

Determination of An Application for an Environmental Permit
under the Environmental Permitting (England & Wales)
Regulations 2016 (EPR 2016)

Notice of decision to refuse application for a permit – In
accordance with Paragraph 13(2)(b), Schedule 5 of the EPR
2016

The application reference number is K67332.

The Applicant is Tyregen UK Ltd

The proposed installation location is Unit 2, Westfield Industrial Estate,
Waunarlwydd, Swansea. SA5 4SF.

The installation proposed is a Small Waste Incineration Plant (SWIP).

In accordance with Paragraph (3), Section 17, Schedule 5 of Environmental
Permitting (England & Wales) Regulations 2016, this decision document includes the
reasons for refusal of the permit application.

Signed

A handwritten signature in black ink, appearing to read 'Tom Trice', with a large, sweeping initial 'T'.

Divisional Environmental Health Officer

Pollution Control, Private Sector Housing and Building Control

Date: 9th October 2025

Tyregen UK Ltd Permit Determination.

The Environmental Permitting (England & Wales) Regulations 2016.

The Environmental Permitting: Core Guidance document sets out the aim for Environmental Permitting:

Some facilities could harm the environment or human health unless they are regulated. The aim of the regime is to:

- protect the environment so that statutory and government policy environmental targets and outcomes are achieved;*
- deliver permitting, and compliance with permits and certain environmental targets, effectively and efficiently, in a way that provides increased clarity and minimises the administrative burden on both the regulator and operators;*
- encourage regulators to promote best practice in the operation of facilities*

The Environmental Permitting (England & Wales) Regulations 2016 sets out that the operation of a regulated facility must be authorised by an environmental permit. The Local Authority is defined as a 'regulator' within the regulations.

The Environmental Permitting (England & Wales) Regulations 2016 set out the types of installations that are to be considered to require a permit.

The application submitted by Tyregen UK Ltd is for a Small Waste Incineration Plant (SWIP). Regulation 32(5)(c), of the Environmental Permitting (England & Wales) Regulations 2016, confirms that the discharge of functions in relation to the regulated facility, 'a small waste incineration plant', are exercisable by the Local Authority.

Upon receipt of an application, the regulator must consider if sufficient information has been provided for a determination to be made. Upon confirmation that all the information has been submitted and the application fee has been received, the regulator must confirm that the application has been 'duly made' and that the determination process will commence.

For this type of application, a SWIP, there is a requirement for a consultation process with members of the public and other organisations.

The Environmental Permitting: Core Guidance document confirms that:

If the regulator grants a permit it can include any conditions it sees fit (see

paragraph 12(2) of Part 1 of Schedule 5). It has a duty to impose conditions in order to secure the objectives that apply to the class of regulated facility

If the regulator determines that a permit is not to be issued i.e. refused the application, then the applicant may appeal to the appropriate authority in accordance with section 31 of the Environmental Permitting (England & Wales) Regulations 2016.

Legislation and guidance documents applicable when determining applications of this nature are:

- The Environmental Permitting (England & Wales) Regulations 2016 [The Environmental Permitting \(England and Wales\) Regulations 2016](#)
- Environmental Permitting: Core Guidance. For the Environmental Permitting (England & Wales) Regulations 2016 (SI 2016 No 1154) [Environmental permitting: Core guidance](#)
- Environmental Permitting. General Guidance Manual on Policy and Procedures for A2 and B Installations [Local Authority Pollution Control: general guidance manual - GOV.UK](#)
- Welsh Government. Notes for Guidance Environmental Permitting Guidance – Waste Incineration [Notes for Guidance](#)
- Environmental Permitting Technical Guidance PG13/1(21). Reference document for the operation of small waste incineration plants (SWIPs)

Background

An application for a A2 environmental permit was received on the 23rd of October 2023. The permit application was for a SWIP I was submitted by Tyregen UK Ltd. The application what was considered as Julie made on the 30th of January 2024.

Within the application form the applicant included the following as the 'Non-Technical Summary':

The permit application is for a proposed small waste incinerator plant at unit 2, Westfield industrial estate, wine I live, Swansea, SA54SF. The plant will be a pyrolysis plant to thermochemically process pretreated tyres to produce fuel oil and carbon black, whilst also producing pyrolysis gas that is cleaned prior to the use to fuel the process. The Pyrolysis plant will have a throughput of approximately 7650 tonnes of pre cheated tyre material (input fuel) per annum. There will be no significant release of pollution to land or water. The residual gas output it by the plant will be cooled and then cleaned via a number of abatement process including desulphurisation and dust filtering devices before being released and will not lead to any significant pollution or odour to air. As part of the permit the facility will be required to adhere to strict emission limits, which will be monitored and regularly checked by the regulator, ensuring the impacts of the facility are insignificant.

Correspondence was received from the applicant on the 3rd of April 2024 regarding confirmation of what information would be made available through the consultation., as they stated that the application is highly confidential. Further correspondence was received from the applicant on the 17th of June 2024 setting out the justification for the request for confidentiality for elements of their application. The request for confidentiality was accepted and the preparation for the consultation process began.

Consultation exercise was carried out in accordance with the general guidance on the 4th of September 2024. The following organisations were consulted as national consultees:

- Mid & West Wales Fire and Rescue service
- Food Standards Agency Wales
- Welsh Government
- Local Authority Support Unit
- Natural Resources Wales
- Public Health Wales
- UK Health Security Agency

A public notice was also placed in the local Swansea Evening Post publication on the 12th of September 2024 with the consultation closing on the 2nd of October 2024. Emails were also sent to ward members to advise of the consultation exercise being carried out.

The following national consultees responded:

- Local Authority Unit
- Natural Resources Wales
- UK Health Security Agency
- Welsh Government

As a response to the national consultee consultation process it was raised, by Natural Resources Wales (NRW) and the Local Authority Unit (LAU) that this application could also have been considered under the Environmental Permitting (England&Wales) Regulations 2016 section 1.2(f)(iv) - Activities involving the pyrolysis, carbonisation, distillation, partial oxidation or other heat treatment of other carbonaceous material (otherwise than with a view to making charcoal) and therefore an A1 activity. Further discussion with the LAU took place and it was confirmed that as the permit application had already been 'Duly Made' that it was still a valid application as an A2 activity and so could continue.

The LAU also advised that the maximum incineration capacity be confirmed with the applicant. This information was requested and the applicant advised, in their response dated 3rd March 2025, that the maximum capacity of the reactor was 12 tons and that batches take 7 hours.

Therefore, upon receipt of this information it has been calculated that the maximum capacity is approximately 1.7 Tons/Hour and so within the capacity threshold of a SWIP.

The LAU also provided examples of a pre-operational condition and improvement conditions for consideration.

NRW also advised that:

'There is a current permit issued at Unit 2 Westfield Industrial Estate held by the operator The Treatment Hub Ltd (TTH) that allows the treatment and storage of hazardous industrial wastes. These materials are primarily filter cakes and contaminated hazardous soils. There is currently approximately 10,000 tonnes of mixed hazardous waste and other waste materials on site estimated by the operator, however, the landlord estimates there to be more.'

In 2020 NRW served a partial Suspension Enforcement Notice on the operator requiring removal of waste to the compliant volume levels prescribed in the permit before operations could continue. Since the Notice issue, the operator ceased operating and the waste has remained on site. Both TTH and the landlord are looking for ways to remove and remediate the waste to avoid the need to dispose of to a hazardous landfill.

Information on the environmental permit, compliance assessment reports for site inspections, and other regulatory information is publicly available on the NRW Public Register found [here](#).

Company Director

The listed Director for the Company Tyregen UK Ltd is Mr Dennis Egan. Any legal action taken against Mr Dennis Egan by Natural Resources Wales is now considered spent under the Rehabilitation of Offenders Act 1974.'

The UK Health Security Agency (UKHSA) response included:

'We would however strongly recommend that the regulator is completely satisfied with the proposed storage and management controls of the tyre waste and resultant pyrolysis products on site. The risk of fire through inadequate management could impact on the locale.'

'The safe operation of the process will rely on the adherence to strict management protocols. The regulator should ensure these measures and controls are followed and that best available techniques are used to reduce the risk of identified hazards on the locale.'

'In view of the potential local public health impact of a fire and to minimise risks, the regulator must make sure that the operations are managed in accordance with current guidance.'

A total of 976 responses were received from members of the public. 975 Objections and 1 in support.

Comments from members of the public can be summarised as follows:

- Health and Air Quality. Concerns regarding potential emissions from the site, potential exacerbation of respiratory conditions, proximity to residential and vulnerable populations.
- Proximity to Sensitive Sites. Respondents cited concerns as two primary schools in the area along with several care homes and a retirement park. Concerns also expressed due to children's exposure during outdoor activities.
- Environment Impact. Concerns raised over potential effects to local wildlife and ecosystems, potential contamination of soil and water and negative impact upon nearby conservation areas.
- Traffic and Infrastructure. Concerns raised about additional traffic on the roads, road safety, congestion and noise from the operation of the facility.
- Fire and Safety Risks. References were made to past 'Tyre Fires' and their impacts on the environment. Concerns regarding the hazards, emergency response and pollution.
- Operator. Concerns raised regarding past history of the applicant. Doubts raised about technical and regulatory compliance.
- Planning and Policy Concerns. Original Planning permission over a decade old. INSERT ref to lawful certificate. Conflicts with Welsh Government's net-zero and sustainability goals. Lack of Environmental Impact Assessment and ecological surveys.

The public and national consultee responses can be found in Appendix A.

A site visit was arranged for the 4th December 2024 with the applicant at unit 2 Westfield industrial Estate, Waunarlwydd, Swansea where the proposed operation was discussed. During the visit, officers were advised that the waste referred to by NRW, for the partially suspended permit, was behind a separating wall. The applicant also pointed out the locations for the equipment and tanks required. It became apparent at this time that the applicant was also referring to equipment relating to the processing of tyres post-delivery and prior to use a fuel for the process. This information was not referred to within the application. The site visit came to an end with the applicant agreeing to provide an update and confirmation that responses to further questions by the Council would be responded too.

A request for further information most submitted to the applicant on the 31st of January 2025 (Appendix B). The response was received on the 3rd of March 2025. (Appendix C).

An information notice was served on the 27th of March 2025 (Appendix D), and the response was received on the 28th of April 2025 (Appendix E)

Prior to the launch of the Public Consultation on the Draft Determination Document, a copy was sent to the applicant. Email correspondence was received from a Director at Tyregen UK Ltd (Mr. Peacock). He was advised that a response would be provided after the consultation exercise had closed as part of the determination process.

All National consultees and the public consultees that responded to the Public Consultation exercise, were notified that Consultation on the Draft Determination Document launched on the 29th July 2025 and ran to the 25th August 2025 at the following webpage <https://www.swansea.gov.uk/environmentalpermitapplications>

The Regulations set out that if the council does not receive any representations, the council decision will be made final and the applicant will be notified within 5 working days of the end of the period for representations.

If the council does receive representations the council's decision will be finalised and notified to the applicant and to the public by means of the Swansea council website, within 15 working days of the end of the period for representations, or a longer period as the council may agree with the applicant.

The council received 13 responses to the consultation, 2 in support (from the same individual) and 11 objections (Appendix F).

The responses covered issues such as:

- Concerns of Air Quality and Pollution in a residential area with schools and a nursing home.
- Impacts to the environment and sensitive receptors
- Concerns about health impacts from incineration and pyrolysis
- Support for economic opportunity
- Implementation of mitigation measures and regulatory safeguards

The Determination Process

In accordance with paragraph 13 of schedule 5 to the environmental permitting regulations, an application must be refused if the applicant:

- will not be the operator of the installation, or
- will not operate facility in accordance with the permit.

Section 9 of the Department for the Environment, Food and Rural Affairs (DEFRA) Environmental permitting: Core Guidance – For the Environmental Permitting (England and Wales) Regulations 2016 (SI 2016 No 1154) – states:

Following an application for the grant or transfer of an environmental permit, there is also a specific duty on the regulator not to grant or transfer the permit if it considers that the operator/new operator will not operate the facility in accordance with the permit (see paragraph 13 of Part 1 of Schedule 5). In making this decision the regulator should consider whether the operator cannot or is unlikely to operate the

facility in accordance with the permit. The regulator might doubt whether the operator could or is likely to comply with the permit conditions if for example, the operator:

- has an inadequate management system;
- demonstrates inadequate technical competence;
- has a record of poor behaviour or non-compliance with previous regulatory requirements; or
- has inadequate financial competence.

This guidance document sets out the approach to dealing with these points.

Is the applicant the operator of the Installation?

Confirmation has been received that the applicant Tyregen UK Limited (Company number 10531708) will be the operator.

Will the applicant operate the facility in accordance with the permit?

Section 6.22 of the Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations states:

‘An example of where an authority might refuse an application is when an operator proposes locating a new installation close to an extremely sensitive environment, but with no known way to provide adequate control; or the information provided by the operator does not provide a reasonable basis to determine the permit conditions. This latter example should include consideration of the operator’s responses to requests for additional information’.

The nearest residential receptor is located on Westfield Road approximately 230 metres. This residential receptor can be classed as a sensitive environment and so requirement for adequate controls for emissions to air, land and water are very important to ensure that adverse impact does not occur. There is also another residential receptor, at approximately 260 metres from the proposed installation, called Ty Waunarlwydd, Residential Home for the Elderly.

In accordance with the guidance documents, a question to be considered is whether adequate control can be provided to prevent adverse impact. The applicant sets out their controls within their non-technical summary, air emissions risk assessment and their written responses to requests for further information.

Consideration must also be given at this point to the information provided by NRW regarding the partially suspended permit in place at the proposed installation address. Their information advised that there are approximately 10,000 tonnes of mixed hazardous waste at the site and it is not likely that this hazardous waste issue will have been resolved in the near future. The presence of this hazardous waste is

considered a high risk adjacent to the proposed activity and the potential for serious environmental impacts exists.

Section 4.3.2 of the Environmental permitting technical guidance PG13/1(21) – Reference document of the operation of small waste incineration plants (SWIPs), references the Industrial Emissions Directive (IED) requirements that:

‘plants shall be designed, equipped, built and operated in such a way that the gas resulting from incineration or co-incineration of waste is raised in a controlled and homogenous fashion and even under the most unfavourable conditions, to a temperature of at least 850oC for at least two seconds. The requirement to achieve the minimum temperature and residence time set out above, shall apply after the last injection of combustion air.

The operator must provide evidence at the application stage that the temperature and residence time requirements under normal operating conditions (i.e. maximum throughput) and the most unfavourable conditions are capable of being achieved. It is preferable that this is done using computational fluid dynamic (CFD) modelling as this will help support the approach to validation.

Where available, the operator should present the firing diagram, presented graphically and as a table covering the nine points of the operational envelope, including any overfiring/downturn condition which may be less favourable.’

The applicant has submitted CFD evidence as part of their application. However, a valid confidentiality application was submitted and so this information will not be shared within this determination document. The evidence submitted concluded, *‘based on the information provided by Tyregen UK Ltd and adopting a conservative approach where possible, simulations indicate that the IED criteria to remain above 850°C for a minimum of 2 seconds can be achieved’.*

The applicant has confirmed in their response to the request for further information, document reference APS_E1027B_B2-1, dated 28th April 2025 (Appendix E), that the:

‘The firing diagram and furnace manual are not currently available and will be provided by the appointed engineers upon installation of the equipment in the United Kingdom.

It has been confirmed by the appointed engineers that development of the firing diagram is dependent on the physical installation of the system and cannot be completed in advance. They had advised that this documentation, along with the relevant certificates and operating details, will be made available prior to the commencement of any operational activities.

It is proposed that submission and approval of this documentation be included as a condition of the permit, ensuring that no manufacturing or processing can

begin until all reports, firing diagrams, and supporting documentation have been reviewed and approved by the regulator.

The current application does not seek permission for any research and development activities. Information on furnace operating parameters, including the requirement to achieve a minimum temperature of 850oC held for two seconds, has already been included in the application under IED compliance requirements.'

Section 4.3.2 of the Environmental permitting technical guidance PG13/1(21) – Reference document of the operation of small waste incineration plants (SWIPs), also includes that CFD modelling will help define where the qualifying secondary combustion zone ends and helps identify the best locations for temperature probes. It is advised that CFD should be seen as an essential part of the design process. Section 4.3.6. also adds that the location of the temperature measurement is important as it forms a key role in ensuring that the temperature and residence time conditions are achieved.

In correspondence, received 16th July 2025 from Mr. Peacock, requested confirmation that the statement does not discount the CFD evidence submitted within the application.

'The applicant has submitted CFD evidence as part of their application. However, a valid confidentiality application was submitted and so this information will not be shared within this draft determination document.'

The council can confirm that the reference to the information not being shared relates to the confidentiality element of the application in that it would not be provided in the public realm as part of the consultation process.

Swansea Council does not have all the information referenced within the Environmental permitting technical guidance PG13/1(21) – Reference document of the operation of small waste incineration plants (SWIPs) to be satisfied that the likelihood of serious environmental impact has been addressed to consider granting an environmental permit.

Management Systems

Section 11.23 off the Environmental Permitting General Guidance Manual on Policy and Procedures for A2 and B Installations states that:

'environmental management systems may be the means of demonstrating and maintaining technical competence. Competence of individuals should form part of those management systems.'

The applicant has submitted documentation to set out their plans to operate the proposed facility. It was confirmed during the site visit that the raw materials (i.e. tyres) would be further processed after receipt, prior to be used as the fuel source.

This would need to be considered as an 'Directly Associated Activity' (DDA) and further information was provided by the applicant.

Within the applicant's response to the request for Further Information Notice, dated 28th April 2025 (Appendix E), Question 15 asked:

In section 2.36 reference is made to the installation being carried out by Chinese manufacturing engineers. It is also advised that 'all risks have been considered to ensure safe operation and negligible environmental impacts'. Please can you provide information/evidence from the Chinese manufacturing engineers to support these statements.

The applicant's response was:

All manufacturers are required to provide a CE certificate, which is approved by testing laboratories. As part of the certification process, each company undergoes comprehensive training facilitated by testing laboratories. This training covers all aspects of the manufacturing process, from the steel used to the individual components. Upon completion, the company is issued a CE certificate, equivalent to the ISO14000 standard'.

Additionally, each engineer involved in the installation is required to undergo specific training by the manufacturer. After completing the training, engineers are issued a certificate confirming they are qualified to install the machinery safely and in compliance with all relevant safety standards.

Regarding the design of the Pyrolysis plant, Digital Engineering Services has provided the necessary digital dynamics to demonstrate that the plant can achieve a minimum temperature of 850°C, maintained for 2 seconds, as required by IED regulations. This was submitted to SC in October 2024 and SC were successfully satisfied in January 2025.

The SWIP application cannot be applied for until the facility application for a permit has achieved the "duly made" status. Furthermore, the updated technical drawings follow British standards, and all motors and pumps are Siemens-branded. The only components manufactured in China are the Pyrolysis retort and the steel structure. While most manufacturers in China use boiler plate gauge 10–12, 16-gauge steel has been specifically requested for use in the construction, as this is standard for ensuring long-term durability and safety.

The CE marking for a product:

- Shows that the manufacturer has checked these products meet EU safety, health or environmental requirements.
- Is an indicator of a product's compliance with EU legislation.
- Allows the free movement of products within the European Market.

By placing the CE marking on a product, a manufacturer is declaring, on their sole responsibility, conformity with all of the legal requirements to achieve CE marking. The manufacturer is therefore ensuring validity for that product to be sold throughout the EEA. (<https://www.gov.uk/guidance/ce-marking>)

In correspondence, received 16th July 2025 from Mr. Peacock, it states:

‘The council therefore specifies only one element of absent information under its assertion that it ‘does not have sufficient information’. This is hard to read as Tyregen has CE certification for each element of the installation and would have provided such as evidence if this information had been requested.’

A request to provide information/evidence to support statements made about ‘safe operation and negligible environmental impacts’ was made in the information notice, dated 28th April 2025 (Appendix E). The Council is of the opinion that this is a request for such information. Swansea Council has not been provided with CE certification for the installation.

Swansea Council does not have sufficient information to satisfy that the facility will be able to operate in accordance with an environmental permit. The council considers that this information is key to the operation the small waste incineration plant and cannot accept any activity, even commissioning, taking place without transparent details outlining full operation.

Operator technical competence

Section 11.22 of the general guidance manual states *‘the test of competence should be related to what is necessary for the particular type and scale of installation. A risk-based approach should be taken, relating technical competence requirements to the likelihood and seriousness of environmental impacts that occur to curb from incidents arising out of inadequate competence’*.

The applicant has stated within their application that ‘An Environmental Management System’ (EMS) will be developed by the operator and implemented prior to the site commencing operation under the permit’. Section 21, of the non-technical summary document (E1027_NTS-5) confirms that an EMS will be fully developed and implemented and in operation at the time of Plant Commissioning, this is further confirmed in responses to requests for further information.

Swansea Council has concern over the likelihood and seriousness of environmental impacts from the installation due to fire, explosion and release of gas. Currently, the applicant is not able to provide evidence to demonstrate real-world operation of facility.

There are also concerns regarding the ground conditions present at the site, there are areas of unmade ground and varied condition of the existing slab. Whilst the applicant has advised that new drainage systems will be installed for the process,

there are concerns regarding conditions outside the building and protection to land and ground water.

In correspondence, received 16th July 2025 from Mr. Peacock, raised concerns regarding the interpretation of risk management used as part of the determination process, misunderstanding of the proposals/information provided and conflating issues relating to a third party on a separate site.

The Council must consider that there is a current permit issued at Unit 2 Westfield Industrial Estate, The Treatment Hub Ltd and must consider the hazardous industrial waste that is present. The concerns regarding ground condition are valid as there is the potential for migration of solids and liquids from the installation that could further contaminate poor ground conditions. It is understood that Tyregen could carry out testing of the capacity, effectiveness and integrity of the system, there are still concerns that the storage tanks would not be sufficient to capture fire water in the event of an incident and this could lead to further contamination of surrounding land.

Section 4.3 of environmental permitting technical guidance document PG13/1 (21).

Soil and groundwater protection, states that 'storage capacity shall be provided for contaminated rainwater runoff from the site of the waste incineration or Co incineration plant or for contaminated water arising from spillage of firefighting operations. Storage capacity shall be adequate to ensure that such waters can be tested and treated before discharge where necessary.

In practical terms, the discharge from site drainage system must be capable of being closed without the system being overwhelmed. The accumulated water can then be tested before being'.... 'pumped out for off-site treatment and disposal.'

The applicant has advised that drains within the building will be embedded into the flooring and will lead to the two 10,000L storage tanks. These tanks will be underground and the applicant has advised that they will be specified for use in emergencies. The applicant, in response to the Further Information Notice (dated 3rd March 2025), that this is the equivalent capacity of approximately 10 Fire Engines.

Given the high-risk nature of the facility, consideration of the prevention principle, the likelihood of contamination to ground and to groundwater, from an incident, can be considered as high.

Natural Resources Wales advised in their consultation response that there is a Current Environmental Permit - EPR-ZP3933NJ issued at Unit 2 Westfield Industrial Estate held by the operator The Treatment Hub Ltd (TTH) that allows the treatment and storage of hazardous industrial wastes. These materials are primarily filter cakes and contaminated hazardous soils. There are currently approximately 10,000 tonnes of mixed hazardous waste and other waste materials on site estimated by the operator, however, the landlord estimates there to be more.

In 2020 NRW served a partial Suspension Enforcement Notice on the operator requiring removal of waste to the compliant volume levels prescribed in the permit before operations could continue. Since the Notice issue, the operator ceased operating and the waste has remained on site. Both TTH and the landlord are looking for ways to remove and remediate the waste.

At the time of determination, confirmation was provided in the response to the Further Information Notice (dated 28th April 2025) that the fire mitigation strategy for the site was under development. The LA-IPPC Risk Method April 2005 (Updated July 2013) assigns the highest risk class to the process of incineration, class 3, for inherent environmental impact potential. Given the proximity of receptors, the presence of hazardous waste at Unit 2 Westfield Industrial Estate, subject to the partial Suspension Notice served by NRW and the storage of products as part of the proposed activity, the regulator is not satisfied that the facility would be operated in accordance with a permit.

Technical Competence

Confirmation has been received that any legal action taken against Mr Dennis Egan by Natural Resources Wales is now considered spent under the Rehabilitation of Offenders Act 1974.'

Swansea Council is not aware of any 'relevant person' convictions within the last 5 years.

Financial competence

The Council has been provided with conflicting information regarding the name of the 'operator' for the proposed installation. At the application stage both the companies Tyregen UK Ltd and Tyregen (DE metals) Ltd were referenced. This was confirmed by the applicant, in writing dated 10th January 2024, that the operator is Tyregen UK Ltd. However, in response to a request to additional questions, dated 3rd March 2025, the applicant advised that '*Tyregen DE Metals Ltd are the operators*'.

The applicant then stated in their written response to the Further Information Notice (dated 27th March 2025) that:

'Tyregen DE metals Ltd has no involvement in the operations of Tyregen UK Ltd. The sole purpose of Tyregen DE Metals Ltd is hold and manage patents. The company does not have any operational or financial connection to the operation of the facility.'

'The financial capability of Tyregen UK Ltd to operate a facility of this nature will be demonstrated through audited financial statement and other financial forms.'

