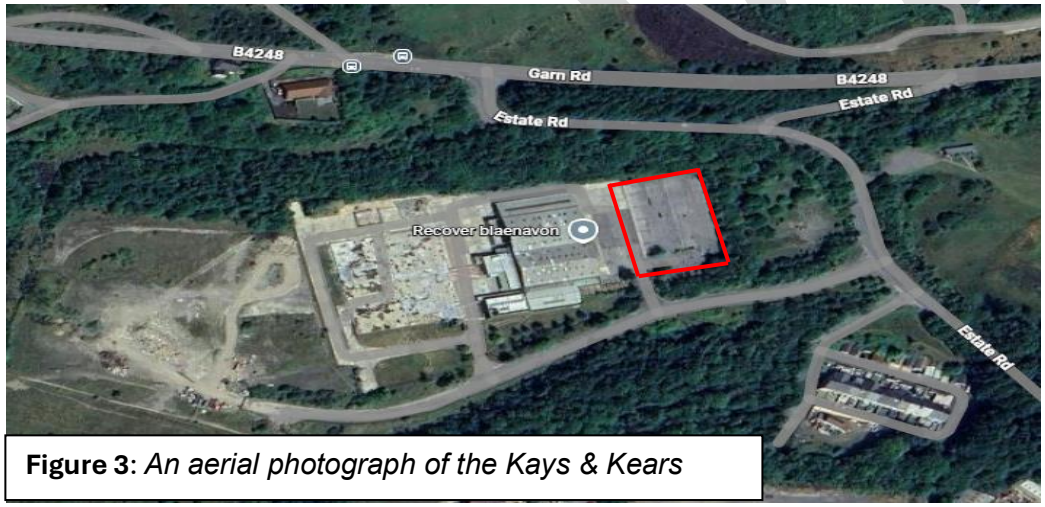


Figure 3: *An aerial photograph of the Kays & Kears*

2.2 Previous Use and Current Condition

The property consists of a multi-bay industrial unit with a steel portal frame and pitched roof, located on roughly 6.5 acres. Previously operated by Recover (Coveris), it was acquired from Capital Valleys Plastic, which recycled plastic film and flexibles. ReCover held an A1 waste permit, allowing storage of 1,000 tonnes and recycling up to 20,000 tonnes of plastic annually; the permit was surrendered to Natural Resources Wales in February 2025.

On September 4th, 2021, a major fire destroyed the building on the western side of the site. Remaining parts of the building were unsalvageable and scheduled for demolition, leaving the large concrete floor slab present today.

Neither the concrete slab nor the current building will be used as part of the interim solution. The interim operations will be contained in the car parking area on the east side of the site.

See the Existing Site Layout and Services drawing (SLR, 402.065983.00001.003, Rev. PA0) and Topographical Survey (Total Surveying Solutions Ltd, KAY/01, Rev. 1) for existing site information.

2.3. Project History

Torfaen County Borough Council's waste and recycling service operates across two main facilities. New Inn receives kerbside food, garden and residual waste, together with waste from the household waste recycling centre (HWRC), streetscene and highways services. Ty Coch receives kerbside dry recyclables for sorting and baling. As food waste and dry recycling are collected on the same vehicles but must be unloaded at different locations, the current arrangement results in operational inefficiencies.

Neither facility provides a suitable long-term solution. The Ty Coch lease is due to expire in April 2027, and the site is affected by ageing infrastructure, structural deterioration and limitations associated with the existing buildings and equipment. New Inn also has capacity and infrastructure constraints, including an ageing hopper system, limited space for additional recycling streams and no space for baling facilities. These factors restrict the Council's ability to provide an efficient and resilient service over the longer term.

The Council has been seeking a suitable long-term recycling bulking and transfer solution for more than ten years. A site on Panteg Way was explored, but work on this project was discontinued in 2022 due to site constraints, contamination and significantly increased development costs.

Expansion of Ty Coch was also pursued to enable food waste and dry recycling to be managed at a single location, but concerns associated with its former landfill setting, site constraints and, subsequently, the landlord's refusal to permit food waste operations prevented this from providing the required long-term solution.

Other options, including consolidating operations at New Inn/Ty Blaen, were subsequently assessed but could not meet the Council's requirements.

Units 1 and 2 at Kays and Kears, Blaenavon became available in 2025. Following concept design work and site investigations, the site was identified as having the capacity and operational flexibility to support the Council's longer-term requirements with the progressive discounting of alternative options.

The Council's long-term objective is to develop a purpose-built recycling transfer station at Kays and Kears, bringing food waste and dry recycling operations together at a single location and providing appropriate sorting, baling, storage and transfer capacity. This would replace the existing constrained split-site arrangement with a more integrated, efficient and resilient operation capable of responding to future recycling requirements.

The permanent recycling transfer station will require detailed design, planning approval, environmental permitting and technical assessment before it can become operational. In the meantime, the Council must maintain continuity of essential recycling services given the expiry of the Ty Coch lease in April 2027.

The development proposed through this application therefore represents a temporary arrangement at Kays and Kears. It would provide the infrastructure required for the temporary reception and bulking of specified recyclable materials while the permanent facility is progressed.

The interim development is not intended to replicate the permanent recycling transfer station and would not provide its full sorting and baling capabilities. Rather, it provides an interim solution to maintain service continuity during the transition from the existing arrangements to the Council's longer-term waste and recycling infrastructure.

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3. Design Development

This section considers how the design has evolved throughout the pre-application process and in discussions with the design team.

3.1 Pre-application Enquiry

A formal pre-application query was submitted to the Local Planning Authority (LPA) on the 24th May 2026. A written response from the LPA was received on the 26th June 2026.

