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Mr. Mark Walton
WYG
54 Hagley Road
Birmingham
B16 8PE

Please ask for: Simon Hughes
Direct Line: 01792 635792
E-mail: simon.hughes@swansea.gov.uk
Date: 1/03/2018

Dear Sir/Madam

The Town and Country Planning Act 1990 (As amended)
The Town and Country Planning (Pre-Application Services)(Wales) Regulations 2016

Application No: 2018/0237/PRE
Site Location: Biffa Waste Services Ltd. Unit 10/11 Clarion Close Morrision Swansea
SA6 8QZ
Proposal: PRE-APP - Incineration facility

I refer to the above pre-application received on 30 January 2018 seeking advice under the statutory pre-application services provided for under the above Regulations.

Thank you for agreeing an extension of time to your pre-application request.

The Proposal

The proposal is for a waste transfer and incineration facility including the provision of an extension to the building and associated 25m (maximum) stack.

Relevant planning history

There is no recent planning history for the site, with the relevant history appearing to relate to applications for the early development of the Enterprise Park in the 1970s and 1980s:

78/1464/03 - INDUSTRIAL PARK COMPRISING LAND RECLAMATION AND REDEVELOPMENT FOR INDUSTRY, WAREHOUSING, BUILDINGS WITH ASSOCIATED YARDS, ROADS, DRAINAGE, LANDSCAPING, LAKE AND FOR RECREATIONAL PURPOSES

79/0629/01 - INDUSTRY AND ANCILLARY DISTRIBUTION AND WAREHOUSING (USE CLASS III AND IV AND X)

84/5015/05 - SECTION 53 APPLICATION-GENERAL + LIGHT INDUSTRIAL PROJECTS WHOLESALE + STORAGE WAREHOUSES + RETAILING PROJECTS OF UP TO 45,000 SQUARE FEET.

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Development Plan and Relevant Policies

The Development Plan for the area is the City and County of Swansea Unitary Development Plan (UDP) (Adopted November 2008), within which the following policies are considered to be relevant to your proposal:

AS2 (Design and Layout), AS6 (Parking), AS10 (Traffic Management and Highway Safety), EC3 (Established Industrial and Commercial Areas), EV1 (Design), EV2 (Siting and Location), EV28 (Sites of Local Importance), EV33 (Sewage Disposal), EV35 (Surface Water Runoff), EV36 (Flooding), EV40 (Air Noise and Light Pollution) and R12 (Waste Management).

Supplementary Planning Guidance (SPG):

SPG relevant to the proposed development, which are available to download in full from our website at www.swansea.gov.uk are as follows:

- Parking Standards (Adopted March 2012)
- Swansea Enterprise Park Planning Policies (Adopted 1994)

Deposit Local Development Plan (LDP)

The Council's emerging LDP is at the deposit stage and is currently going through its examination in public (EIP).

Planning Policy Wales (PPW) advises that the weight to be attached to an emerging LDP will in general depend on the stage it has reached, but does not simply increase as the plan progresses towards adoption. When conducting the examination the appointed Inspector is required to consider the soundness of the whole plan in the context of national policy and all other matters that are material to it. Consequently, policies could be amended or deleted from the plan. Thus in considering what weight to give to the specific policies in an emerging LDP that apply to a particular proposal, local planning authorities will need to consider carefully the underlying evidence and background to the policies.

As the EIP is currently taking place it is considered that little weight may be given to the emerging LDP in the consideration of this pre-application.

Notwithstanding this, deposit LDP Policy RP7 (Sustainable Waste Management) supports sustainable waste management facilities within 'Preferred Areas' or areas having the benefit of lawful B2 use, provided they address the criteria of the policy. The policy confirms that proposals will need to conform to the waste hierarchy and have regard to the nearest appropriate installation concept and self-sufficiency principles, where necessary. Proposals must be supported by an appropriate Waste Management Assessment.