Whilst the Swansea Council accepts that Tyregen UK Ltd will be the operator of the proposed installation, the Council feels that there is insufficient evidence currently to

fully confirm the financial ability of the operator to operator the installation in accordance with an environmental permit.

Conclusion:

- Swansea Council is satisfied that the applicant, Tyregen UK Ltd, will be the operator.
- Swansea Council has been provided with an assurance on financial capability and that it will be demonstrated through audited financial statements and other financial forms. However, Council feels that there is insufficient evidence currently to fully confirm the financial ability of the operator to operator the installation in accordance with an environmental permit.
- Swansea Council does not currently have all the information to support the writing an environmental permit.
- Swansea Council has concerns that the applicant has provided conflicting information during the application process and this raises issues regarding the understanding of the requirements of the Environmental Permitting (England & Wales) Regulations 2016.
- Swansea Council has considered the consultation responses received.
- Swansea Council is of the opinion that the application demonstrates a high-risk activity and it is felt that granting of a permit would not prevent the likelihood of a serious environmental impact from occurring.

It is concluded that this permit application should be refused on the basis that the applicant is unlikely to operate the regulated facility in accordance with the environmental permit, due to the following reasons:

- insufficient technical competence
- inadequate environmental management systems

Appendix A

From:
To:
Cc: Re: Re: ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016, SI 2016/1154
Subject: REGULATION 13 AND SCHEDULE 5, PARAGRAPH 6
18 October 2024 15:51:36
Date: [image003.jpg](#)
Attachments: [image.png](#)
[Environmental permitting technical guidance PG13 Final..pdf](#)
[Pre-operational and Improvement conditions..docx](#)

CAUTION: External email - Do not click links/open attachments unless you recognise the sender and know the content is safe

Hello Tom,

I have had a quick look at the application. It is an application for the pyrolysis of pretreated waste tyres under the European waste catalogue code 16 01 03 to produce fuel oil and carbon black whilst also producing pyrolysis gas cleaned via a hydroseal before fueling the process. Pollutant emissions to air from the process will be through a stack 3 metres above ground level.

Based on the information available to us, it would seem that this can also be permitted under the Environmental Permitting (England and Wales) Regulations (EPR) 2016, as a section 1.2 Part A(1) (f)(iv) activity – **Activities involving the pyrolysis, carbonisation, distillation, partial oxidation or other heat treatment of other carbonaceous material (otherwise than with a view to making charcoal)**. This is because this activity primarily aims to produce products that are not subsequently burned (fuel oil and carbon black). The residual pyro gas is released to air after going through a desulphurisation process. Although a portion of the pyro gas produced is cleaned in a hydroseal before being combusted in the burners, the non-technical summary suggests that it would still be considered waste, so the requirements of Chapter IV and Annex VI of the Industrial Emissions Directive (IED) will apply even if permitted as a section 1.2 Part A (1) as detailed above. As a Part A(1) Activity BAT can be developed for the pyrolysis and production of material outputs unlike if it is regulated as a SWIP. Natural Resource Wales will be the Regulator in this instance.

If you decide to permit this as a Small waste Incineration plant, follow the recently developed draft SWIP Guidance, which is attached. Additionally, consider the following:

I have not seen the incineration capacity of the unit in tonnes per hour. The non-technical summary states that the pyrolysis plant will have a throughput of 7560 tonnes per annum, equating to 0.8 tonnes per hour. Note that capacity is the maximum throughput based on the plant's capacity rather than how the plant is operated. You may want to confirm the maximum throughput/capacity of the unit in tonnes per hour with the operator to determine if it is within the capacity threshold of a SWIP.

In support of the application, the operator has carried out an air dispersion model, which predicts that the impact on relevant sensitive human health and ecological receptors will likely be insignificant. In the assessment, the operator used BAT-AELs instead of the emission limit values under Annex VI of the IED to generate their emission rates. The BAT-AELs don't apply as the BAT conclusions only apply to incineration plants with a capacity of above 3 tonnes per hour for non-hazardous waste

and above 10 tonnes per day for hazardous waste. However, you can accept this on this occasion, as the BAT-AELs are more conservative. Additionally, in Wales, Schedule 8 of EPR applies BAT to SWIPs for emissions to air only. Note that these limits, which they have used in their assessment, should be the limits on their permit if the application is successful. We trust that you will thoroughly consider the full detailed modelling assessment as part of your determination to ensure that the impact of emissions from the proposed development is acceptable.

To demonstrate compliance with the temperature and residence time requirements of Article 50 of IED, the operator has carried out a computational fluid dynamics model (CFD). The CFD model predicts that a residence time greater than 2 seconds at a minimum temperature above 850°C will be achieved. In line with section 4.3.4 of the SWIP guidance, you should include a pre-operational condition (PO) and an improvement condition (IC) in the permit to verify the residence time and minimum temperature as reflected in the CFD model. I have attached an example PO and IC to this email, which you can adapt to suit your needs.

Under section 8 of the Non-Technical Summary, the applicant states that the oil and solid deposits produced from the process are products the operator commercially distributes and are thus entirely re-used. All material outputs are waste unless subject to an end of waste position.

Additionally, although commonly referred to as small waste incineration plants, a Chapter 5, section 5.1 Part B plant for waste wood combustion differs from a Schedule 13 SWIP. This is a Schedule 13 SWIP application, so the reference to a 5.1 activity in the application form is incorrect.

Kind regards



Advisor - Local Authority Unit

Environment Agency | Trentside Office,
Scarrington Road, West Bridgford, Nottingham,
NG2 5FA.

From:
To:
Cc: ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016, SI 2016/1154 REGULATION 13 AND SCHEDULE 5, PARAGRAPH 6
Subject: 10 October 2024 14:06:11
Date: [image002.png](#)
Attachments: [image003.png](#)
[image005.jpg](#)
[image004.jpg](#)

CAUTION: External email - Do not click links/open attachments unless you recognise the sender and know the content is safe

Hi Team

NRW would first question whether this proposed activity would fall under a part b remit rather the Industrial Emissions Directive.

Based on the treatment activities and waste storage volumes intended the operator, this would require a permit under the EPR 2016. More specifically Part 2, Chapter 1, Section 1.2 - Gasification, Liquefaction and Refining Activities, (j) Activities involving the pyrolysis, carbonisation, distillation, liquefaction, gasification, partial oxidation or other heat treatment of - (iv) other carbonaceous material.

If activities are below EPR threshold, NRW would expect various conditions to be incorporated into any Part b licence, namely:

- strict waste acceptance, storage, and management procedures;
- maximum material storage limits and timescales;
- emissions management; and
- fire prevention and mitigation plan considerations.

Current Environmental Permit - EPR-ZP3933NJ

There is a current permit issued at Unit 2 Westfield Industrial Estate held by the operator The Treatment Hub Ltd (TTH) that allows the treatment and storage of hazardous industrial wastes. These materials are primarily filter cakes and contaminated hazardous soils. There is currently approximately 10,000 tonnes of mixed hazardous waste and other waste materials on site estimated by the operator, however, the landlord estimates there to be more.

In 2020 NRW served a partial Suspension Enforcement Notice on the operator requiring removal of waste to the compliant volume levels prescribed in the permit before operations could continue. Since the Notice issue, the operator ceased operating and the waste has remained on site. Both TTH and the landlord are looking for ways to remove and remediate the waste to avoid the need to dispose of to a hazardous landfill.

Information on the environmental permit, compliance assessment reports for site inspections, and other regulatory information is publicly available on the NRW Public Register found [here](#).

Company Director

The listed Director for the Company Tyregen UK Ltd is Mr Dennis Egan. Any legal action taken against Mr Dennis Egan by Natural Resources Wales is now considered

spent under the Rehabilitation of Offenders Act 1974.

If you have any further queries please let us know.

Kind regards

Alex

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



Our Ref: B0ZW3941

26/09/2024

SENT BY EMAIL

Swansea Council

Tom.Price@swansea.gov.uk

Dear permitting team

Permit application – Small waste incinerator plant, Unit 2, Westfield Industrial Estate, Waunarlwyd, Swansea, SA5 4SF

We welcome the opportunity to comment on this permit application. This assessment is based on actual or potential health risks from environmental exposures to chemicals, noise and extreme environmental events such as flooding.

Proposed Development

The application from Tyregen UK Ltd relates to the development of a small waste incineration plant involving pyrolysis of waste tyres. The pyrolysis plant will have a throughput of approximately 7,650 tonnes of pre-treated tyre material per annum.

The tyre material will have been stripped of its steel wire, textiles and some additives prior to its use as fuel. The pyro gas generated from the cracking of the tyres will be cleaned via a hydroseal prior to being used in the burners to heat the process, or being sent to the dusulpherisation plant. Oil and solid deposits produced via this process will be commercially distributed via the operator. Gases produced will be cleaned via numerous abatement processes.

Overall Conclusion

Based upon the information received and provided operations are undertaken in line with industry practice, we do not foresee any adverse risks to public health. As stated in our [position statement on incinerators](#), any potential health effects on those living within close proximity to the site are likely to be minimal. **We would however strongly recommend that the regulator is completely satisfied with the proposed storage and management controls of the tyre waste and resultant pyrolysis products on site. The risk of fire through inadequate management could impact on the locale.**

Public Health Risk Assessment

The applicant has provided details of how they will mitigate the developments impact on air emissions, land and water. An air emission risk assessment has been

provided; outlining that the impacts associated with the proposed facility have been assessed in relation to the air quality objectives. The nearest receptors have been identified and considered in their assessments and have concluded that the proposed operation will cause insignificant impact. The safe operation of the process will rely on the adherence to strict management protocols. **The regulator should ensure these measures and controls are followed and that best available techniques are used to reduce the risk of identified hazards on the locale.**

Our primary concern with sites that handle waste material, such as tyres, is risk of fire. Where fires do occur, they can present a potentially serious risk to public health and the environment. To achieve good fire risk management, we agree with the Waste Industry Safety and Health Forum (WISH) that waste management operators should go beyond basic legal and regulatory compliance. As such, we strongly recommend that the operator follow and adhere to the WISH 'Reducing Fire Risk at Waste Management Sites' Guidance¹. This sets out clear advice and information to help reduce the likelihood and frequency of fires, and measures to reduce the impact should fires occur. **In view of the potential local public health impact of a fire and to minimise risks, the regulator must make sure that the operations are managed in accordance with current guidance.**

We note that the site has an Environmental Management System, in line with ISO 14001:2015 standards.

Any additional information obtained by the regulator in relation to these comments should be sent to us for consideration. Such information could affect the comments made in this response.

Yours sincerely

Gwasanaeth Iechyd Cyhoeddus Amgylcheddol yng Nghymru
Environmental Public Health Service in Wales

¹ [WISH 'Reducing Fire Risk at Waste Management Sites' Guidance](#)

From:

Sent: Friday, October 18, 2024 4:00 PM

To: Pollution <pollution@swansea.gov.uk>

Subject: RE: ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016, SI 2016/1154 REGULATION 13 AND SCHEDULE 5, PARAGRAPH 6

CAUTION: External email - Do not click links/open attachments unless you recognise the sender and know the content is safe

Afternoon Tom,

Thanks for the opportunity to comment.

I don't have any comments on the technical aspects of the application.

However, the activity itself appears to me to meet the Part A(1)(f) activity under Section 1.2 (Gasification, liquefaction and refining activities) of Schedule 1 in EPR. This relates to activities 'involving the pyrolysis, carbonisation, distillation, partial oxidation or other heat treatment of— (iv) other carbonaceous material'.

The interpretation and application of A(1) for this section clarifies (3) that “carbonaceous material” includes ‘such materials as charcoal, coke, peat, rubber and wood, but does not include wood which has not been chemically treated or sewage’.

Additionally, as I’m sure you are already aware, the ‘activities falling within more than one Part description’ section in Part 1 of Schedule 1 further clarifies (2) that where an activity falls within a description in Part A(1) and a description in Part B, that activity must be regarded as falling only within the description in Part A(1).

I suspect you have already considered this in advance of duly making the application, but I thought it worth raising regardless.

Thanks again,

Having read through the information provide I have to object to the proposal of a tyre incinerator in our village.

The application is from a number of years ago and our community and approach to recycling has changed dramatically.

The recent drive to become net zero would suggest that this proposal should not be granted.

What about the air quality for our community? Surely this will be compromised should this proposal go ahead. They say they will monitor air quality. What happens should they fail to comply with set targets?

There are too many cons to this argument and with that I have to urge that no permission is given to this site.

I object to the environmental license, reasons being.

Incinerator burning will effect wildlife, has an ecology assessment been carried out for Bats & other wildlife in the area?

Medical effects on those with respiratory issues, bare in mind there are 5 care homes in the village all in extremely close proximity of the proposed incinerator.

Heavy goods vehicles will create more traffic, more pollution, more damage to the roads.

Entrance on Swansea Road cannot withstand anymore heavy goods vehicles, housholds now have more vehicles per household the roadsides are heavily blocked by parked cars on both sides of roads, causing obstruction for normal sized cars, heavy goods will creste an even more obstruction to the roads. The current hours that they heavy goods vehicles operate are already driving through after 11pm & before 6am, which is extremely inconvenient and major impact to public transport.

Outdoor teaching/play breaks in schools will be effected by the smell, again effecting any children with asthma, there are 2 schools again in very close proximity.

I acknowledge that a solution for the disposing of waste tyres is required . While tyre pyrolysis is a proven technology, diverting waste tyres from landfill and regarded as an environmentally responsible approach to waste tyre management, the process and bi-products are not without risks and environmental impact. The Tyre Pyrolysis Oil (TPO) and recovered Carbon Black (rCB) produced as a result of this process can be used as replacements for fossil fuels however TPO includes many pollutants such as Sulphur compounds and polycyclic hydrocarbons which are carcinogenic and mutagenic. Burning TPO produces gaseous pollutants.

The operation of the proposed pyrolysis plant will involve odorous emissions. The ERA concludes that the risk of air quality impact of these emissions to human health and ecological habitats is likely to be "insignificant", however it is not without risk to the surrounding residential areas and the 5 conservation/ protected areas within 10km of the plant.

Pyrolysis processes have historically suffered from safety issues. There is a risk of accidental combustion of organic materials when in contact with Oxygen or high temperatures. Fforestfach experienced a severe fire from the combustion of tyres in recent years affecting the operation of neighbouring businesses and the health of workers and residents for many weeks.

Does the Council have the confidence of this company to ensure the integrity of the equipment , the training of the operators plus adequate safety measures and monitoring to prevent the emission of pollutants and explosions?

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Does the Council have the confidence of this company to ensure the integrity of the equipment , the training of the operators plus adequate safety measures and monitoring to prevent the emission of pollutants and explosions?

I object to this Application. I live in the local area and this will bring smells and an impact on our breathing, and the general well bring of everyone in the village.

Objection to this

I would like to completely object to the proposed application, based on:

- The fact the same/a similar proposal was rejected by a nearby authority raises concerns given the proximity to resident areas (including my own current address) and an area I have recently moved from and have many friends living currently.
- The fact that these processes are quoted in the proposal as being monitored and dealt with by best endeavour is seriously concerning. The proposal does not make enough effort or concern with residents nearby. The mitigation against breaches here are, in my option, seriously lacking and concerning for nearby residents including myself.
- The proposal laughably lists this area as only an industrial estate, which is unbelievably misleading given the proximity to schools and residences in the area. This industrial estate is within a few hundred metres of homes, and has at least 4 schools within a small radius from the site, with likely more vulnerable residents and day centres for children and the elderly within this radius.
- To reiterate my last point, the fact that there are 4 schools, including primary education, within the area of the proposed site raises serious personal concern.

To summarise, it is my opinion that this application should not be considered by the Council as it is a complete backward step in the way waste is handled and it would indisputably introduce unpleasant side effects, including but not limited to increased noise and traffic, and health risks to the nearby community and school children in the area.

As such I would ask that this application is rejected and declined.

Pollution when in close proximity to two primary schools, numerous sporting clubs and a high population.

There are many reasons for my objection to the purposed tyre burning site in Waunarlwydd. Firstly, there are many known health risks caused by this process. Waunarlwydd, has provided a home to the young, the elderly and the vulnerable and they would be greatly affected by this plan. Secondly it would be devastating environmentally. There are far better ways to get rid of unwanted tyres, than spreading harmful, foul smelling smoke into the atmosphere. Thirdly it would be catastrophic to the local wildlife. I STRONGLY urge you to oppose this motion

This in no way can possibly go ahead so close to homes and schools

Regardless of where it happens tyres should not be burnt due to the environmental impact this is 2024 not 1974

I think this would be detrimental to the communities of both Gowerton and Waunarlwydd as, as far as I know, there is no safe place provided for storing the waste that will eventually be incinerated and there is a distinct possibility of pollution in an extremely populated area. Therefore I must object to this plan for the safety of other residents in this area.

Concern if running 24/7 that emissions will be pumping out day and night where there are SPA/SAC sites, schools, residents, sports fields, and streams near by. To suggest the chemicals listed are & within parameters; and therefore will not affect land, water and air quality seems hard to prove until it is too late. What if they want to expand and/or burn more? How often will the premises and surrounding area be reviewed and analysed? How will the combustible pyro gas be stored? What fail safes will be in place?

Don't want this close to where my children live and play

I am writing to you to express my strong opposition to the granting of a licence to incinerate tyres on the site of the old Alcoa works in Waunarlwydd. As a resident of the village for fifty five years, I have seen many changes take place but this would be detrimental to the residents and the environment. There are two junior schools and four care homes in close proximity to the Alcoa site. We also have a retirement chalet park which is very close to the site.

In addition to unknown health risks I believe pyrolysis can release harmful pollutants into the atmosphere which could have serious problems for those who are vulnerable and contaminated water from the plant could seriously affect wildlife. Please reject this proposal.

Although I live in Gowerton, I object to this site as it is in line with my property, as the crow flies, I can see smoke arising from this plant currently, especially at night and would hate to be impacted by black smoke and smell of burning rubber. How many lorries will be accessing this site? they will add to traffic congestion in Gowerton and Waunarlwydd area which is already gridlocked on a regular basis. I am concerned about the health of my grandchildren growing up in such an environment. I say NO to this development.

My mother's house is in Swansea Rd Waunarlwydd and I am concerned this would be detrimental to her health and everyone else who lives in the area and I would be concerned allowing my children to stay at my mother's as I feel their health would also be at risk, due to us now becoming more into recycling I am also shocked that there hasn't been a scheme to recycle old tyres or is this the quickest and cheapest way of doing things.

I would like to object to the proposal due to the harmful chemicals, smells etc that would be released during the process. Given the proximity to the village including 2 local junior schools, and thriving rugby and football clubs, I feel the effects from the tyre burning plant would be very detrimental and dangerous to the health of everyone in the area. I do not believe this would be a suitable place for this proposal and I trust that permission for this will be denied.

I object, it's creating too much pollution & it's a narcotic. This company didn't comply with health & safety. The population in and around Gowerton & Waunarlwydd are expanding if this goes ahead it will cause health issues for generations of people.

Health hazard. Pollutant.

I am writing to strongly object to Tyreger UK Limited's application to operate an incineration plant at Westfield Industrial Estate. While the application suggests minimal environmental effects, the incineration of waste, even if non-hazardous, poses significant health risks to the local community. Incineration plants are known to release pollutants such as particulate matter (PM), nitrogen oxides (NOx), and volatile organic compounds (VOCs), all of which can contribute to respiratory problems, cardiovascular issues, and other serious health conditions. The fact that this facility would be located near two primary schools and a local sports club, where children regularly spend time outdoors, raises significant concerns. Children are particularly vulnerable to air pollution, and prolonged exposure can lead to long-term health complications, including asthma, reduced lung function, and developmental issues. Additionally, the proximity of the plant to these sensitive areas threatens to degrade the local air quality, making it unsafe for recreational activities and general community health. I urge the council to consider these serious health risks and deny the permit to protect the well-being of local residents, especially young children and vulnerable populations.

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I wish to object to this application for the following reasons:-

There is a risk of “odour” from the plant. This odour could be a trigger for asthma and allergic reaction in the local population and workers at other businesses and organisations within the area. The applicant states that it will be released “ over 230 metres from the nearest sensitive property” but there are workers at other businesses and a long established Sports facility within that area of 230 metres, a Bowls Club. There are a Rugby Club, a Football Field, a Primary School within close proximity to that zone. If there were unexpected emission;s including dioxins there are also residential properties nearby. That is unacceptable!

Applicant states that the “ waste” will not be unloaded and processed completely undercover. There is a possibility for run off and contamination if this is the case.

There will be some use of LPG used in the start up process each day in two burners.

There is no reference to dealing with emissions from this LPG

Some aspects of the application have been redacted. How can I be confident that this does not refer to aspects which could be dangerous or related to aspects of production that are hazardous?

There are areas of woodland and natural areas within the industrial estate and also in close proximity to the proposed plant. There are bats, hedgehogs and other small mammals birds and insects which could be affected by any emissions.

I am a resident of Waunarlwydd, along with my husband who suffers with chronic obstructive pulmonary disease and, as the crow flies or wind blows, we live within 600yds of the proposed Pyrolysis-incinerator site. Waunarlwydd is a thriving community. The proposed site is flanked, by other thriving neighbourhoods. I am concerned about the environment, public health and wellbeing not only for the community members of Waunarlwydd but for those that live alongside us and those beyond.

I am concerned that there will be dioxins and Furans (known cancer causing toxins) odorous gases (including sulphur) and metals emitted into the air. I am concerned that toxic emissions will not remain constant nor at the level stated in the air pollution risk assessment.

The company states that the incinerator is new but is it absolutely a new incinerator or new to the company. The age of an incinerator may likely have a greater potential to emit more toxic waste than a brand new incinerator and presumably, the pollution risk assessment is based on the emissions of a new incinerator.

I am concerned about the Bio fuel or oil secured in a storage tank as a potential fire hazard.

I am concerned about Carbon Black, also known as soot, a bi-product of the incineration process, as it has several negative impacts on the environment: Contributes to climate change and global warming.

Inhalation of black carbon can lead to respiratory problems, cardiovascular disease, cancer, and birth defects.

It can pollute waterways and damage ecosystems when deposited on land or in water bodies.

I am concerned about what precautions will be taken to ensure the Carbon black is removed from the incinerator and site under strict controls. In addition, the company procedures for changing components of the incinerator, filters/scrubbers, that will have a high level of toxic waste attached. What procedures will be followed to ensure that the safety of the public/environment is at the forefront of all processes? How will and where will any used component of the incinerator be stored prior to their collection? How often are they changed? How will such used components be disposed of? And, How will they be transported without placing public health in danger?

I am concerned about vehicle emissions on site. The risk assessment states that Some pollutant emissions to air may arise from the delivery vehicle exhausts when their engines are operational but the quantity of emissions will be low. We should not accept this as increased exhaust emissions of vehicles to and from the site; vehicles used to remove the biofuel and carbon black from the proposed site; the use of vehicles to feed the shredded tyre into the incinerator.

Moreover, the impact increased heavy industry traffic may have on the surrounding roads and degradation of these roads and health/wellbeing of residents. Imagine the impact on the surrounding access roads and those residents living alongside these roads (M4, Penllergaer, Tesco lights, through to Garnoch lights, down toward fforestfach industrial estate and onto Titanium Rd). The nearest residence to Titanium road is 30 yds and this road also provides access to a lane onto my and

neighbours homes, that is, about 100yds away.

In addition, I am concerned about the impact all toxic dioxins and heat that will emit into our atmosphere will have on global warming and climate change.

Furthermore, I have concerns that no ecological assessment has been completed into the impact the emissions may have on land, local aged oak trees and other fauna and flora.

I am concerned about the amount of shredded tyre that may be stored on site and the potential such toxic waste has on the land and as a potential fire hazard. How will the tyre waste be stored? How much tyre waste will be stored on site? What fire precautions and plan/s will the company have in place prior to the commencement of their operations?

I remember the 2009 tyre fire in port Talbot at Tyregenics site.

The Swansea tyre fire in 2011, the fire took three weeks to control. It was reported that the fire created a plume of smoke which had a serious impact on air quality and the water used to fight the fire had polluted the nearby River Llan and Fforestfach stream. The overall cost of the operation was, at that time, 2.6 million. The site was located in forestfach under the control of Globally Greener Solutions (GGS) who, it has been reported, was paid by a local company, named Tyregenics, over £260,000 to store tyres from their business. The two directors of GGS received custodial sentences with the Judge stating, ;Only an immediate custodial sentence can be justified. There is no room for recklessness in this sphere.

Tyre fire at Port Talbot June 2016 - Egan Tyre Recycling Ltd.

Residents living nearby had been advised to keep windows and doors shut. At its height, there were 21 appliances and 100 personnel on site dealing with the incident. Natural Resources Wales stated that they have had concerns about the site for some time after successfully prosecuting the previous occupier when it was discovered he had illegally stored waste there. We recently prosecuted the previous occupiers of the site in respect of this illegally stored waste and had already started the process of using our statutory powers to require its removal from the site; (Wales on line; 13th June 2013). Indeed, in September 2015 Dennis Egan, a Director of Egan Tyre Recycling Ltd., from Gorseinon was sentenced to a total of 18 weeks in prison, suspended for 12 months, and was ordered to carry out 150 hours of unpaid work after pleading guilty to operating a regulated facility without a permit and keeping treated tyre waste in a manner likely to cause harm to human health and pollution of the environment and failing to comply with a waste removal notice.

