



PLANNING STATEMENT

S73 APPLICATION TO CONSTRUCT PROPOSED BLOCK MAKING PLANT

**BERSHAM COLLIERY SPOIL TIP
RHOSTYLLLEN, WREXHAM LL14 4EG**

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1. INTRODUCTION

Background

- 1.1 This Planning Statement has been prepared by Brownshore Management Ltd on behalf of Bersham (Glenside) Ltd, for submission as part of a planning application proposing a variation to planning permission P/2015 /0337, as granted by appeal (Appeal Ref: 2082561).
- 1.2 The application seeks a variation of planning permission P/2015 /0337. This variation relates to Condition 6 (Working Plan) and Condition 26 (Vehicle Movements).

Condition 6

Prior to commencement of development a detailed Working Plan shall be submitted to and approved in writing by the Minerals Planning Authority. This shall include detailed consideration of working phases and methods which will maximise the retention of peripheral mounds and vegetation to mitigate noise and visual disturbance of the site clearance works, contamination, combustion and stability issues and provision of periodic reviews of working procedures. The works shall be carried out strictly in accordance with the approved Working Plan unless otherwise approved in writing by the Minerals Planning Authority.

Condition 26

Deliveries of excavated material from the site by road shall be restricted to 54 vehicle movements per day (54 in and 54 out).

Condition 6 (Working Plan)

- 1.3 In terms of Condition 6 the working method of the reclamation of the spoil material is not fully defined within the extant planning permission, specifically the extant planning permission and associated conditions do not define the scope of onsite reclamation and processing of the spoil material prior to its export from the site.
- 1.4 A detailed review has been undertaken of the extant planning permission including the ability to deliver and achieve a modern and sustainable working method. The proposed variation to the extant planning permission remains intrinsic to the development proposal is to reclaim the tipped materials, “mainly for use for construction purposes” (Inspectors Report; Paragraph 9).

- 1.5 This application seeks a variation of Condition 6 to clarify and establish the Working Plan for the site, including the processing of the material to include the “erection and operation of a block making plant with associated structures”. An example varied wording of Condition 6:

Condition 6

Prior to commencement of development a detailed Working Plan including the block making plant and associated structures shall be submitted to and approved in writing by the Minerals Planning Authority. This shall include detailed consideration of working phases and methods which will maximise the retention of peripheral mounds and vegetation to mitigate noise and visual disturbance of the site clearance works, contamination, combustion and stability issues and provision of periodic reviews of working procedures. The works shall be carried out strictly in accordance with the approved Working Plan unless otherwise approved in writing by the Minerals Planning Authority.

Condition 26 (Highways)

- 1.6 In terms of Condition 26 this relates to the deliveries of excavated material from the site by road and that vehicle movements shall be restricted to 54 per day (54 in and 54 out).
- 1.7 A direct environmental benefit of this variation is the significant reduction of operational requirements of highway movements. This arises from the onsite reclamation of the spoil material reducing the off-site related highway movements. The reduction (numbers) of the highway’s movements are expected to be identified and agreed with the Highway Authority as a Statutory Consultee.

Development Plan (Local Plan)

- 1.8 The extant planning permission has been established to accord with the relevant planning policies and site allocations in the adopted Local Plan. In planning terms this application does not change the development proposal. The development remains the “reclamation of colliery spoil together with associated works, including the siting of temporary structures and the installation of rail freight sidings”.
- 1.9 This application will retain and make effective and efficient use of previously developed land. Critically, it will utilise the existing site and the accessibility of the adjacent rail infrastructure for the sustainable export of manufactured products from the plant.
- 1.10 The application proposals have sought formal pre-app consultation and engagement with Wrexham Council which commenced in February 2019. The Local Planning Authority has not provided a formal pre-application consultation response to the development proposals.
- 1.11 This Planning Statement details the application proposals and draws together the separate supporting technical assessments and statements provided in support of the application.

- 1.12 Section 2 of this Planning Statement provides relevant background information to the proposals including a description of the site and surrounding area and related planning history. Section 3 provides a description of the application proposals. Section 4 sets out the relevant planning policy considerations as well as reviewing how that planning policy has emerged and been established.
- 1.13 Section 5 considers the proposals in terms of its acceptability in principle and in the context of the relevant environmental and amenity considerations. Section 6 provides a summary of the main considerations raised by the application proposals and the conclusions reached in terms of policy compliance and acceptability.

2. RELEVANT BACKGROUND INFORMATION

a) Site and Surrounding Area

- 2.1 The land subject to this application comprises the former Bersham Colliery Spoil Tip and the land at the southern extent of the site in proximity to the highway and the rail line.
- 2.2 The accompanying plans illustrate the application area outlined in red and in context of the full extent of former Bersham Colliery Spoil Tip.
- 2.3 The site is accessed by road from the East. Rail access is gained by the adjacent (South) railway and the extant planning permission allowing the construction and operation of rail sidings for the purpose of the development.
- 2.4 To the East of the buildings and hardstandings associated with the former Bersham Colliery. This area includes a range of building types including the Bersham Enterprise Centre (North), storage and distribution, recycling, plant hire and the Bersham Enterprise Park (South).
- 2.5 To the West is the A483 and that this location is routed at an elevated position (<8m AOD – Approx.) with mature vegetation along much of the periphery of the transport corridor.
- 2.6 The nearest notable residential receptors are located at Glan Yr Afon. This group of residential properties are located approximately 50m North of the site boundary, these properties are located adjacent commercial businesses including car sales showroom, industrial hire shop and commercial vehicle operations.
- 2.7 The surrounding area is characterised by urban development, primarily comprising industrial and residential uses, with Rhostyllen and Bersham to the North, the commercial / industrial land uses to the East are a key landmark feature as they directly relate to the site.
- 2.8 In planning terms the site does not exist in separation, the site was formed by, is physically linked with and directly relates to Bersham Colliery adjacent to the East. The intrinsic colliery developments existed since 1864 significantly before the Town and Country Planning Act 1947 (1 July 1948). Collieries by their nature need to be located at the site of the mineral resource, Colliery Villages are therefore located adjacent to these collieries to allow the workforce access to their employment.
- 2.9 The 1960 OS plan illustrates the physical extent of the colliery following nationalisation and the construction of the modernised new pithead block housing new pithead baths, canteen and offices designed to cater for up to 1,100 men (completed in 1954). These pithead buildings are indicated to be the Bersham Enterprise Park (South).

