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18 March 2024

Dear Sir or Madam,

Formal request for an EIA Screening Opinion for Trebanos Wastewater Treatment Works Access under Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.

Ove Arup and Partners Limited (Arup) has been instructed by Dŵr Cymru Welsh Water (DCWW) to submit this letter as formal request for an EIA Screening Opinion from Neath Port Talbot Council (NPTC) in accordance with Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017; hereafter referred to as the 'EIA Regulations'.

This letter has been produced in accordance with the requirements of Regulation 6(2) and includes:

- (a) a plan sufficient to identify the land: refer to Figure 1.**
- (b) a description of the development, including in particular—**
 - i. a description of the physical characteristics of the development and, where relevant, of demolition works (see Appendix A).**

Trebanos Wastewater Treatment Works (WwTW) is situated approximately 800 metres south of Trebanos, Neath Port Talbot, approximately 11km northeast of Swansea at the approximate National Grid Reference SN 71162 02271. See Figure 1. The site is bounded by the River Tawe to south and east and open fields to the north and west.

Trebanos Rugby Football Club is approximately 115m north of the site, which shares the same access road as the application site. It is approximately 120m south from Green Farm and approximately 170m south from Trebanos Park. The closest residential receptors are residential properties located on Swansea Road, approximately 140m west of the site.

The proposed development comprises the upgrading and extension of the existing Trebanos WwTW including construction of treatment, access road, plant, machinery, storage tanks, hardstanding and associated development. The proposed treatment works processes and hydraulic operations appurtenant to Welsh Water statutory undertakings determine the design of the proposal including the scale, siting and layout.



Figure 1: Site Location

The main works proposed at the Trebanos WwTW site include:

- Works within the existing WwTW on operational land (considered to be permitted development)
 - 1no. Final effluent flowmeter chamber;
 - 1no. Sample kiosk;
 - 1no. Sample chamber and valve slab;
 - 1no. Storm flowmeter chamber;
 - 1no. Final effluent (FE) diversion chamber and pumping station (PS);
 - 1no. peak flow equivalent treatment (PFET) Package plant with building;
 - Package plants for both FE booster filter and pumps within building;
 - PFET lift PS;
 - 1no. first flush storm tank;
 - Modifications to existing storm return PS;
 - 1no. inception chamber;
 - Modification to existing return activated sludge / surplus activated sludge pumping station (RAS/SAS PS);
 - 1no. Potable water booster set;
 - Tarmac access road to provide access to existing equipment;
 - Inlet works;
 - Existing primary settlement tank (PST) No.1 modified to include edge protection;
 - Existing PST No.2 modified to include edge protection;
 - Existing aeration tanks modified;
 - Modifications to the activated sludge process/plant (ASP) outgoing channel;

- Existing final settlement tank (FST) filled with stone to create access track;
- Below ground pipework and ducts; and
- Replacement double leaf gate.
- Works outside and adjacent to the west of the existing WwTW (considered to require planning permission):
 - 1no. Raised distribution chamber;
 - 2no. Flowmeter chambers;
 - 2no. Settlement Tanks;
 - 2no. Sludge holding tanks;
 - 1no. Sludge thickener within kiosk;
 - 1no. Motor control centre (MCC) kiosk elevated on a structural steel support frame with access steps, on a reinforced concrete (RC) base slab;
 - 1no. Transformer elevated on a structural steel support frame with access steps;
 - Standby generator enclosure;
 - Welded mesh fencing;
 - Stone/Grasscrete track for crane access to aeration tanks;
 - Concrete access road and pedestrian footpaths;
 - Woodland planting strip;
 - Landscape and planting screening;
 - Swale and screening bund around the perimeter of the proposed development.
- Works associated with the replacement outfall to the south west of the existing WwTW (considered to require planning permission):
 - 1no. Headwall built in situ with piles and reinforced concrete planks in between, approximately 3m in height finished in concrete (grey coloured);
 - Handrailing at the top of the headwall approximately 1.1m high;
 - Concrete / Galvanised Steel Steps to access the Headwall, approximately 7m in length and 1000mm in width;
 - 1no. Security access gate, approximately 2.4m in height;
 - 1no. reinforced concrete Outfall pipe approximately 900mm in diameter; and
 - Galvanised metal Safety Grill on front of pipe stretching approximately 4.35m.