Tyre Gen UK Ltd. - The company now making the application to the City and County of Swansea for the permit to incinerate tyre shreds was registered on 19th December 2016 to date the Directors are Dennis Egan, (registered as a Director on 21st January 2022) and Mathew Peacock, resides in England, (who has been a Director since 19th December 2016). Daniel Egan, a former director, resigned on 21st January 2022 This company has already been denied a permit by Neath Port Talbot County Borough and the Notice of decision to refuse application for a permit; dated 26th November 2018 makes for extremely worrying reading and has only fuelled to heighten my concerns around this company, and the directors of this company, having evidenced a total disregard for regulations, statues, law, the potential impact on the environment and public health. One Director has already been criminally convicted of

such misconduct (refer to Tyre fire at Port Talbot June 2016 - Egan Tyre Recycling Ltd. and Mr. Dennis Egan) . I urge members to read the Notice of decision to refuse application for a permit; and to take into account the evidence presented in the notice for denial when determining whether to grant this company a permit.

I am concerned about the reliability of this company to ensure the incinerator is maintained to a high standard; that they can be trusted to manage an incinerator with public health, an individuals welling and the environment at the forefront of all managerial decisions; that they will keep accurate records of near misses; or accidental toxic spillage onto land will be reported to the relevant department, for example, Natural Resources Wales or City and County of Swansea

Noise Pollution

It needs to be borne in mind that the company intends to run the incinerator 24/7, burning 7650 tonnes per annum or 20.7 tonnes per day. There is already one incinerator at the site and indeed noise from the site at night, such as, loud bangs, odorous emissions and noise from articulated veicles can be heard on a regular basis. So, without doubt, noise levels wil be increased if this company is successful in their application.

The tyre waste will be transported by road, from various sources to the site (presumably via the M4). The Pollution risk assessment states that Some pollutant emissions to air may arise from the delivery vehicle exhausts when their engines are operational but the quantity of emissions will be low. We should not accept this last statement without taking into account not only the impact on an already concerning volume of traffic on our roads but also the increased exhaust emissions of vehicles to and from the site; vehicles used to remove the biofuel and carbon black from the proposed site; the use of vehicles to feed the shredded tyre into the incinerator; the removal of the carbon black from the incinerator that hopefully will be appropriately packaged before being secured and transported to safe storage facility prior to removal from site. Residents already living close to a Pyrolysis incinerator also complain about the noise from the steam emitted from the exhaust pipe.

Finally, the impact increased heavy industrail traffic may have on the surrounding roads and potential impact of noise as well as air pollution, degradation of roads and health/wellbing of residents. Imagine the impact on the surrounding access roads and those residents living alongside these roads (M4, Penllergaer, Tesco lights, through to Garnoch lights, down toward fforestfach industrial estate and onto Titanium Rd). The nearest residence to Titanium road is 30 yds and this road also provides acces to a lane onto my and neighbours homes, that is, about 100yds away.

There must be a better way of recycling tyres than burning three tonnes a day.

This would be detrimental to public health.

The original application was made 13 years ago. Since then Swansea has grown outwards and there are future plans for large residential developments on land around the site. Should these go ahead the tyre recycling plant will have a much greater potential pollution impact on its neighbours than currently exist. It could become one of those plants that hit the news which begs the question of “How did that get planning authority?”

The assessments of chemicals listed in the proposal include many elements of a toxic and persistent nature more associated with heavy industry than a residential area. The quantities proposed are often listed as a conservative estimate so there appears to be a suck it and see approach.

It appears that the plant will run 24 hours a day so any discharges could take place at night.

Any noise emitting from the site at night will be more obvious and be more of a nuisance.

Dear Sir,

Tyre pyrolysis proposal: a wolf in sheeps clothing

I understand you are considering a tyre pyrolysis proposal for Westfield Industrial Estate in Waunarlwydd. I disapprove of this proposal and urge you to reject it.

- An Unsustainable process: Tyre waste is major problem worldwide. However there is little evidence that pyrolysis is the solution. Pyrolysis reprocesses waste tyres into gas, oils and solid residue (char). But it is not environmentally friendly. A process is not sustainable just because it claims to recycle or reuse of waste. It has to be considered holistically in light of the process by which it is done as well as its aims. The argument that pyrolysis is carbon neutral is flawed. 'Pyrolising' materials into a gas or oil and then burning the gas as fuel is an energy consuming process requiring significant energy input: more energy has to be put in than can actually be recovered. It cannot be sustainable. Thus it has a large negative environmental impact. To be sustainable energy efficiency and minimisation are required to reduce change emissions. Climate change emissions are not avoided by pyrolysis - rather as the fuel generated is burnt to generate energy it releases locked in carbon. This releases the same carbon dioxide than if the rubber had been incinerated directly. The waste has simply enjoyed an intermediary stage in the combustion of a fossil fuel. This is not a good thing.

- Waste materials transportation: Due to the need for large amounts of waste to make pyrolysis a viable industrial process (the 7650tons a year quoted), deliveries will likely be made throughout the day and night. This waste material transportation will have very large detrimental environmental impact via associated climate change emissions, local pollution, local noise, and strain on road infrastructure due to heavy goods vehicles. This is in addition to waste sourcing elsewhere and necessary transportation of the solid residue for disposal. If they do not transport out the waste residue, this will build up endlessly.

- Pollution and health: Tyres themselves are a complex toxic chemical mixture. When burnt they are highly polluting.

A process involving their incineration and venting of smoke and gases comes with very high health risks for the local community. Tyre pyrolysis vents a large quantity of toxic polluting gases and smoke. The application says it will have not one but four incinerators. There will be a startup process every day that burns liquid petroleum gas. The more tyres they incinerate the more pollution generated. Pollution is especially true when there is incomplete combustion or these gases are not cleaned or captured. Such gases include heavy metals and dioxins known to be detrimental to health. They can cause upper respiratory problems such as asthma and increased cancer diagnoses. Smoke pollution is already a significant blight in the area due to smoke from woodburners. An industrial process that actually purposely generates smoke from such noxious sources would be extremely extremely hazardous to health of local residents and wildlife.

- storage and fire risk: Large stores of tyres come with associated risks to the local area from accidental fires or even arson. The Westfield Industrial Estate runs alongside the railway line where already there is evidence of anti-social behaviour (eg litter, graffiti). Accidental and intentional burning of large stocks of tyres are well documented throughout the world as highly toxic and disastrous - some documented lasting for over 15years. They have even entered popular culture, for instance think of Springfield's neverending tyre fire often featured in the tv series The Simpsons. The storage of continually generated large quantities of solid residue waste, and possible leeching of chemicals into environment, will also be a problem.

- Noise: The ongoing processing of so many tons of waste, venting of gases and deliveries will generate a great deal of noise pollution. This is true even if a facility is contained. Waste tyres will probably require pre-processing (ie shredding) to remove steel rims. This will be noisy. I live less than a kilometre away. Noise day and night from that site is already excessive. In recent years I have registered complaints with Natural Resources Wales over frequent excessive noise pollution from the Westfield Industrial Estate (constant industrial droning and metallic 'clanging-clonking' sounds - probable delivery or industrial material processing). This would worsen.

- Houses: in recent years due to private developments, renovations and Swansea Council's own local area development plan, a large amount of housing has been built and is planned in close proximity to this site. Pollution, transportation and noise will have a detrimental effect on these properties. It may even make some (such as those still being constructed in Gorwydd woods' site) unsaleable. This is not likely to go down well with residents or be politically astute. These properties would be white elephants of your own making.

- Planning and company: I understand planning permission for this site was somehow gained over a decade ago. Precisely when is not clear to me - the application says 2012 but the included planning approval in the clarification document is dated 25th October 2011. Either way it was not followed up then either. The applicant was also a different company, Egan metals ltd, which while it had the same director, became insolvent and dissolved in 2015. The new company, Tyregen Uk Ltd, has a name implying UK-wide or international links however it is registered as a microentity according to publicly available data at Companies House. While it does have capital reserves of some 30k, it already has, if I understand its permitted abridged accounts correctly, large liabilities (approx 80k falling this year and £80k approx falling after this year). If this reading is correct, I would be uncertain they have the capability make a project such as this viable.

Business case: There is very little evidence of a business case for tyre pyrolysis. It has associated risks and investment costs for little return. It has never been widely adopted, despite the technology being around for decades. Indeed - the equipment proposed in the application is over eleven years old (manufactured in 2013) so is not innovative or new technology. In the time since planning approval, the market has not seen a marked uptick. The majority of tyres are not made from recycled materials. Indeed "efforts have been made to use recycled tires as raw material for new tires, but

such tires may integrate recycled materials no more than 5% by weight, and tires that contain recycled material are inferior to new tires, suffering from reduced tread life and lower traction (Rubber Recycling: Chemistry, Processing, and Applications - Myhre, Marvin; Saiwari, Sitisaiyidah; Dierkes, Wilma; Noordermeer, Jacques, 2012; Increasing the Recycled Content in New Tires 2004 - Rubber Chemistry and Technology; California Integrated Waste Management Board. Cited in Wikipedia). The residue - the char, minerals once part of the tyre - are a waste material produced that cannot be used in new recycled tyres as implied by the proposal. It apparently has little or no market value, yet constitutes 40% of output. This is very inefficient. This is seen as a significant impediment. Thus there seems little to suggest there is viable market for tyre pyrolysis or that it is a growing business sector.

Lastly, on process, I am disquieted by the short notice given to the public to respond to this. I only found out because it was in a newspaper a few days ago. I feel the council has a duty to ensure the public are informed and comment on issues that may effect many people's lives in significant ways. This does not appear to have happened in a satisfactory way.

All these issues run counter to becoming more sustainable. In short, pyrolysis is a wolf in sheeps clothing: much like similar incineration processes they masquerade as environmentally friendly when they are not.

Objecting to this proposal by Tyregen Ltd, for their operation line of business, has many environmental issues for the locally property areas, farmland and natural green areas. Not only present but also the potential of surrounding areas all within 1 - 2000 metres which will take the brunt of any omitted potentially harmful residue to the locality.

Also has the Company/Directors got a good standing and have qualified working practices in this line of operation that have not been subjected to any unlawful actions taken against them. I certainly cannot see this proving a benefit for the local community at present without sufficient air/emission studies.

With family members, who are also objecting to this licence issue, who are severely asthmatic and already miss days attending Work / College from chest issues the possible air pollution from burning tyres could cause further discomfort to an already stressful and painful days experienced.

I strongly disagree with this request as I am very concerned about the environmental impact with this type of business will have to the community air and smell airborne pollution.

I strongly disagree with this request, as I am concerned about the environmental damage of pollution to the air quality and possible smell of within the atmosphere:

I strongly object will bring noise and more important the pollution

Environmental pollution

Object this decision

High level of concern regarding air quality in the area of the proposed incineration plant.

I would like to object in the strongest possible manner to the proposed application, based on the following:

This application surely cannot be in line with the Councils 2030 and 2050 net zero ambitions; - incinerating tyres, 24/7, with the associated carbon footprint cannot possibly be the right direction for society to be taking in this day and age;

How can a planning application approved 13 years ago still be considered relevant given the change in environmental issues;

The licence application itself appears very light on detail offering no evidence required; and vague answers across the piece with no EIA having been undertaken, is this representative of the attitude of the company?;

The fact that a similar proposal has already been rejected by a neighbouring authority raises concerns;

The fact that these processes, which produce known harmful gases will be monitored and dealt with by best endeavours is alarming, and the fact that these processes require monitoring puts the emphasis on the company to stay within regulated limits does not guarantee there won't be breaches. The only way to guarantee clean air in our communities is to not produce the gases in our communities;

To suggest that this development is on an industrial estate is misleading at best - the centre of that industrial estate is within a few hundred metres of homes, and has no less than 4 schools within a 1300m radius from the centre of the site - what impact will this have on the residents and future generations?;

In summary, it is my opinion that this application does not accord with the Councils net zero ambitions (nor that of Welsh Government), it would be a backward step in the way we handle our waste and it would indisputably introduce unpleasant side effects (increased noise and traffic), and health risks to the nearby community.

As such I would ask that this application is declined.

There's enough going on in my area ATM and adding a site that is burning anything from Tyres to other products So close to a housing community is I feel a step too far.

I want to express my opposition and disapproval if the location if Tyregen UK application at Waunarlwydd. This area has become increasingly residentially populated with new large developments, has carer/nursing homes, schools, community/social hubs, gyms, retail, farms, etc all within the area, and such a business is not suitable placed in this location. We have previously had a Tyre Warehouse fire that meant significant people were seriously affected, and evacuated from their homes. We already have noticeable air pollution from farms etc., to add to this in an increasingly populated area is irresponsible and displaced. I vehemently oppose and object to the locating of Tyregen UK Ltd in Waunarlwydd.

I am objecting to the application by Tyregen UK, Ltd. Westfield Industrial Estate Unit 2, Waunarlwydd, SA5 4SF for a permit to incinerate waste tyres (WT).

The pyrolysis process to recycle waste tyres (WT) produces many pollutants such as particulate matter, carbon monoxide, and volatile organic compounds that may impact air quality affecting the well-being of individuals and the environment (land, water and wildlife). A major factor is the proposed location of the plant in a relatively small industrial site surrounded by the communities of Forrest Fach, Waunarlwydd, Gowerton, Garden Village, Gorseinon and Penllegair and the surrounding land which has been designated for housing development by the Swansea City Council under the local development plan (LDP). Can we as a community ask people to purchase houses or be allocated to an area which will have a detrimental effect to the environment and the overall health of the new and existing communities.

A further consideration is the transportation of materials and equipment to the plant which is usually neglected in the research literature regarding the pyrolysis process of WT, but in this case the transportation of goods is crucial and must be considered. The proposed plan involves the transportation of two major materials 1. The transportation of the WT and safe storage and 2. The transportation of the byproducts of the process including oil, gas and carbon black, and steel along with further waste products. The transportation factor further compounds the overall environmental contribution of the pyrolysis process, and these factors should be strongly considered in the consultation.

Swansea is experiencing the effect of global warming with severe storms and resultant flooding which has produced one month's rainfall in a few days along with other communities in Britain and this is only September. We must stand back and put the environment first when making major decisions which affect large areas of the community.

I object to the siting of this plant in this area due to the nature of its products and its position within a residential area which is continually expanding with development of further 200+ houses being considered by yourselves at the moment.

Regarding the output products Carbon Black is a particularly dirty material and if not managed correctly can adversely affect the local environment which Swansea council should be aware of having once had a plant located on the East side of Swansea which produced this material.

The fuel which is the other product mentioned I assume would be carbon based, what is this to be used for? Should we be supporting this with the world in grips of global warming due to a great extent by the burning of carbon based fuels.

The plant itself would need to be stringently monitored being an incinerator as burning of some plastics and other materials can cause carcinogenic gases and other harmful gases to be emitted.

Another thing worth considering would be Neath and Port Talbot councils decision to refuse this company a permit in 2018.

Finally in a week when the UKs last coal fired power station is shutting down and the Port Talbot steel works blast furnace has melted its last charge of iron ore should a plant like Tyregens be considered.

Burning tyres so close to houses. The smoke and the smell alone will spoil the environment. During summer how are local people who live close supposed to enjoy their gardens. What effect does the smoke have long term health? It needs to be put further away from houses/people.

I am objecting to the application by Tyregen Uk, Ltd. Westfield Industrial Estate Unit 2, Waunarlwydd, SA5 4SF. For a permit to incinerate used tyres, this cannot be good for our communities, there is a body of evidence that supports this, the carbon footprint is huge, through air pollution, we are already experiencing the effects of Global warming with extreme weather conditions.

The amount of chemicals released into the atmosphere through incineration releases significant amounts of toxins into the air, such as Sulfur Dioxide (So₂), Nitrogen Oxide (Nox), Carbon Monoxide (Co), Volatile Organic Compounds (VoCs), particular Matter (PM) also fine particles known as (PM_{2.5}) and other harmful substances. These pollutants can contribute to the damage to surrounding habitats and disturb the balance of our Ecosystems cause smog formations. The human health cost would be enormous, and the pollutants are known to be carcinogenic and have adverse effects on lung and heart disease, asthma, bronchitis and can cause lung cancer.

Swansea City Council has a ten-year, housing development strategy plan, to build by the year 2030 18,000 houses in the immediate and surrounding area of this Industrial Site, from Gowerton, Waunarlwydd, Garden Village, Penllygaer, Llewitha and Fforestfach. Who would consider having an Industry site so toxic in the midst, of all these communities. The number of children growing up in such a polluted area, what a legacy for Swansea City Council, these children are our future please lets, have some common sense and reject this application.

I have, to ask why this company was turned down for this permit application by Neath/ Port Talbot County Council? Have they ever been prosecuted or fined at any time in the past?

We all know we need jobs in the area, however the number of jobs created certainly would not equate to the Human Health Cost!!

This is very close to where I live and I am in extreme objection to this being done

On this auspicious day, when the last UK Coal Fired Power Station and the UKs largest blast furnace steel-making facility are shutting down, both polluting and carbon emitting, it seems perverse to be considering this permit application for what seems to be a process that doesnt pass the sniff test, both literally and metaphorically.

If the applicant has had a previous attempt refused, albeit in a different local authority area, how does this application differ?

And of course, accidents never happen, do they? Potentially emitting noxious substances. And even if the applicant provides all the assurances necessary, will there not be times during day to day operations when standards may slip?

Yes, we are in the vicinity of this potential operation and not implicitly against industrial operations, but this doesnt feel right.

Note the very close proximity of the main railway line to west Wales, also.

My child attends school very close to this site and we dont know the long term health implications for those in the area. Windows will have to be closed in the school, play times will be affected, outdoor sports.

Unsuitable site surrounded by houses and new housing proposals

Love other side of railway tracks, don't want to be so close to this.

I have two grand daughters and a daughter also living in this village. I have lived here for 31 years it is a small close knit village quite quiet and peaceful. We do not want poison rubber smelling toxins polluting our air so find somewhere else. Well away from humans actually

Isn't it strange how the council put the speed limit down on our roads worried about pollution but have no worries with polluting the air we breath when it suits

Now leave our village out of your plans please

I wouldn't like to have such an environmental pollutant nearby. There are households and scouts groups in the area too.

As a local resident with young children, I strongly object to the proposed tyre incinerator. This will have a dire effect on the air quality in the surrounding areas, as well as the local nature.

Our household is near to the proposed development. We have members of the household that suffer from asthma and we are concerned the burning of tyres would have a detrimental effect on their health if toxic fumes were released in to the atmosphere. We also have young children and are concerned on the impact on their health. There is also currently a planning application in for a new housing development, including a new primary school, along the nearby Titanium Road; presumably this tyre burning development would make these properties more difficult to sell and conflict with the local authoritys plans for affordable housing?

I have only just come to know of the plans in relation to the burning of tires in the vicinity of Waunwrlwydd. There are very clear environmental issues associated with this as well as health implications for the local populus which includes two care homes and two primary schools. I wish to note my objection to this proposal in the strongest possible terms given that likely negative impact to health for young and old.

We do not need the smell and smoke that places like this emit. Too many schools in the area will be affected

I am the*** for Fforestfach Scouts who have their hut in Abergelly road. We 100% object to this application on account of the environmental risks that this will cause.

We spend a lot of time outdoors and if this goes ahead I would be concerned about the health and wellbeing of our young people and volunteers. The area has a high amount of older residents also who could be at their advanced age subject to health issues such as COPD and asthma.

I have elderly parents who have trouble with walking after suffering strokes, one of them left paralyzed with chest and breathing problems. They live in the chalet park, the smell etc. would be detrimental to their well being.

I strongly object to this licence being granted. The physical and environmental damage that such an incinerator will cause is totally unacceptable

We do not want this affecting our children's health

Needs more consultation on pollution control.

We wish to object to consent being given to the pyrolysis process in the former Alcoa plant on the following grounds:

1. The control of pollution from the pyrolysis process rests on the plant being contained within another building on the site. Although it is claimed that the building will be adequate for the purpose, it was not constructed to contain polluting gases, is almost certainly not airtight, and can be expected to release gas and particulate matter, for example when doors are opened.
2. Even if the building is reasonably airtight in normal conditions, it will be too easy for gas and particulate matter to be released in large quantities when something goes wrong, for example, if there is a fire.
3. The tyres which are delivered but not yet processed will be stored somewhere on the site. What precautions are being taken to ensure that they are safely stored, and safeguarded against, for example, an arson attack? The fire which consumed tyres stored in a building in the Fforestfach area some years ago released large quantities of toxic pollution.
4. The delivery of the tyres is almost certain to be noisy, generating increased noise pollution in the local community. The handling of tyres and the pyrolysis process may also generate significant noise.
5. The proposal involves the construction of a chimney stack to release smoke (ie particulate matter) and exhaust gases to the air. There is likely to be a significant smell problem as well as any toxic effect of the material, particularly when atmospheric conditions work against the smoke rising and being dispersed. There is likely to be an impact on people's health, particularly for those who have lung problems or allergies to smoke.
6. The applicant claims that the pollution generated will be no worse than was historically experienced. This is an absurd claim as standards have changed, and pollution which was tolerated years ago is no longer acceptable today. Over the years the pollution experienced by the local community has reduced as the heavy industries of the past disappeared. Residents are no longer simply the families of workers at the plant - many people have moved into the area, and the villages around are now more dormitory towns than local housing for those who are employed at the industrial plant. Historic pollution levels are no longer acceptable.
7. The applicant notes that the nearest dwelling is some 230 metres from the plant. However this is an area where new houses have been proliferating, many only a short distance from the plant. Indeed the Local Development Plan envisages the construction of housing over much of the local area, and dwellings envisaged for the future are likely to be much closer to the plant. If the pyrolysis plant is built, it is likely to mean that developers will be reluctant to develop housing estates which they may find difficult to market because of the plant, and that in consequence the Council's proposals to meet future housing need will be frustrated.

8. The applicant claims to have planning consent for the construction of the plan. However the consent to which the application refers is no more than a declaration that constructing a pyrolysis plant would not involve reclassifying the use of that area of land. Surely the construction of a new plant would require detailed planning consent, although the work could be considered to be internal to an existing building. In any event the construction of a new chimney stack projecting into the skyline would require planning consent.

I strongly object to this planning application. How on earth can this comply with any of the green policies laid down by Welsh Government? This should not even be a consideration.

There is strong evidence which shows that the incineration of such products will have serious consequences for our communities through air pollutants and byproduct atmosphere. These pollutants contribute to adverse effects on human health and have been known to be linked to respiratory diseases and other cancers.

The carbon footprint would increase the smell of tyres burning will not be pleasant for the immediate and surrounding communities.

Swansea City Council have pledged a housing development plan to build up to 18,000 houses in the immediate and surrounding area, the other side of the railway line from Gowerton, Waunarlwydd as far as Garden Village, Penllygaer, Llewitha and Fforestfach are they going to want to be responsible for the detrimental effects of these communities being affected by the pollution of this industry.

Let's be sensible and read up on the green policies already put in place and reject this planning application.

Against air quality pollution

Detrimental to health

Toxic emissions

The smell will be horrendous

It will affect the whole neighbourhood

The value of property in the area will be adversely adversely affected

I object to having this near our homes

The site for this development is close to a primary school so the fumes and toxins would be very detrimental to young bodies. There's also the gyms close by and the Gymnastics Centre which is on the same estate. Lots of young children attend this gymnastics centre so again the pollution will be affecting young families, not to mention the traffic and the affect it will have on the state of the already poor road conditions

The smell of burning in the area currently is horrendous, if this goes ahead then it'll be almost unbearable to open the windows and doors to allow "air" into the house. This in turn will also have a negative impact on our health.

This needs to be seriously reconsidered and moved to a much more remote location.

The area is already polluted with constant burning due to plants/business in the industrial estate, in the summer is sometimes hard to keep windows open due to the already strong fumes of burning, and it's really hard to breathe that in. This will only make it worse for us asthma sufferers. We should not have to pay council tax to live like this, let alone with the proposal of this new plant! The area (Forestfach) has a great elderly population and they alone should not have to endure this!

Working in the local school, I can't see how noxious fumes help our right to be healthy. I can see breaktimes where we can't go outside if the wind is in the wrong direction and us having to keep classroom windows closed. A very bad idea. Please don't allow this

The fumes and pollution that will come out of the chimney will have a detrimental affect on the health of Waunarlwydd residents causing health issues such as breathing problems etc. It will go into the water, the ground and air. It's right by a school, nursing home and over 50s housing estate. If they had a fire we would be prisoners in our own homes and not just Waunarlwydd but surrounding areas too.

Good grief, this is madness. Burning tyres in an area surrounded by residential property? How can this possibly be described as non-hazardous;? A hard no to this please.

I object to the proposed incinerator due to numerous points,

1. Residents in and surrounding areas at risk of toxic cancer causing deposits released in the air.
2. Increased traffic into a now mainly residential area, further impacting with noise and pollution.
3. Impact on wildlife in the locality and impact to natural tree and plant growth important to our environment.

I wish to object on the following grounds

1 For many years I lived in Waunarlwydd with the Alcoa factory onsite with all the associated problems in the area. The new factory would create more.

