

CiNER Glass Ltd.

**CiNER Rassau – Dragon Glass
Bottle Manufacturing Facility**

Response to public comments on the
planning application

Final | 14 January 2022

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 273927-00

Ove Arup & Partners Ltd
63 St Thomas Street
Bristol BS1 6JZ
United Kingdom
www.arup.com

ARUP

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On 22 September 2021, Ove Arup and Partners Ltd (‘Arup’) submitted an application for full planning permission on behalf of CiNER Glass Ltd (‘CiNER Glass’) to Blaenau Gwent County Borough Council (‘the Local Planning Authority’) for the Dragon Glass Bottle Manufacturing Facility (‘the facility’).

During the statutory consultation period for the planning application, the Local Planning Authority has received comments from members of the public in relation to the facility.

This document provides a response to comments made by members of the public which have commonly arisen. The document does not provide an answer to every comment which has been made, but to those comments frequently arising, grouped into key themes.

Each comment has been responded to as simply as possible in **Table 1**, beginning on the next page. However, for more information on particular points please refer to the Environmental Statement which reports on the assessments undertaken to inform the planning application.

Table 1: CiNER Glass response to commonly arising public comments on the planning application

Ref No.	Theme	Public comment raised	CiNER Glass response
1	Economic Development	How committed are CiNER Glass to come to Ebbw Vale?	CiNER Glass is making a long-term commitment to Ebbw Vale and the local area. The facility is an opportunity to create and secure well-paid jobs which can benefit the whole community. CiNER Glass want to hire local people and foster skills and expertise in Blaenau Gwent, with the aim of being a long-term, high quality employer in the area.
2	Economic Development	How many direct job opportunities will be created through construction and operation of the facility?	The construction phase will create 450 new jobs. When fully operational, around 670 new direct jobs will be created. The operation of the facility is planned for decades but has the potential to continue beyond that.
3	Economic Development	What supply chain opportunities will there be for the local economy?	It is important for CiNER Glass that materials and services required for the facility come from local companies, so that the facility is an asset for the whole community and local economy. This will also reduce transportation costs, ensure security of supply and reduce carbon footprint. The main supply chain opportunities for local companies relate to providing: <ul style="list-style-type: none"> • raw materials (including recycled glass and limestone); • machinery supply and maintenance; • packaging materials; • security services; • catering services; • logistics operations; • cleaning services; and, • training and development providers. CiNER Glass is committed to placing these contracts with local companies.

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4	Air Quality	Will air emissions from the glass bottle manufacturing process affect the health of local residents?	<p>An assessment of emissions from the glass manufacturing process on human health has been undertaken. The assessment has been undertaken in accordance with best practice and guidance and concludes that there will be no significant effects to air quality. More information can be found in the Environmental Statement submitted with the planning application. The technology being used at the facility is tried and tested, with similar facilities successfully operating within other parts of the UK.</p> <p>More information can be found in Chapter 5 (Air Quality) of the Environmental Statement.</p>
5	Air Quality	Can particulate matter from the chimneys enter rainfall and fall within the Carno reservoir?	<p>An assessment of particulate matter entering rainfall (known as ‘wet deposition’) has been undertaken.</p> <p>It was agreed with the Local Planning Authority that effects from wet deposition at the Carno reservoir would not be included in the assessment, as the reservoir is not a designated habitat. However, the effects assessed at sensitive ecological sites within a similar distance of the facility as the reservoir show that no significant impacts will result from the facility.</p> <p>More information can be found in Chapter 5 (Air Quality) of the Environmental Statement.</p>
6	Air Quality	What forms of filtration and embedded mitigation measures would be used to reduce the quantity and concentration of emissions?	<p>The facility has been designed to include embedded mitigation measures in accordance with UK and European Union best practice air quality controls.</p> <p>The embedded mitigation measures include abatement measures (selective catalytic reduction) to manage emissions from gasses from the furnaces and filtration of any particulate matter. Following treatment, the two chimneys are designed to the height required to allow dispersion of the treated emissions, considering local weather conditions.</p> <p>More information can be found in Chapter 5 (Air Quality) of the Environmental Statement.</p>