Initial assessment of the proposed development and consideration of planning merits

It is understood the site is currently be used as a vehicle storage and service depot, accommodating a fleet of some 15 vehicles that collect waste from commercial premises and transfer the waste to

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the Council's bailing plant at Ferryboat Close. It is further understood that waste is not currently brought to the premises. It is bulked up at the bailing plant for onward distribution to Trecatti Landfill, Merthyr Tydfil.

The proposal will provide a new waste facility including a waste reception, drying and treatment operation, together with a waste transfer and incineration facility. The proposal would treat up to 25,000 tonnes of commercial waste per year and will generate some 0.4MW of electricity. The facility will operate 24/7 but waste deliveries will be limited to existing depot opening times, reported to be Monday to Saturday from 06.00 to 17.00 and occasional Sundays with respect to any emergency collection requirements.

The principle of the development (land use)

TAN 21: 'Waste' notes that the waste hierarchy should be applied to all waste proposals and should be considered alongside other relevant social, economic and environmental factors, including the amenity of adjacent uses and communities, before the appropriateness of potential developments can be determined. The guidance states that the recovery of energy from mixed municipal waste in high efficiency facilities is considered by Welsh Government to be a vital component of the waste management system in Wales. Such facilities are currently considered to represent the most sustainable outcome for mixed municipal waste. However, it is noted that waste incineration facilities dedicated to the processing of municipal wastes only may be considered to be recovery facilities (R1) rather than disposal facilities (D10) under certain specified conditions. TAN 21 states that local planning authorities should take account of the energy efficiency of any energy from waste proposal, ensuring that any such facility operates or is capable of operating, at high efficiencies that minimise the environmental impacts and maximise the benefits of recovering energy from waste. This will involve consideration being given to the way in which heat is recovered from the installation. The guidance states that local planning authorities should support the development of appropriate energy recovery options for the optimal recovery of energy from residual waste in Wales, including the development of markets for heat output and processed combustion residues, as well as electricity.

No information has been provided on the energy efficiency of the proposed facility, however, it is recognised that the proposed development would serve to divert waste from landfill, which in principle, would accord with the waste hierarchy and the Welsh Government's long terms aim, as set out within 'Towards Zero Waste' of eliminating land filling as far as possible.

The site is located within the Swansea Enterprise Park, an established commercial and industrial area that is covered under UDP Policy EC3 which supports improvements and enhancements within such areas. The Council's supplementary planning guidance document 'Swansea Enterprise Park Planning Policies', whilst somewhat dated, provides a guide on the types of uses that may be acceptable within specific 'zones'. In this respect the application site is located within zone D where office, storage, industrial and car showrooms may be appropriate. It should, however, be noted that zone C is specifically identified for 'general industry and non-conforming uses', this includes waste disposal transfer processes and the open storage or the processing of scrap metal.

To the north of the site, beyond Camffrwd Way there are employment allocations within the UDP under EC1 (3) 'Swansea Vale', which are intended within the plan to be used for high-grade

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employment categories B1 and B2, with only a small area in the northern sector of the Central Business Park acceptable for B8.

In Clarion Close itself the majority of uses in the area immediately surrounding the site appear to be storage and distribution or light manufacturing.

UDP Policy R12 deals specifically with developments for waste management facilities including (but not limited to) waste transfer, treatment, re-use, recycling and energy recovery. The policy explains that proposals must be considered against regional and local requirements and further states that proposals will be permitted within areas designated for B2 industrial use or having the benefit of lawful B2 use provided the proposals accord with the criteria of the Policy. In principle, therefore, whilst the site itself may not benefit from a lawful B2 use, zone D of the enterprise park is listed within the 'Swansea Enterprise Park Planning Policies' SPG as being acceptable for B2 uses.

When considered against the surrounding commercial context, in land use terms, the proposed development may have some merit, however, it will need to be demonstrated within any planning application that the development would accord with the criteria of Policy R12. In this respect I would comment as follows on the policy criteria:

(i) Scale and location

There is an existing building on the site measuring some 38m x 30m with a ridge height of 10m, which is proposed to be extended northwards by 6m creating 180sqm of additional floor space. The external plant associated with the development would be an air filtration system and a 25 metre high (maximum) emission stack. Drawings of the proposal have been submitted with the pre-application.