2 The villages of Waunarlwydd and Gowerton have grown considerably over the years with more residential housing and traffic, both within the village and beyond.

3 The increased traffic would place greater pressure on all roads surrounding the area which is already near breaking point especially in Gowerton where gridlock roads are a way of life.

4 The factory would be near a school, nursing home and an accommodation complex for older people. These should be protected from the increased pollution that will occur if the factory is built

5 I understand that during part of the process some pollution will be released into the atmosphere via a chimney stack. The pollution and smell however slight would be unacceptable. This could cause long term health problems to all areas of our villages. It could also cause residents to have to shut windows to create better living conditions for themselves and their children.

6 The factory should not be built in this area. There are better places away from housing, schools and amenities.

7 In the event of a fire breaking out in the factory this could take days to bring under control with pollution levels being very high.

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I strongly object to this proposal.

My garden backs onto railway which runs alongside the Westfield site.

I can see the old Alcoa site from my bedroom window.

My husband lived in Port Tennant during the carbon black era on Fabian way.

He was horrified to hear about the carbon black by product which will be produced by proposed project.

I am very concerned about the potential pollution from this development.

I have researched burning treated tyres in other areas of the UK, and it is obvious that treated or not, burning tyres produces huge amounts of pollutants especially CO2.

As Wales is trying to reduce our carbon footprint through various initiatives, eg.20mph, local councils planting more trees etc

This proposal goes against any such initiatives and permission should be declined.

Harmful for the environment

Please stop this from going ahead.

Air quality is so important. This is near a residential area. Our children deserve better.

This will cause serious air pollution that will affect the neighbouring population

I wish to object in the strongest possible terms to the application for a waste incinerator in Waunarlwydd.

The incinerator will lead to pollution and foul odours in a village which stands at the gateway to Gower which was the first area of Britain to be granted ANoB.

I was most impressed when Swansea Council was the first in the UK to achieve the One Planet Standard acknowledging the work that has been done in reducing its ecological footprint. Granting a permit to burn tyres would be a massive step backwards.

In 2020 the Swansea Council Charter on Climate Action was signed with the aim of making Swansea net zero by 2050. In order for this to happen the council needs to honour the pledge it made to the residents, and any pledges the residents have made. It is baffling that this incinerator could be allowed to burn tyre when the Council and the Welsh Government are making such huge strides towards decarbonisation.

As an asthmatic, I am deeply concerned about the effects this incinerator will have on my health. I am also concerned with the effect this incinerator will have on house prices in the area.

Finally, I have deep concerns over Tyregen themselves. They were refused a permit by Neath port Talbot Council "on the basis that operator technical competence is considered to be inadequate." Living near to the site of this proposed incinerator makes me extremely nervous especially recalling the tyre fire in Fforestfach in 2011 which burned for 22 days. This kind of incident would cause potential health risks to the residents and cause operational issues for the main West Wales train line which runs next to the proposed site.

Please count this as an objection to the application.

I object to this plan because of the amount of pollution it will cause, effecting my daughters future.

Its a blight on the environment and we are all being encouraged to recycle and maintain clean air. There are a lot of children playing a lot of different sports ie football, rugby etc . There are couple of schools, and we dont want the next generation to grow up with lung problems from pollution

.

More pressure in our community for all amenities

We did not move to the area to live near to a place that will be releasing toxins into the air. I do not want my family to be exposed to this health risk and impact our health in the future.

I object for it would ruin the environment

It would be detrimental to our environment This should definately not be allowed in our community

I object to this planning , as it will cause pollution and effective the neighbours and environment in surrounding areas .

The pollution will effect our health as well as the environment.
Waunarlwydd is next to the Gower , and area of outstanding national beauty with National Trust. The tyre factory will directly effect this.

I support the granting of a permit, as it recycles the materials in tyres, rather than destroying through incineration or burying through land infill.

We have 3 nursing homes within the small village of waunarlwydd. 2 schools and a dentist. This tyre plant should not be placed here at waunarlwydd causing us and our children toxin through the tyres burning I object to it being built in wauanrlwydd.

We already know the harmful effects of tyre and other incinerators, so why would this be allowed to go ahead in a highly populated area unless there was a brown envelope involved. Criminal if it's approved

Please no! Not in our village, think about our children 😬

I do not think that this should be allowed so close to communities and schools. This will undoubtedly affect the health and wellbeing of waundarlwydd, gowerton and Fforest ffach residents. There must be a an alternative site that is more suited, or a more environmentally sustainable way to dispose?

No I dont agree I think this would be horrendous for the people who live here and surrounding areas

We cannot have an industrial site such as this, so close to so many homes, affecting such a large number of people. The emissions will not be good for peoples health especially those with lung issues, such as asthma.

I am writing to formally object to the proposed small waste incineration plant involving the pyrolysis of waste tyres at Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF. As a resident of Waunarlwydd, I have several serious concerns regarding the potential environmental and health impacts of this project as follows:

1. Environmental Impact:

The pyrolysis process, while intended to reduce waste, can release harmful pollutants into the air, including volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), and other toxic substances. These emissions can contribute to air pollution and pose significant risks to local wildlife and ecosystems.

2. Health Risks:

The incineration of waste tyres can produce hazardous by-products such as dioxins and furans, which are known to have severe health implications, including respiratory issues, cancer, and other chronic diseases. The proximity of the proposed plant to residential areas increases the risk of exposure to these harmful substances for the local population.

3. Inadequate Waste Management:

There are more sustainable and less harmful methods of waste management that should be considered. For instance, recycling and repurposing waste tyres can significantly reduce the environmental footprint compared to incineration.

4. Impact on Property Values:

The presence of an incineration plant can negatively affect property values in the surrounding areas. Potential buyers may be deterred by the perceived health risks and environmental degradation associated with such facilities.

When considering these points, I urge you to decline this application. I strongly believe that alternative waste management solutions should be explored that do not compromise the health and well-being of our community and environment.

Thank you for considering my objections. I look forward to your response and hope that you will take the necessary steps to protect our community.

I object wholeheartedly to the introduction of a tyre burning facility in Waunarlwydd. The toxins released from such burning are known carcinogens and have no place in or near residential areas. Despite claims the emissions will be small, any level of fumes and particulates released from burning tyres are toxic and dangerous. Not to mention of course the increase in traffic delivering tyres to the facility from near and far. I trust that the council will reject this application, just as Neath Port Talbot did in 2018.

Not suitable , too close to housing and wildlife.

This would ruin the environment around Waunarlaudd

Eco Tyre Incinerator objections

We are the Waunarlwydd primary eco team. We have objections to a tyre incinerator plant in our area due to the negative impacts of burning tyres and the long-term effects it will have on our community.

1. Environmental Impact

- **Air Pollution:** Tyre incineration can release harmful pollutants such as carbon dioxide. This contributes to climate change and can reduce our air quality.
- **Toxic Emissions:** Burning tyres can release heavy metals such as lead and mercury and toxic chemicals which can contaminate the atmosphere and affect wildlife.
- **Greenhouse Gas Emissions:** Burning tyres releases a significant amount of CO₂, contributing to global warming and undermining efforts to reduce carbon emissions.
- **Waste of Resources:** Tyres contain valuable raw materials such as rubber, steel, and oil. Incineration ends the possibility of recycling or repurposing these materials, making it an inefficient use of resources.
- **Impact on Biodiversity:** The burning could harm nearby ecosystems, potentially causing acid rain or damaging local wildlife habitats due to pollution.

2. Health Concerns

- **Respiratory Problems:** Fine particulate matter given off from tyre incineration can exacerbate respiratory illnesses, including asthma, bronchitis, and lung cancer, especially in children.
- **Cancer Risk:** Exposure to toxic chemicals released from burning tyres, has been linked to an increased risk of cancer.
- **Cardiovascular Disease:** Air pollution from tyre incineration may increase the risk of heart disease and stroke, as exposure to particulate matter can lead to cardiovascular problems.
- **Noise Pollution:** The operation of the plant, particularly heavy machinery and transport vehicles, can contribute to noise pollution, affecting our community.

3. Social and Economic Concerns

- **Property Devaluation:** Nearby residents may experience a decline in property values due to the perceived and actual environmental and health risks associated with living near a tyre incineration plant.
- **Quality of Life:** Communities near incinerators often face a reduction in overall quality of life due to increased pollution, unpleasant odours, and noise, leading to long-term stress and health issues.
- **Job Creation vs. Health Impact:** Owners of tyre incineration plants often talk about job creation. However, these jobs come at the cost of our health and alternative industries like tyre recycling offer safer employment opportunities.

4. Sustainability and Alternatives

- **Promotes Unsustainable Practices:** Tyre incineration encourages single use (use, burn, dispose) rather than recycling where tyres could be reused.
- **Alternative Solutions:** Instead of incineration, alternatives such as tyre recycling are more sustainable options with less environmental and health risk.

Thank you for taking the time to read our ideas and opinions.

Incineration is Not very environmentally friendly way to dispose of tyres
Waunarlwydd lays in a valley where pollution can settle onto the residents of the village burning this amount of material 24 hours a day seven days a week. later on in life health complications could be very dangerous for everyone including the environment the next generation does not need this hanging over them when they get older .

lessons should be learnt from the miners and steelworks of men and women that have suffered health conditions in later life. Incinerating tyres have loads of pollutants including sulfur dioxide (SO₂) nitrogen oxide (NO_x) carbon monoxide (CO) volatile organic compound (VOCs) and particulate matters (PM) including fine particles know as PM_{2.5}

I strongly object to the application for an incinerator at Waunarlwydd on environmental grounds.

Smell and pollution of the village and green spaces will be awful which will lead to an increase in health problems. The surgeries are already at full capacity! This needs to be away from populated areas if needed at all.

i object on the grounds of enviromental issues

I am strongly opposed to this site being used as a waste dump for tyres as I have a history of respiratory issues and this site would not only affect me but many others who live near as many within the neighbourhood are elderly. This site would affect the environmental element of our community as there are multiple families with young children and as mentioned many elderly living near the site proposed for the tyre burning. Our community would be affected by the odour and any additional excess produced by the factory which could affect our day to day living conditions.

Like the rest of my family.
No

No thankyou

A big no to this

Don't want it to be granted permission. Have enough problems with noise from other company breaking up material and specially at weekends!

I do not support any business capable of such pollution in a residential area. I support my nearby neighbourhood in their concerns.

Severely object

Object

Youre having a laugh.

This is a residential area. Thats people including kids and babies.

No one wants an incinerator near their homes for all the obvious reasons i.e health and aesthetics.

Stop it now.

NOT SUPPORTED

I am worried about this being so close to residential areas and the pollution this will cause. This will have a negative impact on children's health and those with chronic illness.

It will or only impact local area but also nearby areas and schools

Pollution, smell, any wind from any direction and housing areas will be affected. Smell in particular from burning tires is obnoxious, foul and a health hazard. I strongly object to this proposal.

This will cause pollution is against a viable carbon footprint and will make the air quality around the area insufferable causing issues with medical conditions

Traffic congestion. Too much building and sewerage works already in Gowerton.

I object to the proposed Tyregen facility setting up in Fforestfach. As a resident of this community, I have serious concerns about the negative impacts this facility will have on the environment, public health, and overall quality of life for local residents. This facility would release toxic pollutants which pose significant risks to local ecosystems and wildlife, as well as the broader environment. The proximity of this facility to residential areas, schools, and parks raises serious concerns about the long-term health of those who live and work nearby, including vulnerable people such as children and the elderly. I strongly urge the relevant authorities to reconsider the approval of this facility and explore alternative locations or methods that do not pose such significant risks to the community and environment.

Thank you for your attention to this important matter. I trust that you will consider the interests of local residents and the protection of our environment.

Dear Pollution Control Division,

I am writing to object to Tyregen UK Ltd's application for a Part 2A Permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Waunarlwydd, Swansea.

As a member of the local community, I do not believe that such a facility is appropriate for our area. The potential negative impact on air quality, public health, and the environment is a significant concern. I strongly feel that this type of facility should not be located within our community.

I ask that Swansea Council reject this application in order to protect the well-being of local residents and the surrounding environment.

Yours sincerely,

No thanks, try somewhere else

Wrong

To whom it may concern,

I am writing to formally lodge my objection to the recent application by Tyregen UK Limited for a permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF. This proposed facility would be situated dangerously close to residential areas, including the community where I reside, as well as schools such as the one my daughter attends. It is deeply concerning that a project of this nature, with the potential to emit pollutants into the local environment, is being considered in such proximity to homes and educational institutions.

Proximity to Residential Areas and Schools

The installation is intended to operate at a capacity of less than 3 tonnes per hour, but the scale of the operation does not diminish the potential harm it could inflict on the local population, particularly children. The proposed site is alarmingly close to a residential area and within a short distance of a school, which is an unacceptable risk. Children, including my daughter and her peers, are far more vulnerable to the adverse effects of air pollution, particularly respiratory conditions, due to their developing lungs.

There is mounting evidence linking air pollution from industrial sources, such as incineration plants, to serious health conditions, including asthma, chronic obstructive pulmonary disease (COPD), and even long-term cardiovascular complications. Exposing children to this level of environmental hazard is not only irresponsible but borders on negligence. I am not prepared to accept that my daughter or any other child should be placed in harm's way due to poor planning decisions by the local council and Tyregen UK Limited.

Concerns Over Environmental and Health Impacts

The incineration process, even for non-hazardous waste, releases harmful particulate matter, nitrogen oxides, and volatile organic compounds into the atmosphere. While the application may attempt to downplay the severity of these emissions, there is no guarantee that the mitigation measures proposed will adequately protect residents or schoolchildren from the cumulative effects of exposure over time.

As a parent and a member of this community, I find it wholly unacceptable that we are expected to bear the brunt of increased pollution while the company profits from such an operation. The children of this area, including my own daughter, deserve clean air and a safe environment in which to grow up, not one blighted by industrial emissions.

Lack of Accountability and Request for Compensation

Should the council approve this application, it raises a serious question about accountability. Will Tyregen UK Limited or the council be prepared to provide compensation upfront for the illnesses, respiratory symptoms, pain, and suffering that are likely to arise from prolonged exposure to the pollutants emitted by this plant? The health of our community should not be collateral damage for the benefit of

corporate interests, and if this incineration plant goes ahead, there should be financial and legal mechanisms in place to ensure that all affected residents receive compensation.

I will not stand by idly and allow my daughter or other children in the community to suffer because of short-sighted, profit-driven decisions. If the council permits this application to proceed, I will personally make it my mission to ensure that all those who have contributed to allowing such an atrocity to take place are held professionally and financially accountable for any harm caused.

Conclusion

In light of the above concerns, I urge Swansea Council to reject this application in the best interests of the health and well-being of local residents, and more importantly, the children who will be disproportionately affected by the pollution that this incineration plant would bring. There are countless other areas, far from residential neighbourhoods and schools, where such an installation could be located without endangering public health. I strongly suggest that Tyregen UK Limited explore these options rather than imposing unnecessary risks on our community.

To allow this incineration plant to be established so close to homes and a school would demonstrate a grave disregard for the duty of care that local authorities owe to their residents. The community, and more specifically, its children, must come first.

Object to due to air pollution levels in the surrounding areas will have a detrimental effect on residents especially those of ill health and of old age. This will be an addition to the high level of traffic pollution from the Carmarthen Road.

I object to the proposal of a industrial waste disposal site to dispose of vehicle tyres as I feel it is a environmental and hazard to myself my children and their future especially living nearby .

There are so many more appropriate sites in the area for this kind of industry. It is too close to local schools (login fach and waunarlwydd) to parks and old age people's homes. The pollution will cause serious health implications for the most vulnerable people in the area!

Build it somewhere where there are no residents have toxic waste blown around 24 hours day isnt going to help people with breathing problems and the smell wi be disgusting

I think this incinerator will be a major pollutant in the area and for this reason I object to its installation.

I object

The comments I would like to put forward are as follows:

Who will be controlling and monitoring this project, not only at its construction stage but the general day to day operation of it.

Will it be constantly managed and monitored on site, by an independent body or by the applicants, hoping that they will do it in a controlled manner.

There is data supplied on the emission levels, I am sure the council should ask for a more comprehensive report or at the very least question the accuracy of this very vague report.

There are serious questions over Water and Air pollution, in addition to most certainly noise. With this being a licence application, it is totally unsuitable in very close proximity to a considerable amount of residential properties and primary schools.

Will there be any personal undertakings for the Directors of the Company to adhere too, avoiding them hiding behind a Limited Company if there is some kind of a serious issue at the site, that causes health, injury or suffering to close by residents and children.

There are a lot more questions than answers in this licence application and I think the public and residents deserve a lot more information on this than has been already given and for the reasons given in this objection it should be flatly refused.

I object to the pollution

The last tyre fires we had made many people quite ill...My lungs did not recover for a year,,, The thought of dangerous tyre storage again should, historically, be enough not to consider this application. When burning by purpose this type of smoke will pollute the atmosphere constantly and peoples health should be of more consideration. The public should not be subjected to this type of health hazard,,,, The whole idea of burning rubber tyres seems so archaic and dated. The work of burning will be continuous and despite the danger to health the smell is going to be dreadful as the company will be working most days.

I would not want this in my area reasons are

Air pollution,

road congestion,

Dangerous heavy vehicles going through our small village .

I wish to object this.

Burning and incinerating anything produces toxins. Being an engineer myself I understand the use of filtration units but even the finest denier filters still allow harmful particles through. The problem being is the particles will be so fine they will not be seen by the human eye but can be injected causing all sorts of health problems later in life.

The highways are already congested in the area and to add more lorries/traffic in an already pot hole ridden system will only cause more pain for the villages of waunarlwydd and fforestfach.

This type of plant is more suited to a rural area away from children's schools, play areas and communities where further congestion and pollution will only frustrate people, increase risk of accidents with heavy goods vehicles and poison the air that we breath.

The plant may create some jobs in the area but the consequences and sacrifices for these jobs is heavily out weighed by the disruption and health issues associated to such a plant.

Feel free to contact me and I will be available to give an engineering insight to such a venture.

Please listen to the residents and relocate to a rural area.

Environmental concerns.

It is detrimental to the people and places around, effecting kids sports

I object to this facility being located near the village of Waunarlwydd. I believe it would be unhealthy for residents as well as the many sporting teams in the area. Including many members of my family's

I am very concerned after reading about the tyre burning process that emissions will affect the air quality in the area. The proposed plant is atom the flat area at the bottom of the hillside of Gowerton where I live and any emissions will no doubt sit in the surrounding areas ie my home.

I object to the tyre incinerator being planned for Waunarlwydd. It's very concerning as this is a residential area with homes, care homes, schools, shops etc. The smells that people would have to inhale day and night in the air could cause cancer and sickness. We already have Timet and the smells that come from that factory in the air and stick to the clothes which have to be rewashed owing to the smell. It's not the right place to put the tyre incinerator and the health of our children and ourselves are more important.

I object to this application due to the impact on the environment and human health.

Im up wind of this site as the wind blows southwesterly most of the time. Im against it

I seriously object to this application!! This can not go ahead, the pollution and smell that would be detrimental to the area!

There was a fire at a tyre warehouse a few years ago was horrendous and Im sure the smell and pollution would be the same !!

These needs to be rejected!!

Concerned about the air quality in the area which will possibly affect my home

Concerned about the air quality in the area which will possibly affect my home

My child will attend school near there and I do not want him or any other children to be exposed to the fumes of such a dreadful thing as the health implications this will have on the children in the futures will be unknown. It could cause cancer, lung disease, respiratory problems along a whole host of different things. If the wind changes direction which it often does I do not want to be stuck inside my house unable to leave due to the toxins in the air. Unbelievable that this is even being considered!

I object to the burning of tyres. I am a local resident and have lived in Waunarlwydd my entire life.

Severe concerns regarding air quality in the area

Too close to residential area, please consider other Industrial options.

This will create additional traffic in an already busy area & the smell of burning rubber will be vile. There is bound to be additional pollution put into the air and my son is asthmatic.

The local area has famous, local, integral sports clubs which are of the community. The pollution caused will put parents like myself joining these local clubs because of the potential pollution. Causing these historic clubs to die off.

I object veery strongly to this. I'm an elderly neighbour and believe this would be very detrimental to all who live in Waunarlwydd. There are three nursing homes nearby and two primary schools. This site would affect our health and wellbeing

This site is close to where I live and I object to the emissions that would be generated from the process and would have a significant impact on the quality of the air we breathe. Also the increase in noise as a result of production would affect us.

The comment , Not significantly having an impact , is not good enough.
And automatically means there will be some detrimental effects. Tyres for godsake in this increasingly populated area.

No for environmental risks

No for air pollution risks

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I have concerns for the environmental and ecological impact that this will have to an already threatened area. The surrounding areas are green with various small River / Brook systems along with bodies of water that house a wide variety of ecological points of interest. Newts, Bats and Birdlife etc. The carcinogen by products from tyre incineration would cause a serious hazard to the wildlife which is already under significant threat, that along with the impact to the environment and existing mature trees and flora. Surely an ecological study would be required and distributed to all to review and understand before any such permissions are given.

I want to object to the permit on the basis of the detrimental effect it will have on the environment of the families of both Waunarlwydd and Gowerton. We have had recently had a lot of green woodland removed between proposed site and Gowerton village due to new Pobl housing estate which was always a buffer against pollution from the Alcoa site.

I am interested to know whether the company applying for permit has ever had and prosecutions or convictions in the past.

Please also remember that there are many schools in the vicinity that will be affected and as an asthma sufferer myself I know what the implications of poor air quality can be.

Damage to environment,

Noise pollution

Not the type of industry to benefit the local community.

We would object to this application on the grounds of environmental, health, and safety issues. There is a schools in the area as well as housing. How would this affect the health of the children and all residents? How would this affect the value of properties in the area? Historically, Swansea has had enough of pollution. We dont need any more polluting industries. We are still suffering from the events of the recent past.

I strongly OBJECT to the Tyregen application. Apart from the smell, what about the danger to health from the fumes?

I strongly OBJECT to the Tyregen application. Apart from the smell, what about the danger to health from the fumes?

Gowerton Community Council strongly object to this application as it would be extremely detrimental to air quality in the area and could cause health issues to local residents.

Air pollution is my biggest concern, and the resulting diseases that would be caused by this.

As we all work to improve the environment, it is vital this application is thrown out.

Allowing this licence would have a huge detrimental effect on the local community of Gowerton, Kingsbridge, Cockett, and Waunarlwydd.

Neath P'talbot Council flatly opposed a very similar project by the same company recently.

There are local schools, that in my opinion, would suffer pollution.

There are houses being built that again in my opinion would struggle to sell if this project was to go ahead.

Have this Company been financially vetted to confirm that they could run this operation and comply with any conditions that were put on them, could they could afford to pay for anything that went wrong in the operation or would it be the City & County of Swansea left to pick up the pieces.

There are many, many more questions to be asked before this licence is granted.

Waunarlwydd has a diverse population and through research the adverse effects of the pollution would be detrimental to not only this area but also other surrounding areas.

The location and nature of this application are not conducive to a densely populated area. Also the proposal is so close to an AONB with many sites of special scientific interest - despite the assessments and assurances of clean air to the contrary it's not in keeping with the local environmental and ecological footprint and should be refused.

Burning tyres will contribute significantly towards air pollution in Waunarlwydd and Gowerton depending on the wind direction. I Gowerton already has to tolerate the stink of the sewerage works, particularly in summer. Compounded by the traffic congestion which is already a concern during rush hours. It's not acceptable to pollute more and damaging to residents health. Alternative, disposal of tyres needs to be sought and not the easiest cheaper solution to burn on site.

Waunarlwydd is an important area for the promotion of wildlife and key woodland areas. In the area we have peregrine falcons, buzzards, greater and lesser spotted woodpeckers and many more vast wildlife. This tyre burning facility would have an adverse effect of the the wildlife infrastructure in place. Waunarlwydd is also below a flight path for many low flying air craft, especially medical emergency transport and Army planes and helicopters.

Having a tyre burning facility locally would have severe health and wellbeing impact to the whole community that is already struggling with the lack of support from councillors. I object to this application wholeheartedly.

I object on Environmental grounds as these incinerators usually have emissions harmful to the environment, when installed these could be spilling over a large heavily populated area. If there are any emissions this should not go ahead.

I object to the tyre incinerator being sited in Waunarlwydd. I wish to be able to live in an environmentally friendly community with as much fresh air as possible

Ridiculous idea, think of the environmental pollution and the effects on the residents.

I object to this application on the basis of air pollution and proximity of care homes and schools

The community and directly ourselves being immediately a resident close to Alcoa will not benefit in any direct way with the build and siting of the intended incinerator. Certainly properties will become blighted in exactly the same manner as some in the immediate vicinity of Port Talbot Steel works, we will all suffer directly with air Pollution and as a bi-product pollution will as you know bring some health effects also.

Access points into the old Alcoa estate does allow heavy goods through the gates on Bridge street and may bring higher volumes of heavy goods through the village, bearing in mind we have 2 infant schools and road safety is paramount.

Finally, the environmental impact with toxic fumes escaping and the a possible risk of Fire or explosions as we have seen nationally in the media over the years - is this something our councillors want to be remembered for! Wildlife leaving the community and children and the elderly with damaging health skin complaints and breathing issues.

Please find a location that is more rural and less of an impact on any community.