- 2.10 Bersham Colliery operated for 100 years prior to the National Coal Board closing collieries. Throughout this period the colliery remains the primary socio-economic foundation for Rhostyllen and Bersham.
- 2.11 In the emergence of Rhostyllen and Bersham as settlements and forming functional parts of Wrexham these relied upon Bersham Colliery as their primary and adjacent employment source.
- 2.12 The description of the site and surrounding area is further supplemented in the accompanying Design and Access Statement, together with photographic and other visual assessment. In addition, more detailed consideration in terms of location of sensitive receptors and other site-specific details are provided as appropriate in technical assessments.

b) Pre-Application Engagement

- 2.13 On the basis of the above a pre-app consultation request to the Local Planning Authority was duly submitted by WSP on 19 February 2019. The description of development and scale of development remain in context and also included an energy export element, and this linked with the thresholds set by the Welsh Government for a Development of National Significance (DNS).
- 2.14 During the duration of the pre-application process the design and layout of the scheme has evolved based on more effective and sustainable uses of the material at the site and via more detailed environmental and technical assessment of the proposals and site context.
- 2.15 During the period from 19 February 2019 the Local Planning Authority the Local Planning Authority provided a response on 21 April 2020. This is reviewed in detail later within this Planning Statement.

c) EIA Screening

- 2.16 As part of the pre-application and therefore the application process it is necessary to establish the EIA statues of the development proposals. The pre-application process has not resulted in a response from the Local Planning Authority.
- 2.17 As a self-assessment process the EIA process has been established by the extant planning permission and having reviewed the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) the proposals are considered to remain ancillary and subordinate to the primary development and not cause effects sufficient to require an EIA.

3. DEVELOPMENT PROPOSALS

Introduction

- 3.1 The following provides a description of the application proposals and proposed operations of the block making plant.
- 3.2 The Bersham site is a mound of waste material located to the East of the A483 to the south of Bersham itself. The site is bounded to the North by an industrial / commercial estate / residential properties to the East by commercial properties and to the South by the railway and agricultural fields.
- 3.3 The site mound material is waste with a consistency of 8% carbon but overall is waste shale and tailings.
- 3.4 The site has extant planning permission for the reclamation of the site via exportation of the material. The planning permission does not require the export of raw material and does not restrict either the processing or manufacturing of the material at the site prior to being exported from the site.
- 3.5 Rather a selected condition relates to this context:
Condition 6 states that "...a detailed Working Plan shall be submitted to and approved in writing by the Minerals Planning Authority. This shall include detailed consideration of working phases and methods which will maximise the retention of peripheral mounds and vegetation to mitigate noise and visual disturbance of the site clearance works, contamination, combustion and stability issues and provision of periodic reviews of working procedures."
- 3.6 The principle of the excavation and reclamation of the material is established by the extant planning permission. It is noted however that in terms of the Working Plan this shall include detailed consideration of the working phases and methods.
- 3.7 The scope of methods of working this type of material is broad and can range from washing, screening, crushing and the processing of the material. Individually and cumulatively these processes constitute a working method of managing the reclaimed material.
- 3.8 The block making plant constitutes the combined methods of managing the reclaimed material and accords with the extant planning permission by reclaiming the spoil tip and exporting the material for construction purposes. The block making plant will manufacture the reclaimed material and as the exported blocks retain the content of the reclaimed material this accords with the spirit of the planning permission.

- 3.9 The proposed method of managing the material at the site prior to export provides a key product able to support the construction industry at a local level. Additional identified markets include providing concrete sleepers for the maintenance and upgrading of the rail network, agricultural panels and structural blocks for the waste industry. The proposals support significant increases in socio-economic benefits in terms of employment and a sustainable product.

Need for Development

- 3.10 The work at the Bersham site is driven by the need to be managed to avoid slippage of the waste that makes up the distinctive profile of the site. To reduce the risk of slippage the profile needs to be reduced in size and height, which means managing the excess material from this process.
- 3.11 The Bersham site has extant planning permission to export the waste material off-site for processing by a third-party, with a movement of 108 HGV's per day to and from the site. The end use of the material is not conditioned or restricted in terms of distance travelled (locally, regionally, nationally, internationally) and the method of end use.
- 3.12 The unrestricted transportation and the processing method for the end use would be varied, however all would include the processing of the waste material into another product or via combustion. This third-party processing would not be environmentally controlled by the Bersham site and would produce CO₂ from the reclamation, exportation, transportation and processing of the reclaimed material.

Logistics

- 3.13 The size and area of the site does not allow for the distribution on site of the excess material from reducing the size of the mound, therefore, unless the material is managed by some means onsite it will need to be removed from site to another site for processing and become a waste in the process and a liability with the associated management of that waste material.
- 3.14 To avoid the transfer of the waste materials off-site for processing elsewhere and effectively remove the need for waste to be transported from the site, the waste can be utilised at site and processed to convert this into an added value product eliminating the waste material needing removal from the site.

Material

- 3.15 The Bersham site was originally a brick making site and can be developed to manufacture precast concrete building products at the site to utilise the waste materials available in the spoilt tip mound.
- 3.16 In conjunction with Transport for Wales (TFW) these building materials produced at Bersham could be utilised within the Region as TFW are looking for the supply of building products for the building of the Transport infrastructure. In working with Keolis/Amey to look at providing a Wales only solution, the Bersham site produced material is key.
- 3.17 The Bersham site would be self-sufficient in heat and electrical energy, with site vehicles having the option to be powered by site produced clean gas.
- 3.18 The use of the waste from the spoil tip mound onsite with a purpose built process, will ensure that all emissions are monitored to a stringent standard lower than that would be generated by an off-site use of the waste material, without the need for a daily 108 HGV traffic movements and the disruption and pollution from these vehicle movements.

Baseline Option

- 3.19 The current approved planning for the Bersham site is based on a 9-year period initially and is set out as follows:
- Remove the mound waste material from site
 - Transport the material by 108 HGV movements per day to another location for processing
- 3.20 The material removed from site would then need to be processed:
- Process the waste along with other imported materials into another form at this other site
 - Transport the processed waste in the form of a product from this other site to the marketplace
- 3.21 The site will require a permanent based site plant to move the material, grading the mound and loading the material into the HGV's for transportation off site. The Bersham site itself will have an office, weighbridge and facilities to support the site activities.
- 3.22 The material will be moved using the largest trucks currently available for the road with an individual load of 25 tonne. The trucks will run full away from the site but return empty. The destination of the material for processing, during the 9-year period may vary which will influence the CO₂ produced, due to the distance travelled.

3.23 The processing of the material will involve the co-combustion of the waste during the manufacture of the final product. These processes are not controlled by the supplier of the material and the CO₂ cannot be mitigated or reduced and therefore, must be based on the tonnage and calorific value of the waste when deriving the CO₂ production. The onward transportation of the product from the third-party sites cannot be quantified at this time, as the distance travelled for the 3rd party product cannot be determined.

Baseline CO₂ Production

3.24 The waste when moved will generate CO₂, even before any processing of the waste. If measured purely as CO₂ production per week the tonnage currently planned to be moved from site will generate the following CO₂ for transportation off-site alone. These figures need to be added to the CO₂ figures for the processing to provide a true comparison: -

• 7-mile radius from site for processing with lime	-	24 tonne CO₂/week
• 20-mile radius from site out of Wales for processing	-	85 tonne CO₂/week
• 92-mile radius (Holyhead) for shipping	-	347 tonne CO₂/week
• 128-mile radius (Cardiff) for processing	-	540 tonne CO₂/week
• Average mileage over the 9 years based on the above	-	249 tonne CO₂/week

3.25 Processing the waste along with other imported materials into another form at a third-party site is compared based on the tonnage of the material taken from the Bersham site. These figures are only based upon the tonnage of the material to be processed. The calculation is based upon 7056 tonne / week (based on 108 lorry movements per day 5 day per week) and average carbon content of 17%. For a week's waste processed off-site CO₂ would be 4411 tonne CO₂/week.

