TeleCycle Ltd
Waste Planning Assessment
(TAN 21) 2026



1. Introduction and Purpose

This Waste Planning Assessment has been prepared in support of the planning application submitted by TeleCycle Europe Ltd for waste management and recycling operations at the proposed site.

The purpose of this report is to demonstrate that the proposed development accords with Technical Advice Note 21: Waste (TAN 21), with particular regard to Section 4 (Planning for Sustainable Waste Management) and Annex B (Waste Planning Assessment).

This document should be read alongside the following submissions, which form part of the application pack:

- TeleCycle Europe Ltd – Pre-Application Planning Consultation Report
- TeleCycle Europe Ltd – Consultation Response Report
- Planning Statement and supporting technical documents, including specialist reports

This assessment focuses on those themes outlined in the corresponding guidance and does not duplicate matters that are more appropriately controlled through the environmental permitting regime.

2. TAN 21 Annex B Compliance Index

Annex B requirement	Section(s)
Description of the proposed development	1, 4
Waste policy context and contribution to national objectives	3, 5
Need for the development	5
Waste hierarchy consideration	5, 6, Declaration
Best Practicable Environmental Option (BPEO)	6
Development time-scale and lifespan	5A
Days and hours of operation	5A
Types of waste to be managed	6A
Quantities and throughput	6A
Markets served	6B
Site selection and location	7
Compatibility with surrounding land uses	7, 8
Design, layout, buildings and plant	4, 7A
Transport and access	7A, 9
Amenity and nuisance impacts	8
Air quality and emissions	8A

Environmental controls and mitigation	8, 8A
Consultation undertaken	10
Waste hierarchy declaration	Declaration

3. Policy Context

TAN 21 provides Welsh Government guidance on how the planning system should facilitate sustainable waste management. Section 4 sets out the key planning principles, while Annex B identifies the matters that should be addressed within a Waste Planning Assessment.

The relevant objectives of TAN 21 include:

- Supporting the waste hierarchy
- Enabling sufficient waste management infrastructure
- Locating waste facilities in appropriate and sustainable locations
- Protecting human health and the environment
- Avoiding unnecessary duplication between planning and environmental regulation

The TAN 21 has been reviewed in conjunction with overarching and supporting planning policy and sector plans. Towards Zero Waste highlights the need for a reduction in waste produced within Wales but also a transition to a high recycling society. A core tenet is the provision of sustainable waste management and within this the approval of an adequate network of appropriate facilities, within appropriate locations dealing with types of wastes required. To this end the proposal aligns with this core objective.

Towards Zero Waste seeks to outline strategy for achieving zero waste by 2050, with significant progress to be made by 2025. Whilst prevention is the top priority, this is followed by reuse, recycling and recovery. The provision of the proposed facility directly facilitates this core objective, through the treatment of WEEE for further recovery and in undertaking assessment of WEEE for potential reuse.

4. Nature of the Proposed Development

The scope and scale of the proposed development is outlined in detail within the Planning Statement and the Pre-Application Planning Consultation Report. This includes a detailed description of the site, operational processes, and layout. The subsequent Environmental Permit application will elaborate on this further to achieve the appropriate consents for the proposed activities.

The proposal relates to the use of an existing industrial unit for waste management and recycling activities. All treatment operations will be undertaken within the building as well as the majority of storage of materials. All operations are undertaken on an impermeable surface serviced with a drainage system. Therefore, the pathways for potential contamination are very limited and will be managed by the Environmental Permit.

The development does not involve landfill or incineration and does not introduce waste disposal activities. The proposal focuses on recovery and recycling operations, consistent with the upper tiers of the waste hierarchy. In relation to the TAN 21 guidance, the proposed development represents a physical treatment facility, processing WEEE wastes. In contrast to other material recycling facilities, there will be limited potential for receipt of mixed wastes. Receipt of waste is from known sources and represents a natural development from the existing facility in Deeside.

The facility is not intended to accept household or municipal waste streams. Operations are limited to commercial and industrial waste streams associated with recycling and recovery activities.

A detailed description of the site, operational processes, and layout is provided within the Planning Statement and the Pre-Application Planning Consultation Report.

5. Need for the Development

TAN 21 requires consideration of whether there is a need for the proposed waste management facility. As highlighted in prior sections, the provision of such a facility aligns with the core objectives of the Towards Zero Waste strategy for Wales, representing an important site for the management of WEEE waste both nationally and in the locality.

The development addresses an identified need for modern recycling and recovery capacity, supporting:

- Diversion of waste from disposal
- Increased recovery of valuable secondary raw materials
- Regional and national objectives for sustainable waste management

The proposal contributes to the provision of waste infrastructure within an established industrial area, reducing the need for long-distance transport and supporting the proximity principle. Prior use of the site as a haulage and logistics company illustrates the viability in relation to commercial operations undertaken in the area as well as transport infrastructure in the locality.

The wider group is committed to critical mineral recovery and exports recovered printed circuit boards and precious-metal-bearing materials to leading global refineries specialising in precious metal and critical mineral processing, supporting high-value recovery from secondary raw materials.