I dont think this project would be healthy for people who suffer with respiratory problems. Why are we adding more problems to the area

I don't want cancer

This should not be allowed, the site is located on the edge of an area of outstanding natural beauty (gower) and would have a detrimental effect on surrounding communities. Depending on which way the wind is blowing this could affect communities all round Swansea.

I absolutely do not want a tyre burning operation in the next village. This is harmful to our local environment which has already been desecrated by building in recent years. I also have significant concerns regarding the respiratory health of local residents if this were to go ahead.

This should absolutely not go ahead. My son lives in Waunarlwydd and I live in Gowerton. These tyre incinerator plants are known for pollution, burning tires releases toxic emissions such as sulfur dioxide and carbon dioxide. This is not generally not good for the environment or human health. This shouldnt be happening in a built up area where people live go to school and work. I completely object.

Terrible for the environment

Object

Placing a tire distribution center that includes the burning of tires in Waunarlwydd would pose significant risks to the community, particularly because of the presence of children and nursing homes. Burning tires releases harmful pollutants like toxic chemicals and particulate matter, which can severely affect air quality. These pollutants are known to cause respiratory issues, aggravate asthma, and even lead to long-term health problems like heart disease and cancer.

Children, whose lungs are still developing, are particularly vulnerable to air pollution, and the elderly in nursing homes are also at greater risk due to weakened immune systems and pre-existing health conditions. The burning of tires can also produce unpleasant odors and contribute to noise pollution, further disrupting the quality of life in the area. In addition to the health risks, such activities could reduce the appeal of Waunarlwydd as a safe, family-friendly community, potentially affecting property values and community well-being. For these reasons, a tire distribution center with burning tires would be a serious threat to the health, safety, and overall quality of life for residents.

This will damage the local environment and economy

No toxic fumes or increased noise traffic.

I've lived in Waunarlwydd for 38 years. I object to this because I think it would be bad for the residents. As an asthma sufferer, I think it would affect my breathing. The smell and smoke would be detrimental to the residents health

My family live within close proximity, to the Waunarlwydd Industrial Estate and I totally object to the burning of hazardous elements, so close to their home. The burning of tyres, causes the release of toxic compounds into the air, which can lead to cancer and other health issues, associated with severe lung problems. This carries, a massive environmental threat and lots of other risks to public health.

Burning tyres, release a significant amount of toxic pollutants, including sulphur dioxide, nitrogen oxides, carbon monoxide etc, etc, etc. Research is only recently beginning to show, how wide spread, the risk from tyre dust may be to our health and the wider environment.

Waunarlwydd is a village, which has 2 primary schools, 3 nursing homes and at least 3 public houses. It also has a well known, Rugby club and several children's play areas, supermarkets and a number of shops, restaurants and cafes. Many new homes, have been built in and around the village in the past 50 years and obviously, all these have included planning and building regulations. These have all been authorised by Swansea City Council. There will also be many more new homes, built within the next decade and beyond. The C&C of Swansea, will need to show they are working towards redevelopment. They also need to show, they will do their best to cut our carbon footprint.

Burning tyres and the gasses they release are dangerous and before the C&C of Swansea, consider issuing a permit, they need to ensure that an active, accurate and precise indication of the methods used are stated.

Is this an established company and who would be held responsible if there were issues and major problems. What if machinery over heated and caused an explosion? There are lots more questions to be asked, before a permit is issued.

My children go to the local school. My parents also live local. The pollution this would cause would be a health danger to many people within the community.

I object the application of this licence

I don't understand why this development is being proposed so close to so many communities. It's dangerous for the health and well-being of the communities, businesses and schools. Additionally, the environmental impacts will be damaging and irreversible - this simply cannot be allowed to go ahead.

Think will be bad for who suffers from asthma and illnesses

I object to the incinerator due to the added pollution it will contribute

The toxins would be bad for the environment & our village which has 2 primary schools and this could be severely harmful to our respiratory systems, myself having COPD this would certainly affect myself and my family

I don't think it's a good idea at all to have this facility running for so many hours of the day, releasing harmful pollution into the environment. Especially being in close proximity to schools and houses. This shouldn't be allowed.

More Noise pollution than there is now coming from there.
Air pollution and quality will be affected.

We will be far too close to the plant in which the fumes will be detrimental to neighbours health and could prove fatal.

I object this plan

Terrible decision

Pollution in the area, affect house prices,

Dont want this in my village polluting the air and creating noise

Harmful to children

I object to this proposal primarily on the grounds of the proposed facilities proximity to the below locations and the reduced air quality it will cause by emitting toxic vapour for 19.5 hours per day:

- Local residential housing. My property is 294 meters away from the proposed exhaust system on an industrial estate that already houses companies like Real Alloy and Timet.
- 2 Primary Schools in Waunarlwydd
- Multiple Primary and Secondary Schools in Gowerton, Kingsbridge and Fforestfach
- 3 retirement homes in Waunarlwydd and additional in Gowerton
- Multiple Sports venues and club that cater to several hundred adults and over 1000 children (Rugby, Football, Hockey, Cricket to name a few)
- Sensitive eco-logical area for protected species such as Bats, Green Woodpeckers and Shrews (to name a few)

I also question how a facility such as this relates to the UK Governments Climate Change Act of 2008 (Which is Law) and its 'Net Zero by 2050' Target. Pyrolysis has seen big developments in recent years but it is still the least 'Green' way of disposing of rubber tires. There are several viable (and cleaner) alternative such as ambient and cryogenic grinding that produce materials for roads, parks and speed bumps.

I also question the cumulative effect that a business like this would have on the local area: Waunarlwydd, Gowerton, Gorseinon, Penllegaer and Loughor has seen significant amount of (often questionable) housing developments in recent years, which has brought substantially more traffic (both commercial and residential). Has any investigation been done on the current air quality within the 10km zone detailed in the Air Emission Risk Assessment Report? According to the report, this has not been done in the last 3 years!

What is the economic and local employment benefits that this business will bring? Pyrolysis Plants require very few workers to operate and maintain the reactor. Is it really worth having this facility polluting the local area for a relatively insignificant amount of unskilled employment opportunities.

Finally, I question the risk to local residents and businesses should there be an incident (namely tire fire) at this site. I presume that Tyregen intend to store significant amounts of tires in order to feed the reactor. I see no reference to an emergency plan in this application should there be a fire?

I hope the honourable Planning Officer will consider the non-tangible effects that a business like this will have on the local area. While the Air Emission Report is

comprehensive and valid, it only tells a small portion of the story (despite being 87 pages long!).

If this goes ahead many people will suffer with their health, there are a number of people in this village with lung problems who are suffering enough with car fumes, their health will be far worse. People will have to put up with an horrific smell and will have to keep their windows closed permanently, washing will not be able to dried outside costing people outrageous amounts on electricity to dry their washing indoors. There is numerous reasons why this should not be allowed in this village, Ive only touched the tip of the iceberg.

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I object to the proposal of the incinerator. As I live in the vicinity this would be disastrous to wellbeing of local residents

I live close to Alcoa and I strongly object to Tyres being burnt 24/7 in my immediate vicinity. I suffer from Asthma and believe the pollution caused by this will severely affect my health

I strongly object. This is a health and pollution hazard. There are enough toxins in our air without this adding more. There are young children and babies in the village and it is worrying the effects this would have on their health. I would support it being built beside the bosses homes of Tyregen UK Ltd.

Risk to health and well being of locals and wildlife.

As an elderly member of the community I worry what affect this will have on us ,the elderly ,our children and grandchildrens health !

No need for more pollution ,totally unnecessary !

I have severe breathing issues where I have to take 5 types of asthma medication everyday. I also suffer with anxiety and depression. I struggle day to day with my breathing and am constantly worried if today will be the day I end up back in hospital. My anxiety levels are at peak level now worry about the pollution being pumped into the atmosphere just on the doorstep.

There is enough pollution in the are with the amount of cars and trains, without this adding to it.

It is not the type of environment I want my children to grow up around and worry what medical issues can arise from the air quality.

Also, how much can we expect our house values to fall by with having this incinerator around the corner. Who wants to move into an area with that on the door step.

I wholeheartedly object to the incinerator.

Enough pollution around as it it !!

As a sufferer of asthma, this would make going out doors unbearable.

This shouldn't be put in a place where there is a high area of the population, we have kids who play outside and this is so bad for them and their lungs

I think that the lorry's going around the village would be a nuisance especially with such a small road leading to the site, children using this road to get to school and a nursing home on the same street. Pollution would be appalling in such a small community, especially with two schools very close to this site and being so close to a lovely village like Waunarlwydd.

I wish to object to this application and I plead that you take on board the arguments against it.

The proposal site is within close proximity to two major primary schools, three large nursery homes that house patients under palliative care and not to mention the local residents.

I can not understand why this site would be considered for such use with the local authority knowing the health and environmental impact itll have on the local community.

From one human to another, please try and understand the impact this site will have on our community.

My property backs on to Fforestfach industrial Estate and depending on the weather and the way the wind blows this tyre incinerator could have wider implications. This sort of business needs to be further away from people who will be breathing in this air. This is not acceptable to be this close to houses, schools, nursing homes etc

I suffer with my chest now it will get worse with the smell and toxic and it is too near the schools and nursing homes

Burning tyres is deemed a hazardous method for disposing of waste tyres. It carries many environmental threats and poses various risks to public health in our community.

Burning tyres is deemed a hazardous method for disposing of waste tyres. It carries many environmental threats and poses various risks to public health in our community.

We have had noise and air pollution when Alcoa was operating, having invested in an electric car to help improve the environment I see this as a step back. Both in noise and air pollution, I feel this would lead to a decrease in the quality of our environment and life in the community. I strongly object to this.

As someone that suffers with asthma and finds the air quality difficult already on humid days I believe we should not be encouraging fume emissions when the community are actively using their power to decrease emissions for global warming.

As a resident of Waunarlwydd with severe asthma I completely object this. My grandson lives in Waunarlwydd and also suffers with asthma

Completely against this in Waunarlwydd. There are lots of young children and two schools.

It will be unhealthy for people living in the surrounding area.

I strongly object to this application on the grounds of the potential health and safety risk as well as the 24/7 noise pollution. The environmental impact this will have is detrimental to the local habitats as well as the global CO2 emissions.

In 2011 we had a tyre fire in a swansea warehouse that was used to store shredded tyres, this fire took fire services weeks to extinguish, at the time they talked about the pollution that this would cause and the damage it would do to the surrounding environments, therefore this application should fall under the same circumstances and should be treated in a similar way.

The potential carcinogenic pollution that would be produced 24/7 from this plant would be a danger, not only to local wildlife and ecosystems but also to all the families and kids we have living in these local communities. The new estate which has been built behind Gorwydd road has already destroyed a large section of green belt land to house new families and now even they are at risk due to this proposal.

May I suggest this site be moved to Port Talbot, as they will soon be gaining a lot of space due to this terrible governments decision to close one of the worlds biggest steel manufacturer plants, one of the reasons for its closure being because of its contribution to the United Kingdoms CO2 emissions. This proposal will also contribute to the emissions produced by the United Kingdom so this is very much a step in the wrong direction for the Welsh government.

Against

Close to a family members home. Concerns about fumes

We have young children and live right next to a school. Two of our children go to outside rugby classes in the area which cannot be done indoors.
We would've have bought our house if we'd know this would've been suggested, this will reduce house prices in an area which has excellent community and cleanliness.
We object to this plan.

Have various health problems with lungs so obviously having this in the vicinity of my home isnt going to help at all. Even small fires and smoke affect me so this will be catastrophic to my health. Also I have a young adult who is my daughter with special needs who again will not benefit from the smell and fumes from burning tyres/rubber.To even suggest this in such a build up area is ludicrous.

It's not gonna bring any benefit to the area! Just more pollution. Totally against it.

This has serious health concerns for me, the emissions/toxic fumes will pose risk to health in relation to respiratory illnesses for the immediate area and surrounding villages.

Back in 2011/12 a factory unit in Fforestfach storing tons of shredded waste which caught fire and burnt for a number of weeks causing serious air pollution which affected the local population with the long term future health problems it could cause unknown. its obvious that large amounts of tyre waste would be stored for an efficient operation. This proposal will pose dangerous risk to the local area.

This would cause serious health issues to old people like myself who struggle to breath. Poor air quality

It would be against the wishes of the community to go ahead with the planned incinerator to be stationed in our village.
Its location is also too close to the school.
My child also suffers from a lung defect from birth which would be aggravated by having this in our village.

We do not want this in our village

Object due to the effects this will have on our children future health

No

Objecting due to potential air and noise pollution. Also the amount of tyre factories that have gone up in flames over the recent years - this will be a dangerous fire hazard and the smell from burnt tyres is horrendous and can be smelt for miles!

This is an area where children play rugby and football and have a school nearby. This isn't an area that would benefit from the project, there are plenty of rural or busy industrial areas that this would be better suited.

Extremely concerned the proposed application is far too close to the local school ysgol y login fach. The fumes will have a huge impact on child health and effect they're learning environment.

Strongly object to this application .serious concerns around the following rationale :includes .Adverse Health impact on immediate population and further afield - airborne fumes etc. Short term and long term damage caused by waste emmissions impacting on environment, property, natural environment and people. Area already affectedny high volume of airpollution resulting from vehicle emissions in the vicinity. Concerns re. Impact on health and knock on effect putting additional pressure on local medical /health services. Disgusting smell from local water treatment works is an example of how this pollution travels abd impacts on residents.

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I am worried about the damaged to the local environment and any potential pollution that could be harmful to my children also the noise from this site.

I do not want a tyre incinerator on my door step. The pollution with affect my health myself and my son are asthmatic and my neighbours health also the local primary schools and local rugby team

So you want us to go 20mph at the top of the road to reduce pollution but happy to burn a load of tyres down the bottom of the road!! Make it make sense - go and burn them in the middle of nowhere not within a community this is insane and I absolutely object

I would like this idea to be thoroughly investigated and for the council to listen to the concerns from the residents from this village. Accidents happen all the time and we don't need the threat of air pollution and fire hazards. Any air pollution will adversely affect those with lung problems.

We have two schools at opposite ends in the village which means we have a lot of children living here, and a high footfall crossing roads etc. please reconsider this proposal.

We are in a populated area with 2 schools and local sports team the emission s will fall within this area and is not wanted.

We are in a populated area with 2 schools and local sports team the emission s will fall within this area and is not wanted.

I work on Ystrad rd and have done for the last 18 years I'm associated to Waunarlwydd RFC and I object on the grounds of the impact on the community and residents / workers there also , I believe it will have a negative impact due to the volume of pollution that will be created.

I suffer with copd and my garden is directly into Alcoa site I got 3 children and dont want this by our house weve only just built and kids settled into school we would have to move from area if this goes ahead

You cannot possibly let this happen, we live in a house right behind this works place, with three of our children we do not want to breathe in cancerous toxins there are 5 houses across from the train track next to the works who object too!!!

Will not be happy with this coming into my neighbourhood with the toxins that this will bring into the air. With 2 small children and the damage it could do I wholeheartedly object this coming into our village.

I do not want to have the smell of burning tyres in the air. I want to be able to put my washing out on the line to dry and be able to sit out my garden and enjoy the fresh air.

N

Concern regarding emissions from facility and proposed operating hours. The proposed location is in close proximity to nearby schools, residents and recreational areas.

This simply can't happen in this day and age, the impact on people's health burning tyres 24 hours a day. Good one

I strongly object to this development on the grounds of danger to the health and safety to myself and five year old son. I live in close proximity to the site, as do my neighbours, including a Nursing Home, a School a Sports Field. The surrounding area is mostly residential and unsuitable for this type of development. The applicant is also not a fit person to run this type of business, given that he has a previous conviction for pollution offences (Alleged). I would also ask you respectfully take into consideration, the fact that this person has also had the same application refused by Neath Port Talbot council in the past, so a precedent has been set. I am also mindful of the fact, that a tyre storage area at Fforestfach Industrial Estate, ignited and caused a massive fire that took days to extinguish, to say nothing of the trauma that local residents endured, god forbid we should see a repeat of that scenario!

I wish to object to the proposed of Tyregen UK using an incinerator to burn tyres in our village. Waunarlwydd is a heavily populated area with 2 primary schools and 4 nursing and residential homes. The children would be in close proximity to the fumes and gases emitted from the incinerator as well as the detrimental health concerns for vulnerable elderly people who enjoy sitting outside their nursing and residential homes. The toxic waste emissions would have a massive impact on the health and well being of local residents as stated in the many documents written about the awful effects of burning tires when they should be recycled not burnt. The following statements have been researched and are the main reason for my opposition to this proposal.

Burning tires releases a significant amount of toxic pollutants into the air including sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), including fine particles known as PM_{2.5}. All of which can contribute to heavy smog formation, respiratory issues and other negative health effects in nearby communities.

The emissions from burning tires contain a range of harmful substances, including heavy metals (such as lead, cadmium, and mercury), polycyclic aromatic hydrocarbons (PAHs), dioxins, and furans.

These pollutants are known to be carcinogenic and can have adverse effects on the respiratory, cardiovascular, and reproductive systems. Prolonged exposure to the emissions from tire burning can increase the risk of respiratory diseases (asthma, bronchitis, and lung cancer).

Ash generated from burning tires contains toxic substances which may contaminate nearby soil and water bodies. Tire ash that is deposited onto the ground / carried away by rainwater can leach pollutants into the soil and water, potentially affecting ecosystems and posing risks to human health through the food chain and drinking

water sources.

The release of pollutants from tire burning contributes to environmental degradation, causing harm to ecosystems. This environmental impact may damage plant life, affect aquatic organisms, damage surrounding habitats and disrupt the balance of ecosystems.

The pollutants are harmful to all living organisms within close proximity to the burning tires.

Burning tires has the risk of developing to intense and difficult-to-control tire fires. These fires produce a thick smoke, challenging the fire service and in some cases have continued to burn for extensive amounts of time (up to 15 years!!) constantly spreading pollutants and hazardous materials.

Not to mention the incredibly unpleasant smell of burning tires. This can upset the surrounding community, decrease property value and damage the reputation of the surrounding area, which also decreases tourism prospects.

I sincerely hope that for the reasons stated above, Swansea Council will reject the Tyregen application and help this company to recycle them instead of burning them.

Objection to Part 2A Permit for Tyre Incinerator at Tyregen UK Ltd, Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF

Dear Sir/Madam,

I am writing to formally object to the granting of a Part 2A Permit for the proposed Tyre incinerator at Tyregen UK Ltd, Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF.

I have significant concerns regarding the potential health and environmental impacts of this facility, particularly given the following factors:

1. Health Concerns: My father and other family members live close to the proposed incinerator site, and some members of my family already experience breathing difficulties.

The establishment of a Tyre incinerator poses a substantial risk of increased air pollution, which could exacerbate respiratory conditions and lead to severe health implications for vulnerable individuals.

2. Local Demographics: Waunarlwydd and the surrounding area is home to a number of families, including my own, with children who frequent local schools. The potential emissions from the incinerator could contaminate the air quality, posing health risks to our children. It is vital that we protect their health and wellbeing from avoidable environmental hazards.

3. Sensitive Locations: The surrounding areas of Waunarlwydd include several schools which my children attend, nursing homes, and nature reserves. The introduction of a Tyre incinerator could negatively impact the quality of life for residents and visitors alike.

Pollutants released during the Tyre burning process can have detrimental effects on the environment and biodiversity in nearby nature reserves, affecting local wildlife and ecosystems.

4. Community Impact: Our community has already faced numerous environmental challenges, and the additional strain created by a tyre incinerator would be considerable. We value our health, the wellbeing of our children, and the natural beauty that surrounds us. The potential for increased noise, traffic, and pollution only adds to our concerns. Given these substantial concerns regarding health and environmental protection,

I urge the Environmental Agency to reject the approval of the Part 2A Permit for the tyre incinerator at Tyregen UK Ltd, Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF.

It is crucial that we prioritize the health of our community and the integrity of our environment over industrial interests.

Thank you for taking the time to consider my objection. I hope the agency will act in the best interests of the residents of Waunarlwydd and surrounding areas. Sincerely,

Burning tires release toxic chemicals into the atmosphere. Benzene, xylene, ethylene, and acetone are among the most dangerous compounds released during the burning of tires. These chemicals have been linked to cancer and birth defects.

Im 14 and live in waunarlwydd.
But I also attend school near by.
I have a right to breath unpolluted air.

I whole heartedly reheck this application.

It is far to close to schools, and residential homes.

The level of smoke would effect the clean air of nieghbouring homes and public schools.

The proposal for this company to locate business here which will effect the health and lives of residents who will have to live with the consequences of this facility. I strongly OBJECT for myself, my family, neighbours and residents of all ages, this small local area well established area has two primary schools several care home facilities. Ridiculous proposal.

I am concerned about the Health implications of this enterprise. Waunarlwydd is a small village but has 2 primary schools aswell as residential nursing homes. Many children frequent the local rugby/football club on a regular basis.

I worry about people with pre existing health conditions such as asthma which could be exacerbated by emissions from this company.

The potential odour from the burning of tyres is also a worry and the effect this could have on house prices in the area.

This will have severe detrimental effect on the community, increase of health risks especially with numerous schools and care homes in the surrounding community. This should NOT go ahead!

No No and No there is enough solution and this is a green wedge area

It wont be good for the village

We dont want tyres to be burnt near our home as it will make the air at home and our school bad for us to breathe.

This will be bad for the environment.

Our village is pretty and we dont want it to be ruined.

I object

I object on the grounds that their operation will have a detrimental effect upon the environment and the health of the local community.

I object.

As a family living within 500 M of the proposed scrap rubber tyre processing and incineration plant at the ex-ALCOA site, I strongly OBJECT to this grossly inappropriate industry in the heart of the village of Waunarlwydd, and Fforestfach.

Not good for anyone's health

The affect that this will have on health, community and residents will be profound!

I am concerned how this will impact people's chest and their overall health.

I thought that the government produced a report in 1995 that stated that sites close to residential area were not regarded as suitable for tyre recycling plants. Especially in waunarlwydd as the site is actually lower than the village so emissions will easily blow to the village two different school sites, houses, businesses and all the elderly homes which are located in waunarlwydd.

This may be on an industrial estate but my house is very close to this , I am chronicle ill and disabled and have to have windows open all year round , Im afraid this will mean issues in doing this , and the effect it will have on children and local wildlife , its in an area where it is too close to everyday life

This cannot be good for the environment generally and with two primary schools in the area, 4 nursing homes with elderly residents, two residential homes and sports clubs using facilities close to this new site, we are all going to be impacted by the smoke and fumes.

THERE IS ENOUGH POLLUTION COMING FROM THIS SITE ALREADY. I HAVE COMPLAINED ON MANY OCCASIONS REGARDING SITE POLLUTION.

Please do not do this to our community the devastating effect that this will have on our community not to mention our health it has to have some sort of health effect with the toxic waste and smell

Detrimental to Waunarlwydd and the environment.

This is not acceptable within such a built up area with schools and housing so close !

The process of incinerating rubber tyres of which 100s of tonnes have been stored in the proposed building for many years will create immense air pollution and acrid unpleasant smell in the surrounding area.

The village of Waunarlwydd is within 400 meters, Ysgol Gynradd Gymraeg Y Login Fach within 700 meters, Llewitha and the new Phase 1 Persimmond site being constructed at Cwrt Brenin Garden village is within 1400 meters of the 3 meter stack producing the pollutant and fume.

Any particulate pollutant from the process is likely to fall and pollute the adjoining River Afon Llan and adjacent fields

The impact on the public, environment and wildlife in my view should prevent this licence being granted.

Object strongly to this as the affect it will have on the environment in my area. With a primary school and 2 nursing homes.

I oppose this application due to the hazardous microparticles that will be in the air and as a country that promotes being an environmental forward thinking place I believe this is huge step backwards. Also how the extra heavy lorries coming through the very small village will impact the residents especially as it is already had 2 new housing developments passed which will have more traffic

This is a ridiculous and dangerous idea placing this company within waunarlwydd. This community is shared between hundreds of young families with children who attend the primary school within walking distance of the proposed site. Not only is this village a community but its home - we do NOT agree nor support this proposition.

Do not want this company in the village. I suffer from a bad chest so dont want to make it worse.

Surely there are safer places to use than this old factory that is in close proximity to houses, a school, rugby pitch and a fantastic public hse selling food with a great outdoor area for children. The close proximity of the railway line is surely something else to consider. The dangerous nature of this business has already been tested in the last tyre fire in Fforestfach? Only yesterday there was a large fire in Gorseinon and the smoke travelled over to Gowerton and a few weeks ago the large fire in Days M/home section could be seen and smelt in Gowerton so surely a Tyre burning facility is going to on a daily basis produce more smoke than these fires with dangerous TOXIC fumes.

Im so worried about this and surely this needs to be stopped. Im worried for the health of myself and my child and many people in the area with respiratory problems. This is going to affect everyones daily life, due to smell and pollution. With a primary school in the area also I think even the possibility of this is obsored. How can swansea council put that many young lives at risk and even have their outdoor activities compromised. I know theres also of children at that school with complications whos parents have not yet been made aware of this to. So its disgusting that they are not able to have a voice either. By accepting the application and letting it go ahead I think your going to be risking alot of lives and It will become a huge problem. Even things like house sales will be effected and for such a small village thats going to be so detrimental.