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7	Air Quality	How does CiNER Glass and the Local Planning Authority plan to monitor emission levels and any effects on local health?	CiNER Glass will monitor for any emissions from the manufacturing process that could have posed a risk to human health, as will be required by the Environmental Permit for the facility. Monitoring will include a continuous emissions monitoring system, developed in line with best practice. The results will be reported to Blaenau Gwent County Borough Council, as the Environmental Regulator of the facility, in line with the requirements of the Environmental Permit.
8	Air Quality	The manufacturing process of green glass produces high levels of Chromium (CrVI). What assurances can CiNER Glass make to ensure that manufacturing of green glass is not introduced at a later stage?	An assessment has been undertaken in line with best practice, which considers all relevant emissions, including hexavalent CrVI from the production of green glass and the need for raw materials containing hexavalent CrVI for recycled green glass production. The assessment has found that the concentration in emissions of hexavalent CrVI resulting from any green glass production will not create an impact. The wording in the Environmental Statement (Chapter 5 Air Quality) has been updated to make this clear.
9	Landscape	Why is the facility required to be the size proposed?	The size of the facility is dictated by the glass bottle manufacturing processes. The batch building houses the primary raw materials for the process and is a function of the stored volume of materials required to service the furnace. The furnace building is a function of the necessary heights of the furnaces and the adjacent feed silos, the size of which is driven by the commercial viability of the scheme.
10	Landscape	Has the Environmental Statement considered how the proposed facility would impact views from the Carno Reservoir?	Viewpoints included in the Environmental Statement were agreed in collaboration with the Local Planning Authority and Brecon Beacons National Park, prior to submission of the planning application. Although no specific assessment of viewpoints has been undertaken from the Carno reservoir, assessments have been undertaken from a number of representative viewpoints from the surrounding area. It is likely that there will be limited views from the Carno reservoir of the upper portion of the facility such as the chimneys, as land and existing vegetation will provide a partial screen. As part of the planning application, landscape planting is proposed

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			along the eastern boundary of the site, which will provide further screening once the planting has matured. More information can be found in Chapter 13 (Visual) of the Environmental Statement.
11	Landscape	Will the chimneys be fitted with illuminated signs / flashing lights?	The chimneys will be of a height which could require small, red aircraft warning lights to be installed on top, to increase visibility of the structures to aircraft. Such devices prevent aircraft collisions and is a legal requirement. Other than the warning lights, no other flashing beacons / lights will be installed on the chimneys. No illuminated signs will be fitted to the chimneys. Aircraft warning lights are already present on other structures on the Rassau Industrial Estate. They are a requirement on structures like the existing wind turbine on the site, and will be for the recent planning permission granted for an additional wind turbine.
12	Landscape	Will flames be produced from the top of the chimneys?	No, flames will not be produced from the top of the chimneys.
13	Landscape	What forms of visual mitigation would be installed to reduce visual intrusion of the facility?	CiNER Glass has undertaken an appraisal of suitable materials for the façade (walls) of the building, which will provide the most visual mitigation. Reflective materials will be used on the façade of the facility, so it will be able to respond to the ever changing sky and weather patterns, both locally and at a distance. The cladding will create a unique quality of achieving a light-weight finish that will help mitigate and break-up the massing of the building. Further information can be found in the Materiality and Lighting Strategy document submitted with the planning application. Landscape planting has been included as part of the proposal and includes planting on the northern and southern boundaries of the site to ensure the appearance of the building is in keeping within the landscape.
14	Lighting	Has the planning application considered the effects of lighting on the Brecon Beacons National Park Dark Skies Reserve?	The design of the facility has carefully considered effects to the wider environment, including the National Park Dark Skies Reserve through the orientation of roof lights, internal lighting suspended 3m below roof levels and external directional lighting that reduces light spill and skyglow. Likely

