Planning, Design & Access Statement

Prepared by: Arthian Ltd.

For: Asgard Renewables Ltd.

Site: Crugmore Farm, Penparc, Cardigan

Date: 19/02/2025

Document Ref: 314766/YP/1.0

Issue-1.0

www.arthian.com

Quality Assurance

Issue Record

Revision	Description	Date	Author	Reviewer	Approver
0.1	Initial Draft	29.01.2025	YP	SC	SC
1.0	Planning Submission	19.02.2025	YP	SC	SC

Staff Detail

Initials	Name	Position	Signature
YP	Yash Parker	Planning Consultant	Y. Parker
SC	Steven Cameron	Principal Planning Lead	S. Cameron

Contents

Appendices

1. Introduction

1.1 Background

1.1.1 This statement is submitted to the Ceredigion County Council (CCC) by Arthian Ltd. (Arthian) on behalf of Asgard Renewables Ltd. (the client), to provide a summary in support of an application seeking full planning permission for the proposed development of '*Two covered storage lagoons on land adjacent to the existing Asgard Renewables - Food Waste Recycling Plant in Penparc, Cardigan*'.

1.1.2 The description of the Proposed Development is as below:

"Expansion of Existing AD Facility for Proposed Siting of Two Covered Storage Lagoons, Maturation Tank and Associated Infrastructure at Crugmore Farm, Penparc, Cardigan."

1.1.3 The Proposed Development includes the formation of two fully lined lagoons (circa 6,450m^3 capacity each) and associated maturation tank on land adjacent to existing Asgard Renewables Plant at Crugmore Farm in Penparc. The proposed lagoons will expand the biofertiliser storage capacity of the applicant's existing Anaerobic Digestion (AD) plant, and subsequently allow the conversion of its existing biofertiliser storage tank into a functioning digester tank.

1.1.4 A Pre-Application enquiry was previously submitted in June 2024 (Q240104), to determine the council's position in terms of the Proposed Development. The Pre-Application Response dated 29-07-2024 identified support for the principle of the Proposed Development (refer Appendix A).

1.1.5 This Planning Application also seeks a formal Environmental Impact Assessment (EIA) Screening Opinion from the Local Planning Authority as a part of the Planning Application process. The below technical reports are submitted in support of the Planning Application:

- Odour Assessment and Management Plan
- Ammonia Assessment
- Drainage Strategy
- Transport Assessment (including Construction Traffic Management Plan)
- Construction Environmental Management Plan (CEMP)
- Green Infrastructure Statement
- Preliminary Ecological Assessment – Extended Phase 1
- Indicative Landscaping Plan

1.2 The Applicant

1.2.1 Asgard Renewables Limited operates an established AD facility producing biogas from food and agricultural wastes to fuel Combined Heat and Power (CHP) generators creating and supplying

up to 1MW of electricity to the National Grid. The company employees 6 full-time staff at its facility in Penparc, Cardigan.

1.2.2 As part of the AD process, Asgard Renewables produces a BSI Certified 'PAS110' Biofertiliser product, which is utilised by local farmers as a cost-effective replacement to mineral based fertilisers. This biofertilizer is produced continually and, during winter months, stored in the 3rd and largest tank on the existing Asgard site awaiting crop application during the growing season. The biofertiliser undergoes a pasteurisation stage prior to certification as 'PAS110' non-waste product and dispatch to agricultural land.

1.2.3 Asgard Renewables has a Natural Resources Wales (NRW) Permit (EPR/AB3097FU) to operate the AD plant with an annual throughput of 36,500 tonnes of waste input, however the plant has not yet utilised this full capacity. This is primarily due to the size of the existing 2 nos. digester tanks and their limited biological capacity. To utilise the full tonnage capacity of the plant, the company proposes (as envisioned during original conception) to convert the existing biofertiliser store into a functioning digester tank to provide the necessary biological capacity shortfall.

1.2.4 The addition of two proposed lagoons will allow for sufficient digestate storage capacity to meet the requirements under Nitrate Vulnerable Zones (NVZ)[1] and Water Resources Regulations[2], and to allow the potential for conversion of the existing large tank (biofertiliser store) into a functioning digester tank in the future.

1.3 Need for the Development

1.3.1 Anaerobic digestion is a process in which biodegradable matter is broken down by naturally occurring micro-organisms to produce biogas – a source of renewable energy, and a by-product known as 'digestate'. The 'digestate' is a nutrient-rich substance and serves as a bio-fertiliser that can be spread on agricultural land.

1.3.2 The operation of the AD plant itself requires a 'waste operations permit' from NRW under the Environmental Permitting (England and Wales) Regulations 2010 (as amended)[3]. However, the

[1] Nitrate Vulnerable Zones, GOV.UK, Available Online: https://www.gov.uk/government/collections/nitrate-vulnerable-zones.
[2] Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021, GOV.WALES, Available Online: https://www.gov.wales/sites/default/files/publications/2021-03/water-resources-control-of-agricultural-pollution-wales-regulations-2021-frequently-asked-questions.pdf.
[3] Environmental Permitting (England and Wales) Regulations 2010 (as amended), GOV.UK, Available Online: https://assets.publishing.service.gov.uk/media/603669608fa8f54807540920/LIT_6528.pdf

digestate meeting the standards under British Standards Institution's BSI-PAS 110[4] is not classified as a waste product.

1.3.3 The requirement to input waste to the permitted capacity of the AD plant is primarily driven by the recent introduction of the NVZ legislation. This legislation introduces 'closed periods' for application of organic materials to land. Local liquid wastes typically destined for land spreading are not able to be spread for 4 months period between October – February. As a permitted waste disposal site for liquid wastes, Asgard Renewables can utilise this waste for beneficial purposes i.e. production of electricity and certified biofertiliser and store it until required by growing crops. This creates a requirement for additional storage capacity of the biofertiliser.

1.3.4 The Proposed Development is aimed at enhancing the Asgard AD Plant's storage capacity for the nutrient rich biofertiliser which is generated as a by-product of its anaerobic digestion process. It will allow for the digestate to be stored on site till the optimal spreading time, to maximise nutrient absorption for beneficial environmental management.

1.3.5 The Asgard AD Plant currently holds NRW Waste Permit for processing of up to 36,500 tonnes of waste in a year. However, due to the limited storage capacity for the digestate products in addition to restrictions on NVZ spreading and winter-storage, the plant only operates at 20,000 tonnes.

1.3.6 The development proposal is to store the finished product biofertiliser in fully lined and covered lagoons awaiting dispatch, this would be situated adjacent to the AD site and filled via a pipe from the AD site. The proposal also includes a biofertiliser maturation tank situated within the existing AD site to hold the biofertiliser prior to dispatching to the storage lagoon. This is primary to cool the biofertiliser product after it has undergone it pasteurisation stage, being treated to over 70C for over 1 hour.

1.3.7 The lagoons facility provides the AD plant with its own >4 month storage facility for it biofertiliser, this gives the necessary flexibility to apply biofertiliser during the optimum crop growing window, conferring both an agricultural and environmental benefit.

1.3.8 The introduction of two lagoons for the storage of digestate will not only increase the AD Plant's storage capacity but will also allow the potential for subsequent conversion of its existing storage tank into a digester. This will allow the plant to increase its waste processing, this increase however is within the 36,500 tonnes limit already consented under the existing NRW permit.

[4] BSI PAS 110: Producing Quality Anaerobic Digestate, BSI Group, Available Online: https://landingpage.bsigroup.com/LandingPage/Undated?UPI=000000000030281385.

1.3.9 The existing AD Plant currently produces an average of 700kW on its 1MW grid-connection. The Proposed Development would allow the AD Plant to produce the 300kW deficit reliably.

1.3.10 The proposed expansion of the existing AD facility also offers the potential to increase local employment opportunity.

1.4 Scope of the Planning Statement

1.4.1 The following sections of the Planning Statement comprise of:

- Section 2: Characteristics of the Development;
- Section 3: Design and Access;
- Section 4: EIA Screening Request;
- Section 5; Planning Policy; and
- Section 6: Summary

2. Characteristics of the Development

2.1 Site Description and Context

2.1.1 The Application Site covers an area of approximately 1.61ha and is located in the southwestern outskirts of the settlement of Penparc, Ceredigion in Wales as identified in Volume 2b of the Ceredigion Local Development Plan[5]. Existing Asgard AD Plant is situated immediately to the East of the Application Site. Further to the east is a recently developed Crug Mawr solar PV farm, which has been operational since 2015.