We already get an occasional chemical smell in the area (could be due to the factory near by) even through even thats supposed to be pollution controlled but when the wind blows a certain direction you cant control the pass over, you cant have any windows open when this happens and even then the smell gets thorough the house. When I was pregnant even that was a big problem for me and I know many others struggle with that to. So if a literal tire incinerator comes here its going to be horrific. Kids couldnt play outside and it will impact everyone in this areas daily life.

My grandfather died Thursday of COPD and if he had to live with a tire incinerator in the area I guarantee his health would of declined faster than it did. You cannot and should not let this happen with the knowledge of the health decline and wellbeing of people in the area ESPECIALLY the children....so many with asthma too. I think its so wrong no parent should have to worry about the air for the children.

Its such a small village and eating establishments will also be affected due to having outdoor eating areas that no one will want to be in if theres constant pollution of Tyre buring in the area. I think this area has worked hard to become a nicer place to live and I think application will be its undoing.

Just please refuse it for the sake of everyone and their health. Especially those with respiratory illnesses(please do your research of how little it takes to inflict harm on those through pollution) i guarantee swansea council will have caused alot of death due to accepting this application. I think it would be very negligent to let this happen with a large primary in the area also, so many kids there with asthma and others health conditions it will be so horrific to let this happen.

Not only do I object on the basis that burning tyres is terrible for the environment and to the health of people living in that environment, but I am also objecting on behalf of my grandparents who live on Swansea Road in Waunarlwydd and would be directly affected.

My concern is about the potential air pollution and the long term effect with regards to airborne contaminants that will affect the local population over time.

Also there has been an increase in the fires in the areas where these tyres have been stored in readiness for disposal. Over the last few years there has been numerous fires that have started for various reasons and ended up with toxic clouds that have affected the surrounding area and population.

The area surrounding this proposed site has seen a drastic increase in the houses being built and the increase in the associated population.

Please do not allow this to happen. I do not want to live next to a tire incinerator! I dont care how non hazardous you claim it to be, there is no way that breathing in that air is good for you. As a council you have a duty to protect our health, please do so by not allowing this to go ahead!

Not a suitable space to build a tyre incinerator. Too close to homes, schools, nursing homes etc. The pollution levels will be off the charts. What if it catches fire? And yes they do and burn for years!

Find a more suitable site away from home and people!

I am concerned about the emissions from this and the health implications for many members of the public. Although information is provided regarding emissions and environmental impact I don't believe it is sufficient in laymen's terms and perhaps a public meeting could be held to explain things. If this were to be done I feel it would be most beneficial to the applicant and the wider community

Absolutely no way

This incinerator will be extremely bad news for the environment and our health, Waunarlwydd is a small community village with already too much heavy industry around it, the steel works are closing down their blast furnaces to meet environmental targets how can this incinerator get to go ahead

I am concerned about how this will affect the health of local residents and how it will affect the environment too. The noise from the factory is also a concern.

Absolutely awful idea. I have family who live in waunarlwydd who would be at risk from the disgusting fumes that they would be exposed to if this were to go ahead.

I object why would you put such a business so close to a village pouring out god knows what pollution

We do not want polution in our village ,this sort of operation should not be allowed anywhere let alone in a village enviornment,terrible thought.

Negative impact on our community

I object to this application due to the environmental impact it will have on the area.

I work in a home in the area and I think its disgusting that your doing this to your communitys

Concerns over pollution in local area

This will not be good for anyone in the village!!

We live in woodland park a retirement complex many people here have breathing problems burning tyres will certainly emphasise their problems. We have to keep our windows closed when the sewage works start to smell, not ideal in warm weather. Also what about the dust that will incur from burning tyres breathing that in cannot be good.

The health and welling being of the residents who live local and further away, as the wind will carry pollutants and the smell will be unbearable. We have many schools and nursing homes close by that will also suffer from pollution. If there was a fire it would be catastrophic for us and others and would take weeks to recover. Smoking is banned in public places for peoples health, yet an tyre incinerator which will cause massive pollution is being considered in a densely populated area. I strongly object to this proposal. The damage it will cause to the environent, wildlife and residents will be devastating.

I do not think this is environmentally friendly in highly populated area

I have 4 children we live and the kids go to school in Waunarlwydd there are too many homes, care homes, schools and businesses so close to this proposal and the fact most of our homes are uphill from the site where surely fumes will blow

Waunarlwydd is full of families, sports clubs , schools and other residential buildings. I moved here 10 years ago as was a green space and out of the city . Putting an incinerator here is a step backwards for our children . There must be somewhere more industrial and away from homes that this could be placed

I think this would be detrimental to the moral of community(the environment and the local businesses if this were to go through.

The fumes, smell, and extra traffic to the village and surrounding areas will be detrimental to health and wellbeing of the community

Concerns re risk of fire, also air pollution

I strongly object to Tyregen UK Ltd being given permission to start a recycling plant in Waunarlwydd. I believe this would create an enormous amount of air and dust pollution within the area, which would have a detrimental impact of the health of the residents of Waunarlwydd and the surrounding areas.

We live close , and worry about pollution over our homes.

We live close , and worry about pollution over our homes.

Chest issues polluting our countryside

Concerned over environmental impacts, air pollution and impact on traffic to the area where I live nearby.

Environmental concerns as it is extremely close to my house and will cause a lot of disruption.

You dont know what harmful particles would be released into the air surrounding the neighbourhood. This industry should be nowhere near populated areas.

Disgusting and disgraceful to even suggest this

I'm objecting to this proposal

I object to the proposal to place a Tyre Incinerator in our village of Waunarlwydd. The pollution emitted would be harmful to those living here - people of every age would be affected, having to keep their windows closed at all times. There is enough pollution already emitting from the site [old Alcoa] and it can be seen both day/night/weekends/Bank holidays escaping from the chimneys of those factories. Tyres should not be burnt under any circumstances and an alternative way of disposing of them is to use them shredded for play parks etc.

Chest issues polluting our countryside

Do not want the burning of tyres in our village. Think of the air pollution.

There are 100s of employees on site at Westfield Business Park, all of whom will have concerns of health risks, the proposed building is derelict at best, and will not contain the harmful dioxins that will be omitted.

Incinerators emit many toxins and pollutants that harm local air quality, particulate matter that can be harmful to both human health and the natural environment.

Considering how close residential housing is to the site also, this proposal should be abandoned as early as possible.

Far too close to residential areas. Totally inappropriate for local and surrounding residents.

The proposed location is adjacent to a residential area, giving concerns regarding health and wellbeing of the local residents.

Totally against this proposal . My house is literally 100 mtr from proposal

Fearful of the damage to young children, elderly, and environmental issues this horrendous application will cause

Theres enough Inco plant air pollution from Westfield site at the moment, without burning 🔥 tyres there, it will impact on the health of people living locally

I am writing to formally object to the proposed pyrolysis plant at Westfields Industrial Estate.

My objection is based on the air pollution and health risks this facility would bring to the community of Waunarlwydd.

The SWIP application form, Section C9 confirms that odorous emissions/ exhaust gasses will be produced as a product of this process. In addition, they have conceded that no environmental impact assessment or emissions monitoring has been carried out.

In Section C8, Tyregen UK Ltd are required to describe the arrangements made for contaminated run-off from fire-fighting operations, in which they insufficiently answer the question by stating there would be none, even though they state in C11 that 20,000 litres of water will be held underground. The furnace would be operating at 850 degrees Celsius with the potential to reach 1200 degrees Celsius during unfavourable conditions. The risk of fire is significantly higher in facilities that operate at these temperatures and therefore this company has not shown the due diligence required to operate safely and considerately.

Furthermore, in Section C 11, they discuss the site operator using his judgment on whether a fire extinguisher or call to the fire serve is required. It is unlikely that a fire extinguisher would be sufficient when working in conditions of 850 degrees Celsius or above. The huge risk to life, wildlife, surrounding businesses and regard to the community was not acknowledged in this response.

No regard has been given to the hazardous emissions created if there were to be a fire at this plant. The location is unsuitable for the following reasons:

- 175m (approx.) away from the busy Swansea to Pembroke railway line. Any fire at the facility will halt all network rail journeys for several hours / days.

- 350m (approx.) away from Ty Waunarlwydd Nursing Home. This is a council run nursing home for approximately 40 elderly and vulnerable residents. Any odorous emissions will result in windows needing to be closed and residents not being able to sit outside. A fire at the facility would result in the Council's Emergency Contingency Plan needing to be implemented to evacuate 40 resident due to the air pollution created.

- 300m (approx.) away from a residential street. Residents will need to close their windows, and the odours created will make it unpleasant to sit outside or dry washing on the line. A fire at the facility would lead to a large village needing to be evacuated via the Council's Emergency Contingency Plan.

- 500m (approx.) from Moorland Care Home. At this distance any odorous emissions will lead to windows needing to be closed and residents not sitting outside. A fire at this facility would result in the Council's Emergency Contingency Plan needing to

evacuate 41 vulnerable residents.

- 550m (approx.) Aura Care Home. At this distance any odorous emissions will lead to windows needing to be closed and residents not sitting outside. A fire at this facility would result in the Council's Emergency Contingency Plan needing to evacuate 22 vulnerable residents.

- A total of 103 elderly and vulnerable adults would have their lives impacted by the air pollution created at this plant. This is not including the staff members at these homes. A fire would result in them needing to be evacuated into CIW registered accommodation. This is not including any Support Accommodation projects for the young and vulnerable and any emergency accommodation there may be in the Waunarlwydd area.

- This facility is located directly under the flight path to Swansea airport and any air pollution, or particles released into the air will affect the proposed plans for Swansea Airport. A fire at the facility would halt flights altogether.

- 650m (approx.) from Waunarlwydd Rugby Club where over 300 children regularly play sport. The air pollution created by the pyrolysis plant include Nitrogen Dioxide (NO₂), Particulate Matter (PM₁₀ and OM 2.5) and volatile compounds (VOCs) which would impact their right to play sport in a healthy environment as stated in the United Nations Convention on the Rights of the Child, Article 24.

- 650m (approx.) from Waunarlwydd Primary School. Any exhaust gasses released at this proximity will impact on the quality of the air for these children aged 3yrs to 11yrs old. The school will have to close windows and the children will not be able to play and learn outside. The benefits of having windows open was proven and recommended during the pandemic. Tyres burning due to a fire at this facility would lead to closure of the school temporarily and impact the children's education. The children would not be able to access education from home (as done during the pandemic) if they had also been evacuated as the majority of pupils live in the village.

- 700m (approx.) from Login Fach Primary School. Any exhaust gasses released at this proximity will impact on the quality of the air for these children aged 3yrs to 11yrs old. The school will have to close windows and the children will not be able to play and learn outside. The benefits of having windows open was proven and recommended during the pandemic. Tyres burning due to a fire at this facility would lead to closure of the school temporarily and impact the children's education. The children would not be able to access education from home (as done during the pandemic) if they had been evacuated. The majority of pupils live in the village.

- A total of over 500 children would have their education impacted if this proposal goes ahead. The impacts range from closed windows daily, to no outside learning spaces, no school sports day, or outside carol services. In addition, the local schools would require contingency plans in the event of a fire as the children and staff would need to be evacuated in an emergency due to risk to health.

The location of this proposed plant raises significant concerns about the plant's ability to comply with air quality standards for the community of Waunarlwydd.

The Mettoys factory in Fforestfach, Swansea in 2011 was on fire for several weeks due to the tyre material being difficult to extinguish. High amounts of Benzene, Xylene Ethylene and Acetone were released into the atmosphere at the time. This proposal would have significant risk of this happening again in this area.

Section C9 discusses the noise generated by waste deliveries, and how deliveries will 'generally' be scheduled for times of day when the local area will be less sensitive to noise levels. There is a high number of residents near this facility proposal as it's in a residential area, therefore any noise will impact us. The facility will be active 24 hours a day, therefore it's very likely that noise will be created on weekends and during unsociable hours.

Section C9 insufficiently explains where any waste material will be disposed of. It is explained that waste water will be removed from the proposed facility, but fails to document all other waste created from the burning of tyres.

Section C11 requires Tyregen UK Ltd to describe how the person who will be responsible for the day operation of the incineration plant will be selected and trained. This question was sparsely answered, stating there will be a site manager. No evidence of recruitment selection or training was provided. Their response stated that there would only be one site manager, however this facility will be operating at extreme temperatures 24 hours a day. Their proposal evidenced that the site will not be sufficiently staffed in order to prevent serious harm to others in the vicinity and the community.

There is a large solar farm 800m (approx.) from the proposed site of this plant. Emissions, particulate matter along with any smog produced prevents solar panels from harnessing sunlight. Recent studies (MIT "Air pollution can put a dent in solar power", Science Daily 2018) and (Bergin et al 2017) have proven that air pollution can significantly reduce the power output from solar panels by between 17- 25%.

Just beyond the solar farm is Cwmllyd Nature Reserve which is a registered area of special interest. A tyre burning facility so near to a nature reserve is not acceptable.

Swansea Council aspire to become a Carbon Net Zero City by 2050, however this proposal would reverse any progress made toward this ambition.

I respectfully urge Swansea Council to refuse this licence application for the proposed pyrolysis plant at Westfields Industrial Estate proposed by Tyregen UK Ltd due to the health risks and detrimental effect it would have on the health and wellbeing of the community of Waunarlwydd and surrounding areas.

Yours sincerely,

I am 84 years old in poor health. I object to this application as I am concerned about the affect on my already poor health

There is a primary school in the area and a lot of rugby and football teams practice in the vicinity. To burn tyres where it is going to increase the air pollution will be dangerous to the kids, general public. It is a very highly populated area with houses, nursing homes, schools ect. Surely this sort of facility would be better off in a less populated area. I strongly object to this going ahead. It will risk the health of everyone on the village.

My children go to Waunarlwydd Primary school and it's not good for the children to be surrounded by this pollution.

Dont want it

Can't they do this somewhere out of the way from a residential area?

This is not wanted in the area

As an asthmatic working in the area I would like to object to this as it's not good for anyone's health or the environment

I am Headteacher of Waunarlwydd Primary School and would like to express my strong objection towards the proposal of a tyre incinerator in Waunarlwydd. The detrimental effect on the environment and wellbeing of the local community (including the pupils, staff and families of Waunarlwydd school) that this would cause are clear. The health risks are well documented with respiratory issues, risks posed by carcinogens and the impact on quality of local food sources. Environmentally there will be an increase in air pollution, greenhouse gases and presence of toxic byproducts. In summary, the tyre incinerator would pose a significant threat to environmental quality, public health and community wellbeing. Cleaner, more sustainable alternatives are available and should be prioritized over incineration!

Terrible idea

I comment as Chairman of Waunarlwydd Galaxy AFC CIC, a football club which operates in Waunarlwydd and has 300 young children as members as well as over 100 adults. All of our members, some 400 plus, object strongly to the creation by Tyregen UK Ltd of a tyre incineration plant within the village of Waunarlwydd. Many of the children who access our session are already unhealthy, over weight, suffering with depression and lack of self esteem. It is almost inconceivable, in a village that is one of the most deprived in Wales, according to the WIMD, that a plant with the potential to do so much damage to the health of our children would be given the go ahead - just meters from our sports facilities and primary schools! Waunarlwydd is a tiny village, it severely lacks from funding and investment, its gauling that the only development considered in this village isnt one that will benefit our community but significantly damage our health and what little we all ready have. As a club we fight daily to help children in our community overcome the social, economical and health barriers that blight their lives. This plant would be a significant nail in the coffin for our village thats fighting a losing battle to improve the lives of its community.

This will have a huge impact in the health and well-being on a community of many school children and also an elderly residential area

I object to the Tyregen UK application.

I strongly object to this application, with the number of houses in close proximity of this plant, a number that have been built and being built per agreement with Swansea City Planning Department, the omissions risk is to great. There is already a plant in this vicinity with furnaces being used for smelting metal waste, this produces nasty smells which could possibly be hazardous if not controlled correctly. Tyre incineration would add this concern and could result in health issues for the locality. A similar plant to this was housed at the old Mettoy factory in Fforestfach Swansea that resulted in a devastating fire, in the event of this happening in the proposed Tyregen UK application it could result in a pollution and fire spread to local properties. So let this application be nipped in the bud with total rejection.

Not environmentally friendly

We are already subjected to obnoxious omissions on times from the Westfield Industrial Estate which is situated not far from our home on Cwmbach Road. If Tyregen UK Ltd are allowed to open an incinerator to treat (an euphemism for burning) waste tyres then it follows that there will be toxic emissions of varying degrees. My wife and I vehemently oppose the opening of an incinerator. Please ensure that our objection is duly recorded.

For the sake of public health and the environment I strongly object to the licence being granted.

I object to the planned facility being built at the proposed Waunarllwyd site due to the effect it will have on air quality. This is a particularly important consideration given its close proximity to residential areas and the susceptibility for particulates emitted from it to travel on the prevailing winds coming in off the Lougher estuary.

I note the proposal and accompanying environmental impact report differ little from the proposal made when the facility was to be sited in neighbouring Neath Port Talbot; and many of the reasons for rejection also ring true in the case of the Waunarllwyd site; Its proximity to residential areas make it an unsuitable location which will have a negative impact on the health of local residents.

As someone who regularly cycles in and around the immediate proximity it is of great concern to me that the council may consider approving a facility of this nature at a site so close to residential dwellings in the immediate and surrounding vicinity.

It seems counter productive to the councils objectives to promote environmentally conscious travel within the city and surrounding areas, and to Improve air quality for all residents, to then approve of the sustained and unrelenting (the facility is proposed to run around the clock, year round) incineration of rubber tyres.

We feel very strongly that this should not be permitted . We already have to put up with 'breaking up machinery' excessive noise especially at weekends.

I object in regards to this tyre burning furnace, I live 5 minutes away , it is terrible for the community and will

Destroy our area with awful and unhealthy pollution for my child and family. It will decrease my house value and completely ruin our area, this can not happen.

I object on the grounds of the environmental impact to the area, the risk of the reduction in the air quality, possible pollution and the fact it is a 24 hour process. Waunarlwydd and Gowerton area built up areas with severe road congestion with no alternative routes for the additional haulage coming into the area.

I work on the same site where this proposal to burn is and I cannot understand why you would want to burn in this area!

I object to the burning of tyres in the local vicinity. Added pollution so close to residential houses and a local primary school/ rugby and football teams play and train all week round is unacceptable and a new location further afield should be sorted after.

Totally against this. Concerning for the environment...smoke smell

I object near two primary schools and the toxic chemicals that would be let off with the burning,
I live in the area and family members.

I object to this incinerator plant opening in such a close vicinity of a populated area with numerous schools and sporting facilities. The environmental risk to the air quality would be detrimental to the health of those living nearby.

Waunarlwydd is a community with lots of young families and with two local primary schools, nursing homes, shops and supermarkets very near to where this is being proposed. Waunarlwydd is a built up area where people live and I don't think that this is a suitable place for somewhere like this causing extra pollution for our children.

This will seriously impact the local community, there is a primary school and rugby club near by, I am worried for my own health as well. If this is approved I will be moving away from Swansea. This is awful news to waunarlwydd

Request name and contact details to remain anonymous please.

Rejected on following grounds.

1. Proximity and location for an industrial incinerator is too close to multiple communities and villages in the surrounding areas. The previous industrial facility of this area was long lived with sections active during the second world war in the 1940s. Local communities, villages and populations have grown substantially in recent years. Air pollution and odours remain live risks during operations, there are likely to be early commissioning compliance issues across these factors.
2. The area for the incinerator is also extremely close to areas of local scientific interest. The Lougher salt estuary, the Gower Peninsular(AOOB) and local flora and fauna in the immediate location is at risk to remain sustainable. In the factory grounds itself Alcoa conducted years of regeneration with rare wild orchids, Fungus and a strong presence of bats and raptor birds making these areas their habitat. Other protected areas such as the common grass lands border the old factory site. Local community Rugby Clubs, such as Waunarlwydd are integral parts of the local community, at a time when we need to promote more inclusion for local sports due to the general decline of younger people wanting to play sport. But a local club such as this, reaches far further in a community than just the members and players of that club. Coming from a near village with similar club and community, it is essential we all support our friendly sporting rivals but a part of our bigger community within Swansea and South Wales.
3. In the Permit and supporting documentation, there are many concerns and a lack of overall information and understanding of operational risks that could have an immediate effect on the local surrounding areas. The company does not capture requirements on Fire and Emergency Prevention, Protection and Intervention (PPI) in their Permit Application (Reference Section 14.0). For example, no references are made with internal PPI arrangements, firefighting capabilities and trained team(s), nor does it outline any research and engagement for local fire brigade response times and fire-fighting capabilities. Furthermore, it does not seem to include any fire rating capabilities and proposed mitigation around the existing structure. Given the nature of the application (Incinerator), it would be advised that the council should insist on an independent assessment by a nationally competent third party, if this has not been conducted to date.

In Summary, this location is imbedded too close to too many communities with too much intrinsic risk applied to the proposed undertakings of this application. Better industrial locations that may be more remote would be better suited for this application.

Regards

I work in the old Alcoa site and object to the proposal, the fumes and debris from the aluminium recycling plant there is bad enough, a tyre burning plant will emit terrible fumes and harmful/toxic byproducts into the atmosphere and to the surrounding houses, and affecting the workers in the surrounding factories that were there long before it.

This facility will have an enormous environmental impact within the community. It close to housing and noxious fumes will spread widely. Also the continuous operational noise will impact local residents. Will there be an improvement in the local roads accessing the site? As the roads at the moment are in a pretty poor state. Heavy lorries will further degrade these roads.

There is also a concern that if the stored tyres were to catch fire that would have a massive detrimental effect on the local area. Having experienced this when stored tyres in Fforestfach caught fire several years ago.

This is a populated area with great emphasis on cycle routes and healthy outdoor activities. Not to mention the proximity to many local sports clubs, schools and the beautiful Gower to name a few. Surely there are far better options to deal with this kind of waste than adding up needed pollutants to this area.

world.

When tyres are burned, toxic chemicals such as carbon monoxide, nitrogen oxides, and particulate matter are released into the atmosphere. These pollutants can cause serious respiratory and cardiovascular diseases, which could eventually lead to death. Furthermore, tire burning emits carcinogenic compounds such as dioxins and furans. People who have been unintentionally exposed to large amounts of these chemicals have developed a skin condition called chloracne, liver problems, and elevated blood lipids.

Tyre combustion also releases heavy metals such as lead, chromium, and zinc, which can contaminate soil and water and have devastating effects on the environment and human health.

Humans are particularly vulnerable to the smoke produced by burning tyres. It may irritate the eyes, nose, and throat as well as cause headaches and even result in lung cancer. Additionally, the smoke contributes to the development of smog which can lower air quality and visibility.

Please do not bring the incinerator to waunarlaudd

Too close to residential and areas with nature and will significantly affect air quality which as an asthmatic concerns me! I remember years ago the tyre fire not far from that area, the whole community was affected for days with awful smells and chest complaints

Given the close proximity to neighbouring properties including my own, I strongly object to this application.

My main environmental and community concerns include:

1. **Emissions and Pollution**: Pyrolysis can release harmful pollutants, including sulfur and styrene, which are present in tyres. These emissions can negatively impact air quality and pose a range of health risks to nearby residents.
2. **Energy Consumption**: The process of pyrolysis requires significant energy input, which can sometimes exceed the energy recovered from the process. This raises questions about the overall sustainability and efficiency of the technology.
3. **Waste Management**: While pyrolysis can reduce the volume of waste tyres, the by-products (such as pyrolysis oil and carbon black) need to be managed properly to avoid secondary pollution.
4. **Community Impact**: There is a potential for increased traffic, noise, and other disruptions associated with the construction and operation of pyrolysis plants.
5. **Economic Viability**: The financial feasibility of pyrolysis plants can be uncertain, especially if the market for the by-products is not well-established.

I hope the Council will consider these objections carefully and follow other Local Authorities lead in refusing the application.

Kind regards

I am concerned about this, it is very close to the houses and gardens on Swansea road, it is bound to have a negative impact on the village especially the noise.

Extremely bad for the environment and local communities.

Too close to housing surely?
Cant be environmentally friendly .

Too close to housing surely?
Cant be environmentally friendly .

Huge environmental issues in a residential communities.

I strongly object to the licensing of a Tyre Burning Establishment on the industrial site at Waunarlwydd. My ward of Gowerton is a close neighbour of this site and the prevailing winds would pollute the immediate vicinity. The health implication are a very worrying consequence of such an activity. There is already a high incident of patients with Asthma in the Bishwell Estate which would increase with such a process. The license should not be granted under any circumstance in this location. During the last few years the fire which occurred in Fforestfach hi-lighted the problems which happened and the ongoing issues for the cost to the authority and health of the residents of that area.

I am very concerned about the implications of this permit being granted . We live in the busiest road in Swansea where air quality is poor , items are regularly burned on the industrial estate to the rear of our house and we often have to close windows and re wash clothes that have been line dried . The thought of having more pollution in probably the worst polluted part of Swansea is devastating . If this permit is granted we will sell our property and move from the area that we have lived in for over 20 years . Please consider the affect on the quality of life of the people who live in the vicinity . The council's policy was supposed to be improving the environment not making it worse . We spend hours recycling all of our waste carefully and yet the council are considering a permit which allows a company to burn waste , surely this isn't environmentally appropriate and these tyres could be recycled according to the policies that the council has enforced .

