



Energybuild Ltd.
Aberpergwm Colliery,
Engine Cottage Site,
Glynneath,
Neath,
SA18 5AJ

Date. 02/06/2025

Ein cyf/Our ref: CAS-279039-S2M5

LLEOLIAD/LOCATION: A 16 X 5M2 SHED BUILDING CONSTRUCTED ON PRE-EXISTING CONCRETE MINE YARD SURFACE. THE BUILDING WILL HAVE A DRIP TRAY CONSTRUCTED WITHIN THE FLOOR WHERE OIL PRODUCTS ARE TO BE STORED.

With regard to your letter of the 23rd May 2025, please see the responses to you queries below.

Q1 Pollution Prevention

“In order to fully assess the proposal we request that further information is submitted in support of the application to confirm the type and quantity of the oils that will be stored on site. The quantity of oil is of particularly relevance from a secondary containment perspective and to ensure sufficient capacity.”

1a. Oils – please see below list of oil utilized and stored on site:

- Fuchs- Hydrotherm 68
- Fuchs- Titan Truck Plus
- Exol Ultramax 46
- Fuchs- Agrifarm Utto MP
- Fuchs- Renolin CLP Gear Oil 100
- Fuchs- Renoclean Air Lock-down
- Fuchs- Renolin B32 Plus
- Fuchs- Renoclean Citricent natural
- Fuchs Renolit LX-EP 2
- Fuchs Renolin Unisyn CLP 320
- West Wales Lubricants - Greasetech
- Fuchs Titan Supergear
- Fuchs Phosphocent 246
- Fuchs Powergear



1b. The preexisting concrete floor has been in position for several years. It is 300mm thick and steel mesh and contains fiberglass strengthening. However the oil shed base is constructed of a 150mm thickness of high strength concrete inclusive of steel mesh and fiberglass reinforcement. It is totally impervious to any form of leakage. The drip/containment section is constructed directly onto this area, this again impervious. The structure is totally isolated from the external environment.

The drip tray is an integral part of the of the containment capacity i.e. bund which again is impervious.

The containment dimensions are as follows :

Width = 4.1m, Length = 4.3m, Depth = 0.450m

From the above dimensions. Containment capacity = 7.9335m^3 . Which equates to **7,933.5 litres.**

The maximum amount of oil permitted to be stored in the oil stores is 3,000 litres.

The containment bund is fitted with a steel grid surface on which the oil barrels stand. It is also provided with a steel tapping at its base which allows a spillage or leakage to be collected directly from the containment bund by an approved contractors tanker for recycling.

Oil will be stored in a mixture of 205 litre steel drums and 20ltr plastic containers. No oil or grease containers are opened within the oil stores. The unopened containers are distributed to their individual points of use for use. There are five individual workshops on site each provided with containment relative with the amount of oil used. The oil stores is provided with spill kits and spill absorbent granules. All waste oils etc. are collected by an approved contractor i.e. Pure Clean Environmental, Avon mouth.

Q2 Watercourses

“In addition, we note the presence of two culverted watercourses to the east and west of the development site. We defer to your Authority’s Drainage Engineers as to the exact path of these watercourses and advise that it is extremely poor practice to erect any structure over, or close to a culvert as any failings in the integrity of the culvert may result in damage to the built structure and pollution of the water environment.”



2. We are aware of the exact location of the culverts. The oil stores do not impinge on the culverts in any way. The closest of the culverts to the oil stores is approximately 50m away. The culverts are well constructed of concrete pipes encased in concrete.

Q3 Flood Risk

“The planning application proposes less vulnerable development. The Flood Map for Planning identifies the application site to be at risk of flooding and very partially Flood Zone 2 (Rivers). Given the location of the development at the very edge of Flood Zone 2 and the limited extent of flood risk we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.”

3. Energybuild is aware of the proximity of the development to the Flood Zone.

Q4 Protected Species

“We note that the ecological information submitted in support of this application is from 2021 and may be deemed out of date. We recommend you seek the advice of your Authority’s internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.”

4. We have consulted with the ecologists at NPTCBC and NRW. Our Company ecologist, Barry Stewart of Celtic Wildflowers, has met representatives of both organisations on site to discuss this matter. Together, they have come up with a plan in going forward to minimise any impacts of this development, and indeed the other applications which the Company has submitted, and to provide planning gain where possible. In this regard, a plan has been produced, attached, which involves a scheme of various types of bird boxes, owl boxes and bat boxes placed around the site (each of the boxes will relate to the various applications which we have running at the moment, please refer to the plan to identify those associated with the oil stores application.

It must also be noted that the oil stores shed will sit in the centre of the mine yard surface area and as such there will be no direct impact on any ecology.

As part of our ongoing environmental and ecological stewardship of the mine surface area we are also in discussions with our ecologist regarding the creation of both a badger set and otter holt at the easternmost extent of our site where there is potential for both these species to thrive.