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			<p>impacts of lighting from views in the National Park has been assessed in the Environmental Statement, with effects likely to be experienced over a very small area, confined to the southern slopes of Mynydd Llangynidr.</p> <p>No impacts are predicted on the National Park's Dark Skies Reserve core area, which was not included in the Environmental Statement due to the distance and intervening landform between the dark skies core area and the facility.</p> <p>More information can be found in Chapter 13 (Visual) of the Environmental Statement.</p>
15	Lighting	What methods are proposed to ensure the facility does not create light pollution?	<p>The facility will require some external lighting within the surrounding car park and internal road network. An external lighting strategy will be developed, and this will be agreed with the Local Planning Authority before construction begins. The lighting strategy will include lighting solutions established as best practice and that have been used on other similar projects in the UK to prevent light pollution (i.e. downward facing lights).</p> <p>The reflective materials on the façade of the facility will be adapted to best suit the site conditions and its context through the introduction of different levels of matt or patinated finishes. This will reduce any reflection of light into the National Park.</p>
16	Noise	Will the construction phase create significant noise for nearby commercial and residential properties?	<p>The construction phase would not create significant noise impacts.</p> <p>The greatest level of noise from the construction phase will be the removal of the existing hardstanding on the site, which will result in a 60 dB noise impact (which is the equivalent of a normal conversation level of noise or an air conditioning unit) during certain activities lasting less than a month. These activities will be controlled to minimise disruption through a Construction Environmental Management Plan, which will be agreed with the Local Planning Authority.</p> <p>Deliveries to site will take place during the day and will be well distributed throughout the day to avoid noise pollution overnight.</p>

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			More information can be found in Chapter 10 (Noise) of the Environmental Statement.
17	Noise	When operational, will the facility create significant noise for communities in Rassau, Beaufort and Garnlydan?	<p>An assessment has been undertaken on noise from when the facility becomes operational. The assessment has found, that in nearly all circumstances, noise from the facility does not exceed pre-existing background noise levels.</p> <p>The only increase in noise levels is predicted at two locations along Llangynidr Road (3.1dB and 3.9dB increase). However, the increase in the level of noise would be lower than 5dB which is an industry established standard for noise arising from a development of this type. For context, noise at 10dB is equivalent to a person breathing normally and 20dB is equivalent to a ticking watch – so although there is a predicted increase at two locations, it will be very low.</p> <p>More information can be found in Chapter 10 (Noise) of the Environmental Statement.</p>
18	Ecology	Is new tree planting proposed as part of the facility?	<p>Some initial clearing of conifer and mixed woodland will be required for the construction of the facility, however approximately 566 new trees will be planted on the site as part of the scheme. These will consist of broad leaf native trees planted on the north and south of the site and along the watercourse, to supplement the existing conifer and mixed species trees.</p> <p>The tree planting will provide rich woodland habitat which will be of value to a broad range of animals and birds, in particular providing more opportunities for roosting bats and nesting birds which are currently limited due to the majority of woodland comprising conifer species.</p> <p>CiNER Glass are also proposing to provide offsite mitigation to enhance habitat sites in the local area.</p>
19	Ecology	Will protected ecological sites be affected by construction of the facility?	The facility has the potential to impact upon habitats of value to nature conservation including species rich grassland and notable fungi within the mixed plantation woodland. Some habitats will be lost as a result of the facility, however mitigation will be provided through the management of