Thank you

There are many people in this village including myself who suffer with chest and breathing problems. If this license is granted it will exacerbate chest conditions. Along the M4 corridor in this area the speed limits have been reduced to 50mph to reduce pollution levels so why is the above application going to be even considered 🤔 . What on earth has happened to the Clean Air Act!! I object strongly against this application.

My concern is the air pollution, Burning tires can greatly affect the environment. It produces toxic chemicals that can remain suspended in the air and can even cause problems with our ozone layer. Whilst I appreciate that efforts will be made to reduce the fumes omitted there will be inevitably be fumes added to the air and therefore increase air pollution! This is in addition to the large vehicles dropping off the tires. chemicals fumes can also get into the soil and biomagnify plants, or into the water and biomagnify aquatic animals. There is a large farming presence in the area and I worry about the agriculture. Especially when farm animals are eaten by humans as the concentration of these toxic chemicals increases, causing several health problems.

The roads leading to the site is not fit for large industrial vheicles and I worry for traffic and safety.

It is also worth mentioning the same company have already had one rejection in similar site.

There must be a more suitable and sustainable area where air pollution would not be affected as much as it would be if it was based here.

Thank you for reading

I object due to the impact this site would have on the following

Air pollution

Local wildlife

Local trees and nature

Long term impact on children within the vicinity

The sustainability impact of burning this material

I strongly object to Tyregen installing tires incinerator, as there will be significant amount of toxic in the air

I read the air quality report and other reports. I live within smelling distance of the proposed site given my experience of emissions at similar sites in the UK.

I object because:

I cannot see a way to avoid increased heavy traffic with its associated noise and air pollution.

I have severe sensitivity to airborne pollution. 'Probable insignificant impact' in the air quality report is not reassuring. I suffer significant respiratory symptoms simply by being drive past the Port Talbot works on the M4. The risk to me would be too high for me to remain living in my home if this proposal is approved.

Tyres need to be stored. Accidents happen and accidental fires occur. If that happened before I'd been able to move home, the air pollution could be fatal for me and probably equally dangerous to many people in the nearby nursing homes.

What is the plan to remove the million tonnes of contaminated waste left by the previous occupants.

I object to the approval of this application for the following reasons

1. Pollutants in localised fallout.
- 2.What is the impact on the area?
- 3.this is a residential area
- 4.I refer to the objection by NPT council stating the applicants have a lack of understanding of the process
- 5.keep our village clean and green!

I currently work at Timet Uk in Waunarlwydd, which is on the same site. Has the impact on workers within the close proximity of proposed development been discussed or considered. I am on site 4 days a week 12 hours a day. I would like to see evidence that this will not affect my health.

Instead of burning tyres creating more environmental damage why don't the council recycle the tyres to put into the community for playgrounds, roads and landscape etc. I find it so jarring that the council push recycling and environmental sustainability and they do the opposite like this. Burning these tyres can give people illnesses and severely damage communities and environments.

I oppose to the building of this incineration plant on the grounds that it will drastically affect the air quality within this area. The plant is set to be in close proximity to my granddaughters school. These poor little children will be involuntarily subjected to the onslaught of harmful fumes, and poor air quality from the incineration of 72 metric tonnes of tyres per 24 hours! I am concerned for the health of my grandchild attending school next to this plant, without doubt this will affect their respiratory health, as she already suffers from respiratory issues.

I am concerned about the odour and air pollution and how it will affect my own children and my niece who live and go to school locally.

This is a residential area, and will affect most people in the village if they are going to burn tyres morning noon and night
Also bad for the environment
Bad for people who have respiratory problems

Good Morning ,

As a County Councillor of Gowerton adjoining Waunarlwydd Ward I wish to strongly object the the granting of a licence of burning tyres in an incinerator in Waunarlwydd. Cast your mind back to June 2011, when tyres caught fire The fire at the former Mettoys plant in Fforestfach , black toxic smoke billowed to the air and could be seen from Wayanwryllydd and it caused no end of health issues, resulting in a cost of £1,544,784. I realise this incinerator would be managed correctly, however, accidents happen, and if that was the case smoke would be all over Wanarwlyd and Gowerton, so on behalf of my ward residents I object to the granting of a licence. I also live in Waunarlwydd and am personally against the proposal, and a member of Waunarlwydd RFC. Waunarlwydd RFC play an important part on village life and wellbeing for our young people. Toxic fumes in tier lungs whilst training and playing is a worry.

Contamination to air quality, a danger to people and wildlife. Depreciation of property values.

We live right behind the incinerator and would get all the fumes and smell of what ever is being burnt.

You have given outline planning permission for a new housing estate very near by, do you think this is good planning ? More children and elderly to be affected by poor quality air. This will seriously impact on article 24 of the UNCRC. We have 2 primary schools more than 3 residential homes for the elderly, and a thriving junior section for Rugby and football for young people.

Considering that the introduction of 20mph speed restrictions throughout the area were in part meant to reduce pollution levels, this application appears to be contrary to this.

Being the Sustainability Lead at a large Civil Engineering and Building company located in Swansea, and have reviewed the documents on this proposal, I heavily object to this proposal. Although this proposal states the incineration of the tyres will lead to energy production, this is considered one of the worst options when considering the waste hierarchy. I believe, with help, there are far better options to deal with the waste tyres dealt with at this facility that will lead to an improved impact on the environment, local community and Wales on the whole.

My children live in the area and I'm worried about the health implications

Allowing the introduction of a tyre burning facility in the middle of a city in 2024 is outrageous. Surely there are more environmentally friendly and public health conscious methods for treating tyre waste. I work in this area daily , and this will have a direct impact on my health over my career. Tyres contain many harmful substances including heavy metals and hydro carbons. The local population will suffer for this decision to go ahead.

There are speed limits in place on the M4 to reduce the amount of so called air pollution in the area so it's a bit of a contradiction to allow 3 tonnes of tyres a day to be burned to add to that issue

Burning tyres is hardly in keeping with our zero carbon goals. There are far more environmentally friendly ways of disposing of them.

Would strongly object to this! As a parent and resident nearby the risks to health and the pollution would be devastating. This is not something I or elderly residents I have spoken to that do not have the know how to use IT to complete forms want. The smell and chemicals would be a risk to health and the environment for us all. It is near a children's school and right in a very residential area - absolutely NOT!

I strongly disagree with this request as i live to close to the site.

I strongly disagree with this application regest, as I live in close proximate to the ex Alcoa site.

I'm objecting against this application on grounds of air pollution. Has the company behind the application undertaken an air pollution impact assessment covering all directions within 2.5 kilometres of the proposed site. The last tyre fire in fforestfach in 2011 impacted upon women's health within a 2.5 kilometres radius, resulting in increased complaints to their GP practices.

Until an adequate air quality impact assessment has been carried out any and all applications should be deferred or refused.

I strongly object to the burning of tyres in waunarlwydd on air pollution and also the fire risk or storing tyres at the premises we have already experienced a serious fire at Fforestfach industrial estate in 2011 a warehouse storing tyres caught fire it took a number of days to extinguish with people up to 2.5 km from the fire reporting breathing difficulties to their GPs there also a number of schools and care homes in the Waunarlwydd and Gowerton area

No to pollution, surely they can find a way to recycle rather than destroy the tyres.

My child and his teammates use the playing field nearby and they would be subjected to dangerous pollution from this proposed incinerator.

Not to mention the local community also having to live by this! It makes no sense having such a site within the local area.

Pollution would seriously affect a number of local businesses as well as the residents of Waunarlwydd and Fforestfach. This proposal also doesn't seem to coincide with the green policies and potential nearby solar farms.

I work next door and am worried about pollution levels

We have just bought a house in Gowerton; do not want to be breathing in pollution. I can remember the incident of tyres being set on fire years ago in Fforestfach. The smell smoke was horrendous you couldn't open the windows. Surely this sort of thing should be done in an area where there are no communities/houses around. Completely object.

Surely not a project for a residential area. How is so called old tyres stored. Remember the Fforestfach fire a few years ago took 2 weeks to extinguish. Newport have refused this and Swansea must do the same.

We have 2 primary schools and many junior sections for Rugby and football who use our out side spaces on a regular basis. This could have an impact on the children's right to have a clean environment stated in article 24 of the UNCRC. I worry for our gardeners who spend a lot of time outside, and for the food they produce. I worry about the impact on nature, our environment and the habitat of our many birds reptiles flora and fauna. Please do not give a license to put any more pollution into/over our village.

I object to this application on the grounds that both the storage of non-hazardous waste, and the burning of said waste is environmentally unfriendly. It will produce both pollution and smells which will emirate across the valley.

Similar sites in Pembrokeshire have caused significant disruption to the neighbouring villages, and should prove as a warning of such facilities, especially near built up areas.

Put it next to the council leaders houses and see how quick this would be rejected.

Burning over 3 tonnes of waste will be no good for the environment and working next door to this building I object to extra air pollution

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Absolutley appalling that you can allow this within such close priximatey to housing. Burning tyres is seriously harmful to human health things like this show the councils lack of concern for public health.

My children attend Login Fach and I do not wish for my children to be breathing in the waste produced by the incinerator. I dont feel that this is a sensible place to position this sort of business. Its not in the best interests of the school community.

I am very much concerned at the risks of pollution that may be caused by allowing this plant to operate, especially air pollution. It is too close to the village of Waunarlwydd. We do not want additional pollutants in our air!
If used tyres are stored there prior to incineration, it could also be a fire risk. There has already been one tyre fire at Fforestfach Industrial estate that caused a lot of pollution for local residents in that area and took a long time (plus presumably a lot of money) to put out.

The additional traffic will increase emissions. Never mind the incinerating of so many tyres

I believe that such an enterprise would be harmful to our village - both to the people living here and also to the environment. There are schools in the village, playgrounds, parks and football fields, and the pollution would be a problem especially for both old and young who suffer badly with their health. Also the pollution to gardens, streams and rivers in the vicinity would be affected. There are fields where wildlife can be found, plus the birds of the air. Why cannot the tyres be shredded and used for playgrounds and similar surfaces which is the modern way of disposing of tyres.

I strongly reject this idea. we all know what burning rubber fumes are like you have schools in the area as well as hundreds of homes and the road structure is awful.. Bad idea and I'm very surprised you are considering it

Environmentally unfriendly, far too close to residential homes. Could be damaging to health! Assume there would also be disgusting fumes.

A local community with 2 schools in the area and they want to burn waste well I personally think that will have a detrimental affect on people's health including myself who suffers with asthma

Pollution Enviromental issues. Too near local schools and community.

No more rubbish in waunarlwydd!!

Burning our waste is bad enough but tyres will give of a unpleasant smell with people living close to the site.

Objection on environmental grounds

Well populated area with several schools and residential areas as well as local conservation issues

Burning tires releases a significant amount of toxic pollutants into the air including sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), including fine particles known as PM_{2.5}. All of which can contribute to heavy smog formation, respiratory issues and other negative health effects in nearby communities.

The emissions from burning tires contain a range of harmful substances, including heavy metals (such as lead, cadmium, and mercury), polycyclic aromatic hydrocarbons (PAHs), dioxins, and furans.

These pollutants are known to be carcinogenic and can have adverse effects on the respiratory, cardiovascular, and reproductive systems. Prolonged exposure to the emissions from tire burning can increase the risk of respiratory diseases (asthma, bronchitis, and lung cancer).

Ash generated from burning tires contains toxic substances which may contaminate nearby soil and water bodies. Tire ash that is deposited onto the ground / carried away by rainwater can leach pollutants into the soil and water, potentially affecting ecosystems and posing risks to human health through the food chain and drinking water sources.

The release of pollutants from tire burning contributes to environmental degradation, causing harm to ecosystems. This environmental impact may damage plant life, affect aquatic organisms, damage surrounding habitats and disrupt the balance of ecosystems.

The pollutants are harmful to all living organisms within close proximity to the burning tires.

Burning tires has the risk of developing to intense and difficult-to-control tire fires. These fires produce a thick smoke, challenging the fire service and in some cases have continues to burn for extensive amounts of time (up to 15 years!!) constantly spreading pollutants and hazardous materials.

Not to mention the incredibly unpleasant smell of burning tires. This can upset the surrounding community, decrease property value and damage the reputation of the surrounding area, which also decreases tourism prospects.

I am concerned of the impact on the environment and health implications to my family.

Burning tyres gives off toxic fumes and are a potential fire hazard and , facilities such as these should not be allowed in or around built up areas.

Im not happy about an installation that burns any waste at any given time. Its bad enough if there is the odd tyre fire which we have experienced in the past. It will affect Waunarlwydd, Gowerton, Gorseinon all depending which way the wind blows. No not at all happy so I definitely object.

An installation such as this is not suitable for the area or the environment

I whole heartedly object to this.

Objection to Planning Application for Proposed Pyrolysis Plant

Dear Sir/Madam,

I am writing to formally object to the proposed pyrolysis plant, which is located approximately 1 mile from my home. My objection is based on the potential health risks associated with air pollution from the facility, particularly in relation to emissions of nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), volatile organic compounds (VOCs), and other hazardous substances.

1. **Air Quality and Public Health Risks**

The emissions from the pyrolysis plant, as detailed in the air emission risk assessment, include nitrogen oxides (NO_x), fine particulate matter (PM₁₀ and PM_{2.5}), benzene, 1,3-butadiene, dioxins, and heavy metals such as arsenic, cadmium, and nickel. These pollutants are known to have serious health impacts, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing respiratory conditions.

- **Nitrogen Dioxide (NO₂)**: The plant's predicted process contribution (PC) for NO₂ is as high as 21.7% of the annual Air Quality Assessment Level (AQAL), a significant level that cannot be ignored. Long-term exposure to NO₂ is linked to respiratory issues and exacerbation of asthma, which could severely affect people in our area.

- **Particulate Matter (PM₁₀ and PM_{2.5})**: PM₁₀ and PM_{2.5}, which contribute to respiratory and cardiovascular diseases.

- **Volatile Organic Compounds (VOCs)**: The emissions of benzene and 1,3-butadiene are of particular concern, with the process contribution of 1,3-butadiene reaching 45.9% of the AQAL. Benzene and butadiene are classified as carcinogenic and can lead to long-term health risks, including leukemia. This presents an unacceptable risk to the health of hundreds of children.

- **Heavy Metals**: The assessment reveals significant levels of arsenic and cadmium emissions from the plant. Arsenic, even at low concentrations, is associated with increased cancer risks. The background levels of arsenic in the area already account for 16% of the AQAL, which, when combined with the plant's emissions, could lead to cumulative health risks.

2. **Potential Non-Compliance with Air Quality Standards**

The proximity of the proposed facility to our home raises significant concerns about the plant's ability to comply with air quality standards and objectives. The UK's Air Quality Objectives (AQOs) and European Air Quality Limit Values (AQALs) are set to protect public health, and any exceedance can result in serious consequences for local residents and young athletes.

According to the assessment, the levels of NO₂, benzene, and 1,3-butadiene

emissions are concerning, particularly given that the cumulative exposure from both background concentrations and plant emissions could lead to exceedances of the AQALs. The assessment has not adequately considered the potential for cumulative impacts from other sources of pollution in the area.

3. The Environment Agency's guidance highlights that health impacts cannot be ruled out if predicted contributions are greater than 1% of the AQAL for long-term exposure. The predicted contributions for NO₂, PM₁₀, and VOCs from the plant exceed this threshold, posing significant risks to the health of young athletes who are exposed to higher levels of air pollutants during physical exertion.

The impact on clean air in the area is particularly concerning as exercise increases the rate at which pollutants are inhaled. The long-term exposure of children and young adults to harmful pollutants while engaging in regular physical activity could lead to serious respiratory issues, which would not only affect their health but also their ability to engage in sport.

4. **Uncertainty in Air Quality Predictions**

The report also acknowledges several uncertainties in the air quality predictions. The use of worst-case assumptions in the modelling suggests that the actual impacts could be even greater than predicted. This uncertainty, combined with the significant health risks associated with the plant's emissions, makes the proposal unacceptable, particularly when considering the health of young people and the community.

5. **Request for Refusal**

Given the potential health risks posed by the emissions from the pyrolysis plant and the significant uncertainty surrounding the predicted air quality impacts, we respectfully urge the council to refuse planning permission for the proposed development. The health and well-being of the local community should take precedence over this industrial development. Clean air is essential for their growth, development, and participation in sport, and this proposal would jeopardise that.

Thank you for considering our objection.

Dear Sir/Madam

I live in Gowerton about 1 mile away from the proposed incinerator. The reason why I am writing to formally object to the proposed pyrolysis plant, which is located approximately 635 meters from Waunarlwydd RFC, where over 300 young people regularly play sport. Our objection is based on the potential health risks associated with air pollution from the facility, particularly in relation to emissions of nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), volatile organic compounds (VOCs), and other hazardous substances.

1. ****Air Quality and Public Health Risks****

The emissions from the pyrolysis plant, as detailed in the air emission risk assessment, include nitrogen oxides (NO_x), fine particulate matter (PM₁₀ and PM_{2.5}), benzene, 1,3-butadiene, dioxins, and heavy metals such as arsenic, cadmium, and nickel. These pollutants are known to have serious health impacts, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing respiratory conditions.

- ****Nitrogen Dioxide (NO₂)****: The plant's predicted process contribution (PC) for NO₂ is as high as 21.7% of the annual Air Quality Assessment Level (AQAL), a significant level that cannot be ignored. Long-term exposure to NO₂ is linked to respiratory issues and exacerbation of asthma, which could severely affect young athletes who regularly train and compete on the rugby fields.

- ****Particulate Matter (PM₁₀ and PM_{2.5})****: PM₁₀ and PM_{2.5}, which contribute to respiratory and cardiovascular diseases, also pose significant risks. Although the predicted contribution of PM₁₀ emissions is lower, the plant still contributes 1.3% of the AQAL. Children and young people, who are the primary users of the Waunarlwydd RFC grounds, are particularly susceptible to the harmful effects of particulates, especially during intense physical activity.

- ****Volatile Organic Compounds (VOCs)****: The emissions of benzene and 1,3-butadiene are of particular concern, with the process contribution of 1,3-butadiene reaching 45.9% of the AQAL. Benzene and butadiene are classified as carcinogenic and can lead to long-term health risks, including leukemia. This presents an unacceptable risk to the health of hundreds of children who spend significant time outdoors at Waunarlwydd RFC.

- ****Heavy Metals****: The assessment reveals significant levels of arsenic and cadmium emissions from the plant. Arsenic, even at low concentrations, is associated with increased cancer risks. The background levels of arsenic in the area already account for 16% of the AQAL, which, when combined with the plant's emissions, could lead to cumulative health risks.

2. ****Potential Non-Compliance with Air Quality Standards****

The proximity of the proposed facility to the Waunarlwydd RFC grounds raises

significant concerns about the plant's ability to comply with air quality standards and objectives. The UK's Air Quality Objectives (AQOs) and European Air Quality Limit Values (AQALs) are set to protect public health, and any exceedance can result in serious consequences for local residents and young athletes.

According to the assessment, the levels of NO₂, benzene, and 1,3-butadiene emissions are concerning, particularly given that the cumulative exposure from both background concentrations and plant emissions could lead to exceedances of the AQALs. The assessment has not adequately considered the potential for cumulative impacts from other sources of pollution in the area.

3. **Health Implications for Sensitive Receptors, Including Waunarlwydd RFC**

Waunarlwydd RFC, where over 300 young people regularly participate in rugby and other sports, is located approximately 635 meters from the proposed plant. The Environment Agency's guidance highlights that health impacts cannot be ruled out if predicted contributions are greater than 1% of the AQAL for long-term exposure. The predicted contributions for NO₂, PM₁₀, and VOCs from the plant exceed this threshold, posing significant risks to the health of young athletes who are exposed to higher levels of air pollutants during physical exertion.

The impact on clean air at Waunarlwydd RFC is particularly concerning as exercise increases the rate at which pollutants are inhaled. The long-term exposure of children and young adults to harmful pollutants while engaging in regular physical activity could lead to serious respiratory issues, which would not only affect their health but also their ability to engage in sport.

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5. **Request for Refusal**

Given the potential health risks posed by the emissions from the pyrolysis plant and the significant uncertainty surrounding the predicted air quality impacts, we respectfully urge the council to refuse planning permission for the proposed development. The health and well-being of the local community, including the hundreds of children who regularly play at Waunarlwydd RFC, should take precedence over this industrial development. Clean air is essential for their growth, development, and participation in sport, and this proposal would jeopardise that.

Thank you for considering our objection.

I have 2 children and I am pregnant with my 3rd, I do not want my children breathing in the crap that they will be burning at this premises. There are a quite a few elderly people living within the village again Im certain they would not to breathing in junk from the air! My children attend the school that is close to where they intend on opening if this was to go ahead I would be moving my children from that school to give them clean air to breath! I think its ridiculous that this has been even mentioned on such a popular village. What a way to bring the population down in the area

This would be detrimental to the health of the players, supporters and community surrounding the rugby field.

I object.

This is objectively an idiotic place to put an incinerator. Its a built up residential area with schools, a care home and a number of houses all in close proximity.

Its irrelevant if the party submitting the planning deems it safe and non-toxic (because let;s face it, theyre obviously going to say that). Burning quantities of anything next to people;s homes isnt exactly a great idea.

There are plenty of industrial areas in Swansea away from residential zones. Find somewhere else for it.

No

I strongly object to this proposal on environmental and social grounds.

It is in a heavily populated area with several schools, residential and local conservation areas.

We already have a significant problem with the pollution from heavy road traffic and the air quality is noticeably worse since the woodland was removed for housing development on the new Pobl Living estate.

Burning tires releases a significant amount of toxic pollutants into the air including sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), including fine particles known as PM_{2.5}. All of which can contribute to heavy smog formation, respiratory issues and other negative health effects in nearby communities.

The emissions from burning tires contain a range of harmful substances, including heavy metals (such as lead, cadmium, and mercury), polycyclic aromatic hydrocarbons (PAHs), dioxins, and furans.

These pollutants are known to be carcinogenic and can have adverse effects on the respiratory, cardiovascular, and reproductive systems. Prolonged exposure to the emissions from tire burning can increase the risk of respiratory diseases (asthma, bronchitis, and lung cancer).

Ash generated from burning tires contains toxic substances which may contaminate nearby soil and water bodies. Tire ash that is deposited onto the ground / carried away by rainwater can leach pollutants into the soil and water, potentially affecting ecosystems and posing risks to human health through the food chain and drinking water sources.

The release of pollutants from tire burning contributes to environmental degradation, causing harm to ecosystems. This environmental impact may damage plant life, affect aquatic organisms, damage surrounding habitats and disrupt the balance of ecosystems.

The pollutants are harmful to all living organisms within close proximity to the burning tires.

Burning tires has the risk of developing to intense and difficult-to-control tire fires. These fires produce a thick smoke, challenging the fire service and in some cases have continued to burn for extensive amounts of time (up to 15 years!!) constantly spreading pollutants and hazardous materials.

Not to mention the incredibly unpleasant smell of burning tires. This can upset the surrounding community, decrease property value and damage the reputation of the surrounding area, which also decreases tourism prospects.

Strongly object.

It will pollute the air and cause neighbouring houses and community problems.

Object. Strongly discussed with this being brought forward

I object on the grounds that the pollutants generated by the incineration process will have a detrimental effect upon air quality and ultimately the health of residents in the vicinity.

I object to the incineration of tyres by a business in the village I live in! I think this will have an impact on the air quality and quality of life of people young and old living in the surrounding area!

We are a small village and the air pollution that this would bring could have significant impact on how we currently live!

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This is unacceptable There is enough pollution as it is . This will cause so many problems to peoples health .Surely there is a better option than thiis for disposing of tyres

It will ruin the area

This is going to affect our residents who live in Ty Waunarlwydd and also the staff who support our residents daily . This concerns me about everyone's health of having a tyre burning factory local. Let alone all the schools around and the health effects it will have on the children.

Burning is not a solution and should be rethought.

It would be disgusting for the community. A place that already potentially has issue with pollution due to the large busy roads going through. This wouldn't even be consider in a more affluent area.

Kenfield is a supported living home in Waunarlwydd the fumes from this will effect their health and daily living

I work in waunarlydd and this will impact the residents I look after

I strongly object to this, it being too close to residential properties. I live in the area and can remember the thick black smoke from the fire at the tyre warehouse in Fforestfach, which was much further away. If anything like that were to happen at this site it would badly affect Waunarlwydd and Gowerton.

I object to this and the pollution it would produce in our local area, especially the impact it would have on the health of the young children who live in the area and attend the local schools.

I would like to protest against this application to install an incinerator into our village

This will impact everyone and myself however I have to protect my daughter and her future

I would like to strongly oppose the proposal for a tyre incineration plant. The area is not at all suitable and I feel this will spoil and be detrimental to the area. There are so many risks and negative reasons to going ahead with this proposal. This is a mainly residential area and the pollution this is bound to bring is not acceptable for residents living in and passing through the area. The Gower is an AONB - how can you put a polluting plant in an AONB? The roads in the area are already in poor condition due to the increased volume of traffic with the recent addition of new housing estates in the village of Gowerton, these are already unsustainable. The addition of more heavy vehicles regularly passing through the local villages is unsustainable. The damage to the environment, wildlife and residents that is bound to be caused by this unwelcome development is unacceptable. I would strongly urge the council to reject this proposal and to get behind the major issues we are all facing with the serious threats from global warming and unwelcome pollution to our already suffering environment.