(see General Arrangement Plan(s) in Appendix A).

Having regard to the broad scope and purpose of the EIA regulations the project could be considered to fall within the development description in Column 1 of the table in Schedule 2:

Section 11 (c) Waste-water treatment plants (unless included in Schedule 1.).

The total area of the site is approximately 18,000 square meters, therefore the works would exceed the 1,000 square meter threshold stated in Column 2 of Section 11 (c) of the EIA Regulations 2017. As such, the development requires screening to determine whether significant effects on the environment are likely and hence whether an EIA is required.

Project Need

DCWW are progressing their Asset Management Plan 8 (AMP8) capital investment programme which is detailed in their Business Plan 2025-2030. The overall aim is to significantly improve water infrastructure at various locations during the plan period to sustainably increase its operational capacity. The existing Trebanos WwTW site is being upgraded as part of AMP8 in order to significantly improve water infrastructure at this location. The proposed development is for the associated essential upgrades to the existing Trebanos WwTW to ensure compliance with the key AMP8 drivers of Quality, Growth and Maintenance. Works would include the extension of the existing Trebanos WwTW with the provision of plant and machinery.

ii. a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

Existing Environment

As shown in the Preliminary Ecological Appraisal (Appendix B), Trebanos WwTW predominately consists of amenity grassland. The fields to the west consist of improved grassland. The east and south boundary of the site which is predominantly semi-natural broadleaved woodland with some tall ruderal. The west and north boundaries consist of predominantly semi-natural broadleaved woodland, dense scrub, scattered scrub, and scattered trees.

Trebanows Multi-Overflow & Outlet Sluice from the Swansea Canal Grade II listed structure is approximately 350m north of the proposed works.

The Main River Tawe is located adjacent to the replacement outfall, and approximately 50m east of the existing WwTW site boundary. All of the site and the adjacent fields are located within Flood Zone 3 for risk of river and sea flooding, and in a Zone C2 on the Development Advice Map.

The proximity of the works to sensitive areas are shown in Table 1 and the Environmental Constraints Plan (Appendix C). There are no Special Protection Areas within 10km of the site, and the site is not located within a National Park, World Heritage Site, or Area of Outstanding Natural Beauty. In addition, there are no Scheduled Monuments within 2km of the site.

Table 1: Sensitive Areas

Site	Distance	Baseline
International Statutory Sites (10km)		
Cymlyn Bog/Cors Crymlyn Special Area of Conservation (SAC)	9.5km south	Cymlyn Bog/Cors Crymlyn SAC is approximately 9.5km south of the site. This site is primarily designated for Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> (EU habitat code 7210), and Transition mires and quaking bogs (EU habitat code 7140).
Crymlyn Bog Ramsar Site	9.5km south	Crymlyn Bog Ramsar Site lies approximately 10km South of the site. This site is designated for topogenous fen, slender cotton-grass and peatland invertebrate assemblages.
National Statutory Sites (2km)		
Glais Moraine Site of Special Scientific Importance (SSSI)	1.75km south	The Site is located north of the Glais Moraine SSSI (see Environmental Constraints Plan in Appendix C). The SSSI is designated for its geomorphological interest as the most spectacular of the South Wales valley end-moraines occurs at Glais in the Tawe Valley. The moraine has a clear crescentic form and is thought to represent a retreat stage of the Late Devensian ice sheet, rather than its maximum limit. Exposures along the northern and western margins of the moraine shows highly variable composition of till, sand and gravel and also structural features, but the exact mode of formation of the moraine has not been determined. The Glais moraine has been responsible for local diversion of the River Tawe westwards.

c) a description of the aspects of the environment likely to be significantly affected by the development

The proposed works are in proximity, and are hydrologically connected via the River Tawe, to the Glais Moraine SSSI. However, the SSSI is designated for its geomorphological features and is not of ecological interest. A Preliminary Water Environment Regulations Compliance Assessment (see Appendix D) has been undertaken and concludes that no adverse effects on the SSSI are expected provided the mitigation measures contained within the assessment are strictly adhered to. No direct adverse effects are anticipated during construction as all works will be carried out using best practice pollution prevention methods (e.g. Guidance for Pollution Prevention: works and maintenance in or near water: GPP5; CIRIA Best Construction Practice Guidance). The contractor will work in accordance with an up-to-date Construction Environmental Management Plan (CEMP) that will contain site-specific methods to ensure that all site activities are controlled and are in accordance with the aforementioned best practice procedures, including ensuring that at no point during construction should any water be discharged into waterways.