The LPA did not identify any fundamental objection to the principle of the development and acknowledged the site's industrial setting and the operational need for waste infrastructure.

The response confirmed that a future planning application would need to be supported by further technical information, particularly in relation to heritage impacts associated with the Blaenavon World Heritage Site, biodiversity, drainage, transport and operational impacts such as noise. A Heritage Impact Assessment was specifically recommended due to the site's location within the World Heritage Site.

Overall, the pre-application response was positive and indicated that the proposal could be supported in planning terms, subject to the submission of appropriate supporting assessments and mitigation measures addressing the issues identified.

3.2. Environmental Impact Assessment

An Environmental Impact Assessment (EIA) screening request was submitted for the proposed temporary recycling and bulking facility at Kays and Kears Industrial Estate, Blaenavon. The LPA concluded that a full EIA was not required for this proposal.

The screening opinion confirmed that environmental matters such as heritage, ecology, drainage, transport and noise should be addressed through supporting technical reports as part of the planning application, but that the development was unlikely to result in significant environmental effects requiring EIA.

3.3. Design Evolution

The technical design team has advised on the following matters:

3.3.1. Flood Risk & Drainage

SLR Consulting's Flood Consequences Assessment (SLR, 402.065983.00001-FCA, Rev. 1), prepared in accordance with relevant Welsh planning policy and TAN 15, identifies the site within Flood Zone 1 for river and sea flooding. Risks from fluvial, tidal, groundwater, sewer, reservoir and other artificial sources are low. Surface-water and small-watercourse flooding is the principal risk, with NRW mapping showing a north-to-south flow path across the site. The development predominantly uses existing hardstanding, adds no impermeable area and will not materially alter overland flows. The bays have no northern openings, reducing direct entry of surface water from the north. The assessment recommends an additional gully north of the bays to intercept and route floodwater around the storage area. Potentially contaminated runoff will be captured separately in a foul-water storage tank for removal and off-site treatment. The FCA recommends sufficient tank capacity for runoff generated during an extreme flood event, with the required capacity to be determined through hydraulic modelling. Operational measures include monitoring forecasts and NRW/Met Office warnings, maintaining drainage, managing stored materials and reviewing or temporarily suspending operations during severe weather where necessary. Taking these measures into account, the assessment concludes that flood consequences are acceptable for the

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temporary use and flood risk does not constrain the development.



Figure 4: *Flood Risk Map*

SLR Consulting's Drainage Statement (SLR, 402.065983.00001-DS, Rev. 1) informs the drainage design and supports the planning application. A separate application for sustainable drainage systems (SuDS) approval will be submitted to the SuDS Approving Body (SAB). The development occupies approximately 2,635 m² of existing former-car-park hardstanding and does not materially increase impermeable area or significantly change runoff characteristics. The strategy therefore retains the existing drainage regime while incorporating sustainable drainage systems (SuDS) where reasonably practicable. The roof/canopy keeps paper and cardboard dry in response to recycling-market requirements. Clean roof runoff will pass through two modular SuDS rain garden planters, providing temporary storage, filtration and gradual release to the existing on-site surface-water drainage network. Filtration, interception and biological uptake will improve water quality, while low-maintenance, flood- and drought-tolerant planting will provide amenity and biodiversity benefits. Potentially contaminated runoff from operational areas in front of the bays will be collected separately through a dedicated concrete channel and directed to a foul-water storage tank for removal and appropriate off-site treatment. Infiltration to ground is not proposed because of contamination risk. The drainage design also provides controls for the sealed glass-handling area and welfare-cabin foul drainage. Arrangements are shown on the Proposed Drainage drawing (SLR, 402.065983.00001.006, Rev. PA0). The modular planters can be removed and reused in the future recycling transfer project. The Statement concludes that the strategy provides an appropriate, sustainable solution for the temporary facility, improving water quality, amenity and biodiversity. The SuDS proposals will be subject to SAB approval; the approval requirement relates to the construction area, generally 100 m² or more, rather than the total site area.

3.3.2. Ecology

The proposal is confined to an existing industrial site and hardstanding area. Existing boundary vegetation will be retained and will not be disturbed.

See the accompanying Green Infrastructure Assessment (TCBC, TCBC-BLV-GIA-001, Rev. P01).

Vehicles tipping in winter will be restricted to 08:00 to 16:00, including weekends, to reduce disturbance to surrounding habitats.

3.3.3. Historic Environment and Archaeology

SLR Consulting's Heritage Technical Note (SLR, 402.065983.00001-HTN, Rev. 1) assesses effects on the Blaenavon Industrial Landscape World Heritage Site (BILWHS), the Blaenavon Landscape of Outstanding Historic Interest (BLOHI) and nearby designated heritage assets, including Blaenavon Ironworks, Big Pit and their associated Listed Buildings and Scheduled Monuments. The site lies within both designated landscapes but comprises previously developed land within Kays and Kears Industrial Estate, with no individually

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designated historic assets or identified features contributing directly to the World Heritage Site's Outstanding Universal Value (OUV). No designated heritage asset would be lost, removed or physically altered. Although parts of the estate are visible from Big Pit, the development area is screened from most of the colliery complex; intervening topography, vegetation and development also limit its relationship with Blaenavon Ironworks. The temporary proposal retains existing screening, limits the scale of new structures and uses subdued external finishes to minimise visual prominence within its established industrial setting. The Technical Note concludes that the proposal would not adversely affect the significance or setting of designated heritage assets, harm the BILWHS's OUV, or harm the historic character and significance of the BLOHI.