In terms of the physical works proposed to facilitate the development, the extension would be in keeping with the design and overall scale of the building. The external plant would be sited on the southern side of the building, closer to the road frontage, but would be effectively screened by the mature trees along the site frontage, particularly when the trees are in leaf. The stack would be visible above the treeline even from more distant views, however, its relatively slender width would mean that it would not significantly draw the eye. The use of a non-reflective finish would help in this respect. Overall, it is considered the physical scale of the proposed works would not be out of keeping with the industrial scale of the building and would be an appropriate location given the surrounding commercial context.

(ii) Public safety

No specific information has been provided regarding the exact types of waste that would be processed, other than to confirm that the waste would be from commercial and trade sources.

Further information would therefore be required to confirm the types of waste that would be processed, including any hazardous wastes. The risks posed to public safety by the storage and treatment of the waste would need to be assessed as part of any planning application and supporting information would be required to demonstrate that the risks are not significant and, where necessary, can be mitigated to ensure no harm to public safety.

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(iii) Amenity

The 'Waste Planning Practice Guide' which supplements TAN 21: 'Waste' lists the planning issues associated with municipal solid waste incinerators: Noise, vibration, odour, dust, air emissions and bioaerosols. Each of these issues will need to be addressed within any planning submission.

It is noted there are residential properties some 160m to the east of the site on Clos Yr Fendrod and Pant Yr Blawd Road. The proximity of these dwellings, particularly given the noisy nature of the proposed activities taking place at the site, particularly if operated on a 24/7 basis, will introduce the potential to result in significant disturbance to these properties.

In order to assess the impacts upon these properties it will be necessary for the application to be supported by noise and odour assessments, which should be based on the proposed operations that would take place at the premises and must consider the impacts upon the nearest residential receptors or any other receptors that may be impacted by virtue of the prevailing topography or climatic conditions. The application will therefore need to be accompanied by sufficient information to demonstrate that the proposals would be in compliance with criterion (xiii) of policy EV2 (Siting and location) and policy EV40 (Air, Noise and Light Pollution).

(iv) Transportation

Waste management facilities have the potential to generate a large increase of vehicle movements within the locality. Vehicular movements, highway safety, transport and access are material planning considerations.

Clearly there is a current fallback position associated with the existing operations taking place at the premises and it is noted the information supporting this pre-application suggests that the facility will not significantly increase current HGV movements to and from the premises. It is also suggested, the facility will reduce the daily HGV movements between the bailing plant and the Trecatti Landfill at Merthyr Tydfil.

In order to fully assess the transportation and highway safety impacts of the proposals, it will be necessary for any future planning application to be supported by a transport statement (scope to be agreed with the highways officer). Moreover, a site layout will be required indicating adequate parking for the staff/visitors and parking/turning for the commercial vehicles expected to use the facility. A construction method statement would also be required.

Whilst I have not received formal comments from the Highway Authority any planning application for the development will need to be supported by information regarding the expected levels of traffic generation arising from the development and information to demonstrate that vehicles will be able to enter and exit the site without resulting in any detriment to highway and pedestrian safety. A transport statement may be required and you are advised to contact Amanda Pugh (amanda.pugh@swansea.gov.uk) to discuss this potential requirement further and any other general highways requirements in order to ensure the development would accord with UDP policies EV3 (Accessibility), AS2 (Design and Layout) and AS6 (Parking).

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(v) Visual impact

See (i) above.

(vi) Natural heritage and the historic environment, including water quantity and quality and air pollution,

At the time of writing no response has been received from the Council's planning ecologist, however, the following ecological issues will need to be addressed in any subsequent planning application.

As the proposal involves alteration to the roof of the building a preliminary/scoping survey will be required to determine the likelihood of it being used by roosting bats. This survey can be undertaken at any time of year.

The application site is sited less than 3km from the nearest part of the Crymlyn Bog SAC/ Ramsar site, it is therefore possible that the plant airborne emissions could reach the site and adversely affect the site features. The application will therefore need to assess the impact of the development upon this feature. The assessment will also need to consider the impacts upon the adjacent Swansea Vale site of interest for nature conservation (SINC).