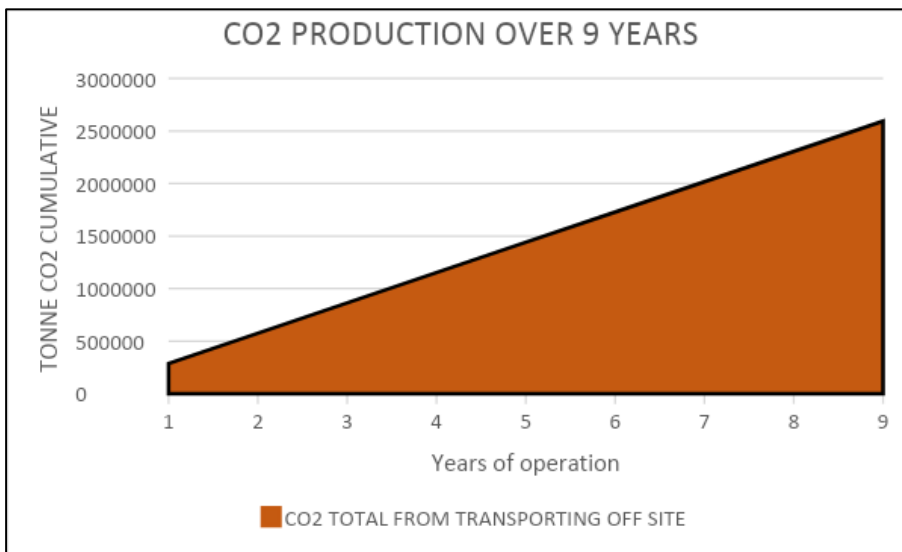
3.26 Processing the waste along with other imported materials into another form at a third-party site is compared based on the tonnage of the material taken from the Bersham site. These figures are only based upon the tonnage of the material to be processed. The calculation is based upon 7056 tonne / week (based on 108 lorry movements per day 5 day per week) and average carbon content of 17%. For a week's waste processed off-site CO₂ would be 4411 tonne CO₂/week.

3.27 This CO₂ produced is only the conversion of carbon, this does not consider the other emissions in terms of quantity and does not consider the additional CO₂ that will be produced from a plant importing power. The additional CO₂ could be up to 20% more per week at 5293 tonne CO₂/week. The total per year of CO₂ produced therefore, would be as the table below: -

Radius of transport miles	Transport CO ₂ tonne / year	3rd Party Plant CO ₂ tonne / year	CO ₂ Total Tonne / year
7	1248	275236	276484
20	4420	275236	279656
92	18044	275236	293280
128	28080	275236	303316
Average 61.75	12948	275236	288184

The tabled figures will be cumulative over the operating period and is based upon a 9-year period.

In an illustrative graphical perspective of the CO₂ generated throughout the development this indicates a continued ascent of CO₂ produced.



Baseline - Other Considerations

3.28 The transportation of the waste off-site that will generate other problems / issues that need considering such as;

- Durability of the local road take the number of waste lorries
- On-site vehicles operating in diesel fuel creating emissions
- Can the road network cope with this major increase
- Pollution from lorries along the transport route
- Road noise along the transport route
- Road vehicle cleaning to avoid road dust/ dirt
- Processing of waste off-site will require power from the grid to be imported

Proposed Option

3.29 The Bersham site offers an alternative to processing the material off-site and that is to use the material but at site to manufacture precast construction products (PCP) a finished product that can then be used within a local area for the expansion and building programme local to the Bersham site.

3.30 The proposed solution would have the key following elements: -

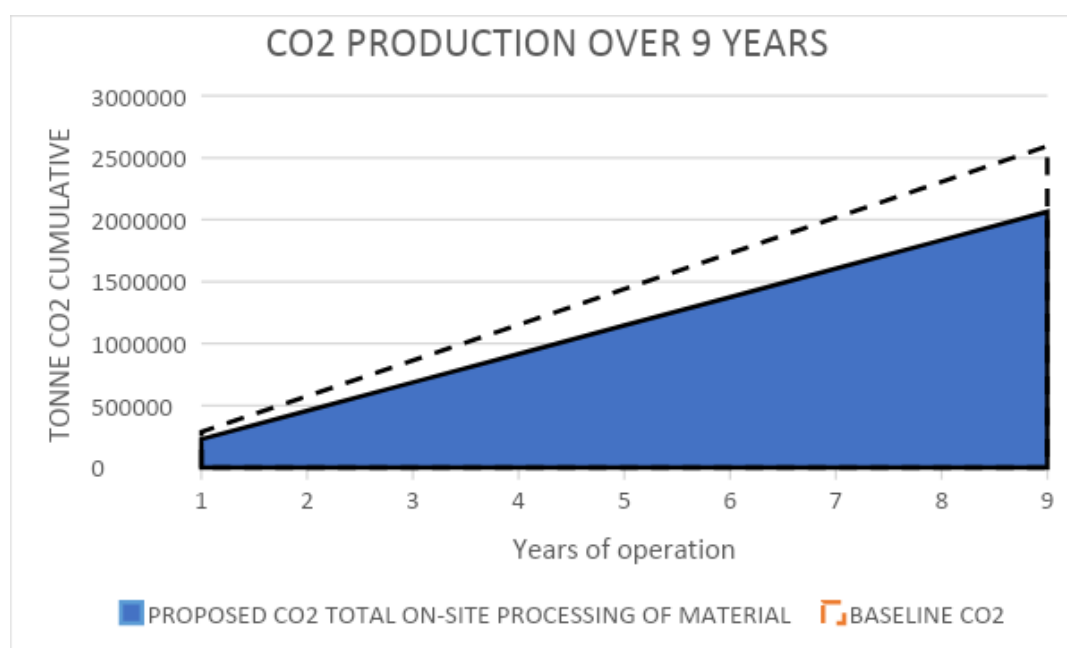
- Reprofile material from the site into material handling on site
- Pre-process the waste material
- Process material generating heat and a biproduct for block making
- Import from local supply, sand, cement
- Manufacture light weight blocks from site material (combined with imported materials including sand and gypsum)
- Cure the lightweight blocks using heat generated on site
- Waste heat use to generate power for site equipment
- Generate hydrogen on-site from waste heat to power portable plant on-site and export excess energy stored in batteries and export power based on demand from the grid
- Importing waste to site to add to the blocks

3.31 The site will require a permanent based site plant to move the material grading the mound and loading the material into the site processing. These trucks would be powered by site produced energy in the long term. The Bersham site itself would have a block plant, processing plant, wash plant, gypsum production building office, weighbridge, and facilities to support the site activities. These facilities would be powered and heated by the PCP process. The block making plant itself would consist of the following main steps: -