The Heritage Technical Note considers archaeological and non-designated heritage interests associated with the site and surrounding area. A review of the Heneb Historic Environment Record identified a range of non-designated heritage assets within the wider study area, reflecting the extensive historic industrial activity associated with Blaenavon. The proposed development area comprises previously developed land within the existing Kays and Kears Industrial Estate. No archaeological remains have been identified within the proposed development area that would preclude the development

3.3.4. Noise

A Noise Impact Assessment has been undertaken by Hunter Acoustics to assess potential noise effects from the proposed facility on nearby residential receptors. The assessment identified glass handling, particularly the shovelling and loading of glass, as the principal potential noise source and recommended additional physical screening and operational controls to reduce noise at sensitive receptors.

The assessment has directly informed the final design of the facility. In response to its recommendations, the proposed Legato block screening has been increased from 4 m to 5 m in height and extended beyond the waste bays, providing greater screening between glass-handling activities and nearby properties. Acoustic barrier treatment will also be incorporated along the extended wall to provide further noise attenuation as shown in Figure 5. These physical measures will be supported by operational controls, including minimising glass shovelling, reducing glass drop heights during HGV loading and managing noisier activities during daytime operating periods. Further detail is provided in the Noise Impact Assessment (Hunter Acoustics, 8043/NIA1, Rev. 1).



Figure 5: *Noise Acoustic Barrier*

3.3.5. Site Access & Movement

The swept-path analysis has informed the site layout and access arrangements to support safe, efficient movement by operational vehicles and staff. The existing Estate Road access will be retained, with a clockwise one-way system to minimise

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conflicts between incoming and outgoing vehicles and reduce reversing. Swept-path analysis demonstrates that refuse collection vehicles and 16.5 m articulated vehicles can safely access, manoeuvre within and leave the site. A defined pedestrian route and temporary fencing will help separate staff from operational traffic. The assessment findings are summarised in Section 7.1.

See the Transport Assessment (WSP, UK0029247.4683, Rev. 1), Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0) and accompanying Proposed Site Plan Arrangement (SLR, 402.065983.00001.005, Rev. PA0).

4. Waste Policy and Strategic Context

4.1 Overview

This section considers the waste-policy and strategic context for the four-year interim facility described in Section 6. Its contribution is to maintain the reception, bulking and onward transfer of paper, cardboard and glass during the transition from Ty Coch to longer-term arrangements. The wider sorting, baling and service-integration benefits of the proposed permanent Recycling Transfer Station are separate from this application.

The following frameworks provide the context for this assessment:

- the principles established by the EU Waste Framework Directive, including the waste hierarchy;
- Towards Zero Waste, the Collections, Infrastructure and Markets Sector Plan and the Welsh Government Collections Blueprint;
- the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015;
- Torfaen's Recycling and Waste Strategy 2025–2030; and
- Future Torfaen: A County Plan and the TCBC Climate and Nature Emergency Action Plan 2022–2027.

4.2 Waste Policy Framework

EU Waste Framework Directive

Although waste management policy in Wales is now primarily implemented through UK and Welsh legislation, the principles established by the European Waste Framework Directive (2008/98/EC) continue to underpin the waste management framework within Wales. The Directive establishes the overarching legislative framework for waste prevention, collection, recovery and disposal and seeks to protect human health and the environment through the sustainable management of waste.

A central objective of the Directive is the promotion of the waste hierarchy, shown in Figure 6.

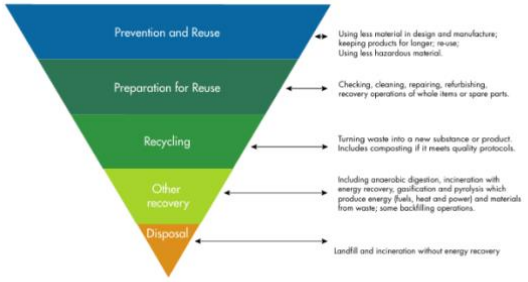


Figure 6: *Waste management hierarchy*

The Directive also promotes the application of the proximity principle, whereby waste should be managed as close as practicable to its place of generation, and the polluter-pays principle, which requires the costs of waste management to be borne by those responsible for generating waste. The Directive further introduced the concept of Extended Producer Responsibility (EPR),

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placing greater responsibility on producers for the management of products at the end of their lifecycle.

The Directive has been instrumental in shaping subsequent Welsh Government waste policy, including Towards Zero Waste, Beyond Recycling and the Collections Blueprint, and provides the foundation for Wales' transition towards a circular economy focused on waste prevention, resource efficiency, increased recycling and the reduction of carbon emissions associated with waste management.

The Blaenavon interim facility supports the Directive's waste hierarchy by maintaining the reception, bulking and onward transfer of paper, cardboard and glass for recycling following the expiry of the Ty Coch lease. Although final reprocessing will take place elsewhere, the site provides a link between collection services and recycling destinations, helping to retain these materials within the resource cycle. Its contribution is to sustain existing recycling arrangements during the transition to permanent infrastructure, rather than provide additional treatment capacity.

Towards Zero Waste (2010)

Towards Zero Waste: One Wales, One Planet established the Welsh Government's long-term strategy for waste and resource management and remains an important policy document within the evolution of waste management in Wales. The strategy introduced the concept of a circular economy and set a long-term objective of achieving high levels of resource efficiency, minimising waste generation and reducing reliance on landfill. It established ambitious targets for waste reduction, recycling and the diversion of waste from disposal, including the objective of achieving 70% recycling and progressing towards a zero-waste society.

Central to the strategy is the application of the waste hierarchy, with priority given to waste prevention, re-use and recycling ahead of recovery and disposal. The strategy recognises that achieving these objectives requires investment in appropriate collection, treatment, transfer and recycling infrastructure capable of supporting increasing material recovery and improved resource management.