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			<p>nearby woodland and grassland habitats. This will enhance the quality of habitat in the local area and increase the diversity of flora and fauna overall.</p> <p>Through design, best practice mitigation and enhancement measures proposed with the facility, it is not anticipated that there will be any residual significant effects on valued ecological sites. In addition, the planning process will require no net loss of ecology as a result of the facility.</p> <p>More information can be found in Chapter 7 (Ecology) of the Environmental Statement.</p>
20	Ecology	What mitigation measures are proposed to minimise impacts on wildlife?	<p>Best practice mitigation measures are proposed to protect wildlife through construction and operation of the facility.</p> <p>Mitigation will include sensitive vegetation clearance under ecological supervision; a trapping and relocation programme for reptiles and amphibians (if present); closure of badger setts under an agreed licence (if required); sensitive lighting during construction; and, regular on-site briefings to appointed contractors to ensure understanding of environmental controls (known as ‘tool box talks’). New habitats will be created within the site, to provide a home for wildlife and to enhance ecological connectivity through the site.</p> <p>More information can be found in Chapter 7 (Ecology) of the Environmental Statement.</p>
21	Climate Change	Has CiNER Glass considered the use of recycled glass in the glass bottle manufacturing process, so that waste creation is reduced?	<p>CiNER Glass proposes to use recycled glass in their production and has the ambition to increase the percentage of recycled glass used year on year, with the ultimate aim of using 100% recycled glass.</p> <p>Supply of glass in sufficient quantities could be sourced from local authority glass recycling across Wales, and the Applicant is keen to work with the supply chain across South Wales to maximise this opportunity.</p> <p>More information can be found in Chapter 6 (Health) of the Environmental Statement.</p>

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22	Climate Change	Has the Environmental Statement considered the levels of CO2 emissions which could be emitted from the facility?	<p>The quantity of greenhouse gas emissions emitted during the construction and operation of the facility has been assessed within Chapter 6 (Climate Change) of the Environmental Statement. These include the following:</p> <ul style="list-style-type: none"> • Carbon dioxide (CO2); • Methane (CH4); • Nitrous oxide (N2O); • Sulphur hexafluoride (SF6); • Hydrofluorocarbons (HFCs); and • Perfluorocarbons (PFCs). <p>As part of the assessment, greenhouse gases from the following sources have been considered:</p> <ul style="list-style-type: none"> • Construction materials; • Transport of materials to site during construction; • Construction site emissions; • Construction worker commuting; • Transport and treatment of waste materials arising from construction; • Operational energy consumption of the facility (electricity and natural gas); • Transport of raw material for glass manufacture to the facility; • Transport of finished product off-site to distribution centres; • Operational worker commuting; and • Change in carbon sequestration rates from habitats lost/gained. <p>The predicted quantity of greenhouse gases emitted from the facility is compared against Welsh and UK carbon budgets in the report. Please see Chapter 6 of the Environmental Statement for further information.</p>

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			During the construction and operational phases, mitigation measures embedded in the design of the facility and to be agreed through the Construction Environmental Management Plan will reduce greenhouse gas emissions.
23	Drainage and Water	Will the facility result in groundwater leaching or drainage into the Carno reservoir?	<p>Construction and operation of the facility is unlikely to result in groundwater leaching or draining into the Carno reservoir.</p> <p>The reservoir is to the north-east of the site, but the general fall of the land is away to the south-east of the site. Given the topography of the land and the location of proposed plant within the site, it is unlikely for the site to drain into the reservoir.</p> <p>During construction, any groundwater removed will be gathered and discharged (after treatment, if necessary) through a temporary drainage system into local watercourses. These watercourses flow into the River Ebbw downstream of the Carno reservoir. Groundwater monitoring will be undertaken during construction of the basement level of the facility and monitoring measures will be controlled through the Construction Environmental Management Plan document prepared by CiNER Glass.</p> <p>Operation of the facility will not require further dewatering and no more groundwater will be removed from the site. Site drainage may intercept shallow groundwater, this will be discharged into the same local watercourses. All trade effluent and foul flows produced will be disposed of through foul drainage, not through surface water drainage.</p>
24	Drainage and Water	Is there sufficient capacity within the existing drainage network to accommodate the facility or will additional drainage infrastructure provided?	<p>Welsh Water Dwr Cymru have confirmed that the existing drainage infrastructure is capable of accommodating foul drainage and trade effluent flows arising from the facility</p> <p>Storm water discharge will be provided into the brooks adjacent to the site, via a new sustainable drainage system within the site. The design of the new drainage system will be a sustainable solution which is being agreed with the appropriate authorities, and will require a separate approval to the planning permission and environmental permit.</p>