- Mixing of materials (sand, cement, site processed waste, site aggregates)
- Potential future stage to embed captured CO₂
- Moulding the PCP and placing onto pallets
- Curing the PCP in drive in curing kilns heated by heat from the site
- Quality control
- Cubing the PCP by re-palleted the PCP onto transportable pallets
- Transportation off-site to end user

Proposed CO₂ Production

- 3.32 By processing the waste on the Bersham site, the transportation CO₂ for the waste is negated along with the larger number of vehicle movements. The processing of the waste will generate CO₂, but the process can be managed on-site to ensure a higher standard of flue gas treatment, plus the use of waste heat to provide other process treatment and generation of power.
- 3.33 The mitigation of CO₂ production can be made at site for the on-site plant, the heating and powering of the site. The CO₂ produced by the site therefore for comparison with the baseline option is based upon the tonnage of the material to be processed. The calculation is based upon 7056 tonne / week (108 lorry movements per day 5 day per week as per the Baseline option) and average carbon content of 17%. For a week's waste processed on-site CO₂ would be 4411 tonne CO₂/week.
- 3.34 The graph below shows the cumulative tonnage of CO₂ produced by the plant but does not consider any future capture of CO₂ at site to embed into the blocks.



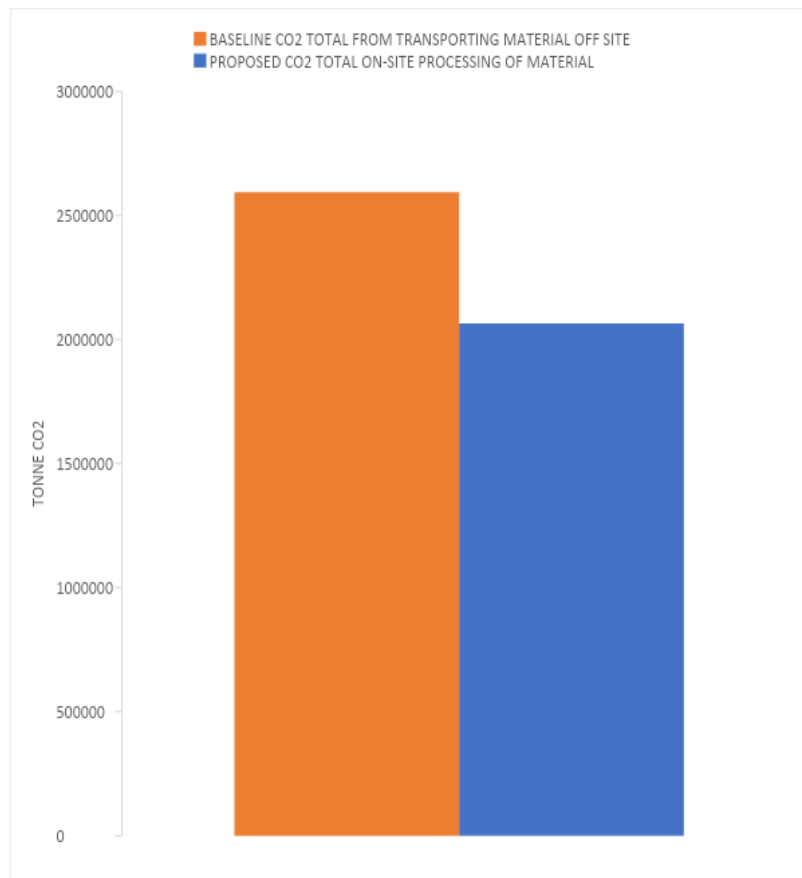
Proposed – Other Considerations

- 3.35 The processing the waste material on-site can have the following benefits over the baseline option.
- Higher value output from the site in the form of precast construction products
 - In conjunction with Transport for Wales (TFW) these building materials produced at Bersham could be utilised within the region as TFW are looking for the supply of Building products for the building of the Transport infrastructure

- Working with Keolis/Amey to look to providing a Wales only solution for transport, the Bersham site produced material would be key – wash plant would allow utilities waste to be re-used
- Any site produced waste upcycled, combined in the lightweight blocks
- Reduced on-site vehicles due to fixed electrical equipment and can be powered by hydrogen
- Waste heat used for site heating, block curing and can be used for local heating
- Flue gas treatment to high standard
- Any emissions monitored to a regulated standard and dispersed before ever reaching residential areas
- Carbon capture techniques possible to be developed at site
- Energy storage at site for grid power balancing
- Energy generation that will mitigate any site electrical loads but also be of great advantage to generate hydrogen a clean fuel for use for vehicles on-site, to and from the site or put into the national gas grid
- Local jobs, to reduce workers commuting

Summary of the Option Outputs compared

3.36 The options highlighted as baseline and proposed can be directly compared in terms of CO₂ production without the other benefits of the proposal ignored. The outcome will always be a lower figure for site management of the waste material as the transport element is always an addition to the total. The chart below provides a comparison against the baseline of the proposed.



4. PLANNING POLICIES

DEVELOPMENT PLAN

Wrexham UDP

- 4.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that the determination of the Application must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.2 The adopted Development Plan relevant to this Application comprises the Wrexham UDP (UDP) which was adopted in 2005 and covers the Plan period from 1996 – 2011.
- 4.3 The UDP is, however, largely out-of-date on the basis that it was only ever intended to guide development over a period up to 2011.
- 4.4 Paragraph 1.21 of PPW10 states that “up-to-date development plans are the basis of the planning system and set the context for rational and consistent decision making”. As the UDP is time expired, reduced weight that can be given to the adopted UDP in decision making.

Local Policy Adopted Wrexham Unitary Development Plan 1996 – 2011 (UDP)

- 4.5 The following relevant policies within the adopted UDP are discussed below:

Policy PS1 – Settlement boundaries

- 4.6 This outlines that new development for housing, employment, and community services will be directed to within defined settlement limits/employment areas.

Policy PS2 – Development impact

- 4.7 New development must not materially detrimentally affect countryside, landscape/townscape character, open space, or the quality of the natural environment.

Policy PS3 – Land use

- 4.8 Development should use previously developed brownfield land comprising vacant, derelict or underused land in preference to the use of greenfield land, wherever possible, particularly so where greenfield land is of ecological, landscape or amenity value, or comprises agricultural land of grades 1, 2 or 3a quality.

Policy PS4 – Settlement Patterns

- 4.9 Development should maintain the existing settlement pattern and character and be integrated with the existing transport network to help reduce the overall need to travel and encourage the use of alternatives to the car.

Policy PS8 – Transport

- 4.10 The transport network will be developed by providing an integrated range of travel options to and from principal residential, commercial, employment and education centres by making the best use of the existing road and rail network, including, where necessary, the provision of facilities for both passenger and freight interchange and by the encouragement of public transport, cycling and walking.

Policy PS11 – Biodiversity

- 4.11 Encouragement will be given to proposals which improve the biodiversity value of sites and to the establishment of local nature reserves where the nature conservation and landscape interest of the land will be protected and enhanced.

Policy GDP1 – Development Objectives

- 4.12 This policy outlines a number of objectives that proposals should demonstrate accordance in order to be considered acceptable (in planning terms).