Whilst *Towards Zero Waste* is not a development plan document, it provides strategic context for waste planning in Wales and has informed subsequent policy, including *Beyond Recycling* and the Collections Blueprint. The interim facility supports these objectives by maintaining a route for paper, cardboard and glass to reach recycling and reprocessing facilities following the expiry of the Ty Coch lease.

Collections, Infrastructure and Markets Sector Plan (July 2012)

The *Collections, Infrastructure and Markets Sector Plan* was prepared by Welsh Government to support delivery of the objectives established by *Towards Zero Waste*. The document recognises that achieving high recycling performance requires an integrated approach encompassing waste collection systems, treatment infrastructure and stable end markets for recyclable materials. It identifies the need for investment in modern waste management facilities capable of handling increasing quantities of recyclate and supporting improved material quality.

The Sector Plan places particular emphasis on ensuring that local authorities have access to suitable infrastructure for the reception, sorting, bulking and transfer of recyclable materials. It recognises that effective transfer infrastructure forms a critical link between waste collection services and final treatment or

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reprocessing facilities and is necessary to support efficient resource recovery systems across Wales.

The proposal's contribution to the Sector Plan is the continuity of bulking and transfer capacity between collection and reprocessing. The permanent facility's sorting, baling and additional material-stream capacity remain outside this application. The Sector Plan provides strategic context rather than forming part of the statutory development plan.

Welsh Government Collections Blueprint

The Welsh Government Collections Blueprint establishes the preferred model for municipal waste collection services in Wales and provides guidance on the infrastructure necessary to support high-performing recycling systems. The Blueprint is founded upon the application of the waste hierarchy and seeks to maximise waste prevention, re-use and recycling whilst reducing the amount of residual waste requiring treatment or disposal.

The Blueprint recognises that achieving high recycling rates requires not only effective collection systems but also supporting infrastructure capable of receiving, handling, segregating, bulking and transferring recyclable materials. It promotes the development of facilities that maintain material quality, improve operational efficiency and support the long-term transition towards a circular economy.

The Blueprint also identifies the importance of ensuring that recyclable materials are managed through transparent and sustainable end markets, supporting both environmental objectives and resource efficiency. In doing so, it acknowledges the role of transfer facilities within the wider waste management system and the need for appropriate infrastructure to support future recycling growth and emerging material streams.

The interim facility supports the transfer-infrastructure role described above by maintaining a reception and onward-transfer route for glass and combined paper/cardboard. It is not presented as delivering every element of the Blueprint or accommodating additional material streams. Its limited scope should be distinguished from the Council's longer-term service arrangements, with material handling and onward destinations addressed in the Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01).

Environment (Wales) Act 2016

The Environment (Wales) Act 2016 establishes the legislative framework for the sustainable management of natural resources in Wales and seeks to ensure that environmental, economic and social considerations are integrated into decision-making. The Act introduces the principle of Sustainable Management of Natural Resources (SMNR) and places duties on public bodies to contribute towards the long-term resilience of ecosystems and the sustainable use of natural resources.

A key component of the Act is the duty placed upon public authorities to seek to maintain and enhance biodiversity and, in doing so, promote the resilience of ecosystems. The Act recognises that environmental protection, climate resilience and sustainable resource use are fundamental to the delivery of sustainable development in Wales.

The principles of the Act have informed national planning policy, including Planning Policy Wales, and are relevant to the consideration of waste infrastructure proposals where they relate to resource

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efficiency, climate change, biodiversity enhancement and environmental sustainability. The Act also supports the development of infrastructure that contributes to more sustainable management of resources and reduction in environmental impacts associated with waste management.

The interim facility helps make better use of resources by keeping accepted materials moving to recycling facilities. The application must also assess effects on wildlife, habitats and the wider environment and explain how they will be protected. Although the use is temporary and makes use of existing hardstanding, this alone does not demonstrate that its environmental effects are acceptable.

Whilst the Act is not a development plan document, it forms part of the wider legislative context that underpins environmental policy and planning decision-making in Wales.

Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations (Wales) Act 2015 establishes a statutory framework requiring public bodies in Wales to pursue sustainable development and improve the economic, social, environmental and cultural well-being of Wales. The Act introduces seven well-being goals and promotes long-term thinking, prevention, integration, collaboration and involvement in decision-making.

The Act has significantly influenced Planning Policy Wales and Future Wales, with its principles embedded throughout the Welsh planning system. In the context of waste management, it supports the development of infrastructure that promotes resource efficiency, increased recycling, reduced carbon emissions and the transition towards a circular economy.

The interim proposal contributes to service resilience by maintaining essential recycling transfer capacity while the Council progresses its permanent solution. Its role is preventative and transitional: avoiding disruption to existing services rather than delivering the permanent station's wider resource-recovery capabilities. This contribution must be considered alongside the effects on neighbouring amenity, the environment and the World Heritage Site.

The Act provides wider strategic context. The application must be determined in accordance with the statutory development plan unless material considerations indicate otherwise; the relevant planning-policy assessment is set out in Section 5.

Torfaen Recycling and Waste Strategy 2025–2030

The Torfaen Recycling and Waste Strategy 2025–2030 sets out the Council's approach to improving recycling performance, reducing waste and supporting a circular economy, including the need for resilient infrastructure. The interim facility has a limited but necessary role in this transition: maintaining capacity for paper, cardboard and glass after the Ty Coch lease ends. It does not deliver the Strategy's wider ambitions for new material streams or the permanent station's sorting and baling capabilities. The Strategy provides local operational and strategic context rather than forming part of the statutory development plan.

Future Torfaen County Plan

The interim proposal supports Future Torfaen: A County Plan's objectives for environmental sustainability and resilient public services by maintaining an essential part of the existing recycling service. Its relationship to the Council's longer-term investment is explained in Section 2.3; it is not a substitute for that investment. The

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County Plan provides corporate context, while Section 5 assesses the planning merits.