Moreover, given the proximity of the site to the Nant y Fendrod, it will need to be demonstrated that the proposals will not impact upon water quality.

The application site is located within zone C1, as defined by the development advice maps referred to under TAN15 (July 2004). Based on the information available on NRW's website the application site is at a high risk (1 in 30 year annual probability event) from fluvial flooding. Reference to TAN 15 indicates that the development would be classed as highly vulnerable whereas the current use is likely to be regarded as less vulnerable. On this basis the proposal would likely materially increase the consequences of flooding at the site.

As the site is within a C1 flood zone, new development should only be permitted where it is determined to be justified in that location. Developments can only be justified through the tests set out within 6.2 of TAN 15: Development and Flood Risk, that is:

i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or,

ii. Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region

and

iii. It concurs with the aims of PPW and meets the definition of previously developed land; and,

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iv. The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in section 5 and 7 and Appendix 1 of TAN 15 found to be acceptable.

These tests are broadly incorporated into Policy EV36 of the UDP; in addition Policy EV2 (ix) of the UDP refers to having regard to whether a proposal would be at risk from flooding.

In order for a proposal to be policy compliant with TAN 15 both the justification and acceptability test must be satisfied. The local planning authority has generally taken a pragmatic approach to new developments within the enterprise zone, in doing so recognising its function as an important source of employment and industry within the city. Notwithstanding this, as the proposal is for highly vulnerable development, which has the potential to result in significant pollution and water quality issues, should the site be flooded, it is not considered that the development could be justified under the tests in TAN 15. The site is not part of a local authority regeneration initiative or local authority strategy, moreover, the development is not necessary to contribute to key employment objectives supported by the local authority to sustain an existing settlement or region. Therefore, in principle, the development would not be acceptable and would run contrary to TAN 15, EV36 and EV2. It is accepted that the site is previously developed land under PPW under iii., however, in terms of test iv. clearly no information has been provided at this stage to assess the consequences of flooding at the site, however, as the development is considered to be unacceptable in principle, it is considered that any technical assessment to address the consequences of flooding would be given very little weight in the determination of any planning application for the development.

This follows the approach on a recent appeal decision for housing at the Former Clayton Works Site, Station Road, Pontarddulais (Appeal Ref: APP/B6855/A/15/3132964) where the inspector held that it wasn't necessary to give detailed consideration to the 'fourth test' where the principle of the development was unacceptable under the first test.

Notwithstanding the above, clearly the proposal has the potential to result in detrimental impacts upon the environment and given the advice in TAN 21: Waste that proposals for waste management facilities should be considered in parallel with permitting applications you are advised to seek early advice from NRW on these proposals.

Natural Resources Wales has a key role in the planning system and you may wish to hold pre application consultation with them, utilising their pre-application service, so that environmental considerations are identified and addressed at the earliest opportunity. More information about Natural Resources Wales's pre-application service, including what advice can be sought for free, and what advice is subject to a fee can be found at:

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/our-service-to-developers/?lang=en>

The Council's Pollution Control Division has re-iterated the requirement to provide sufficient information to support the application as referenced in the pre-application covering letter. This information should also include the modelling regarding the stack height, the technical specifications of the installation and further information regarding the waste stream.

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The Council's drainage officer has noted that the areas proposed for the extensions is already impermeable so it is unlikely that any attenuation will be required, however, the water quality impacts will need to be assessed, and where necessary mitigated, to ensure protection of the water environment.

Dŵr Cymru Welsh Water has a key role to play in the development and planning process as the services provided are at the forefront of public health and protection of the environment. Dŵr Cymru encourages all developers to engage with them as early as possible in order to address any issues that may arise during the planning/construction process.

To assist, Dŵr Cymru operates a pre-planning service in order to assess the impact of the proposed development. A written response will be provided advising whether the local network(s) can support the proposal, whether off-site water mains and/or sewers will need to be provided, and whether there are any apparatus located within the land you wish to develop and the requirements for these apparatus. This service is provided for a fee of £155+ VAT and can be submitted by post or by completing the online enquiry form at <http://www.dwrcymru.com/en/Developer-Services>. Further information can be obtained from the dedicated team of planning officers on 0800 917 2652.