The PEA notes non-statutory sites which fall within the ZoI include the Tawe Corridor and Swansea Canal SINCs, as well as the blanket SINC designation to all watercourses in Neath Port Talbot (NPT). Whilst no significant effects are expected from operation, the proposed works have the potential to indirectly affect these sites through pollution or surface run-off during the construction phase. As such, the pollution prevention measures noted above will be included in the CEMP and implemented to ensure that there are no significant effects during construction.

As outlined within the PEA the area is dominated by a mixture of improved and amenity grassland, broadleaved woodland, hardstanding, and structures associated with the WwTW. The proposed development would be predominately sited upon existing grazed pasture field to the west with further development of the south of the WwTW comprised of scrub and broadleaved woodland. Impact to the surrounding habitats would be mitigated through avoidance where possible, and appropriate landscaping planting including a new woodland planting strip along the west boundary in order to ensure there is no significant impact to biodiversity in the area. In addition, further arboricultural surveys and assessment will be undertaken to support planning and inform habitat replacement. If vegetation removal is undertaken, an Ecological Clerk of Works will be present, and will have completed necessary additional surveys and/or pre-work checks.

Further targeted species surveys for badger, bats, nesting birds, hazel dormouse and otter are proposed. Applications for European Protected Species (EPS) Licences (if required) will be obtained from Natural Resources Wales following the species surveys.

The headwall works will take place the River Tawe Designated Main River. A Flood Risk Activity Permit from Natural Resources Wales is required. During construction, best practise pollution prevention measures will be adhered to and flood-related risk will be mitigated using a CEMP. In addition a Flood Consequence Assessment (FCA) will be prepared in accordance with the requirements of TAN15 for less vulnerable developments within Flood Zone C2 to ensure that there are no unacceptable flood risk consequences.

There is a potential risk of encountering ground contamination and buried services during construction works. A full Ground Investigation Report has been undertaken (Appendix E) and provides further information on the level of risk and outlines required mitigation to ensure no significant effects are encountered.

The amount of waste generated on site will be minimised through best practice waste management techniques. Hence, no significant effects on resources and waste management are anticipated as a result of the proposed works.

The proposed site would be located approximately 140m east from the nearest residential receptors. The existing WwTW has an established use in the area. It is anticipated that the proposed development would not result in additional noise or odour impact at the site over and above the existing use which would result in detrimental impact to neighbouring amenity. Odour and noise impact assessments will be undertaken in

support of a full planning application. There is the possibility for minor disturbance to a nearby residential development during construction, however the effects are not likely to be significant. This includes the possibility for construction traffic to cause short-term noise and air quality impacts in Trebanos. This will be managed through the CEMP.

The proposed works are not anticipated to cause any impacts on designated heritage assets or archaeological records. The proposal does not include any tall structures which would have an impact on views of the heritage asset identified in the surrounding area. As such, the existing landscape, setting of the heritage assets, character and appearance of the area would be protected as a result of the proposed development.

The site is not located within any landscape designation. No likely significant effects on the landscape setting from construction plant and vegetation removal during construction are anticipated. Mitigative tree, hedgerow and shrub planting are proposed which will provide screening as they mature.

It is our view that the proposal as described does not require EIA to be undertaken as no likely significant effects have been identified and we request your confirmation of the opinion herein.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'I. Meyrick', written in a cursive style.

Ian Meyrick

Enc.

1. Appendix A: Trebanos WwTW General Arrangement Drawings
2. Appendix B: Trebanos WwTW Preliminary Ecology Appraisal
3. Appendix C: Trebanos WwTW Environmental Constraints Plan
4. Appendix D: Trebanos WwTW Preliminary Water Environment Regulations Compliance Assessment
5. Appendix E: Trebanos WwTW Ground Investigation Report

Appendix A

General Arrangement Drawing(s)

Appendix B
Preliminary Ecology Appraisal

Appendix C

Environmental Constraints Plans

Appendix D

Preliminary Water Environment Regulations Compliance Assessment

Appendix E
Ground Investigation Report