The operation of the existing site at Deeside, which has been in operation since 2023, has highlighted the demand for processing of WEEE wastes as operations have steadily grown. Commercially, TeleCycle has reached the point where expansion of operations into a larger facility to support those at the established site at Deeside is the natural next step. Whereas Deeside undertakes manual dismantling of WEEE and storage of PCBs, the proposed development will duplicate and expand upon these operations, shredding the material to fractions for further recovery.

The applicant forms part of a wider group that is a member of the UK Critical Minerals Association, reflecting alignment with national objectives relating to resource efficiency, circular economy principles, and the recovery of strategically important materials from secondary sources.

5A. Development Timescale, Employment and Skills

The proposed development is intended to operate on a long-term basis, providing stable and continuous recycling and recovery capacity within the region.

The development will support local employment within an established industrial area. The applicant is committed to developing skills and operational competence within the workforce over the lifetime of the facility.

The Company is also exploring opportunities to support training and development initiatives, including discussions around vocational and skills-based training programmes, including potential engagement with HMP Berwyn and other appropriate organisations. Any such initiatives would be developed in partnership with appropriate organisations and would sit outside the planning control framework.

Operations will take place within the hours set out in the planning application and supporting documents. Any variation to operating hours would be subject to further approval through the appropriate regulatory processes.

The facility has been designed to allow for operational resilience and future-proofing within the scope of the planning permission and any environmental permit in force. Any future changes that would materially alter the nature or scale of the development would be subject to separate planning and environmental consent, as appropriate.

6. Waste Hierarchy and Best Practicable Environmental Option (BPEO)

The proposed development accords with the waste hierarchy by prioritising recovery and recycling over disposal.

The nature of the operations represents the Best Practicable Environmental Option (BPEO) as it:

- Maximises recovery of valuable materials
- Minimises residual waste requiring onward management
- Utilises existing industrial premises rather than undeveloped land

Where practicable, opportunities for re-use will be incorporated within the facility as operations become established, further supporting the waste hierarchy. Any such activities would remain ancillary to the primary recycling and recovery operations and within the scope of the planning permission and environmental permit.

Detailed process controls, emissions management, and operational safeguards will be secured through the environmental permitting regime regulated by Natural Resources Wales.

6A. Types and Quantities of Waste

The facility is intended to manage waste streams associated with recycling and recovery activities, including printed circuit boards, precious-metal-bearing materials, and non-ferrous materials arising from waste electrical and electronic equipment and related commercial and industrial sources.

The facility is not intended to operate as a waste facility for household or municipal waste.

Details of the specific waste types and the anticipated scale of operations are set out within the planning application and supporting documentation. More detailed information on annual quantities, throughput and design capacity will be provided through the environmental permitting process, where appropriate.

Residual materials and recovered fractions will be managed in accordance with the waste hierarchy. Recovered materials will be directed to appropriate downstream recovery and refining facilities, while any residues requiring onward management will be transferred to suitably authorised facilities.

6B. Markets Served

The proposed development serves markets within North, Mid and South Wales and the wider UK for secondary raw materials. The facility also supports established international markets through export routes for specialist refining and recovery. Exports are undertaken in accordance with the relevant shipment notifications to several countries including Japan, the Republic of Korea, Germany and the Netherlands and have been for several years at the Deeside facility. This illustrates the consistent demand for the products of treatment, and the hope is that the expanded treatment and storage capacity at the proposed facility in Wrexham can expand both current and future contracts.

These markets form part of established internal supply chains that support high-value recovery of materials, particularly precious metals and critical minerals, contributing to circular economy objectives and reducing reliance on primary extraction.

7. Site Selection and Location

TAN 21 and supporting policy requires waste management facilities to be appropriately located.

The site is located within an established employment and industrial area where waste management and recycling activities are compatible with surrounding commercial land uses. The location benefits from:

- Existing industrial infrastructure
- Suitable access to the strategic and local highway network
- Separation from sensitive receptors

The wider industrial estate accommodates a number of established recovery and recycling operations, generally operating at a larger scale and handling bulkier material streams than

those proposed at the application site. The former use of the site in haulage and logistics demonstrates the viability of the existing road infrastructure and appropriate location for such a facility. A Noise Impact Assessment submitted aligns with this, indicating no significant impacts of proposed activities to the local amenity.

In this context, the proposed operations are compatible with the established character of the area and are modest in scale relative to surrounding uses. The decision to undertake operations in the area are reflective of the appropriate location from a commercial perspective, the proximity to the existing facility and infrastructure for overseas shipment and viability of the existing site for the conversion into waste management uses.

The suitability of the site and its context has been considered through the planning application and consultation process, as set out in the Pre-Application Planning Consultation Report and Consultation Response Report. This should be reviewed in combination with this Waste Planning Assessment.

7A. Demand, Capacity and Industry Trends

The TAN 21 guidance outlines the need to capture current and future demand, in justification for the approval of the proposed. The WEEE recycling sector in the UK has experienced steady growth through recent years, with collection of WEEE wastes having reached their highest levels in the last six years. Forecasted market trends point towards growth in future, supported by environmental regulation, rising electronic consumption and improved technologies. As more electrical products flow into the waste sector as they meet the end of their product life, the demand for facilities to process this waste stream will increase, and the provision of facilities such as the proposed will become increasingly important.