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25	Health	Has the Applicant considered the existing cumulative impacts of existing dust, noise, air quality issues and other pollutants on local residents from the Rassau Industrial Estate and other similar forms of development along the Head of the Valleys Road?	<p>Existing dust, noise, air quality and other pollutants from the Rassau Industrial Estate have been captured within the baseline for each of the assessments undertaken and therefore are a fundamental part of the assessment. The assessment found that there are no significant impacts on local residents from noise, dust and air quality during construction and operation of the facility. More information is provided in Chapter 8 (Health) of the Environmental Statement.</p> <p>The health assessment in particular considers how the cumulative impacts on air quality (including dust) and noise are likely to affect population health. The assessments found that there are no significant impacts.</p> <p>The cumulative effects assessment (Chapter 15 of the Environmental Statement) also includes an assessment of any future developments that have been consented but are not yet constructed. The assessment found that there are no cumulative impacts on human health.</p>
26	Health	Has the health chapter in the Environmental Statement considered any potential mental health implication of the facility on local residents?	<p>The World Health Organisation defines health as "a state of complete physical, mental and social wellbeing and not merely an absence of disease or infirmity". The evidence used within the assessment of health determinants, includes consideration of how mental health is affected.</p> <p>Chapter 8 (Health) of the Environmental Statement assessment included in the relevant health determinants for the facility, which included air quality, noise, crime and community safety and access to education and training. Recognition is made within the assessment to how changes in these health determinants can be subjective, reflecting on individual vulnerabilities. The assessment concluded that there will be no significant during construction and operation of the facility.</p>
27	Highways	Will HGV vehicle movements from the facility create traffic issues in the Rassau industrial Estate?	HGV movements into the facility will be distributed throughout the day to reduce congestion within the Rassau Industrial Estate. This would include incoming materials being delivered between 08:00 and 17:00 and outgoing movements between 06:00 and 22:00.

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			<p>The facility includes a ‘holding area’ for HGVs, where they can park, meaning there will be no stationary HGVs outside of the site that could potentially cause congestion problems.</p> <p>A Site Traffic Management Plan has been prepared in consultation with the Local Planning Authority, which includes measures to ensure there will be no traffic issues arising from the facility.</p>
28	Highways	Are any improvements proposed relating to highway safety?	<p>The mini roundabout in the Rassau Industrial Estate is proposed to be removed as part of highway improvements with the facility. It will be replaced with a priority T-junction entrance into the site. This approach has been subject to consultation with the Local Highway Authority, to ensure highway safety in accordance with established standards and good practice.</p>
29	Environmental Impact Assessment	Why has the Environmental Statement been prepared by CiNER Glass and not an independent organisation?	<p>In accordance with planning application procedure, as the Applicant for planning permission, CiNER Glass is required to prepare a planning application for the proposed development and an Environmental Statement. The Environmental Statement has been prepared by Arup - an independent, specialist firm commissioned by CiNER Glass.</p> <p>The Local Planning Authority is consulting widely on the document including internal departments and key external organisations such as Natural Resources Wales and Welsh Water Dwr Cymru. It is understood that the Council has commissioned a consultancy to validate some of the more technical aspects of the planning application including around air quality.</p>
30	Environmental Impact Assessment	The Environmental Statement provides a lot of technical information which is difficult to understand. Where is the technical information in the Environmental Statement summarised?	<p>A Non-Technical Summary (NTS) document has been prepared to provide a high-level overall summary of the Environmental Statement, and the main sections of the planning application, with additional links to sign-post to where further information can be found.</p> <p>The NTS and the Environmental Statement have been prepared in line with legislative requirements and established guidance published by the Institute of Environmental Management and Assessment (IEMA) on the Environmental Impact Assessment.</p>