2.1.2 The land gradates down to the South and is currently laid in ryegrass dominated improved grassland. The small parcel of land proposed for locating the maturation tank is laid in marshy grassland.

2.1.3 The Application Site is currently accessed by a narrow informal track to the North that connects it to the A487 highway network via the private access serving the neighbouring Asgard renewables plant.

2.1.4 While there are no trees present within the site, it is edged by a treeline hedgerow to its East. the Application Site is not within any protected sites (SSSI, SPA, SAC, or Scheduled Monument). The nearest Site of Special Scientific Interest (SSSI) and Geological Conservation Review (GCR) identified as 'Banc-y-Warren' is situated approximately 240m to North-East of the site. It is however separated by the existing AD Plant facility.

2.1.5 The site is generally well screened from the A487 corridor by the roadside hedges as well as interspersed tree clusters. It also benefits from a backdrop of shrubs and trees lining the eastern boundary that extends further South. Wider site topography comprises undulating land with hedge lined fields, the application site is consequently well screened from public view.

2.1.6 The immediate development pattern in the area is predominantly industrial in nature with the Asgard Renewables site as well as the established 12.4ha Crug Mawr Solar farm located to the southeast. Additionally, MD Recycling - a small waste management and recycling unit is identified to the North-West of the site. Other primary uses include agricultural farmlands.

[5] Ceredigion County Council. (2013). *Ceredigion Local Development Plan 2007-2022*. Available Online: The Current Ceredigion Local Development - Ceredigion County Council

2.1.7 As illustrated in Figure 1, the nearest residential development includes a dwelling in association to agricultural land use and is located approximately 170m to the West. Another housing group is located roughly 370m to the North-East of the site.

Figure 1: Site Context

2.2 Planning History

2.2.1 The proposed Application Site is open agricultural farmland. There are no historic planning applications or consents related to the Application Site. The following historic applications are related to the adjoining Asgard AD Plant:

- A230824 – Non-material amendment to planning permission - A120564 - Amendments to site levels, compost pad and lagoon positions and geometries, and location of planting
- A190023 – Variation of condition 6 of planning permission A140756 volume of feedstock
- A181127 – Variation of condition 2 of planning decision A130627 to accommodate alterations to the proposed scheme. (reduction in ground level; different holding and digester tanks; formation of an earth bund instead of concrete retaining walls and associated works)
- A180829 – 1. Change to the number and positioning of various storage tanks used inside of the reception building including the omission of one SPEL tank. 2. The installation of a ventilation system. 3. A change to the position of the Macerator de-packager equipment inside the reception building and consent for an increase in its dimensions. 4. Change to configuration of the pasteurisers so as to allow an internal pre-heat tank to be fitted and to enlarge the dimensions of

the (already consented) housing surrounding the pasteurisers and (when installed) the pre-heat tank. 5. A change to the position of the wood chip bio-filter and a change to the dimensions. 6. The installation of a mixing pit.

- A120564 - Construction of inert waste recycling and green waste composting facility and associated works
- A080293 - 2.5m Landfill of inert waste materials to facilitate extension to farmyard as a raised level area, grassed back on completion. Average depth of fill to be 2.5m

2.3 Proposed Development

2.3.1 The Proposed Development primarily consists of the siting of two covered and fully-lined lagoons proposed to the South-West of the Asgard AD Plant, for the storage of digestate before it is spread over nearby agricultural fields as a biofertiliser. The lagoons will connect to the infrastructure of the existing AD Plant through a proposed maturation tank sited adjacent to its digester tanks located at the AD Plant site.

2.3.2 The Proposed Development is aimed to enhance the existing plant's storage for biofertiliser, allowing it to store digestate until the optimal spreading time.

2.3.3 As illustrated in the Site Plan below, the key components of the Proposed Development include:

- 2 Storage Lagoons;
- Maturation Tank;
- Site Access, Service track, and Parking;
- Drainage Infrastructure;
- Security Fencing; and
- Landscaping.

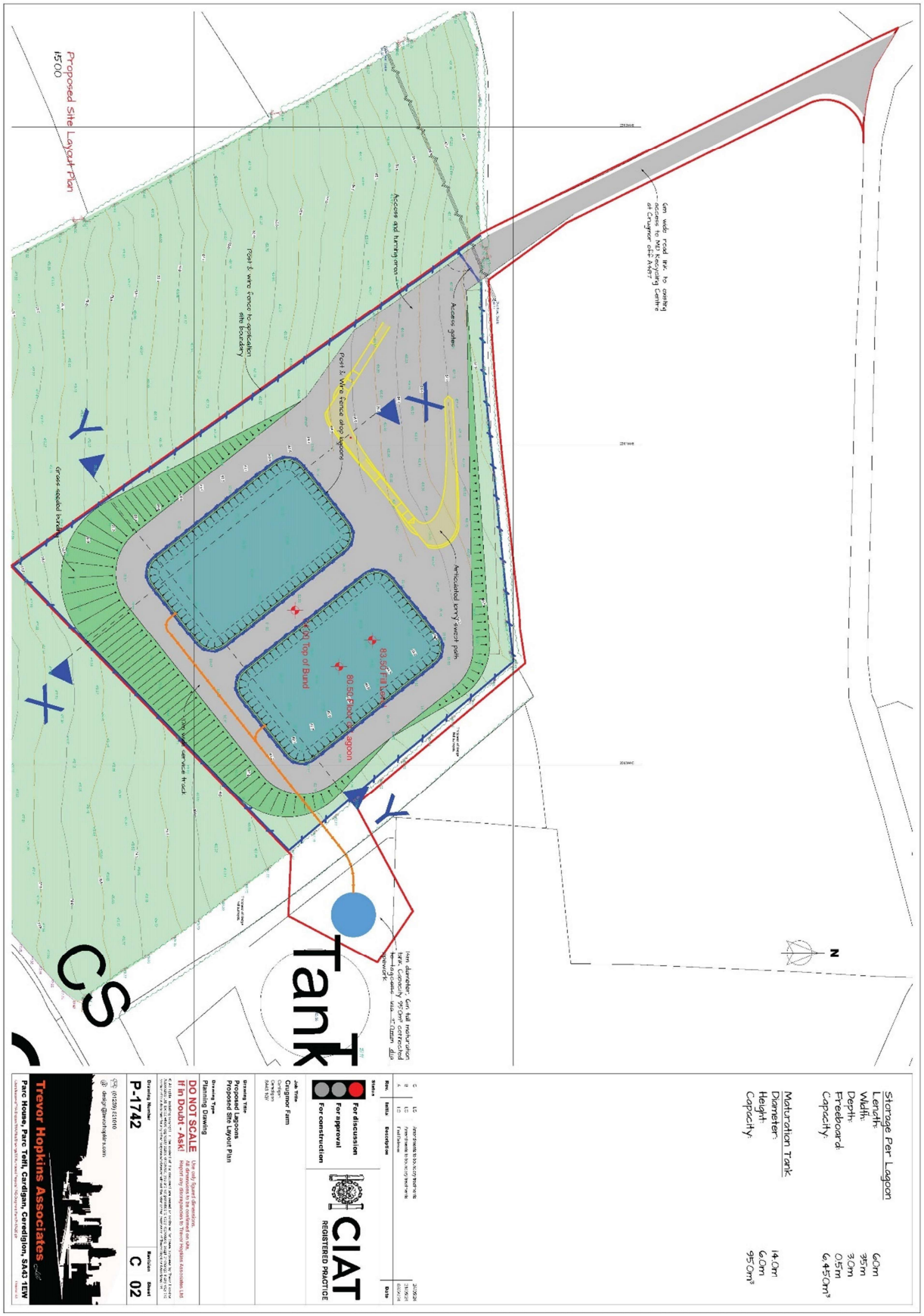

Figure 2 Site Plan

3. Design and Access

3.1 Introduction

3.1.1 This section provides an overview of the design approach and access provisions taken into consideration for the Proposed Development.