Policy EC2 – Agricultural Land

- 4.13 Development on agricultural land of grades 1, 2 or 3a will only be permitted if it does not lead to the irreversible loss of that land.

Policy EC4 – Hedgerows, trees and woodland

- 4.14 Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.

Policy EC6 – Biodiversity Conservation

- 4.15 Development either within or close to sites of biodiversity interest will only be permitted where it can be clearly demonstrated that the need for the development outweighs the need to safeguard the intrinsic nature conservation value of the site. Where such development is permitted, damage should be kept to a minimum, and compensatory measures should be provided. Measures to improve the biodiversity value of sites and enhance their natural conservation interest and landscape quality including the establishment of local nature reserves, will be supported.

Policy EC12 – Development and Flood Risk

- 4.16 Development within defined flood plains will only be permitted if it would not be subject to an unacceptable risk of flooding on-site; and/or does not result in an unacceptable risk of flooding on or off-site; and/or does not adversely affect flood management or maintenance schemes.

Policy EC13 – Surface Water Run-off

- 4.17 Development which would result in an unacceptable adverse impact on the water environment due to additional surface water run-off will not be permitted.

Policy EC16 – Derelict Land

- 4.18 The adopted Wrexham Unitary Development Plan 1996 – 2011 (UDP) allocates the whole site (EC16 – Ref.6) as land to be reclaimed and restored for beneficial use. The extant planning permission

NATIONAL POLICY

Planning Policy Wales 10 (2018)

- 4.19 PPW10 was published on 6th December 2018 and introduces the concept of placemaking and is a key element to deliver on the aspirations of the Well-being of Future Generations (Wales) Act 2015 in order to proactively deliver plan-making and Development Management decisions. PPW10 embraces the statutory goals and ways of working as well as giving clear direction through the definition of key planning principles and placemaking outcomes in Wales.
- 4.20 PPW10 represents the aspirations of the Welsh Government in line with the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 as well as other key legislation. The principles and objectives of PPW10 should be given significant weight.
- 4.21 The following relevant principles within PPW10 are discussed in detail below:

PPW10 - Development Plans

- 4.22 PPW10 sets out at paragraph 1.21 that up-to-date Development plans are the basis of the planning system and set the context for rational and consistent decision making. It requires that plans at all levels of the Development Plan process must be prepared in accordance with national planning policies.

Sustainable Development (Chapter 1)

- 4.23 PPW10 is clear that up to date development plans are the basis of the planning system and planning applications must be determined in accordance with the adopted plan, unless material considerations indicate otherwise.
- 4.24 Sustainable development is defined at Page 9 of PPW10 as “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.
- 4.25 Paragraph 2.21 of PPW10 provides detailed guidance on key factors in the assessment process of each area of sustainable development.

Placemaking (Chapter 3)

- 4.26 PPW10 sets out that Placemaking is “a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and wellbeing in the widest sense. Placemaking considers the context, function and relationships between a development sites and its wider surrounding”.
- 4.27 Furthermore, PPW10 states that the national sustainable placemaking outcomes should be used to inform the assessment of development proposals. These outcomes are strategic and spatial choices, productive and enterprising places, distinctive and natural places and active and social places.

Design (Chapter 3)

- 4.28 Paragraph 3.3 of PPW10 states that “good design is fundamental to creating sustainable places where people want to live, work and socialise”. This indicates five objectives including access, character, community safety, movement and environmental sustainability.

Development in the Countryside (Chapter 3)

- 4.29 PPW10 provides key guidance regarding development in the countryside and states this should “be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conversion”, furthermore all new development should be of a scale and design that respects the character of the surrounding area”.

Supporting Infrastructure (Chapter 3)

- 4.30 Paragraph 3.57 of PPW10 states “Adequate and efficient infrastructure including services such as education and health facilities along with transport, water supply, sewers, sustainable management, electricity and gas (the utilities) and telecommunications, is crucial for economic, social and environmental sustainability”

Distinctive and Natural Place (Chapter 6)

- 4.31 PPW10 (Paragraphs 6.1.8 and 6.1.9) state there is a requirement to ensure that the preservation of the historic environment is considered at the earliest stages of the planning process and that decisions affecting the historic environment must consider the potential for harm that proposals may have on the significance of historic assets.

Material Considerations

- 4.32 Material considerations relevant to this application include:

Emerging Local Development Plan

- 4.33 The Local Planning Authority has prepared their new Local Plan to replace the outdated and expired UDP and this document is at an advanced stage in the planning process. The Local Planning Authority are in the latter stages of their Examination in Public (EiP) that allows a full and detailed public examination of the Local Plan with Planning Inspectors leading these public hearing sessions.
- 4.34 The hearings commenced in the Summer of 2019. Further hearings were held during Autumn 2019, additional hearing have been held in Spring 2020 to focus on specific outstanding topics / matters.
- 4.35 During these hearings the Bersham site has been represented across a range of topic / matters. Key matters included the emerging Local Plan omitting a transitional policy from EC16 of the adopted UDP, this omission results in the emerging plan not offering a policy framework supporting the reclamation of former industrial sites across the authority area.
- 4.36 This matter was discussed in detail and the Planning Inspectors required the Local Planning Authority to draft an updated EC16 related policy wording to facilitate a transitional policy bridging the adopted and emerging Local Plans.

- 4.37 On 24 March 2020 the Local Plan EiP Programme Officer confirmed matters relating to Action Point AP4 Additional Hearing Session: Matter 3 Housing Provision. This confirmed the response by the Council to the Employment Action Point in relation to the former regeneration Policy EC16.
- 4.38 The Council have identified the relevant action point (reproduced below). This was dealt with in Hearing Session 12 on Minerals and Renewable Energy.
- 4.39 In response to the actions point set out by the Planning Inspectors the Council confirm the following addition into the emerging Local Plan:

New Para 6.197	Hearing Session 12 (9/10/19) Matter 15 Minerals and Renewable Energy Action Point 2	New Paragraph; <u>6.197 Proposals for opencast coal extraction may be considered acceptable in specific circumstances for example where the site is derelict and there may be an opportunity to restore land to a better condition and bring about local or community benefits.</u> <u>Reclamation and reworking of mineral waste may be considered acceptable where it can be demonstrated it would achieve the permanent high quality reclamation of derelict land.</u>
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- 4.40 This additional paragraph (6.197) provides the transitional policy guidance linking Policy EC16 with the emerging Local Plan. This is a significant step in terms of supporting the reclamation and reworking of mineral waste.
- 4.41 The principal requirement of Paragraph 6.197, in terms of the reclamation and reworking of mineral waste is “where it can be demonstrated it would achieve the permanent high quality reclamation of derelict land”.
- 4.42 This requirement is currently met by Condition 18 of the extant planning permission for the site (Ref: P/2015/0337). Condition 18 states:

Condition 18

No materials shall be removed from the site before a detailed Landscape Master Plan and specification has been submitted to and approved in writing by the Minerals Planning Authority, Details shall include restoration of the site, hard and soft landscaping works, ecological habitat creation, recreation provision, areas of vegetation to be retained and removed, proposed landform, phased areas of implementation and an implementation timetable. The Plan as approved shall be fully implemented in accordance with the approved timetable.