In terms of natural heritage, the site is located some 1.4km from the nearest scheduled ancient monuments to the east (Scott's Pit Engine House & Traces of Ancillary Building and Townshend's Great Leat & Waggonway) and in view of the maximum stack height of 25m, it is not considered the proposed development would result in any material impacts upon these heritage assets.

The site is also located some 290m from the Grade II listed St Samlet Church which lies at a higher land level than the application site. It is not considered the proposed development would have a detrimental impact on the setting of this listed building.

(vii) The type, quality and source of waste

See (ii) above.

(viii) Relationship to adjoining land uses.

As described above, in land use terms the proposal may have some merit, there are premises within Clarion Close which accommodate large scale commercial uses surrounding the site, albeit these appear to be B8 storage and distribution uses rather than B2 uses. Clearly the proximity of dwellings to the site is a concern and it will need to be demonstrated that there would be no significant adverse impacts upon the living conditions of the occupiers of these properties and that the proposals would not have an unacceptable impact upon the environment.

TAN 21: Waste

TAN 21 provides guidance in respect of waste management facilities and Annex C to the guidance sets out the detailed planning considerations relevant to the consideration of such proposals. Each of these issues will need to be addressed within any planning submission.

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TAN 21 also requires development for waste management facilities to be accompanied by a Waste Planning Assessment (see Annex B to the guidance). The detail and technical complexity of the Waste Planning Assessment (WPA) will reflect the scale and potential significance of the proposed development. Advice on the preparation of a WPA is provided within Annex B.

Details of any documents required for a subsequent application

The local planning authority is in receipt of a request for a screening opinion for the development, which will be issued under separate cover. Should it be determined that an environmental statement is required then this list may be subject to change.

- Pre-application consultation report
- Noise and vibration assessment
- Air and odour quality assessment
- Preliminary ecological assessment
- Health impact assessment
- Drainage Strategy
- Transport statement
- Flooding consequences assessment (notwithstanding the comments above relating to the principle of the development)

Conclusion

In conclusion, the proposed development would, subject to confirmation of energy efficiency of the development, appear to be in accordance with the Welsh Governments strategy to reduce the amount of waste heading to landfill and would accord with the waste hierarchy principle. The application site is located within an established commercial area where B2 uses are supported under the 'Swansea Enterprise Park Planning Policies' supplementary planning guidance. UDP Policy RC12 states that waste management facilities, such as that proposed, will be permitted within areas designated for B2 industrial use, subject to adherence to the Policy criteria. Clearly there are a number of technical issues to be addressed to satisfy the requirements of RC12 and the guidance in TAN 21, however, fundamentally, it is considered that the provision of a new waste facility, which is classed as highly vulnerable development, cannot be justified under the TAN 15 tests. For this reason, whilst the development may have some merit from a land use and waste hierarchy perspective, the provision of a new waste management facility within this C1 flood zone would not accord with Policy EV36 or the advice in TAN 15. It is therefore considered that the development would not receive a favourable recommendation at officer level.

Please note that this guidance is given on the basis of the information submitted, and that full consultation with Statutory Undertakers or interested parties, such as neighbours has not been undertaken, and that it is only through the submission of a planning application that full consideration can be given to a proposal.

Additionally, the views expressed are those of an officer of the Authority, which cannot prejudice any final decision the Council may make if an application for planning permission is submitted.

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I trust that the above advice is satisfactory for your current purposes. However should you require clarification of any of the above matters, please do not hesitate to contact Simon Hughes on the above number.

Should you wish to obtain further discussion and advice in relation to this pre-application, as part of our pre-application services the Council offers follow-up meetings to pre-application letters. In accordance with our Fee Schedule a meeting on this particular scheme would amount to a total of £360.

Yours sincerely

Ian Davies

IAN DAVIES
TEAM LEADER – AREA 1

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