3.2 Design Strategy

3.2.1 As detailed in section 2.3.3, the Proposed Development comprises of:

- 2 Storage Lagoons;
- Maturation Tank;
- Site Access, Service track, and Parking;
- Drainage Infrastructure;
- Security Fencing; and
- Landscaping.

3.2.2 Taking into account the local topography and to minimise groundworks, the two proposed lagoons have been strategically sited at the southeastern edge of the Application Site, with the proposed maturation tank to be located further to the east adjacent to the existing tanks of the AD Plant. Any material from the groundworks would be used on-site, in site preparation or in the proposed landscaping works. No material would be taken off-site.

3.2.3 Each of the proposed lagoons are 60m in length, 35m in width, and a depth of 3m, with 500mm of 'freeboard' at the surface. It would add approximately a total of 12,900m^3 storage capacity to the existing AD Plant. They will be fully lined with a high-density polyethylene liner and enclosed by a floating covered to avoid any adverse impact on the surrounding natural environment. The lagoon, whilst of an impermeable clay construction, will be fully HDPE lined and include an integrated floating HDPE cover, effectively creating a sealed 'bag' within the clay bunding of the lagoon. The lining and covering of the lagoons would reduce the release of gases and reduce odour emissions to air, and risk of rainwater dilution/filling.

3.2.4 The maturation tank would be a steel panel 'slurry store' type construction, circular with a 14m diameter and 6m high, with the capacity of 950m^3. This would be sited adjacent to the existing biofertiliser store which has a roof top at ~12m, and within the AD plant's impermeable bunded area.

3.2.5 The proposed site layout allows for adequate space to the northwestern edge, required for the turning and parking of maintenance vehicles and lorries. It also includes a 10m wide service track surrounding the lagoons.

3.2.6 The Proposed Development makes provision of an underground attenuation tank to the north-west of the site, to accommodate the surface water runoff and to help ensure that there is no increase in runoff over the lifetime of the development.

3.2.7 Security features comprise of post & wire fencing proposed along the edge of the two lagoons as well as along the application site boundary.

3.2.8 The proposed landscaping would include planting of new hedgerows of native species along the western and southern site boundary. Additionally, the banks of the lagoons will be seeded with a locally-sourced wildflower meadow seed-mix to ensure that they sympathetically integrate into the surrounding landscape and to provide biodiversity enhancement.

3.3 Access

3.3.1 As shown in the accompanying site layout, the operational development proposes to share the existing private access and junction from the A487 road which currently serves the AD Plant facility as well as the MD Recycling centre. An extension to this private access would be formed to serve the Application Site by upgrading an informal access track to a 6m wide road link.

3.3.2 As identified in the Transport Statement, it is noted that the existing highway access is generously proportioned and has evidently been designed to accommodate the movements of HGV traffic associated with the AD plant that it serves, with 11m width and 40m wide bell mouth at the end. A visibility of 2.4m x 215m is currently available at the existing junction with the A487 along both the directions, meeting the required road standards.

4. EIA Screening Request

4.1 Introduction

4.1.1 EIA Screening is the process of determining whether a development falls within the remit of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017[6], by identifying whether it is likely to have significant effects on the environment.

4.1.2 The EIA Regulations set out thresholds for Schedule 1 development, whereby an EIA is always required. Where a proposed development is listed on Schedule 2, an EIA may be required if significant effects on the environment are considered likely, by virtue of factors such as size or location. Where proposed developments are listed within column 1 of Schedule 2, and meet or exceed the thresholds in column 2, an Applicant can request an EIA Screening Opinion from the competent authority to determine whether EIA is required.

4.1.3 The existing Asgard AD Plant located at Crugmore Farm generates annually approximately 1MW of electricity by the production of biogas through the process of anaerobic digestion. The existing AD Plant falls under the category of Class 3 (a) - 'industrial installations for the production of electricity' under Schedule 2 of the EIA Regulations[7].

4.1.4 As the Proposed Development is considered as an expansion of the existing AD Plant Facility and consists of an application site area of 1.6ha, it would therefore be classified under Category 13 (b) – 'Changes and Extensions' for the extension of development identified under Schedule 2.

4.1.5 It was identified in the Pre-Application Response (refer Appendix A) that "*the pre-application response does not therefore constitute the LPA's formal screening opinion as to whether the proposal is EIA development. A formal screening request will need to be submitted to the LPA should you wish for the LPA to adopt a formal screening opinion"*.

4.1.6 This section makes a request to the Ceredigion County Council for a formal Screening Opinion, to determine whether the Proposed Development is an EIA development.

[6] The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, legislation.gov.uk, Available Online: https://www.legislation.gov.uk/wsi/2017/567/contents.
[7] Government of Wales. "The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017. *Legislation.gov.uk*, 2017, Available Online: www.legislation.gov.uk/wsi/2017/567/schedule/2.

4.1.7 The remainder of this EIA Screening Statement has been prepared in accordance with the screening selection criteria as detailed within Schedule 3[8]. It outlines the criteria against which the development should be considered:

- Characteristics of development;
- Location of development; and
- Types and characteristics of the potential impact.

4.1.8 The following sections of this statement examine the potential for significant effects on the environment for each topic area relevant to the proposed development. Where necessary, mitigation measures have been identified.

4.2 Environmental Considerations

4.2.1 The table below outlines the environmental considerations relevant to the Proposed Development. The following sections demonstrate that the proposal would not result in any significant adverse effect on the environment, and any potential impact would be limited and confined to the local area.

Environmental Considerations	Summary
Biodiversity	A Preliminary Ecological Assessment – Extended Phase 1, was undertaken by Landsker Ecology in May 2024 to establish the presence of protected species and habitat within the application site and is summarised below. The Application Site lies outwith any statutory or non-statutory designations. The following sites are identified in the wider surrounding area: • Afon Teifi SAC 1.7km SW • Banc y Mwldan SSSI: 1km NW • Banc y Warren SSSI: 250m NE & 1.2km NE • Afon Teifi Estuary Woodlands and Marshes SSSI 1.7km SW <u>Reptiles</u> Potential habitats for reptiles, including collapsed silage bales and hedgerows, were identified within the site. No specific reptile sightings were reported, but suitable habitats suggest the potential presence of species such as slow worms and lizards. Mitigation:

[8] The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017, Schedule 3, legislation.gov.uk, Available Online: https://www.legislation.gov.uk/wsi/2017/567/schedule/3

	There is no predicted loss of hedgerow due to the development. A fingertip search for reptiles and amphibians would be conducted by a qualified ecologist before removing the collapsed silage bale. <u>Great Crested Newt (GCN)</u> No ponds suitable for GCN were found within the application site. Nearby water bodies, including streams, are not conducive to GCN habitation. Mitigation: 4.3.9 Due to the absence of suitable GCN habitats, further surveys or mitigation measures are not required. <u>Bats</u> The site features habitats such as hedgerows and woodland that provide foraging and commuting routes for bats. Mature trees in the area offer potential roosting sites, though no specific structures within the application site were identified for bat roosting. Mitigation: No loss of foraging habitat is expected, and enhancements such as planting native species will further support bat populations. Artificial lighting will be avoided to prevent disturbing bat activity. Proposed landscaping measures includes planting of hedgerows along the west and south site boundaries, comprising of a mix of native species to support biodiversity enhancement.
Agricultural Land	As shown in Figure 3, the Application Site is primarily identified within land classified as Class 5, with a small section of the access situated within land under Class 3b. It is not known for any prime agricultural significance, and no mitigation measures are considered necessary.
Air Quality	Odour and ammonia assessments have been undertaken to evaluate any potential odour impacts and ammonia emissions arising from the Proposed Development. Odour sources include the transportation, storage, and land-spreading of food industry process slurry. The main source of odour is the storage of bio-fertiliser in lagoons, which will have floating HDPE covers to minimize emissions. The lagoons are also a source of ammonia. The source odour potential was classified as medium. The risk of odour exposure was low at some receptors and negligible at others. The overall odour impact was considered to be not significant. The ammonia assessment concluded that ammonia emissions from the Proposed Development would have insignificant impacts on sensitive ecological receptors, with no exceedances at designated sites. Mitigation:

	The results of the modelled ammonia assessment concludes that overall impacts of ammonia emissions from the Proposed Development on sensitive ecological receptors is predicted to be insignificant. No further mitigation measures are necessary. The results of the modelled ammonia assessment concludes that overall impacts of ammonia emissions from the Proposed Development on sensitive ecological receptors is predicted to be insignificant. No further mitigation measures are necessary. Mitigation measures for potential odour impact include: • Routine odour controls include facility design, preventative maintenance, staff training, and proper materials management to minimize odour emissions during normal operations • Potential risk factors like adverse weather, equipment failure, and lagoon overflow were identified. Additional controls include increased vigilance, prompt waste disposal, and regular lagoon maintenance during abnormal conditions. • A procedure is in place for managing odour complaints, including investigation, corrective actions, and communication with complainants. • The OMP will be reviewed annually or after any significant odour incident. All updates and incidents will be recorded in the Odour Management Log Book.
Water Environment	The nearest watercourse is an unnamed Ordinary Watercourse located 200m south of the site, which receives the flows from local land drains serving the area. British Geological Survey (BGS) online mapping (1:50,000 scale) indicates that the majority of the site is not underlain by any superficial deposits. The NRW's 'Source Protection Zones' data, obtained from NRW's Interactive Map accessed 05/12/24, indicates that the site is not located within a Groundwater Source Protection Zone. The site is entirely in Flood Zone A within Welsh Governments TAN 15 Development and Flood Risk Map and therefore is considered to be at little or no risk of fluvial or costal/tidal flooding. Mitigation: As the Application Site is not at significant risk of flooding, there no further mitigation is necessary. The Proposed Development makes provision of an underground attenuation tank to accommodate the surface water runoff and to help ensure that there is no increase in runoff over the lifetime of the development. The proposed drainage scheme includes contaminated water containment achieved using

	a Sandfield ToggleBlok valve integrated into the proposed surface water drainage system. This would minimise runoff contamination effectively.
Cultural Heritage & Archaeology	The Application Site lies outwith any conservation areas. The closest historic asset is located 915m to the South-West, identified as 'Treforgan' (record no. 9892). 'Cardigan Town Walls' (SM Number CD141) is the nearest scheduled monument, located 2450m to the South-West. National Monuments Record of Wales identifies the below key assets in the area surrounding the Application Site: • Banc-y-Warren Enclosure, Crug Mawr, near Cardigan (NPRN. 405527) - 375m to North-East • Solar Farm at Crugmore Farm, Penparc (NPRN. 423670) – 184m South-East • Crug Mawr, site of Battle, near Cardigan (NPRN. 402323) – 473m to North-East There is no significant direct adverse impact on the surrounding historic environment, or its setting anticipated from the Proposed Development. Furthermore, it is noted that the key assets identified above would be separated from the Application Site by the existing Asgard Renewables AD Plant, minimising any potential impact. Mitigation: No mitigation measures are considered necessary.
Access	Access to the Application Site would be provided by an existing private access and junction from the A487 road which currently serves the AD Plant facility as well as the MD Recycling centre. No new access junctions with the public road are proposed. An extension to this private access would be formed to serve the Application Site by upgrading an informal access track to a 6m wide road link. The Transport Statement identified that the existing highway access is generously proportioned and has evidently been designed to accommodate the movements of HGV traffic associated with the AD plant that it serves, with 11m width and 40m wide bellmouth at the end. A visibility of 2.4m x 215m is currently available at the existing junction with the A487 along both the directions, meeting the required road standards.
Landscape & Visual	The Application Site is identified within the National Landscape Character Area - NLCA40 Teifi Valley, known for raised bog landscapes. Due to the low-lying nature and modest scale of the Proposed Development, it would integrate into the surrounding context and is not anticipated to have any significant adverse impact on the landscape and its setting.

	The Maturation Tank would be located adjacent to the digester tanks of the AD Plant, and would largely be screened and integrated in the existing development pattern. The proposed lagoons would be screened by grass seeded bunding and would not result in any adverse visual impact. Additional screening would be provided by the proposed hedgerows along the western and southern site boundaries. There is no artificial lighting proposed, to prevent any adverse impact on the surrounding landscape. Overall, there would not be any significant adverse visual impact on the surrounding landscape, and the Proposed Development would be read in the context of the existing site.
Ancient Woodland	There are no ancient woodlands are located within or adjacent to the Application Site. The proposed site layout is aimed to retain the tree line to the East of the site, and is not anticipated on creating any adverse impact on the natural environment.

Table 4.1 Environmental Considerations

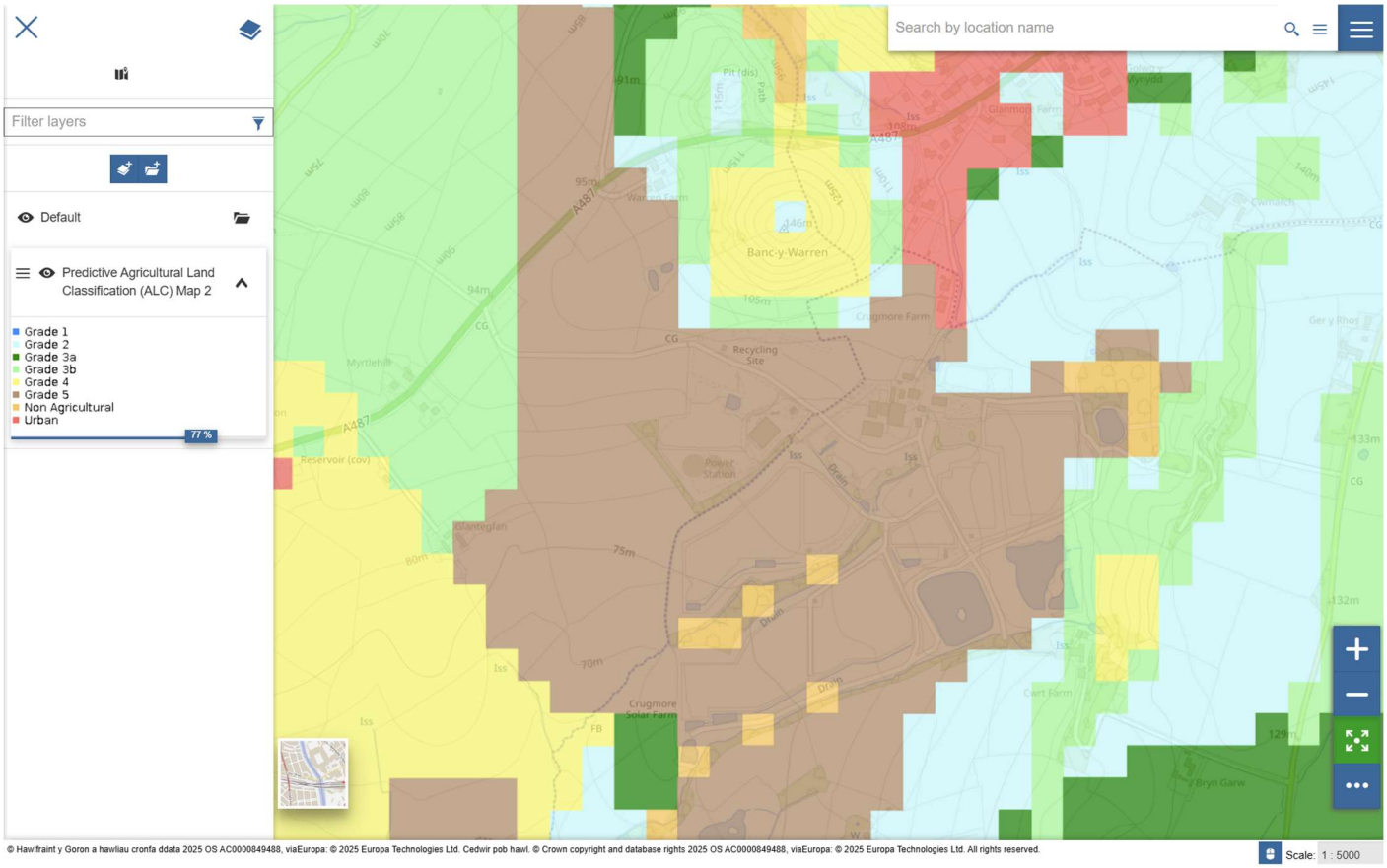

Figure 3 Agricultural Land Classification Map

4.2.2 Additionally, a Construction Environmental Management Plan (CEMP) has been submitted in support of the Planning Application. It outlines how environmental aspects of the construction phase are to be managed in accordance with environmental management best practice and legal/regulatory requirements, and is designed to mitigate and minimise construction effects on the environment.