- 4.43 Condition 18 demonstrates that the extant planning permission for the site shall deliver the permanent and high quality reclamation of derelict mineral waste land. The planning condition sets a legal requirement for the site to include restoration of the site, hard and soft landscaping works, ecological habitat creation, recreation provision, areas of vegetation to be retained and removed, proposed landform, phased areas of implementation and an implementation timetable. These elements shall be fully implemented with the approved timetable.

- 4.44 There is no ambiguity to the extant planning permission and Condition 18, this condition has been written and agreed by the Mineral Planning Authority. The condition, by virtue of being written and agreed by the Mineral Authority, affirms a high quality reclamation of the derelict land will be delivered. The development proposals maintain the existing principle of development in the reclamation of derelict material, delivered in a significantly increased sustainability and accords with the existing Local Plan (specifically Policy EC16) and the emerging Local Plan (specifically Paragraph 6.197).
- 4.45 For the Mineral Planning Authority to seek to undermine the position set out (above) this would be to critically diminish their extant planning permission at the site allowing for the high quality reclamation of waste material, and their ability (through Condition 18) of achieving a high quality of restoration.
- 4.46 In terms of the progression of the emerging Local Plan the Council have indicated that additional work requested by the Planning Inspectors would take approximately 3 months to complete, circumstances permitting due to Covid-19. The Planning Inspectors have decided that the most appropriate course of action would be to suspend the Local Plan EiP for the period from Monday 1 June 2020 to Monday 31 August 2020 accordingly. Currently the Local Plan EiP is suspended.

5. PLANNING REVIEW

Introduction

- 5.1 In terms of assessing the relevant planning policies and guidance, it is established that this application is a variation to the extant planning permission to facilitate and deliver a sustainable working method of managing the waste material at the site.
- 5.2 The block making plant forms an inclusive and intrinsic part of delivering the extant planning permission, it forms a sustainable variation to the reclamation of the site.

Planning Review

- 5.3 PPW10 is key to the planning review of the proposed variation to the extant planning permission. The proposals are driven by the ability to offer a sustainable reclamation of the site, with significant reductions in CO₂ emissions for the duration of the development.
- 5.4 These significant reductions in CO₂ emissions relate to a significant reduction in HGV transport movements. The additional matter relates to the undefined destination for the waste material and therefore a 'worst case scenario' in terms of the emissions resultant from the waste material at the potential destination(s), the onsite working method and associated management of the material will ensure high environmental standards and minimal CO₂ emissions.
- 5.5 In terms of PPW10 the proposals can support the concepts of placemaking incorporating the linked benefits able to improve the economic, social, environmental and cultural well-being of Wales.

Social

- 5.6 The proposed development includes the S106 that includes the provision of social economic investments and the regeneration of the Listed Buildings and associated heritage community facilities.
- 5.7 The broader social benefits arise from significant long-term employment opportunities that can be directly accessed from the Village. This is an established sustainable (pedestrian / cycle) route as this directly mirrors the route established by the Bersham Colliery over a period of 150 years (approx.).
- 5.8 The restoration of the site supports the options to provide for accessible green infrastructure and walking/cycling links providing key exercise / walking / leisure routes encouraging active and healthy lifestyles within the community. The reclamation and ultimately the restoration of the site is able to provide open space benefitting social wellbeing and where feasible the site is also able to provide key infrastructure links. The proposed development is therefore considered to be in accordance with of the UDP.

Economic

- 5.9 The established location of the Bersham Colliery and associated land underpins its accessibility from the adjacent Village and wider Wrexham area. This is well-established as it is maintaining a primary employment hub, initially with Bersham Colliery and more recently with the re-use of the colliery buildings and wider site for a wide range of commercial and industrial employment uses.
- 5.10 The development proposals will directly increase the employment requirements at the site, both in terms of the construction of the block making plant and the operational functions of the plant. This significantly increases the socio-economic benefits of the reclamation of the material at the site in terms of significant and accessible employment opportunities for the local and wider population.

Environmental

- 5.11 There are a range of overriding purposes related to the reclamation of the spoil material, these include; direct benefits of environmental reclamation as per the extant planning permission; addressing factors related to the stability of the spoil material; and the restoration of the site for beneficial uses. These are established by the extant planning permission and underpinned by Policy EC16 of the adopted UDP.

Heritage

- 5.12 There are several designated and non-designated heritage assets associated with the former Bersham Colliery. The potential for the established and permitted development to cause harm on these assets has been assessed and deemed acceptable during the planning process (assessment and determination).
- 5.13 The inclusion of the development proposal as set out in this application would be located within the site and visually assimilated with the operations associated with the reclamation of the waste material. The development proposal is not a standalone development, nor physically separated from the site. It is therefore considered to be observed with the operations of the site and whilst generating an additional feature at the site it is considered this would result in less than significant harm in accordance with the statutory tests set out in the 1990 Act.
- 5.14 The potential scale of harm on the heritage asset has been significantly mitigated through design features that can be secured by condition. This report has considered the effects and that any harm would be of a low level and that the statutory tests set out in the 1990 Act have been met. The proposals are therefore considered to be in accordance with the adopted UDP and PPW10.

Landscape

- 5.15 In terms of background, whilst a formal pre-application response has not been received from the Local Planning Authority informal comments (without policy reference) have included references to the potential landscape effects arising from the construction and operation of the block making plant.
- 5.16 For clarification the Planning Inspectors report (APP/H6955/A/08/2082561; 19/11/2009) states that “the site contains the former colliery spoil tip...which rises to a level some 50 metres above the surrounding ground level. It contains approximately 6 million tonnes of material...”.

Landscape effects (North)

- 5.17 The 6 million tonnes of waste material rise 50 metres above the natural ground level (AOD). For context the proposed main block making plant building has a height of 7m (Eaves); 9.9m (Ridge). With a 9.9m ridge height the building will not be observed from the North as the waste material ascends 40m higher than the buildings ridge height and fully screens the building.
- 5.18 It is recognised that the reduction of the waste material may gradually become visible from the North, including receptors located at Rhostyllen. However, in terms of the northern boundary of the site this is located adjacent to mature mixed species woodland associated with the Glanyrafon Brook. This mixed species woodland is well-established, mature, of significant height and provides a deep level of screening of the site-based waste material. Having reviewed and assessed the potential for the plant to be observed at the end of reclamation from the North this is considered entirely limited due to distance / topography / natural mature woodland screening (including the variable of coniferous woodland).

Landscape effects (West)

- 5.19 In terms of potential visual effects from the West these are screened entirely by the A483 that travels in a northwest (northbound) and southeast (southbound) direction along the west boundary of the site.
- 5.20 At this location the A483 is raised in order to clear both railway infrastructure and the road junction for Rhostyllen and Wrexham. This further increases the screening of the Bersham site from the West as the A483 creates a linear visual barrier.
- 5.21 The only perceivable visual effects arising from the West would be from car users travelling on the A483. These receptors may observe the site when travelling north/southbound. However, it is easily observed that the transport corridor of the A483 has well-established mature linear woodland belts adjacent to the highway assisting in reducing the visual effects / noise / dust arising from the highway. This established screening results in limited (if any) available views from the A483 into the site and location of the proposed plant.

