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Cover Letter



Planning Department
Neath Port Talbot
The Quays
Brunel Way
Baglan Energy Park
Neath
SA11 2GG

Nick Matthews
E: NMatthews@savills.com

Embassy House
Queens Avenue
Bristol BS8 1SB
T: +44 (0) 1179 910 0370
savills.com

Dear Sir / Madam

**Crymlyn Tip, Coed Darcy, Swansea
Full Planning Application**

This letter has been prepared by Savills, in support of a full planning application for engineering works to the Crymlyn Tip, Coed Darcy ('the Site').

The application seeks full planning permission for:

"Engineering works to Crymlyn Tip including installation of a low permeability wall, localised reprofiling and placement of restoration soils"

Purpose of the Application

The Crymlyn Tip (hereafter referred to as the 'Tip') is an historic legacy of the previous use of the site as an oil refinery. Prior to the introduction of more stringent environmental regulations a large amount of waste material from the operation of the refinery was accumulated and stored on site. Whilst environmental mitigation measures have been operational for a number of years which capture and transport the free phase hydrocarbons off-site for disposal, this is not a sustainable long-term solution as it requires continuous management and regular vehicular movements. The proposals contained in this planning application provide a long-term solution which will prevent future leaching and eliminate the need to capture and dispose of material off-site.

The proposed works to the Tip contained in the application are an important but discrete component of the over-arching remediation strategy for the former oil refinery. They have also been known about for many years. Indeed, the proposals in this application are consistent with the remedial action plan works as enshrined in the previously approved outline application and Section 106 Agreement (LPA ref: P2005/0393) as well as carrying through to the current outline application (LPA ref: P2021/1193) which is yet to be determined.

Bringing forward the works to the Tip under a separate full planning application will expedite the works to the Tip and in doing so will bring forward the delivery of this key environmental objective. The environmental benefits of the scheme extend beyond the delivery of a long-term solution which overcomes the need for the capturing and transporting of oil elsewhere, to include enhanced landscaping of the site and implementation of a mitigation strategy.

Planning Application Documents

In support of the planning application, the following drawings and documents have been submitted and should be read in conjunction with this letter:

- Planning application form;
- Site Location Plan (dwg no. 04020-B-921-P1) prepared by PJA;

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- Crymlyn Tip – Planning Boundary (dwg no. 04020-B-916-P3) prepared by PJA;
- Proposed Newt Ponds (dwg no. 4020-SK-913-P0) prepared by PJA;
- Proposed Barrier Wall Installation (dwg no. D1870/23/5289/05) prepared by Englobe;
- Network of Abstraction and Reinjection Wells (dwg no. D1870/23/5289/06) prepared by Englobe;
- Cross Section Location Plan (dwg no. D1870/23/5289/09) prepared by Englobe;
- Long Section Through Ash Bund (dwg no. D1870/23/5289/10) prepared by Englobe;
- Cross Sections – Page 1 of 2 (dwg no. D1870/23/5289/11a) prepared by Englobe;
- Cross Sections – Page 2 of 2 (dwg no. D1870/23/5289/11b) prepared by Englobe;
- Topographical Survey Compound Area – Llandarcy (Sheets 1-3) (dwg no. LST22028_D001) prepared by Precision Land Surveys Ltd
- Proposed Final Levels (dwg no. D1870/23/5289/08) prepared by Englobe;
- Landscape Plan (ref. 04020-B-922-P1) prepared by PJA;
- Ground Conditions Summary (ref. 04020-PJA-23-XX-TN-R-0091) prepared by PJA;
- Construction Method Statement (ref. 04020-PJA-23-XX-TN-R-0092) prepared by PJA;
- Ecological Assessment (9011M.EcoAss.dv5) and separate Summary Note prepared by Ecology Solutions;
- Remediation Implementation Plan (ref. R1870/23/5260) prepared by Englobe;
- Pre-application Consultation Report prepared by Savills.