4.3 Design and Siting

4.3.1 As a greenfield development, the proposal makes use of agricultural land classified as Class 5: very poor quality agricultural land (Predictive Agricultural Land Classification Map). It is not of any prime-agricultural significance.

4.3.2 The Proposed Development is comparable in scale and proportion to the surrounding development pattern including the adjacent AD Plant facility. While the maturation tank would be screened by the existing landscaping, the two lagoons and bunding would be set into the landscape setting.

4.3.3 The lagoons will store digestate (BSI-PAS 110) produced by the adjacent AD Plant. The plant will continue to operate as per the capacity approved under NRW Permit. The development is not anticipated to have any cumulative impact.

4.3.4 The Proposed Development, the formation of lagoons, would not be an untypical development in this rural countryside location, slurry lagoons are often associated with existing agricultural enterprises and are common features in such settings.

4.3.5 There would not be any significant amount of waste produced. The digestate (bio-fertiliser) to be stored at the lagoons (not classified as a waste) will be stored till the optimum land spreading period.

4.3.6 The Application Site lies outwith any areas protected under international or national legislation for their ecological value which could be affected by the proposed development. The site is identified within the National Landscape Character Area - NLCA40 Teifi Valley, known for raised bog landscapes. As the proposed lagoons surrounded by bunding will integrate into the surrounding context, the proposal is not anticipated to have any significant adverse impact on the landscape and its setting.

4.3.7 It is therefore considered that the Proposed Development would not result in any unacceptable significant adverse impact on the environment, and an EIA would not be required. A formal EIA screening opinion is requested from the Planning Authority.

5. Planning Policy

5.1 Introduction

5.1.1 Section 70(2) of the Town and Country Planning Act 1990[9] gave statutory force to a plan led system of development control. Section 38(6) of the Planning and Compulsory Purchase Act 2004[10] requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.1.2 This section of the Planning Statement identifies the Development Plan and policies that are relevant to the Proposed Development.

5.2 Development Plan

5.2.1 The Development Plan comprises of:

- Planning Policy Wales[11];
- National Development Framework – Future Wales: The National Plan 2040[12]; and
- Ceredigion Local Development Plan 2013[13].

5.2.2 The following technical advice notes are also of relevance to the Proposed Development:

- Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities (2010)[14];
- Technical Advice Note (TAN) 12: Design (2016)[15]; and
- Technical Advice Note (TAN) 23: Economic Development (2014)[16]

5.3 Planning Policy Wales

5.3.1 The key national sustainable placemaking outcomes for Wales focus on:

[9] Town and Country Planning Act 1990, UK Legislation. Available at: https://www.legislation.gov.uk/ukpga/1990/8/contents
[10] Planning and Compulsory Purchase Act 2004, UK Legislation. Available at: https://www.legislation.gov.uk/ukpga/2004/5/contents.
[11] Welsh Government. (2018). *Planning Policy Wales*. Available at: Planning policy Wales | GOV.WALES
[12] Welsh Government. (2021). *Future Wales: The National Plan 2040*. Available at: Future Wales: the national plan 2040 | GOV.WALES
[13] Ceredigion County Council. (2013). *Ceredigion Local Development Plan 2007-2022*. Available Online: The Current Ceredigion Local Development - Ceredigion County Council
[14] Welsh Government. (2010). *Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities*. Available at: Technical advice notes | GOV.WALES
[15] Welsh Government. (2016). *Technical Advice Note (TAN) 12: Design*. Available at: Technical advice notes | GOV.WALES
[16] Welsh Government. (2014). *Technical Advice Note (TAN) 23: Economic Development*. Available at: Technical advice notes | GOV.WALES

- making best use of resources
- generation of its own renewable energy
- maximising Environmental Protection
- limiting Environmental Impact
- facilitating Accessible and Healthy Environments

5.3.2 In line with these outcome priorities, the development will support the ongoing operations of the established AD Plant facility that minimises waste and reuses it for the generation of clean renewable energy and production of biofertilisers. The development itself will primarily contribute to the storage of biofertiliser for the optimum spreading period, replacing the need for artificial fertiliser and supporting decarbonisation targets. By sensitively siting it adjacent to the AD facility, it will further reduce carbon emissions arising from any transportation needs related to the storage of digestate.

5.3.3 By siting the development adjacent to the existing AD Plant and in an area with predominant industrial use in the immediate context, the development will sympathetically integrate into the surrounding landscape and its setting. It is not anticipated to have any adverse effects on the character of the area.

5.3.4 While the proposed site has limited agricultural value, the design proposals are strategically sited along the AD Plant facility, aimed to minimise the land required for development.

5.4 National Development Framework – Future Wales: The National Plan 2040

5.4.1 The Application Site is identified within the regional growth area of The Teifi Valley, as identified within the national framework and 'Policy 25 – Regional Growth Areas – Mid Wales' is of relevance to the proposal.

5.4.2 The proposal will contribute to addressing the climate emergency, while protecting the biodiversity and natural environment in the area. It is also respectful to the land uses identified within the site context and follows a sensitive scale and proportion to the AD Plant. It takes into consideration the following key overarching policies:

- Policy 4 – Supporting Rural Communities
- Policy 5 – Supporting Rural Economy
- Policy 9 – Resilient Ecological Networks and Green Infrastructure
- Policy 25 – Regional Growth area (Mid Wales)

5.5 Ceredigion Local Development Plan 2013

5.5.1 The Application Site is situated in the administrative boundary of the Ceredigion County, located to the East of Cardigan. The plan identifies support for renewable energy infrastructure to adapt and mitigate against climate change.

5.5.2 As recognized in the local development plan, Ceredigion makes a significant contribution to the production of renewable energy and the reduction of carbon emissions. The existing Asgard AD Plant supports this by using the food and agricultural waste for the generation of clean energy. This also supports the conversion of waste into a nutrient-rich biofertiliser by-product, further reducing carbon footprint and supporting sustainable agricultural practices.

5.5.3 The following policies from the Ceredigion LDP are of relevance to the proposal:

Policy S01: Sustainable Growth

5.5.4 The development is in line with the strategic objectives of this policy and would support in enhancing environmental management in consideration to the changes in the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021. It would also contribute to the provision of local employment opportunities during the construction phase of the development.

Policy S04: Linked Settlements and Other Locations

5.5.5 While the Application Site is located in the open countryside to the East of Cardigan, it is associated to an existing and well-established Asgard AD Plant facility and is sited adjacent to the substantive built form of the facility.

5.5.6 The Application Site is not allocated for development, but the proposal is modest in scale and is considered as a necessary expansion of the facility to support its ongoing operations. It is aimed to provide additional storage capacity for the digestate produced at the plant in response to the new regulations restricting land spreading of fertilisers over a period of 4 months between October-February.

Policy LU25: Renewable Energy Generation

5.5.7 This policy identifies support for the renewable energy sector to support renewable energy generation and reduction in carbon emissions. In line with the policy, the development would allow efficient operations of the existing AD Plant that generates up to 1MW of electricity, to allow efficient resource delivery.

Policy LU31: Resource Recovery and Waste Management Facilities

5.5.8 One of the key principles of this policy is to ensure that land is available for the composting and maturation of digestate arising from Anaerobic Digestion facilities on adjacent agricultural land. Criterion 4 permits composting and the maturation of digestate arising from Anaerobic Digestion facilities on agricultural land, with Criterion 5 permitting the co-location of facilities at or alongside waste producers to minimise and manage the waste that they generate at source and where practicable to recover energy from the remaining residual waste.