TCBC Climate and Nature Emergency Action Plan

The TCBC Climate and Nature Emergency Action Plan 2022–2027 identifies waste reduction and recycling alongside biodiversity, transport, procurement and resilience as areas for action. The interim facility contributes by maintaining the transfer of the specified recyclable materials for onward reprocessing. It does not introduce additional material streams or resolve the existing split-site arrangement, and no quantified carbon saving is claimed for this application. Any transport and operational effects must be considered through the supporting assessments. The Action Plan provides local strategic context rather than establishing the proposal's planning acceptability.

In summary, the waste-policy justification for this application is the continuity of existing recycling services through proportionate, time-limited bulking and transfer infrastructure. The history and need are explained in Section 2.3 and the proposal in Section 6. The permanent station's wider benefits are not relied upon as outcomes of this interim scheme. Strategic need must be weighed alongside the site-specific effects and mitigation considered in the remainder of this Statement and the supporting assessments.

5. Planning Policy Framework

The application should be determined in accordance with the statutory development plan unless material considerations indicate otherwise. Relevant national considerations include Future Wales, Planning Policy Wales Edition 12 and Technical Advice Notes 5, 11, 12, 18, 21 and 24. Relevant adopted Torfaen Local Development Plan policies include S1, BW1, EET3, EET5, W1, C2 and HE2, together with any other policy identified by the Local Planning Authority during validation or consultation.

TAN 21 requires waste proposals to provide sufficient information for their effects and contribution to sustainable waste management to be assessed. This DAS, the Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01), technical assessments and submitted drawings together provide that information.

5.1 Existing and Proposed Use

As indicated in Section 2.2 of this document the previous use of the site involved the manufacture of building products from recycled plastic. It is considered therefore that the current use of the premises falls into B2 as defined by the Town and Country Planning (Use Classes) Order 1987.

The proposed application, for the temporary use of part of the premises for the bulking and onward shipment of cardboard, paper and glass, does not neatly fit into a use defined by the Use Classes Order. The use is sui generis. As such, the planning application submitted for this proposal will, amongst other things, seek a change of use.

5.2 Planning Policy Considerations

National Policy: Future Wales and Planning Policy Wales (Edition 12)

Future Wales is the national development framework. The site lies within Cardiff, Newport and the Valleys National Growth

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Area (Policies 1 and 33). Planning Policy Wales (Edition 12) (PPW12) paragraph 5.13 recognises the importance of the provision of waste infrastructure necessary to support dealing with waste in an appropriate and sustainable manner at locations that are acceptable.

Both Future Wales and PPW (12) recognise the importance of Blaenavon World Heritage Site (BWHS) within the national and local contexts. PPW (12) states that impacts upon the setting of BHWS are a material consideration in the determination of planning applications (para 6.22)

Any planning application submitted will take account of the relevant Technical Advice Note (TAN). Particularly relevant to this proposed application are TAN 5: Nature Conservation and Planning, TAN 11: Noise, TAN 12: Design, TAN 18 Transport, TAN 24: The Historic Environment.

In terms of TAN 21 Waste, the proposal fulfils an essential element within the waste hierarchy enabling the sorting and

bulking of waste for reuse on a site within County Borough. Paragraph 3.2.7 recognises " *that new sites for waste disposal activities might be suitable in industrial areas".*

Local Planning Policy: Adopted Local Development Plan (December 2013)

The Local development Plan states:

"*In the North Torfaen Area the emphasis will be on creating sustainable settlements through delivering regeneration opportunities and promoting tourism potential of the World Heritage Site. Spatial opportunities contributing to the Network of Integrated Communities Strategy will be promoted including*"(para 4.2.48) :-

b) " *Ensuring the continued protection and enhancement of the character of the BWS by achieving high standards of design, appropriate to its setting and location;*

c) Delivery of major employment development at Kays and Kears site at Blaenavon".

The site lies within the urban boundary ***(LDP Policy S1)*** and forms part of a site that until recently been used for manufacturing (B2) purposes Policies considered specific to the proposal are considered in turn below-

LDP Policy BW1: General Policy – Development Proposals

This Policy sets out criteria against which a development proposal will be considered. Sections 3.3, 6 and 7 of this document address the relevant principal issues raised in this Policy.

LDP Policy EET3: Employment Allocations in the North Torfaen Area

Relevant to the proposed development are allocations ***EET3/3-Kays and Kears,***

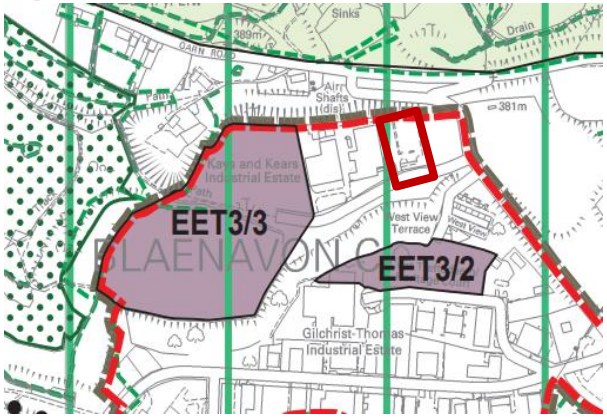


Figure 7: *Torfaen North Local Develop Plan Map 2021*

Blaenavon-6.0ha-B1, B2&B8 and EET3/2-Gilchrist Thomas Industrial

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Estate, Blaenavon-1.2ha-B1, B2 and B8 shown in Figure 7.