Landscape effects (South)

- 5.22 In terms of potential visual effects from the South these are open views as the site is adjacent the railway at this location. Notably the visual effects of the reclamation of the site including the construction and operation of a new railhead facility has been approved as part of the extant planning permission.
- 5.23 Receptors in proximity to the site to the South are limited. The character of the landscape at this direction is arable agricultural land. Receptors and therefore the potential for visual effects arising from the South are limited.
- 5.24 A material consideration is that the extant planning permission allows for the construction and operation of a new railhead at the site. This significant infrastructure will be raised above ground level in order to facilitate loading of material at the railway and in the foreground of views from the South, therefore screening physical elements of the plant.
- 5.25 From the South the plant would be located and observed in a cumulative manner as the railhead will be observed in the foreground and the waste material in the background, the plant facility will therefore be observed in the middle distance from views afforded from the South. Recognising the level of activity at a railhead (including multi-carriage trains) and the mobile plant operations on the different levels of the waste material it is considered that the plant facility would assimilate with the landscape character afforded by the extant commercial and industrial land uses and operations.
- 5.26 The visual effects arising from the South, whilst introducing a broad manufacturing plant into the landscape this forms an intrinsic part of the extant planning permission and the full extent of the associated operations. Therefore, the visual effects whilst moderate have limited (if any) receptors able to fully establish the extent of the effects.

Landscape effects (East)

5.27 In terms of potential visual effects from the East these relate to the following:

Bersham Enterprise Park

The Bersham Enterprise Park adjacent to the waste material is the former Bersham Colliery (Circa 1954) that accommodated the pithead baths, canteen and offices designed to cater for up to 1,100 workers. The Bersham Colliery operated until 1986/1987 utilising these buildings, the associated buildings and spoil tip.

This building and associated site has been directly physically linked to the waste material during the minerals related operations and these areas operated as a single site. The removal of the colliery infrastructure linking the two areas does not result in a visual separation of the colliery buildings and the waste material, the specific character of the Bersham Colliery buildings, including the winding tower and associated buildings retain their intrinsic visual character with the adjacent waste material.

In terms of visual effects arising from the East the receptors need to be identified and the orientation of the primary and associated buildings. These are in a north-western direction and this reflects the arrival and departure point for the employees (<1000) of Bersham Colliery in order to facilitate ease of movement for vehicles and pedestrians.

This orientation focuses views from these buildings toward the eastern elevation of the waste material, approximately 90 degrees from viewing the proposed plant facility. Therefore, in terms of views of the plant facility these would be at an acute and obscure angle, limiting direct or partial views.

A further consideration is the weight attributed to occupants of the Bersham Enterprise Park is a material consideration. These are commercial and industrial premises, not residential properties, the weight afforded to these occupants is reduced in relation to a residential property as the residential amenity value is limited at this location.

The land uses are a key consideration as the existing and adjacent land uses have a long established commercial and industrial character. The proposed plant facility accords with the land uses at this location and provides a compatible neighbouring land use. The potential for visual effects is considered less than significant recognising the limited direct views, the type of (non-residential) receptor and the assimilation of a compatible neighbouring use.

Erddig House (National Trust)

In terms of Erddig House (Grade I Listed) it is recognised that this heritage asset and associated gardens is located within 2km of Bersham Tip and the location of the proposed block making plant.

A material consideration in the assessment of this application is the potential for harm on the heritage asset (Erddig House).

Views to and from Erddig House to the application site have been assessed in terms of indivisibility, landscape character, landscape topography, established woodland and receptors.

A material consideration in this assessment is Planning Inspectors report when granting the extant planning permission. Paragraph 103 of this report relates to Erddig House and the Planning Inspector states:

“The Council has also referred to the tip’s visual relationship with the wider landscape, including the presence of other listed buildings in the vicinity and particularly the Erddig estate. I consider the latter to be sufficiently far away that any effects on its setting would be negligible. In assessing the wider visual effects, one must also remember that most of the tip has been deposited during the 20th Century and appears as an alien feature in the original landscape of relatively flat agricultural land. In this respect its removal might be seen to improve rather than detract from the older historic landscape.”

- 5.28 This is a key set of statements as at almost 2km the upper parts of the Bersham Tip are visible from the western elevation and gardens of Erddig House. The Planning Inspector in terms of Bersham Tip confirms they “consider the latter to be sufficiently far away that any effects on its setting would be negligible”.
- 5.29 The proposed block making facility is located in the foreground of the Bersham Tip and therefore has the ability to be observed from Erddig House. In terms of scale the plant facility has been confirmed to be 9.9m to ridge and in this instance given the separation distance of up to 2km and the intervening mature woodland belts the building will not be identifiable. Furthermore, Erddig House is “sufficiently far away that any effects on its setting would be negligible”.
- 5.30 A formal Landscape and Visual Impact Assessment (LVIA) was not produced as part of the submission of this planning application, recognising the variation and functional inclusion to the extant planning permission. The inclusive assessment offers an appropriate review of the identified receptors and the potential effects arising from the proposed development.

Material Planning Considerations

Emerging Local Plan

- 5.31 The emerging Local Plan is a material consideration however recognising the recent and continued hearings, until these matters are resolved the emerging Local Plan should be given limited weight. The emerging Local Plan is yet to be agreed by the Planning Inspectors and confirmed to be in line with the principles of PPW10.
- 5.32 The application site is allocated within Policy EC16 of the adopted UDP and has extant planning permission for the complete reclamation of the waste material. Whilst the site remains allocated within the adopted UDP the emerging Local Plan disregards the previous principle of encouraging the reclamation of post-industrial sites across the wider Wrexham area.
- 5.33 Recent correspondence with the Local Planning Authority confirms their indication that the site is outside of a settlement boundary and therefore in the “open countryside”.

Policy EC16 states that *“the re-use of hitherto derelict land will reduce pressure for development on greenfield sites and contribute to economy in the use of land.”*

By virtue of this statement the adopted UDP establishes the ability of the sites identified within Policy EC16 to reduce the pressure on greenfield sites and contribute to economy in the use of the land, therefore supporting their reclamation and subsequent redevelopment to support the sustainable development of the broader local.

A further rationale of Policy EC16 includes:

“Although the ultimate objective is the removal of all dereliction, priority will be given to those derelict sites which are close to residential areas or main communication routes, and where beneficial after-uses can be established.”

The Bersham Tip site is located adjacent to Rhostyllen (residential area), is in proximity to the primary junction onto the A493 (main communication route) and offers a beneficial after use (this remains to be agreed and can deliver beneficial uses).

“Where derelict Reclamation of sites indicated by an asterisk is highly desirable but there are presently no firm programmed proposals; resources may, however, become available to enable action to be taken on these sites during the Plan period.”

The Bersham Tip site is indicated in Policy EC16 with an asterix therefore establishing that the reclamation of the site is highly desirable, without the added contribution of external resources the site has become available for reclamation and ultimately restoration as detailed in the adopted UDP.