The demand and development in the WEEE recycling sector can be linked to the trends within the mineral extraction sector. Although globally mineral extraction rates are steady and show growth in some areas, it is still becoming operationally and financially riskier whilst the recovery of precious materials from WEEE continues to become more economically viable and strategically important. Demand for precious metals such as copper, gold, and silver as well as critical raw materials (in which WEEE materials are rich in) is accelerating; treatment of WEEE wastes represents an increasingly viable secondary supply and necessary to support consumers of primary minerals. Increased provision of viable recycling routes will in time reduce pressure on the need for extraction, helping to offset material scarcity, enact the environmental benefits and support development of a circular economy.

The UK Government has recently published its national Critical Minerals Strategy (Vision 2035), which recognises the increasing importance of secure and resilient supply chains for minerals essential to modern industry, clean energy technologies, and advanced manufacturing. A key component of this strategy is the increased recovery of metals and mineral content from secondary sources, including waste streams, in order to reduce reliance on primary extraction and overseas supply.

The Strategy identifies recycling and recovery as a critical means of meeting future demand for key materials, supporting both resource efficiency and wider environmental objectives. In particular, it highlights the need for appropriate domestic infrastructure capable of managing, processing, and preparing metal-bearing wastes for onward recovery within authorised facilities.

These wider trends are the catalyst for the growth in TeleCycle's operation, which has provided a consistent stream of material at their existing facility for a number of years. The new proposed site offers an opportunity to consolidate their position in domestic and international markets whilst providing a needed resource to the Welsh waste sector.

Given this steady increase in supply, in order to accord with the key objectives outlined within the Towards Zero Waste policy, the provision of waste management treatment solutions should be prioritised. The proposed site represents a viable solution, from an experienced operator, to supplement their already permitted operation in Deeside.

7B. Design, Layout and Traffic Context

The development utilises an existing industrial building with minimal physical changes required to accommodate the proposed operations. The layout of operations and required storage are to be specified as part of the incumbent Environmental Permit application.

Traffic associated with the proposed development is expected to be less than historic uses of the site. Working hours are also reduced when compared to previous occupiers, further limiting potential impacts on the surrounding area.

The layout of the site, including operational areas and vehicle movements, is shown on the submitted drawings and described within the Planning Statement.

8. Environmental and Amenity Considerations

Key environmental and amenity considerations include noise, dust, odour, traffic, visual impact, light pollution, litter, birds and vermin, and emissions associated with site operations. These, as with all waste management operations, are governed first and foremost by the Environmental Permit. Given thresholds of operations (waste treatment and storage) fall within the installation bracket, the site therefore will conform with those compliance conditions outlined by Best Available Techniques.

The proposed development has been designed to ensure compatibility with surrounding land uses. In summary:

- All treatment operations are contained within the building
- Storage operations, for the majority are confined to the building
- Noise, dust, odour, and emissions will be controlled through operational practices and the environmental permitting regime
- Lighting will be designed to minimise light spill beyond the site
- Measures will be in place to prevent litter and pest attraction
- Traffic movements are appropriate for the industrial context

Specialist reports submitted in support of the application confirm that matters relating to noise, ecology, and drainage have been assessed and are acceptable.

This approach is consistent with TAN 21 guidance, which seeks to avoid duplication between planning controls and environmental permitting.

8A. Air Quality and Emissions

The proposed development does not involve combustion processes or incineration and does not give rise to significant point-source emissions to atmosphere. Given shredding operations are undertaken within the building with appropriate local extraction, there is limited potential for any fugitive emissions.

Any emissions associated with the handling and processing of materials will be controlled through the environmental permitting regime regulated by Natural Resources Wales. Air quality impacts have therefore been considered appropriate to be managed through permitting rather than planning controls, in line with TAN 21 guidance.

9. Transport and Access

The proposal utilises existing access arrangements within an established industrial area served by appropriate transport infrastructure.

Transport considerations are addressed within the Planning Statement and supporting documents. The proposed development is not expected to result in unacceptable impacts on the local or strategic highway network.

10. Community Engagement and Consultation

Pre-application consultation has been undertaken in accordance with statutory requirements.

The matters raised through consultation, together with the applicant's responses and any refinements to the proposal, are documented within the Consultation Response Report. This Waste Planning Assessment should be read alongside those submissions.

11. Summary and Conclusion

This Waste Planning Assessment demonstrates that the proposed development:

- Complies with the principles of TAN 21 Section 4
- Addresses the matters set out in Annex B
- Supports the waste hierarchy and sustainable waste management
- Is appropriately located within an established industrial area
- Protects amenity and the environment
- Avoids unnecessary duplication with the environmental permitting regime

The proposal is therefore considered to accord with national planning policy relating to waste and represents sustainable development in planning terms.

Declaration

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

Signed:



Name: Jeremy Pudge
Position: Compliance Manager
Date: 23 January 2026