The Site

The Tip is located on the western side of the land allocated for the Llandarcy Urban Village (Policy SRA1). The Site is accessed from the wider site via the security barrier adjacent to Llancoed House, off Darcy Business Park, located approximately 1km to the north east of the Site.

The Application Site boundary comprises several distinct areas. The Tip itself is defined by the Tip Permit area; to the north and west of the Permit area are the perimeter ash bund and a 'peripheral trench' used for the recovery of free phase hydrocarbons. Overall, the Tip landfill covers an approximate area of 6ha and is approximately 600m long by 130m wide, tapering at the eastern and western ends. In addition to these are the areas which includes a temporary laydown area, ecological mitigation area and the Coed Darcy Wetlands. The total site area is approximately 14.18ha (141,827m²).

The Crymlyn Bog, a Site of Special Scientific Interest (SSSI), Ramsar site and Special Area of Conservation is located adjacent to the northern and western Tip boundaries. Immediately south of the Tip are West Bay, Crymlyn Bog Lagoon and South Bay, known collectively as the Coed Darcy Wetlands. These Wetlands will remain unchanged under the proposed works.

Development Proposals

The proposed engineering works to the Tip are required in order to enable a future permit surrender. In order to achieve this the proposed works include:

- i. Installation of a low permeability barrier.
- ii. Targeted non-aqueous phase liquid (NAPL) recovery carried out via a proposed network of abstraction and reinjection wells.
- iii. Re-profiling of the Tip.
- iv. Placement of restoration layers/cap to mitigate potential risks to human health.
- v. Decommissioning of peripheral trench.
- vi. Installation of monitoring infrastructure to confirm compliance with environmental remediation target values.
- vii. Landscaping on top of the cap.

Free phase hydrocarbon contamination is present on Site in the waste deposits and ash bund. As such the installation of a low permeability vertical barrier is proposed to act as a physical barrier to reduce the potential movement of residual free phase contamination.

The proposals include re-profiling works associated with the construction of a temporary working platform during the construction of the barrier wall. In addition, subsequent re-profiling of the Tip is proposed to achieve the required slope angles, this will require cut and fill, with a significant proportion of the material needed for this to come from the Tip itself. Overall, re-profiling of the Tip is intended to enhance the long term stability of the Tip and facilitate capping on suitable slope angles. In addition to this, the re-profiling will also promote drainage of the surface and create a more natural appearance in the long term.

Following cut/fill re-profiling works to achieve the final landform and the completion of the wall installation and NAPL recovering, a final restoration layer/cap will be constructed. It is proposed that the restoration layer is 1.1m thick on the Upper Tip and 0.5m on the Lower Tip.

The thick cap will be installed over the top of the Tip and will be landscaped to return the site to have a natural appearance.

Pre-Application Consultation (PAC)

Since the Project is defined as a 'major development', s17 of the Planning (Wales) Act 2015 requires the applicant/developer to consult the community and the relevant statutory consultees in advance of the submission of a planning application. This process is known as Pre-Application Consultation (PAC) and requires consultation to last for a minimum of 28 days.

PAC ran from 20 November 2023 until 18 December 2023. Details of the PAC process and comments received during this time are detailed in the PAC Report submitted as part of the application.

The PAC documents were available to view and download by visiting the following website: <https://sites.savills.com/CrymlynTip>

Additionally, there were computer facilities available at Skewen Library, Carnegie Hall, Evelyn Road, Skewen, Neath, SA10 6LH for the duration of the PAC period.

For further details on the PAC process please refer to the submitted PAC report.

Conclusion

Overall, the proposals include engineering works to the Tip that will secure the site in the long term. The proposals are consistent with the live outline application (LPA ref: P2021/1193) for the wider site but seek to bring forwards the works to the Tip so these can be implemented ahead of the determination of the outline and any subsequent reserved matters applications. Therefore, the proposals will deliver environmental benefits ahead of the current programme and will not impact on the proposals for the wider site.

Yours sincerely,



Nick Matthews MTCP MRTPI
Director