EET3/3 lies immediately to the west of the Council acquired site for the provision of the full Waste Transfer Station (see Figure 7). Planning permission was granted on part of ***EET/3***, immediately adjacent to western boundary of the Council owned site, for the development of small/medium sized industrial units comprising floorspace of approximately 3900 sq. m within the B1, B2 and B8 use classes (Planning Application Code No 21/P/0709/FUL).

EET3/2 lies in close proximity to the south of the Council owned site.

These allocations and the planning permission granted in regard of part of the ***EET3/3*** indicate that, in planning terms, the area is generally suitable for the development of uses falling within the B1, B2 and B8 Use Classes.

LDP Policy EET5: Protection of Employment Land and Premises

This Policy seeks discourage the conversion or redevelopment of employment sites for uses other than B1, B2 and B8 unless certain criteria can be satisfied. Relevant to this consideration are the following criteria: -

b) The premises site have been assessed and are genuinely redundant based on current and future needs of the employment market and has been realistically marketed at market value for current permitted uses(s):

c) The proposed use is complimentary to the primary employment use of the surrounding area and will not cause an unacceptable impact on the operating conditions and requirements of existing businesses.

LDP Policy W1: Waste Management/Resource Recovery Proposals

In-building facilities for the handling, treatment or transfer of waste will be directed generally towards B2 industrial land and premises or existing or previous waste facilities. Open air facilities are best located away from existing sensitive locations.

With respect to Policy ***EET5*** The Council have been searching for a site to house the WTS for some years now without success. The Kays and Kears became available in early 2025 and was acquired later that year.

Policy ***W1*** , in its justification states that ….”*National policy also supports in-building facilities that can be considered to be an industrial process being located on suitable B2 employment sites as they are normally in the same use class*”. As indicted at Section 5.1 it is accepted that this proposal requires a change of use. It is intended to undertake the proposed temporary operation in the open air. In the longer term once the proposed WTS is in place all activities within the confines of a building. The reasons why it is necessary to operate the site as proposed is explained in Section 3 and 6 of this document. Essentially, there is not enough time available to construct a suitable building. Furthermore, it is likely that such a structure would need to be removed to make way for construction of a purpose built WTS based on design options that are being prepared. This document and a subsequent planning application will illustrate that given the location of the temporary site, the nature of the materials being dealt with and the mitigation measures proposed that the temporary use of the site will not give rise to unacceptable impacts.

LDP Policy C2: Special Landscape Areas

Special Landscape Areas are identified at the following locations:

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LDP POLICY C2/5 - Blaenavon Heritage Landscape; C2/6 - Eastern Uplands;

In order to ensure the continued protection and enhancement of the defined SLA's development proposals that could impact on these designations will be expected to conform to high standards of design and environmental protection which is appropriate to the LANDMAP character of the area.

LDP Policy HE2: Blaenavon Industrial Landscape World Heritage Site

Development proposals within, and adjacent to the BILWHS will only be permitted where it can be demonstrated that:

a) The proposal promotes a standard of design in terms of siting, scale, massing and materials, which is sympathetic to and preserves or enhances the character of the local area and settlement form; and

b) Important views into and within the BILWHS are not adversely affected by the proposals; and

c) The proposal contributes to ensuring the preservation of the 'Outstanding Universal Value' of the BILWHS designation; and

d) The proposal would not adversely affect the overall integrity of the BILWHS and its landscape or historic setting.

All development proposals within and adjacent to the World Heritage Site should be informed by the BILWHS Design Guidance and should identify how the proposals are consistent with the principles in this document.

The criteria identified in ***LDP Policy HE2*** are addressed, as annotated in the Policy text, as follows: -

a) The design of the proposal is appropriate to its industrial setting and is only visible within the context of the industrial estate itself.

b) As illustrated in Section 3.3.3 of this document and the accompanying photographs the site is obscured by a tree line.

c) and d) As illustrated under a) and b) the proposal is relatively minor in the context of the World Heritage Site and would not impact its integrity, landscape of historic setting.

See the accompanying Heritage Technical Note (SLR, 402.065983.00001-HTN, Rev. 1) for the assessment of heritage effects.

5.3 Overall Policy Response

The proposal provides essential, time-limited recycling infrastructure that enables separately collected paper, cardboard and glass to continue to be bulked for onward reprocessing. It therefore supports movement of material up the waste hierarchy and continuity of the Council's recycling service.

The site is previously developed employment land in an established industrial estate. Although the proposed open-air waste transfer use is sui generis and requires planning permission, its operational character is compatible with the industrial context, subject to the submitted controls. The temporary and reversible design responds to the need for an interim facility without prejudicing the separate permanent waste transfer station proposals.

Residential amenity is addressed through separation from receptors, restricted operating hours, the bay layout, acoustic mitigation, controlled vehicle and plant operation, and housekeeping measures. Heritage and visual effects are addressed

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through the Heritage Technical Note (SLR, 402.065983.00001-HTN, Rev. 1), retention of screening, limited scale, subdued materials and removal of temporary infrastructure at cessation.

Taken as a coordinated package, the proposal is considered capable of complying with the relevant waste, employment, amenity, design and historic-environment policies, subject to the final technical reports, drawings and mitigation forming part of the permission.

6. The Proposal

This section describes the four-year change of use and associated development for which full planning permission is sought, including the waste bays, canopy, acoustic screening, ancillary accommodation, access, drainage and security arrangements. The temporary proposal is separate from the permanent waste transfer station, which would be subject to a separate planning application.

6.1 Overview

Full planning permission is sought for a four-year change of use of part of the site to an interim bulking facility for glass and mixed paper and cardboard. The facility will maintain Torfaen County Borough Council's kerbside recycling service following the end of the Ty Coch lease while a permanent waste transfer solution is progressed.