5.5.9 The proposed development will introduce a maturation tank with two lagoons located on immediately adjoining agricultural land in support of the AD Process and requirements in response to Water Resources regulations 2021.

Policy LU32: Development and the Waste Hierarchy

5.5.10 This policy seeks to maximise the opportunities for waste to be minimised and managed effectively in accordance with the principles of the waste hierarchy.

5.5.11 The Application Site is located adjacent to the existing AD Plant, on land not known for any prime agricultural significance. It would support the ongoing operation of the well established AD Plant.

Policy DM06: High Quality Design and Placemaking

5.5.12 The proposal shows compliance to this policy by taking into consideration the site location and its surrounding context and development pattern, including the existing Anaerobic Digestion Plant located on adjacent land. It adopts a modest scale and is aimed to respectfully integrate into the landscape setting.

Policy DM10: Design and Landscaping

5.5.13 The proposed lagoons are positioned to take advantage of the existing topography and will be surrounded by grass-seeded bunding to ensure that there is no adverse impact on the visual setting.

Policy DM11: Designing for Climate Change

5.5.14 The application site is located outwith any areas at flood risk, and is resilient to climate change.

Policy DM15: Local Biodiversity Conservation

5.5.15 The development is not anticipated to have any adverse impact on the local biodiversity. Future applications will be supported by a Phase 1 habitat assessment to identify any constraints and required mitigation measures.

Policy DM20: Protection of Trees, Hedgerows and Woodlands

5.5.16 The proposed site layout is aimed to retain the tree line to the East of the site, and is not anticipated on creating any adverse impact on the natural environment.

6. Summary

6.1 Introduction

6.1.1 The Proposed Development comprises of the expansion of the existing Asgard AD Plant for the siting of two digestate storage lagoons, maturation tank, and associated infrastructure on land at Crugmore Farm in Penparc, Cardigan.

6.1.2 The Proposed Development is considered as an expansion of the existing AD Plant Facility, with the application site area of 1.6ha. As a result, it would be classified under Category 13 (b) – 'Changes and Extensions' for the extension of development identified under Schedule 2.

6.1.3 The Proposed Development is not anticipated to cause any significant adverse impact on the natural or built environment. Mitigation measures have been identified by the relevant consultants, and they will be implemented throughout the construction and operation of the Proposed Development. Therefore, it is not considered to be an EIA development, and an EIA is would not be required. A formal EIA screening opinion has been requested from the Planning Authority to confirm the same.

6.1.4 The Proposed Development is respectful to the surrounding development pattern and is comparable in scale and proportions. It is not anticipated to have any adverse impact on the built and natural environment, or the landscape setting. The type of development proposed is fairly typical in this type of setting. There is also a location need with regards to the direct link with the existing Asgard development.

Appendices

Appendix A – Pre-Application Response

Cyngor Sir CEREDIGION County Council

Russell Hughes-Pickering
Swyddog Arweiniol Corfforaethol : Economi ac Adfywio
Corporate Lead Officer : Economy and Regeneration

Neuadd Cyngor Ceredigion, Penmorfa, Aberaeron. SA46 0PA
www.ceredigion.gov.uk

Mabbett & Associates Ltd
Mabbett House
11 Sandyford Place
Glasgow
G3 7NB

Dyddiad / Date	29-07-2024
Gofynnwch am / Please ask for	Sian Holder
Llinell uniongyrchol / Direct Line	01545 572574
Fy nghyf / My ref	Q240104
Ebost / Email	Sian.Holder@ceredigion.gov.uk

Dear Sir / Madam,

Town and Country Planning Act 1990
Re: Pre-Application Advice: Crugmor Farm, Cardigan, SA43 1QY

Thank you for your pre-application form received on the 03-06-2024. The pre-application submitted is for the proposal to expand the existing AD facility to provide two covered storage lagoons, maturation tank and associated infrastructure.

Relevant Planning History

The planning history of the land is outlined below:

- A230824 - NMA - amendments to application A120564 (Amendments to site levels, compost pad and lagoon positions and geometries and location of planting. Approved 15-02-2024
- A190023 - Variation of condition 6 of planning permission A140756 volume of feedstock. Approved subject to conditions 13-06-2019
- A181127 - Variation of condition 2 of planning permission A130627 to accommodate alterations to the proposed scheme. Approved subject to conditions 15-02-2019
- A150985 - NMA - amendments to application A130627 (proposed installation of an additional CHP engine within the existing building). Approved 03-12-2015
- A150654 - NMA - amendments to weighbridge, log cabin office, toilet & staff room. Part Approved 16-09-2015
- A140756 - Variation of Condition 2 of Planning permission A130627 to accommodate alterations to the proposed scheme. Approved subject to conditions 12-11-2014
- A130627 - Construction and use of an anaerobic digestion facility and associated works. Approved subject to conditions 12-12-2013
- A120564 - Construction of inert waste recycling and green waste composting facility and associated works. Approved subject to conditions 18-04-2018

Legislation

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires an application for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

The development plan for Ceredigion consists of Future Wales: The National Plan 2040 (Future Wales) and the Ceredigion Local Development Plan 2007-2022 (LDP) as a Strategic Development Plan (SDP) has not been adopted for the Mid Wales region. Whilst the Ceredigion LDP has reached its plan end date, it remains the statutory development plan until its replacement with a new adopted plan.

In line with the Planning and Compulsory Purchase Act 2004, should a policy in Future Wales conflict with a policy within the Ceredigion LDP, then the conflict should be resolved in favour of the Policy contained within Future Wales. This is due to Future Wales being the latest document to become part of the development plan.

National Planning Policy and Guidance

The following national planning policy and guidance documents are considered relevant to the proposal:

- Future Wales: the national plan 2040
- Planning Policy Wales (edition 12, February 2024)
- Technical Advice Note (TAN) 5: nature conservation and planning
- Technical Advice Note (TAN) 6: Planning for Sustainable Rural Communities
- Technical Advice Note (TAN) 12: Design
- Technical Advice Note (TAN) 18: Transport
- Technical Advice Note (TAN) 21: Waste Development
- Technical Advice Note (TAN) 23: Economic Development

Relevant Development Plan Policies

On the 25th April 2013 the Council resolved to formally adopt the 'Ceredigion Local Development Plan' (LDP). The LDP can be inspected on the website via the following link; https://www.ceredigion.gov.uk/index.cfm?articleid=4761

The following development plan policies will be considered during the assessment of your proposal:

- S01 Sustainable Growth
- S04 Development in Linked Settlements and Other Locations
- LU25 Renewable Energy Generation
- LU31 Resource Recovery and Waste Management Facilities
- LU32 Development and the Waste Hierarchy
- DM03 Sustainable Travel
- DM04 Sustainable Travel Infrastructure as a Material Consideration
- DM06 High Quality Design and Placemaking
- DM10 Design and Landscaping
- DM11 Designing for Climate Change
- DM13 Sustainable Drainage Systems
- DM14 Nature Conservation and Ecological Connectivity
- DM15 Local Biodiversity Conservation
- DM17 General Landscape
- DM20 Protection of Trees, Hedgerows and Woodlands
- DM22 General Environmental Protection and Enhancement

Relevant Supplementary Planning Guidance

The following Supplementary Planning Guidance documents are applicable and should be considered:

- Transport Assessment SPG
- Nature Conservation SPG
- Built Environment and Design SPG

For further information regarding planning policies please follow this link:http://www.ceredigion.gov.uk/ldp

Initial Assessment of Proposal

The site refers to the existing Asgard Anaerobic Digestion Facility - Food Waste Recycling Plant, which is located to the south of the A487, just to the south-west of the village of Penparc. The development is proposed on land to the west of the existing facility, and includes two covered and fully lined lagoons measuring 60m in length, 35m in width, and a depth of 3m (circa 6,450m3 capacity each) and associated maturation tank. The maturation tank would be a steel panel 'slurry store' type construction, circular with a 14m diameter and 6m high, with the capacity of 950m3. The lagoons will be used for the storage of digestate before it is spread over nearby agricultural fields as a biofertiliser. The lagoons will connect to the infrastructure of the existing AD Plant through a proposed maturation tank sited adjacent to its digester tanks located on site.

