

Neath Port Talbot County Borough
Council
Development Control Section
The Quays
Brunel Way
Neath
SA11 2HZ

Your Reference

Our Reference

B16399-123532-XX-NN-NA-E10012

Afan Wastewater Treatment Works

2 November 2021

Mott MacDonald Bentley
Ty Awen
Spooners Close
Celtic Springs Business Park
Coedkernew
Newport NP10 8FZ
United Kingdom

mottmacbentley.co.uk

We hereby request that Neath Port Talbot County Borough Council adopts a 'screening opinion' as to whether the proposed works by Welsh Water to Afan Wastewater Treatment Works (WwTW) constitutes Environmental Impact Assessment (EIA) development under the provisions of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 (the 'EIA Regulations').

In accordance with Regulation 6(2) of the EIA Regulations this letter provides:

- a plan sufficient to identify the land;
- a description of the development including: – a description of the physical characteristics of the development and, where relevant, of demolition works; and – description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- a description of the aspects of the environment likely to be significantly affected by the development;
- to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from: (i) the expected residues and emissions and the production of waste, where relevant; and (ii) the use of natural resources, in particular soil, land, water and biodiversity; and
- such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

1 Background

Operational improvement works are required at Afan WwTW to implement the necessary secondary containment to bring the site in line with the Industrial Emissions Directive (IED) as outlined in BAT 19 and CIRIA 726.

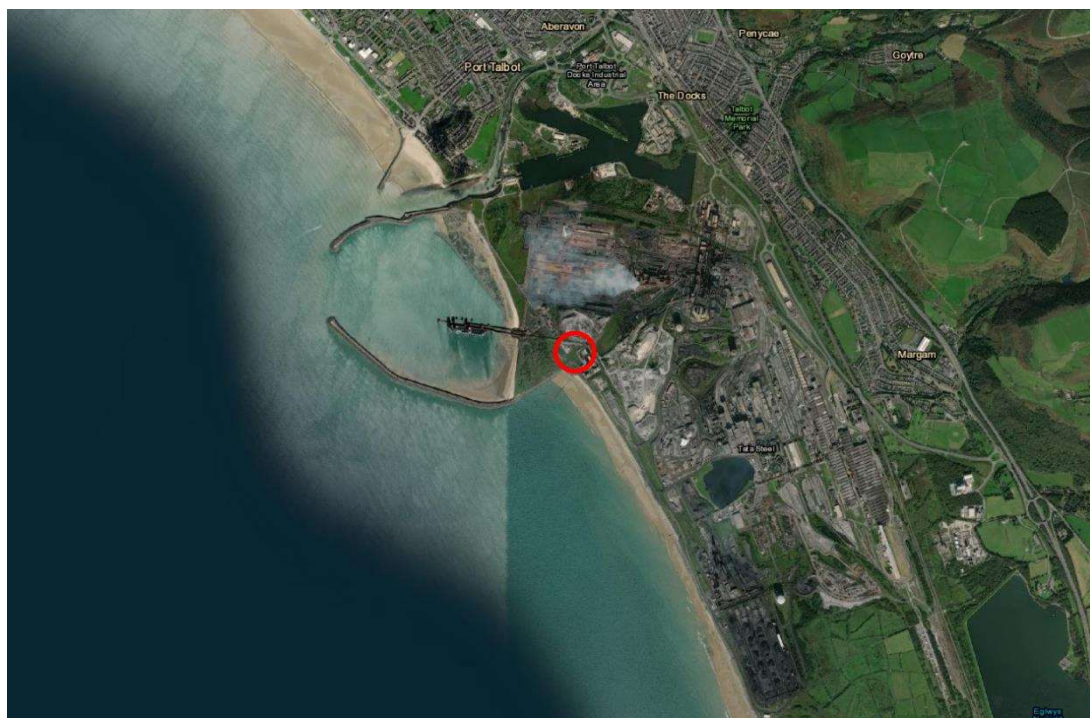
Afan WwTW has advanced anaerobic sludge digesters, which in the case of a fault, may create foaming on top. This scheme is to make the necessary improvements at the site to avoid potential pollution to adjacent land.

The proposed modifications to the works are shown on Drawing No. B14411-123532-XX-XX-DR-CA-C19006 Site Drainage.

1.1 Location

The site is located approximately 3km to the south west of Port Talbot at Grid reference SS 761 873. The works are therefore coastally located adjacent to Margam Sands with the steel works surrounding the site.

Figure 1 Location



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

2 Proposed Development

The works to be undertaken at Afan WwTW comprise:

- Provide secondary containment in the areas specified on Drawing No. B14411-123532-XX-XX-DR-CA-C19006 Site Drainage Plan. The secondary containment will come in the form of bunding, kerbs, speed humps and walls.
- Make all permeable ground areas within the IED Permit Boundary impermeable (i.e., make these areas concrete hardstanding).