Only these materials will be accepted; residual, garden, food and other recyclable waste are excluded. The Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01) sets out the operational process, waste quantities, vehicle movements and management controls.

The design uses existing hardstanding wherever practicable and limits new infrastructure to that needed for safe operation and environmental protection. It responds to vehicle and plant movements, residential amenity, drainage and the industrial and World Heritage Site setting.

The principal elements of the development comprise:

- two waste storage/bulking bays;
  - one combined bay for paper and cardboard;
  - one separate bay for glass;
- interlocking precast concrete block walls;
- a storage container (see Temporary Storage Container Details x2 (TCBC, TCBC-BLV-TD-002, Rev. 1);
- roof/canopy arrangements where shown on the submitted drawings;
- acoustic screening;
- temporary staff welfare accommodation (TCBC, TCBC-BLV-TD-001, Rev. 1);
- vehicle circulation and manoeuvring areas;
- staff parking;
- drainage and pollution-control measures;
- security, CCTV, signage and road markings; and
- associated ancillary works.

The location and arrangement of these elements are shown on the Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0).

The proposed normal site opening hours are 07:00 to 17:00 Monday to Friday, including bank holidays. During winter, tipping will be restricted to 08:00 to 16:00 on all operating days, including weekends, so that it takes place in daylight. Other site activities, such as litter picking, may continue outside the tipping window within the site opening hours.

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Occasional weekend opening, from 07:00 to 17:00, may be required for catch-up collections following adverse weather, unexpected events or haulage delays, and where Christmas Day or New Year's Day falls on a weekday.

The facility is expected to employ three people.

6.2 Access and Movement

Vehicular access will be from Estate Road via the existing industrial estate access. No new access onto the public highway is proposed.

Vehicles will follow the one-way system shown on the Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0) and traffic-flow plan, with staff managing arrivals and directing reversing into the bays.

Staff and visitor parking will be separated from operational traffic. Pedestrian activity will be limited to operational staff, with clear circulation routes and emergency access maintained. Vehicle tracking, signs, road markings and pedestrian segregation are shown on the submitted planning drawings.

For a typical weekday, the stated collection fleet comprises up to 18 individual vehicles, as listed below. This is a fleet count, not the total number of daily arrivals or departures. Overall traffic also includes staff journeys and onward haulage, with operational trips varying according to material volumes.

- 18 kerbside-sort vehicles, each tipping twice daily;
- A trade vehicle tipping twice daily.

The completed Transport Assessment (WSP, UK0029247.4683, Rev. 1) assesses vehicle movements and site accessibility. It confirms connections to the local highway network via Estate Road, the B4246 and A4043, together with access by walking, cycling and public transport, providing staff with alternatives to car travel. The assessment finds the existing network capable of accommodating operational vehicles and development traffic without adverse effects on highway operation or safety; its traffic-impact findings are summarised in Section 7.1.

6.3 Amount, Scale and Layout

Operational review reduced the initial three-bay concept to the two-bay arrangement listed in Section 6.1. Managing paper and cardboard as one stream reduces infrastructure, while glass remains separate because of its different tipping, handling, storage and noise characteristics.

The bays are positioned to accommodate collection and haulage vehicles and mobile plant, alongside acoustic mitigation and drainage. The layout retains safe manoeuvring space within the operational area; circulation arrangements are described in Section 6.2. See Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0).

WRAP modelled current and projected tonnages and confirmed that the bays are sized to store more than one day's material.

The temporary design occupies approximately 2,635 m². As described in Section 3.3.4, the proposed Legato block screening has been increased from 4 m to 5 m in height and extended beyond the bays, with additional acoustic barrier treatment. The drainage design includes two removable SuDS rain garden planters for clean roof runoff and a separate collection channel and foul-water storage tank for potentially contaminated operational runoff, as described in Section 3.3.1.

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The detailed dimensions, heights and position of the bays, acoustic barrier, canopy/roof and other structures are shown on the submitted planning drawings.

See the Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0), Proposed Site Plan Arrangement (SLR, 402.065983.00001.005, Rev. PA0) and Proposed Elevations (SLR, 402.065983.00001.007, Rev. PA0).

The proposed bays will be constructed using an engineered interlocking precast concrete block system or equivalent system suitable for the proposed material storage and operational loading conditions.

The bay walls provide physical containment of the recyclable material and contribute to the management of windblown material and operational noise.

Detailed engineering design will address wall height and configuration, material loads, vehicle and plant interaction, foundations and any buttressing or other structural support. Bay elevations will be limited to the scale needed for safe operation and the mitigation identified by the supporting assessments.

The Noise Impact Assessment (Hunter Acoustics, 8043/NIA1, Rev. 1) has informed the physical acoustic mitigation. The submitted drawings identify the acoustic barrier's location, height and construction and its relationship to the bays.

Drainage will separate clean roof and surface water from potentially contaminated runoff, with controls for the sealed glass-handling area and welfare foul drainage. Detailed arrangements are shown on the Proposed Drainage (SLR, 402.065983.00001.006, Rev. PA0) and Drainage Statement (SLR, 402.065983.00001-DS, Rev. 1); the flood-risk and SuDS/SAB context is explained in Section 3.3.1.

Section 3.3.1 explains the roof's role in keeping paper and cardboard dry in response to changing recycling-market requirements. Its coverage is shown on the Proposed Site Layout (SLR, 402.065983.00001.004, Rev. PA0) and Proposed Elevations (SLR, 402.065983.00001.007, Rev. PA0), with its scale limited to operational and environmental-control needs.

6.4 Appearance

The appearance of the development reflects its operational function and its location within an established industrial estate.

The bays, canopy, acoustic screening, welfare accommodation and containers will have a straightforward, utilitarian appearance without unnecessary architectural features. External colours and finishes will be selected to minimise visual prominence where practicable.