- 5.34 In terms of references to the “open countryside” this primarily relates to restricting unsustainable development outside of established settlements and to direct new development toward sites within the settlement. This position / advice from the Local Planning Authority conflicts with Policy EC16 that identifies the purpose of these sites in contributing toward reclamation, regeneration and supporting the communities in proximity to the sites.
- 5.35 Bersham Colliery has been regenerated into Bersham Enterprise Park utilising existing buildings (Colliery Offices etc) and allowing new builds to accommodate further economic growth at this location. The Bersham Enterprise Park and associated areas provides 29,000m² (approx.) of employment land, adjacent to and within the ‘settlement boundary’ of Bersham and Rhostyllen.
- 5.36 The Bersham Tip remains industrial (brownfield) land retaining the physical and visual link with the colliery buildings. A retrospective settlement boundary at this location does not separate the colliery buildings from the spoil tip either in land use or the industrial character of the sites demonstrating their intrinsic links established throughout their history.
- 5.37 Policy EC16 remains clear supporting the removal of all dereliction and that priority will be given to those derelict sites which are close to residential areas or main communication routes, and where beneficial after-uses can be established. The Bersham Tip site meets all the criteria of Policy EC16.

Pre-application Advice

- 5.38 Following initial discussions with the Welsh Government relating to the broader development proposals it was recommended to engage with the Local Planning Authority and request pre-application advice.
- 5.39 The original development proposals included energy production and the export of energy to the grid. The development would need to be submitted through the Development of National Significance (DNS) route as the development would generate 30MW (approx.).
- 5.40 A pre-application request was submitted to the Local Planning Authority in February 2019. Whilst this was followed-up on several occasions no response was provided.
- 5.41 In February 2020 communications were received from Wrexham Council related to a query on the Bersham site. Whilst addressing the query from the Council this offered the opportunity to request the pre-application submission be addressed.
- 5.42 The Council provided alternative contact details. On 18 March 2020, the updated development proposals (block making plant; no production or export of energy) were issued to the Local Planning Authority. Initial correspondence was received from the Local Planning Authority, this was limited in its scope and not a formal pre-application response providing the required detail, policy appraisal and assessment.

- 5.43 On 21 April 2020, 14 months after the original submission, a pre-application response was received from the Local Planning Authority. However, keys issues incldyde:
- a) This response related to the original development proposals i.e. “reclamation of colliery spoil material and associated works including 30mw energy plant”. The pre-application response did not relate to the updated development proposals issued to the Local Planning Authority a month earlier.
 - b) The pre-application response omits and is silent on the Council’s update to the emerging Local Plan published on 24 March 2020 by the Local Plan EiP Programme Officer.
- 5.44 In planning terms limited weight is afforded to the pre-application response received (dated 21 April 2020) as this relates to a different development proposal, relates to alternative policies and fails to address updated policy guidance of the emerging Local Plan.

Planning Balance

- 5.45 The WCBC Development Plan consists of the UDP that whilst becoming outdated the key test is compliance with national guidance. The UDP retains Policy EC16 that supports the reclamation of sites across the Council’s area (including No.6 – Bersham Tip).
- 5.46 The Local Planning Authority has an emerging Local Plan, which has been submitted for examination and hearing have taken place, followed by additional hearings to further discuss matters of potential dispute. The emerging Local Plan has been purported by representatives at these hearings to be in conflict with PPW10 aims, objectives and content.
- 5.47 A material consideration in the planning balance is that the emerging Local Plan originally failed to provide either a comparable or transitional policy relatable to Policy EC16. This matter has been discussed in detail at the Local Plan EiP hearings and the Planning Inspectors required a policy wording to provide a transitional link between the adopted UDP and emerging Local Plan.
- 5.48 It has been confirmed in Paragraph 4.39 of this report that in response to the actions point set out by the Planning Inspectors the Council confirm the following addition into the emerging Local Plan:

New Para 6.197	Hearing Session 12 (9/10/19) Matter 15 Minerals and Renewable Energy Action Point 2	New Paragraph; <u>6.197 Proposals for opencast coal extraction may be considered acceptable in specific circumstances for example where the site is derelict and there may be an opportunity to restore land to a better condition and bring about local or community benefits.</u> <u>Reclamation and reworking of mineral waste may be considered acceptable where it can be demonstrated it would achieve the permanent high quality reclamation of derelict land.</u>
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- 5.49 This additional paragraph (6.197) provides the transitional policy guidance linking Policy EC16 with the emerging Local Plan. This is a significant step in terms of supporting the reclamation and reworking of mineral waste.
- 5.50 The principal requirement of Paragraph 6.197, in terms of the reclamation and reworking of mineral waste is *“where it can be demonstrated it would achieve the permanent high quality reclamation of derelict land”*.
- 5.51 In this instance the material consideration is that weight is afforded to the additional paragraph included in the emerging Local Plan by the Local Planning Authority and Policy EC16 of the adopted UDP. Fundamentally these policies and guidance continue to support the reclamation of post-industrial sites.
- 5.52 In the planning balance it is considered that the development remains directly relatable and intrinsic to the sustainable reclamation of the material at the site. There would be no adverse impacts that would be associated with the variation of the extant planning permission that would significantly and demonstrably outweigh the many benefits it will achieve, when assessed against the emerging Local Plan (including Paragraph 6.197), Policy EC16 and the policies in PPW10. This application should be supported by the Local Planning Authority and approved without delay.

6. CONCLUSIONS

- 6.1 The development proposals have arisen following the identification of sustainable working methods able to reclaim the waste material in a more efficient and socio-economical beneficial manner, producing a product of national need and significantly reducing CO₂ emissions.
- 6.2 The proposals are for the construction and operation of a block making plant. This facility directly functions as delivering Condition 6 of the extant planning permission (P/2015 /0337) by providing the working method to process and reclaim the waste material.
- 6.3 The proposals are not a standalone development and this Planning Statement demonstrates that the proposals are intrinsically linked to the function and purpose of the extant planning permission. The development proposals of the extant planning permission are not revised.
- 6.4 The planning balance demonstrates that the status of the adopted UDP and the emerging Local Plan. Recognising that the emerging Local Plan has been updated to support the principle of the reclamation of post-industrial sites, and in light of this, significant weight should be provided to this guidance in the emerging Local Plan, Policy EC16 and to PPW10. The proposals accord with the updated emerging Local Plan, Policy EC16 and is supported by the broader principles within PPW10.
- 6.5 The assessment has identified that the proposal will contribute to achieving significant levels of sustainable development by meeting the four identified dimensions stated within PPW10 through the creation of jobs, investment and the regeneration of a derelict and long-term vacant site. The proposals also deliver significant reductions in CO₂ emissions and sustainably produce a product required at a national level.
- 6.6 On the above basis, it is considered that there will be no significant adverse effects associated with the development that would demonstrably outweigh the considerable benefits it will achieve when assessed against the policies of the adopted UDP (including Policy EC16), the updated guidance of the emerging Local Plan and the aims and objectives set out within PPW10.



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