2.1 Construction

A construction compound consisting of site accommodation and material storage will be located within the boundary of the existing site.

The works will consist of installing bunding, kerbs, speed humps, walls and areas of concrete hardstanding.

2.2 Operation

Once the works are completed the site will continue to operate in the same manner. It is not envisaged that there will be any additional road traffic to the site upon completion of the proposed development.

2.3 Decommissioning

It is not envisaged that the site will be decommissioned in the foreseeable future.

3 EIA Screening

In order to determine if an EIA is required a sequential screening test in accordance of the EIA Regulations has been applied as summarised in Table 1.

Schedule 1 of the EIA Regulations sets out those developments for which an EIA is mandatory. Schedule 2 of the EIA Regulations lists those developments which will require an EIA if it is likely to have a significant effect on the environment due to its size, nature and / or location.

Schedule 3 of the EIA Regulations provides details of the selection criteria for screening Schedule 2 developments. Although not all of the criteria will be relevant in every case; three broad criteria are identified which should be considered:

- The characteristics of the development (e.g. its size, cumulation with other development, use of natural resources, production of waste, pollution and nuisance, and the risk of accidents);
- The location of the development (e.g. existing land use, capacity of the natural environment to absorb further development, environmental sensitivity of the location); and
- The characteristics of the potential impact (e.g. its magnitude, probability and duration, frequency and reversibility).

In general, EIA will be needed for Schedule 2 developments in three main types of case:

- For major developments which are of more than local importance;
- For developments which are proposed for particularly environmentally sensitive or vulnerable locations; and
- For developments with unusually complex and potentially hazardous environmental effects.

Table 1: Sequential Screening Test

Step		Comments
1 - Is the project described in Schedule 1 of the EIA Regulations?	No	The development is not described as a Schedule 1 development; Schedule 1(13) refers to wastewater treatment plants with a capacity exceeding 150,000 population-equivalent. The proposed works will not trigger this threshold as the capacity of 139,433 p-e will not be increased.
2 - Is the project described in Schedule 2 of the EIA Regulations?	Yes	The development falls under Schedule 2 in the context of paragraph 11(c) Wastewater treatment works.
3 - Does the development meet any of the relevant thresholds and criteria of Schedule 2?	Yes	The applicable threshold and criteria to be considered when determining if the proposal falls within Schedule 2 are identified as follows: The area of the works exceeds 1000 square metres. It is expected that the combined work area will be 1.3 ha including space for a compound. Please refer to Drawing No. B14411-123532-XX-XX-DR-CA-C19004 Location Plan.
4. - Is it a 'sensitive area'?	No	Three Sites of Special Scientific Interest (SSSI) and one Special Area of Conservation (SAC) are present within 4km of the site boundary.

		It is not anticipated that the proposed modifications to the site will have any effect on the designated site.
5 – Taking account of the selection criteria in Schedule 3 is the development likely to have significant effects on the environment?	No	Characteristics of Development The development will comprise of improvement works at an existing treatment plant in the form of bunding, kerbs, speed humps, walls and concrete hardstanding. The purpose of these works is to comply with the Industrial Emissions Directive. The scale of the new development is in keeping with the existing plant with no proposals to increase the height of the development or the boundaries of the treatment works. Location of Development The site is located within an industrial area. There are a number of designated sites in the vicinity. 7km to the north is Crymlyn Burrows (sand dune and salt marsh), 2.5km to the south is Margam Moors (coastal and floodplain grazing) and 4.4km to the south is Kenfig SSSI, NNR and SAC. These sites will not be affected by the proposal. Types and Characteristics of Potential Impacts An ecological walkover survey was undertaken on 18 October 2021. The affected area is comprised entirely of concrete hardstanding and chipped limestone. No vegetation will be affected by the works. Some sea buckthorn (<i>Hippophae rhamnoides</i>) was noted growing along the fence line. This species is not locally native. There is no risk of transporting any plants to another part of the site during construction, so no mitigation measures are required. It is not considered that there are any significant permanent effects on the ecological receptors.
6 – Is the project likely to have a significant environmental effect?	No	There are not considered to be any significant environmental effects.

4 Summary

Based on the evaluation set out above, it is our belief that there will be no significant environmental effects associated with the proposals and as such an environmental statement will not be required. The proposed development is not considered to be a major development of more than local importance and the potential environmental effects are not considered complex or unusually hazardous.

We should be pleased therefore, to receive your formal Screening Opinion confirming that the proposed development does not constitute EIA development.

If you have any further queries, please do not hesitate to contact me.

Yours faithfully

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