The proposed lagoons will expand the biofertiliser storage capacity of the AD plant, and subsequently allow the conversion of its existing biofertiliser storage tank into a functioning digester tank. The development is aimed at supporting the ongoing operations of the AD plant, allowing an increase in its waste processing capacity, although the increase will be within the 36,500 tonnes limit already consented under the existing NRW permit. The development is required due to the recent introduction of the Nitrate Vulnerable Zone (NVZ) legislation.

It is proposed to re-use the existing private access and junction from the A487 road which currently serves the AD Plant facilities. An additional construction and maintenance access will be formed from this private track to serve the new lagoon development, by upgrading an informal track to a 6m wide road.

Landscaping works will include grass-seeded bunding around the lagoons, with post-wire fencing around the application site

boundary and the lagoons.

Waste Development

It is understood from the information provided that the material to be stored in the proposed lagoons would be PAS 110 standard digestate (i.e a 'product'), and therefore it is agreed that the proposed operations would not be a waste operation, and therefore the proposal would not require a waste planning assessment, as required under TAN 21 for waste development. If the digestate does not meet the PAS 110 standards, it would be classified as waste, and thus a waste planning assessment will be required. This will need to be made clear as part of a formal planning application with some form of formal confirmation from NRW and / or the applicant that the digestate meets the PAS110 standards.

Major Development

The information provided states that the application site is 1.6ha in size, and would therefore be classified as major development. Subsequently, a pre-application consultation will need to be undertaken prior to the submission of a formal planning application, and a report of the findings of the consultation submitted as part of a formal planning application.

EIA Development

Section 4 of the Planning Statement (PS) refers to EIA Regulations and notes that the development would fall under the following Schedule 2 categories:

- Class 3 (a) - industrial installations for the production of electricity; and
- Category 13 (b) â€“ changes and extensions

The PS provides a review of the various factors to determine if the proposed development would have any adverse impacts on the natural environment, and anticipates that the proposal will not result in any significant effect on the environment, with any impact expected to be limited and confined to the local area.

The pre-application enquiry does not request a screening opinion from the LPA as to whether the development is EIA development. The information does not include available results of environmental assessments carried out - for example, it notes that a Transport Assessment, Odour and Ammonia Assessment, Phase 1 Habitat Assessment and Drainage Impact Assessment will be undertaken, however no further information is provided.

This pre-application response does not therefore constitute the LPA's formal screening opinion as to whether the proposal is EIA development. A formal screening request will need to be submitted to the LPA should you wish for the LPA to adopt a formal screening opinion.

Principle of Development

For the purpose of local planning policy, the application site lies outside of any defined settlement and is therefore within Other Locations as identified within the Local Development Plan (LDP). Development within Other Locations is strictly controlled in the interest of sustainable development and protecting the countryside. LDP Policy S04 states that development within Other Locations will be permitted where (of relevance) it accords with the requirements of TAN 6. TAN 6 notes that operations, including renewable energy, are likely to be appropriate uses, for farm diversification.

Planning Policy Wales (PPW) states that planning authorities should adopt a positive approach to diversification projects in rural areas, noting that small business activities can often be sustainably located on farms, and can strengthen the rural economy and bring additional employment and prosperity to communities. It recognises that diversification activities come in many forms, and can also include renewable energy proposals such as anaerobic digestion facilities, and that these schemes should be supported where there is no detrimental impact on the environment and local amenity. Figure 11 demonstrates the waste hierarchy, and given that the digestate meets the PAS110 standards and is considered a product, it could be considered a recycling operations in terms of how the AD Plant deals with the waste.

LDP Policy LU25 sets out a positive policy approach to the expansion of renewable energy capacity, noting that such development will be permitted, subject to meeting the criteria set out.

LDP Policy LU31 aims to ensure that sufficient land is available in appropriate locations to meet regional and national waste plans and strategies. Criterion 4 permits composting and the maturation of digestate arising from Anaerobic Digestion facilities on agricultural land, with Criterion 5 permitting the co-location of facilities at or alongside waste producers to minimise and manage the waste that they generate at source and where practicable to recover energy from the remaining residual waste.

LDP Policy LU32 seeks to maximise the opportunities for waste to be minimised and managed effectively in accordance with the principles of the waste hierarchy.

The agricultural field has a predictive grade of 5 - the lowest possible.

The application site adjoins an existing and well established AD Plant and given that the development would be designed to store digestate from the existing Plant, it is considered appropriate to locate the development close to the existing AD Plant so that the digestate would only need to be pumped a short distance.

In view of the above, it is considered that the principle of development can be viewed favourably.

Visual Impact

LDP Policy DM06 requires development to be of a high-quality design that contributes positively to the context of its location. LDP Policy DM17 requires development to not have a significant adverse effect on the general landscape.

The proposed development would expand the existing AD Plant further west, into currently agricultural field. The maturation tank, which will be 6m high, will be located immediately adjacent to the existing tanks, and is therefore unlikely to result in any additional adverse visual impact on the surrounding landscape. The proposed lagoons cover a large area, however, due to their nature, they will be low-lying and will be mainly screened by the grass-seeded bunding. As a result, they are unlikely to have a significant adverse visual impact on the surrounding landscape, and would be read in the context of the existing site.

The widening of the existing track to 6m, and the creation of an access and turning area will introduce additional hardstanding, and I would advise that soft planting (i.e. trees/hedgerows) should be planted alongside the existing track - particularly along the west facing boundary. Additionally, further soft planting should be provided along the outer boundary of the site i.e. alongside the proposed post and rail fencing. This will help to provide additional screening, particularly to occupiers of nearby properties (as discussed further below), whilst also contributing positively to enhancing biodiversity (as discussed further below).

Residential Amenity

LDP Policy DM06 seeks to protect the amenity of nearby occupied from significant harm caused by new development.

The proposed development would see the existing site being expanded close to the residential properties to the north-west and south-west. It is important therefore that the proposal does not cause significant harm to their amenity. The comments noted above about additional soft planting along the access track and outer boundaries of the site will help to provide further screening of the development from these properties.

It will also be important to demonstrate as part of a formal planning application that the proposal will not result in adverse smell, noise or any other pollution, that would cause significant harm on their amenity.

LDP Policy DM22 also seeks to ensure that new development does not negatively impact water, air and soil and does not lead to increased light and noise pollution.

The PS notes that an odour assessment will be submitted as part of a formal planning application. Such an assessment will need to include an assessment of the following criteria:

- baseline odour conditions
- locality and sensitivity of receivers
- sources of odour
- control / mitigation techniques
- the predicted impact of any fugitive odour with the use of modelling tools either predictive or empirical.

The assessment should also provide a conclusion.

It is also advised that, regardless of the findings of any odour impact assessment, an odour management plan which formalises and describes how odour issues will be managed on site during normal operation, going into further detail in relation to controls already specified such as the proposed HDPE cover (maintenance plan, schematics), should also be submitted as part of a formal planning application.

In terms of dust and noise, it is unlikely that there would be any adverse impact on residential amenity during normal operational use, however this may be a concern during the construction phase. As a result, a Construction Environmental Management Plan (CEMP) will need to be submitted as part of a formal planning application. This shall include rudimentary details of construction plans (such as details of noise generating plant to be used and timescales for completion) in order for appropriate conditions in relation to noise and dust suppression to be considered as part of the formal planning application.

A formal planning application will be subject to consultation with members of the public and any representations received which raises material planning considerations will be considered as part of the determination of the application

Public Rights of Way

A Public Rights of Way footpath runs to the east / south of the proposed development. It will be important that the footpath remains open and safe for users throughout.

Highways

The Welsh Government Highway Authority (Trunk Road) has requested further information on how the increased waste processing capacity would impact site generated traffic movements (including HGV movements). They have also advised that a Construction Traffic Management Plant (CTMP) will be required.

The Local Highway Authority has advised that the internal access road and servicing facilities are acceptable to serve the proposed development.

In view of the comments from Welsh Government, I would advise that a Transport Assessment and CTMP will need to be submitted as part of a formal planning application.