The proposed Zappshelter canopy comprises a Taurinox® fabric membrane supported by a hot-dipped galvanised Ferroten structural steel frame. Its curved, low-profile form is intended to limit visual massing, while the membrane allows natural daylight into the covered bays. A neutral, non-reflective finish is proposed to reduce visual prominence within the industrial and World Heritage Site setting. The canopy can be dismantled and relocated when the temporary use ends; reinstatement of the site is described below.

The ancillary units are detailed in the Temporary Welfare Facility Details (TCBC, TCBC-BLV-TD-001, Rev. 1) and

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Temporary Storage Container Details x2 (TCBC, TCBC-BLV-TD-002, Rev. 1).

Section 3.3.3 explains the screening, scale and finish measures adopted in response to the Blaenavon Industrial Landscape World Heritage Site setting. The Proposed Elevations (SLR, 402.065983.00001.007, Rev. PA0) identify the proposed scale, materials and finishes and should be read alongside the supporting Heritage Technical Note (SLR, 402.065983.00001-HTN, Rev. 1).

Operational noise controls are summarised in Section 7.2 and detailed in the Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01).

No permanent waste transfer building is proposed. Modular concrete block bays, temporary welfare accommodation and other removable infrastructure will limit lasting physical change and allow the principal elements to be removed when the temporary use ends.

Permanent works will be limited to those needed for safe operation and environmental protection, including any required foundations and the glass bay's impermeable surface and sealed drainage system associated with the S2 authorisation.

When the temporary use ends, the structures will be removed and the car park returned to its original use, unless it is developed as a later phase under a separate planning permission. Drainage altered for the temporary facility will be restored to its previous arrangement as far as practicable, in accordance with the relevant approval requirements.

6.5 Community Safety

The site will remain closed to the public. Perimeter fencing and lockable gates are proposed to deter unauthorised access. Regular checks and operational CCTV will support site security and safety.

7. Environmental and Amenity Considerations

7.1 Traffic Impact

WSP's Transport Assessment (WSP, UK0029247.4683, Rev. 1) assesses site accessibility and effects on the highway and sustainable transport networks, informed by Local Highway Authority pre-application discussions, traffic surveys at four key junctions and highway capacity modelling. It forecasts up to 28 arrivals and 24 departures in the AM peak hour and 24 arrivals and 28 departures in the PM peak hour as a robust worst case; actual recycling collection vehicle movements are expected to be lower. The assessed junctions would remain within capacity with the development, and the personal injury collision review identified no patterns or trends indicating an existing highway safety problem within the study area. The assessment concludes that the temporary facility can be accommodated by the existing transport and highway networks without adverse effects on highway operation or safety and is acceptable from a transport and highways perspective. Section 6.2 describes collection and outbound haulage traffic, the retained industrial access, internal one-way system and staff-controlled reversing; no new highway access is proposed. A maximum of two vehicles will tip at any one time. The Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01) sets out anticipated movements, tipping periods and collection frequencies.

7.2 Noise

A standalone Noise Impact Assessment (Hunter Acoustics, 8043/NIA1, Rev. 1) has

been prepared to support the application. It considers operational sources including collection and haulage vehicle movements, reversing alarms, plant operation, loading and unloading, and impact noise associated with glass handling. The assessment has informed the bay layout, acoustic screening and operational controls.

Noise mitigation will include compliance with approved operating hours, maintenance of plant, avoidance of unnecessary idling, staff-controlled glass handling, and implementation of the physical mitigation specified in the Noise Impact Assessment (Hunter Acoustics, 8043/NIA1, Rev. 1) and shown on the planning drawings. The Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01) provides the corresponding day-to-day controls and monitoring arrangements.

7.3 Vibration

No fixed processing or baling plant is proposed. Potential vibration is therefore limited principally to vehicle and mobile plant movements and material handling. Plant will be maintained and operated on the designated hardstanding, and any abnormal vibration or surface defect will be investigated and corrected.

7.4 Dust

Paper and cardboard will be stored in the bay pending transfer into trailers when the hauliers arrive at the site. Hard surfaces will be swept and staff will undertake visual checks to control dust and windblown material from the accepted dry recyclables. Handling may be reduced or paused during adverse conditions if these controls are insufficient.

7.5 Odour and Air Quality

Only paper, cardboard and glass will be accepted. Food, residual waste, garden waste and other putrescible materials are excluded. This substantially limits the potential for odour. Engines will not be left idling unnecessarily, and any non-conforming waste will be isolated and removed as soon as practicable.

7.6 Litter and Vermin

The bay-to-trailer handling arrangements described in Section 7.4 will also help contain litter, with paper and cardboard loaded into trailers as soon as practicable. Daily housekeeping will include perimeter inspections and litter picking. Loads will be managed and material handling paused in high winds where necessary. The exclusion of putrescible waste described in Section 7.5 also limits pest attraction; any evidence of infestation will trigger investigation and corrective action.

8. Conclusions

The application seeks a temporary, operationally necessary facility for the bulking of paper, cardboard and glass. The proposal is located on an established industrial site and uses limited, removable infrastructure. The technical assessment findings summarised in this Statement have informed the design and operational controls for traffic, noise, dust, litter, drainage, ecology, visual and heritage considerations. The drainage proposals also remain subject to SAB approval.

The development should be operated strictly in accordance with the approved drawings, the Noise Impact Assessment (Hunter Acoustics, 8043/NIA1, Rev. 1) and the Waste Operations Method Statement (TCBC, TCBC-BLV-WMS-001, Rev. P01). At cessation, structures will be removed and the car park and drainage reinstated as described in Section 6.4, unless a separate planning permission authorises a later phase of development.

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