Ecology

The development is within 5km of three European protected sites:

- Cardigan Bay SAC (4.1km)
- West Wales SAC (4.6km)
- Afon Teifi SAC (1.75km)

In accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, any development that is likely to have a significant effect on a European protected site must be subject to a Habitats Regulations Assessment. The development poses two hazards to the sites listed above: ammonia and phosphates.

Ammonia
The proposed development will cause ammonia to be released into the atmosphere. Ammonia can have a significant effect on human health and the environment. In order to be able to assess the impact that ammonia emissions released by the development will have on nearby protected sites, an ammonia modelling report will be required to accompany any full planning application that is made. The ammonia modelling must be applied to all protected sites within a given distance of the installation (this includes the Banc-y-Warren and Banc-y-Mwldan Sites of Special Scientific Interest). Further information on screening distances and what is required can be found on NRWâ€™s webpage Ammonia assessments for developments that require a permit or planning permission.

https://naturalresources.wales/guidance-and-advice/business-sectors/farming/ammonia-assessments/ammonia-assessments-for-developments-that-require-a-permit-or-planning-permission/?lang=en

Phosphate
On the 21st January 2021, NRW published an evidence package outlining phosphorus levels for all river SACs across Wales. As part of this package, they issued a Planning Position Statement, in which they advised that any proposed development that might increase the amount of phosphate (or phosphorus) within a river SAC catchment could lead to damaging effects to the SAC. Therefore, such proposals should be screened through a Habitats Regulations Assessment (HRA), to determine whether they are likely to have a significant effect on the SAC.

Presently, the tidal section of the Afon Teifi SAC is not considered to be at risk from elevated levels of phosphate. The proposed development is within the catchment area of this tidal section. Based on the available evidence this would likely mean that, in terms of the HRA, the development can be screened out from having a detrimental impact on the Afon Teifi SAC. However, this situation could change in terms of new evidence that comes available or in terms of new guidance pertaining to other nutrients or chemicals. It is therefore recommended that the latest version of the NRW planning guidance is consulted prior to a full planning application being brought forward, in order to inform what information is required to be submitted with the application.

https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-river-special-areas-of-conservation/?lang=en

Other matters
There are unlikely to any other direct impacts on the qualifying features of the Afon Teifi SAC, such as otters, as there are

donâ€™t appear to be any water courses near the proposed development location and the landscape is agricultural with few habitat features that would encourage otter. Likewise, aside from ammonia, there are presently no other impact pathways between the development and the Cardigan Bay SAC and the West Wales Marine SAC (though see note above about new evidence becoming available).

The proposed development area is >0.1 hectares which indicates the requirement of a Preliminary Ecological Assessment. Page 8 of the Planning Statement states that Further detailed application will be supported by a Phase 1 Habitat Assessment (bullet point 3).

Any ecological assessment should include a walkover of the site to check for protected species, specifically badger which are known to use boundaries of agricultural land (banks, hedgerows etc) to make their setts. The tree line to the east of the site specifically should be checked. If evidence of badgers is recorded then an appropriate mitigation plan will need to be submitted and potentially a licence obtained from NRW. Any ecological consultant that is employed to carry out the ecological surveys will be able to advise further. Measures to prevent mammals such as badgers and otters from entering any excavations and being unable to escape will also be required.

Planning Policy Wales (PPW) 12 (6.4.5) sets out that â€œplanning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversityâ€, and green infrastructure. This policy responds to the Section 6 Duty of the Environment (Wales) Act 2016 which states that all public bodies to maintain and enhance biodiversity in the exercise of functions. A Green Infrastructure Statement that includes details of ecological enhancements should be submitted with any full planning application. It is not appropriate to seek this information retrospectively by way of a condition and it must be provided as part of the planning application process.

The GI Statement will need to include the following information, as a minimum:

1. Description of existing green infrastructure on site
2. Description of surrounding green infrastructure
3. Description of how the step-wise approach has been applied
4. Long-term management plan
5. Details of net biodiversity enhancement

LDP Policy DM06 requires development to retain important natural features along with ensuring the use of good quality hard and soft landscaping and embracing opportunities to enhance biodiversity and ecological connectivity. Policy DM10 requires the submission of a landscape scheme for proposals that would have an impact on the landscape. LDP Policy DM20 sets a presumption in favour of the retention of existing trees, hedgerows and woodlands.

The comments above regarding planting along the internal access road and the outer boundary of the site will help to ensure that the proposed development meets the requirements of PPW, in terms of providing net biodiversity enhancement.

These comments have been made using the information provided in the pre-application â€“ the information included is by no means exhaustive and should not be used as solid evidence for the presence/absence of species/habitats. If recommended an ecological appraisal will look for this information.

Surface Water

The proposed development will need to include a sustainable drainage system (SuDS) to deal with the increase in surface water drainage, in line with LDP Policy DM13 and national planning guidance.

There is useful guidance within the Council's adopted Built Environment and Design SPG.

All new developments of more than 1 dwelling house or where the construction area is 100 square metres or more will require SuDS approval from the Council's Sustainable Development Authority Body (SAB) prior to the start of works on site. This is separate to the planning process.

Other Comments

I would advise that the following information should be confirmed as part of a formal planning application:

- Confirmation / evidence that the proposal does meet the PAS110 standards.
- How much extra electricity power the development would produce. This would help provide further justification, particularly in relation to the transport movements.
- Size of the excavation and how much of the cut materials will be required for fill - will the material excavated be sufficient to build the banks of the lagoons, or will material need to be imported. Imported material will need to meet the required BS standards, BS3882 and WLGA guidance â€“ Requirements for the Chemical Testing of Imported

Materials for Various End Uses. (Requirements for the Chemical Testing of Imported Materials for Various End Uses and Validation of Cover Systems.pdf)

- If there would be an excess of material from the cut then conformation on where would this material go. If this is the case, I would advise that it is utilised on site for landscaping.

Guidance on Submitting an application

Should you wish to proceed with a planning application, full planning permission will be required for the proposed development. The items listed below will need to be submitted as part of a full planning application.

- Full planning application form
- Location plan 1:2500, 1:1250 scale with land in ownership outlined in blue and development area outlined in red.
- Block plan 1:200 scale with land in ownership outlined in blue and development area outlined in red.
- Proposed Site Plan, to an identified scale
- Proposed Elevations, Sections and Site Levels, to an identified scale
- Pre-Application Consultation Report
- Transport Assessment
- Construction Traffic Management Plant
- Odour Assessment
- Odour Management Plan
- Ammonia Assessment to include modelling report
- Ecology Assessment
- Tree Survey (if any trees are proposed to be removed)
- Construction Environmental Management Plan
- Landscaping Plan to include future maintenance plan for the landscaping
- Green Infrastructure Statement
- Drainage Details
- Confirmation / evidence that the proposal does meet the PAS110 standards
- Confirmation of additional electricity power the development would produce
- Clarification on excavated materials
- Requisite Fee

Please note that this is the informal opinion of an Officer, given on the basis of the information currently available to the Officer in relation to your query. The opinion is given on a without prejudice basis and is not binding upon the Council. All planning applications will be subject to formal determination based upon consideration of the merits of each application, current planning policy, legislation, relevant consultation responses and other material planning considerations.

For further information regarding planning policies please follow this link:http://www.ceredigion.gov.uk/ldp

Yours sincerely

Sian Holder
Arweinydd Tim Rheoli Datblygiad (De) / Development Management Team Leader (South)
Ar ran Economi ac Adfywio / On behalf of Economy and Regeneration

Appendix B - PAS110 Certificate

Certificate of Compliance

This is to certify that

Whole digestate ASG-ASG-WD

Produced by

Asgard Renewables Ltd

Unit 2, Crugmore Farm, Penparc, Cardigan, SA43 1QY

complies with the British Standards Institution's Publicly Available Specification for Digestate (PAS110: 2014), the Anaerobic Digestate Quality Protocol (2014) and the Scheme Rules.

PAS 110 PRODUCT
ENGLAND, WALES &
NORTHERN IRELAND

Registration Number: AD00055

Date Issued: 22 February 2024

BCS Number: BCS0417C101

Date Certificate Expires: 31 March 2025

Signed by: .....

Roy Lawford - Senior Certification Officer