My daughters school sits not from from the site

Working in the area where the plan is made, I think this is an disgusting idea as burning rubber is extremely hazardous.the surrounding areas will have a constant burning smell that is not pleasant and the effect it will have on the environment will not be good

Objection on multiple grounds

Well populated area with several schools and residential areas as well as local conservation issues

Burning tires releases a significant amount of toxic pollutants into the air including sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), including fine particles known as PM_{2.5}. All of which can contribute to heavy smog formation, respiratory issues and other negative health effects in nearby communities.

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Not to mention the incredibly unpleasant smell of burning tires. This can upset the surrounding community, decrease property value and damage the reputation of the surrounding area, which also decreases tourism prospects.

Don't want this in village

Given the number of limitations of the report and the close proximity to residential properties and schools I object to the burning of tyres at the location. Many people work from home now and will be in their residences all day and in the local area. The number of hours this facility is going to be burning tyres for across the year is significant.

I object to this to protect the local environment and potential harm to local people. It's a considerably built up area with a large amount of residential properties for miles around as well as local primary schools and residential homes; it is not a safe area to be burning tyres resulting in massive air pollution, releasing harmful chemicals, and allowing toxic smoke which is irritant and causes respiratory problems in such a built up residential area! Many pollutants emitted from tire burning are toxic, carcinogenic, and/or mutagenic; together, they present significant health hazards and should be avoided at all costs in this area!

I don't want this anywhere near my family home or village. It will cause a lot of distress and upset many people living close by

The air quality in Swansea is already well below EU safe standards. Anything which makes that worse should be rejected immediately. This is a terrible idea.

Health and environmental risk especially for children

We kindly request to withdraw the application.
Thank you

Detrimental to local environment and community, zero need for this

My family live within close proximity, to the Waunarlwydd Industrial Estate and I totally object to the burning of hazardous elements, so close to their home. The burning of tyres, causes the release of toxic compounds into the air, which can lead to cancer and other health issues, associated, with severe lung problems. This carries, a massive environmental threat and lots of other risks to public health. The burning of tyres, release a significant amount of toxic pollutants, including sulphur dioxide, nitrogen oxides, carbon monoxide etc, etc, etc. Research is only recently beginning to show, how wide spread, the risk from tyre dust may be to our health and the wider environment.

Waunarlwydd is a village, which has 2 primary schools, 3 nursing homes at least 3 public houses. It also has a well known, Rugby club and several children's play areas, supermarkets and a number of shops, restaurants and cafes.

So many new homes, have been built, within the village in the past 50 years and obviously, all these have included planning and building regulations. These have all been authorised by Swansea City Council. There will also be many more new homes, built within the next decade and beyond. The current Labour Government, has promised this and Swansea and the surrounding areas, will need to show they are working towards redevelopment. They also need to show, they will do their best to cut our carbon footprint.

Burning tyres and the gasses they release are dangerous and before the City and County of Swansea consider, issuing a permit, they need to ensure that an active, accurate and precise indication of the methods used are stated in any application. Is this an established company and who would be held responsible, if there were problems in the machinery with over heating, which caused an explosion. There are lots more questions, which should be asked.

This is a smokeless zone. I cannot burn anything other than wood and smokeless coal in my woodburner or I'd get a fine. If I burnt rubber Tyres environmental health would be all over me. This is not the thing swansea council should be encouraging. We already get kept awake by the noise from the Alcoa site let alone a smell of continuously burnt rubber.

To whom it may concern,

I would strongly like to object at the proposed due to the increase in harmful and toxic outputs in such a residential area.

I personally have family who suffer from COPD, asthma, and one undergoing long term cancer treatment where in all cases there is extream sensitivity to air pollutants, and these can impact quality of life and even length of life.

This type of activity should be kept to remote areas far away from vulnerable general public. If this gets approved, we will start colating formal air quality data and should the proposed action commence if there is evidence if a detrimental impact to air quality I will personally hold both swansea council and the company itself accountable with whatever formal or legal processes are necessary.

Please, think of the people and not just the profits.

I appreciate your time taken reading my feelings on the subject and can categorically say I am not alone, just look at social media for additional examples.

Kind regards,

There are so many toxins within our environment already without having to be burning tonnes of tyres so close to so may residential houses. I love living in Waunarlwydd and feel this would have an extremely detrimental effect on everyone living in the area.

Disgraceful banned cars 20mph for pollution and you want this vile pollution incinerator this goes against climate change

Concerned about the environmental impact on the local community and wildlife

As well as there being 2 schools in the locality, my parents both have health conditions which could be aggravated much further if this were to go ahead. It is certainly not good for the environment either, releasing noxious fumes into the atmosphere.

Don't want this here. It's a residential area with primary schools.

I think we need to establish the level of possible pollution. This question wasn't answered as they had no data to recall from which is a concern. What is the motivation for the company to put the tyre burning there in the first place?

My dad lives at *****, Waunarlwydd, Swansea, . He lives very close to the Alcoa/ICI site and the air pollution that would be caused would be detrimental to his health.

This application if successfully will devalue my property and have an adverse effect on my income.

Several school close by, worrying about long term effects it will have on children

It is a small community, increased risk of respiratory, ear, eye infections to local children affecting learning and missed school.

This is not an appropriate area for this incinerator. I strongly object and fear the impact it will have on the health of people, living in the area and visitors to the near by amenities

The comments in this submission are vague at best with terms unlikely being used. We live as the crow flies in very close proximity of the whole site and depending on the wind direction presently, you can smell some of the existing processes that currently happen at the TIMET site. I am not convinced this will be any different and as an ex firefighter who has attended long drawn out rubber tyre fires with acrid smoke gases being created I find it hard to believe this will be odourless.

Detrimental to the area and pollution

I object against this application

This facility is not suited to a residential area that contains 2 primary schools as well as residential homes and sporting clubs. Air quality would be severely impacted and increased traffic through the villages adjoining would not be suitable.

We don't need anymore pollution!!

I strongly object and opposed this application.

I do not want this incinerator in the village of Waunarlwydd.

In the comments, ask if they

Have completed a 'Children's Rights Impact Assessment' this will definitely have an impact on the air quality which which will affect article 24.

Waunarlwydd is an area used by many children with two primary schools, a thriving juniors rugby section and a dedicated football pitches which are used by a large number of children throughout the week and weekends.

If this goes ahead this will have serious impact on article 24 of the UNCRC, to which Welsh ministers are bound to have 'due regard' to under the Rights of Children and Young Persons (Wales) Measure 2011. Has a CRIP (Children's Rights Impact Assessment) been completed? If so what was the outcome of this?

Disastrous for the area for anyone with breathing issues like myself.

Waunarlwydd is an area used by many children with two primary schools, a thriving junior rugby section and dedicated football pitches which are used by a large number of children throughout the week and weekends.

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Object to this ridiculous application in the Center of a village! Myself with asthma would be hugely affected by this, washing clothes would be impossible and residents mental and physical health will be compromised. House prices locally will also be affected. Please find a site away from any local homes.

This amount of pollution so close to a residential area is not acceptable and this will not bring anything beneficial to the local area.

I object to the application plans. Burning tyres will directly affect the air health, and the health of those living in Waunarlwydd. As a home owner in the area, the the centre will directly effect the cost my house will sell for.

Allowing permission for the Tyregen UK Ltd. to develop a site to burn tyres would be environmentally and ethically irresponsible by the local council and the Welsh Government. The pollution and toxins emitted into the environment, which is situated near several schools and a highly populated area, is bordering on criminal. There are systems in place in most other European countries to recycle and reuse the materials used in tyres in a far more eco-friendly way. Why is this application even being considered? Are our councillors so archaic and narrow minded to think this is a good idea?

Absurd idea and detrimental to peoples health

I object to this facility being built

I object. This will have a detrimental effect on the health and well-being of residents, and those who come to the area for sports teams.

We dont want this happening ridiculous and extremely dangerous with rubber burning

I've lived in waunarlwydd all my life this will not have a positive impact due to it's pollution near where people live and breathe.

Residential area, close primary schools, park, rugby teams - this is not appropriate for residents safety and health.

Health concerns and the smell

If this wasn't allowed in Neath / Port Talbot area, which is already industrial, we do not want it in a rural village which is bordering the Gower

Use port talbot steel works for incineration

It would be an absolute disgrace to allow such a facility in a highly populated residential area, behind nursing home where people already suffer with health problems without mindlessly adding to them. Schools, sports facilities all within a short distance.

People do not and will not accept this in Waunarlwydd and to put it bluntly why on earth should we.

Find an area that isnt in a built up area surely this isnt rocket science!!!!

I strongly object to a Tyre incinerator coming to Waunarlwydd as it would have a detrimental affect on our community , it is close to houses and if there is a fire who knows what will happen .

This will be detrimental to the environment. There are enough things being burned down there through the night as it is with toxic waste. It is very close to schools and an elderly complex and nursing homes people that are already vulnerable.

Dont want the associated noise and smell in our village.

As the Councillor of Waunarlwydd and a resident for 55 years I strongly object to Tyrogen UK coming to Waunarlwydd to set up a Tyre recycling business , I am sure that there will be fumes polluting the air and noise and no matter what the company say it will never be safe also the worry of a fire which would devastate Waunarlwydd and the surrounding areas . We have two schools and 6 nursing/residential homes one which is close to the proposed site and along side the proposed site is a large mobile home estate for over 55s so many elderly live there and the trauma they would go through if something serious happened and it is highly populated around the proposed site . My main concern is for my residents but also all our health and wellbeing and I would like to ask the question why were they refused the licence in NPT and have they had any convictions longer than 5 years they need to disclose ?

I object to this application. Pollution. Negative effecton health

Air quality is essential to health. Physical health and mental health. With multiple schools surrounding this area a polluting project is not appropriate at all.

I live in Dunvant, my parents still live in Waunarlwydd and I object to this on the grounds that its going to cause more pollution for the area, we dont need a lowering of air quality in the area for any reason.

No

The council/environmental agencies cant monitor and control what is being illegally burnt in the nights at the plant situated next door as it is...

The location of this proposal is completely unsuitable there are local school in the near vicinity plus there's a considerable risk to local wildlife and watercourses which could also be polluted also there's a air quality issue

Ridiculous 😏

Pollution in a word. Do we really need more pollution? I think not.

I object to this proposal because of the air pollution and fumes it would cause. This site is in a residential area and close to children's playgrounds and schools and I believe the pollution would be harmful to the local area.

The village is presently the unwilling host to serious industrial pollution to more dangerous pollution would constitute a crime against the community.

We live locally. My son has disabilities. One of which is related to his breathing. If it affects him medically then I will be logging this looking to pursue with the company and the council via the legal route.

I object on environmental grounds but also as someone who lives with a respiratory condition

I strongly object to this as the amount of air pollution will be massive in a highly populated area and this will have a detrimental effect on the health of the population and the resulting fumes from the tyres will be unbearable. The council should reject this completely

F*** off

The smell would blow down to Gowerton

Don't want my children breathing in fumes walking to school

This is going to cause not only issues for local residents and children in the surrounding area. But also on a natural perspective this type of action will cause pollution on a massive scale.

This will be horrendous for public health - Swansea council please have some moral accountability with this decision.

Hi Im an asthmatic 50 yr old , the noise and smell coming from the aluminium recycling plant at the old alcoa site is terrible, i strongly object to another recycling plant, especially tyre recycling, we live in a heavily populated area with road noise and pollution, any more would be detrimental to me and my familys health.

I am strongly opposing this proposal, the nature of this type of business does not belong in a residential area. The risks to the public from this are far too great, the location is almost on my doorstep. This is a grave concern to not only myself and family but to the local and wider community. I have read through the proposition. I am concerned about the environmental impact. The noise and the increase of traffic. What if something goes wrong? There have been numerous tyre facilities that have gone on fire. Forestfach for example why should we have to live with that risk, having a facility of this nature in this area will also decrease house values. I wouldn't have bought my home here if this was already there or any chance of a place like this going in the local area. We have residents with health issues that the fumes would affect my wife and daughter are 2 of those, should we then have to live with our windows closed all year round. There are no guarantees in the proposal but should and unknowns not certain and definite, what if one of those should not happen? There are plans to build houses, schools and doctors surgeries etc off titanium road, this would also be a risk to those properties and mean that the site is then surrounded by residential areas. The government want to cut down on emissions and help the environment this is going against all of what they want, we can't drive our cars without the government wanting to stop it or have fires in our homes because of CO2 but yet would have to live with the uncertainty of this development, this is not a risk that the council should allow

Burning tyres is ridiculous this day and age..pollution needs to reduce not get worse

There's a rugby club that will be affected

Very worrying, as burnt waste rubber product emissions, even after going through the factory cleaning process (which also uses LPG) how can we as nearby residents be 100% reassured that there will be no carcinogenic gases emitted into the atmosphere? What exactly will be emitted into the atmosphere at the end of the process?

The smell that can come from there is bad enough, but to increase it is crazy.

Unsuitable location as near to housing and schools. Health risk to the local community.

Factory is too close to so many houses, schools and local wildlife and air quality will be affected.

This should not be allowed in a populated area.

This will massively affect air quality in an area close to residential areas. I can't believe this is even being considered.

This will cause air pollution and people won't be able to open their windows and doors.

There must be a more sustainable way to dispose of tyres. Setting up an incinerator in an urban area that is surrounded by houses and schools will only lead to chronic health issues. The council are considering an application to build 200 plus houses off Fairwood Terrace that would back onto this facility. The risk assessment may deem their controls sufficient but in the event of a failure of this system the consequences would be catastrophic. There is currently an aluminium recycling plant on the facility that has had several complaints raised against it for polluting our community that the environmental agency has done nothing about.

I object to this proposal

This site will be in between 2 schools the fumes coming from this site will produce contamination to the air in which we all have to breathe. the traffic to warnallydd will become worse with all the cars parking on the footpath where pushchairs and elderly people will have to go in the road

Negative environmental impact in populated area

I object because I am seriously concerned about the air pollution in the area. There are so many people living around. The communities have several schools with so many pupils, including my kid. I think that waste burning facilities should be placed much further away from the populated areas.

Can't see how this will help improve air quality or reduce global warming which is supposed to be one of Wales's many priorities and the reason why 20mph speed limits were imposed.

I suffer from COPD and air quality affects my condition. This tyre burning will limit my going outside my home even move when weather conditions send the smell and smoke towards my home. In Sa5 there are lots of schools play area and sports facilities. Children use these and their health will be affected. I think the health affect of this has not been considered enough on how it will effect people not know but in the future with chest conditions etc. I totally oppose this planning application

Strongly object to this due to it being so close to the community...hazardous to everyone's health.

I object to the planning application of the tyre incineration plant in Waunarlwydd. No doubt this will have detrimental effect on the local community's health where we have two local schools in the close vicinity, sports playing fields and a local park. Personally I lost my dad and grandfather who worked at the old Alcoa site to cancer and many friends of theirs in the local community have suffered losses from the same disease.

I believe this contributed to their short life spans and don't want this to affect our future village generations due to release of harmful gasses from the burning of tyres!

My sons and grandchildren play rugby in Waunarlwydd rugby club. They live near and this will cause ill health and respiratory problems to all who use the club. These sort of premises should be located further away from residential areas. The impact on the local area will be vast. The extra heavy vehicles needing to use the area will be dangerous to the school children and older generations living in the area. The council has restricted speed on the m4 and other roads due to supposed pollution and then want to allow definite pollution in a built up area. This should never be the situation where financial gain is put above health especially as our health services is in dire need of help

This company would bennifit Swansea massively by freeing up jobs for those who can't get any , really hope this gets up and a running in the future

Objecting as it could affect my health as I have copd

This is very close to where I live and I have 2 children. I am concerned with the level of pollution this business will cause and the direct impact this will have on mine and my children's health. I myself have asthma and I am concerned it will have a negative impact on my quality of life due to high pollution levels.

we all have to drive 50 mph on the motorway due to cars affecting air quality and they are telling us burning 500 tonnes of tyres a week 26000 tons a year wont affect air quality. The facility is down in a large wide valley from the top of the hill i often see low fog and cloud sitting there hardly moving which is the same with smoke from a factory which may be allcoa that also hardly disperses. i object it will lower the quality of life for those in surrounding areas

we all have to drive 50 mph on the motorway due to cars affecting air quality and they are telling us burning 500 tonnes of tyres a week 26000 tons a year wont affect air quality. The facility is down in a large wide valley from the top of the hill i often see low fog and cloud sitting there hardly moving which is the same with smoke from a factory which may be allcoa that also hardly disperses. i object it will lower the quality of life for those in surrounding areas

No right so close to so many houses.

Concerns for the pollution affecting the local schools and members of the public living in close vicinity to the plant

Young children train at Waunarlwydd RFC for rugby and football - this added pollution in the area will have an effect on their health. Aswell as the others training and visiting the grounds

Live just up road don't want smells polluting air

I believe it would not be good for our environment and having health issues I do not want to breath or smell burned tyres as I do believe smell will be there by some occasions

I have lived in the village for 41 years my children and grandchildren live here. Its bad enough that the lovely fields around the village are having houses put on them nature losing there homes dont pollute our air too.

I object to this as it is going to cause problems with health to many in the area

My child's health is a number one priority so is the health of all the children in the village. They need to grow up in an environment with clean air and no horrible smoke and smells. I have lived in the area all my life and we DO NOT need something like this in our village. We need to help rebuild the environment not add to the problem. It is not wanted.

Surely these tyres could be recycled! After all we are living in a world whereby recycled is a must! We need to look after our planet not destroy it with toxic waste!

There is no way this should be allowed this day in age

This is not something that should go ahead.

The Fforestfach, Gorseinon, Gowerton & surrounding suburban areas are already saturated with traffic, as well as other heavy pollution emitting businesses, it would be detrimental to the health and wellbeing of the local community to allow this incinerator to be granted permission. The location of choice and radius of emissions also shows that it would spread into the Gower, this protected area would suffer greatly from this plant being established. It would be hypocritical of the WAG and local council to allow such a plant to be established alongside a strong pledge to improve the environment and air quality across Wales.

How can this possibly be any good for the environment? Let alone the surrounding areas who will be affected by the fumes and smell constantly.

Situated in a residential area already congested with traffic that use waunarlwydd and Gowerton rather than use carriageways.

I wish to object this due to likelihood of undue noise, and fumes from the business. Already we have the noise of Alcoa which keeps me up some nights depending of wind direction . Smoke filling the air which will affect my health and asthma.

There is enough pollution now in the area without adding to it please consider the health of the residents especially people with respiratory conditions

We have 50mph speed limits for air quality on the m4 20mph speed limits imposed all totally nonsensical, yet you are considering this proposal ? Has Swansea city council gone insane ? Does this also not directly oppose your intention to become carbon neutral

Due to move to Gowerton. Do not want my children growing up in an area with additional pollution of this nature where health concerns could results! No thank you!!! Recycle, recycle, recycle!

A major pollutant, that will not help to lower our carbon foot print.

Object

We do not need to damage the environment any further

I feel the added pollution will add to Swanseas carbon footprint

This will affect all surrounding areas with a large number of housing, schools and nursing homes.

Too close to many houses

Massive concern for the local environmental impact

Hi I object to this we live really close and my son has bad asthma which this isn't good for him . It will affect our community and our rugby players . I think this is awful .

I don't want this anywhere near my house or the air my children breathe.
This would be awful for the local community and eco system.

I object! This sort of business will ruin our home life. It would force us out of our home and community. We couldn't risk it with a baby and a young child.

I live fairly close by and have 2 young children. I do not want our air quality reduced.
Our overall health score for the area is low as it is.
Thanks

I object to this as it will cause air pollution, is a potential hazard, there will be increased traffic and not so long ago, there was an accident involving burning tyres on an industrial scale when no one could go outside or open their windows. This has already failed an application to NPT CBC so for the sake of children and people with respiratory illnesses, please turn it down. Thank you.

This area is near playing fields and schools . I am concerned about the air pollution that this scheme will bring . I totally object to this

As people of Waunarlwydd, we strongly oppose the practice of burning tires in residential areas due to its adverse impact on air quality and the health of our community. Such activities should be strictly prohibited in close proximity to homes and should only be conducted in designated locations far from residential areas.

Absolutely disgusted that this has been put forward. Reading through it states Likely not be a risk to public health. Not very scientific despite all the graphs. I object strongly.

I fully object to this, in a built up area with this could hugely affect the air quality. I would like to protect my children from exposure to pollution.

The burning of tyres is not environmentally friendly. It is a risk to the environment as a whole and is likely to impact the lives of all residents in the area. As a council who allegedly strive to encourage recycling, this will be a very poor decision if allowed to go ahead.

I have checked to the incineration planning due to having a very young family in the area. I do not think it's wise for people to be living in such close proximity twin generation plant with polluted fumes coming off and also the smell it's not fair on the locals and will drive house prices down

I object to this proposal on the grounds of the effects it will have on the air quality for the local residents.

The proposed site is too near to housing, schools and playing fields. The winds will blow the toxic fumes towards our houses which will be detrimental to our health and devalue our properties.

The Alcoa factory already generates a lot of noise pollution, especially at night. Given the toxicity of the air that will be emitting from the incinerator with that much rubber, it's a severe danger to public health.

I strongly object to the above application due to the under mentioned facts :-

1. It is in a residential area
2. It is within close proximity to
Waunarlwydd Primary School and
Logan Fach Primary School
3. It is within close proximity to Nursing
Homes and Residential Care Homes
where sick , elderly and vulnerable people
live
4. Burning tyres release toxic chemicals
Into the atmosphere which have been
linked to birth defects and cancer
5. Emissions from tyre burning increases
the risk of respiratory problems ,
Including asthma and bronchitis.
6. The process of burning tyres is obviously
a health hazard and the residents of
Gowerton and Waunarlwydd should not
be exposed to these dangerous fumes

I

Completely inappropriate site, very concerned for family members living a stones throw away from the proposed site.

I feel this facility is wholly inappropriate in an area of high residential surroundings. Despite likely reassurances that any emissions are safe there can never be an absolute certainty. Furthermore, the geographic location, being in a low lying area of a valley, any emissions will travel down the valley and be trapped at low level by atmospheric conditions. This phenomena is already evidenced by the frequent episodes of unpleasant odour lingering across the valley from the water treatment works. There should be no further unnecessary pollution to add to this problem.

This would ruin the village and its very close to the school

I vehemently oppose this

The said site is too near our residential estate which will effect us and the playground where children play

I believe that this pyrolysis factory will have a great impact on the local community. All the tyres that have been getting dumped on people's land for years can all be taken here, melted down and re used as something we all need, Fuel. This factory will open up hundreds of potential jobs for the community, dispose of the dreaded tyres that no one else in the country knows what to do with and could potentially make a lot of new soft compounds for playground floors and other areas. Personally I think this could be one of the best things to open up in the UK for the past 30 years and I am for it every step of the way.

Due to increased air pollution. This company has already been rejected planning permission for the same reason in neath port talbot Why should we suffer. As an asthmatic I am concerned about the amount of toxic fumes this would generate into the local area

This will have a detrimental affect on our health and our childrens health.
We do not want to be living near this

Theres enough pollution coming from there now. Lots of black smoke especially at night. No thank you we with asthma suffer enough without more toxic smoke. We can see it from our living room window not a pretty site.

I suffer with lung cancer and I strongly object to this . There are already people burning rubbish in the area without this company adding to the problem .

Smell , pollution of the air, so close to housing

This will be detrimental to the surrounding areas

This is absolutely not what the residence of this areas needs. There is concern for the health of the local citizens as well as the many species of wild life in the area. Some of which or rare species of indigenous amphibians and bats.

This is harmful to the residents of the surrounding areas. Thai will affect my sons estate too.

To many people with health issues

I do not agree that Tyregen LTD should open an incineration plant so close to a residential area which includes schools. Black carbon is harmful to humans, it causes cardiovascular damage which can result in death.

I hope this isnt going ahead. This is dangerous and will release toxic fumes. It will be detrimental to the environment and the citizens of the surrounding areas, causing health issues. Its also near schools and playgrounds. Please do not allow this to happen.

I do not wish for this to be implemented close to my home

Objection to Tyregen UK Ltd's Application for a Part 2A Permit

Dear Pollution Control Division,

I am writing to object to Tyregen UK Ltd's application for a Part 2A Permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Waunarlwydd, Swansea.

As a member of the local community, I do not believe that such a facility is appropriate for our area. I understand that the proposed site may be an industrial area but it is surrounded by residential areas. The potential negative impact on air quality, which will in turn affect the environment is a significant concern. Also it will impact on mental health and well being of affected residents. I strongly feel that this type of facility should not be located within our community. There are schools and old peoples homes in the vicinity and I feel this business should not even be considered in this location. Surely we have a right to breathe in fresh air and to be able to open our windows. Why isn't recycling being considered in the current climate?

I ask that Swansea Council reject this application in order to protect the well-being of local residents and the surrounding environment.

Yours sincerely,

I absolutely object to this proposal. What a wreck less and idiotic idea to put such a highly toxic facility within a thriving and highly populated area. It would be criminal to make local and surrounding area residents suffer the pollution that the facility would generate, it would affect the communities wellbeing. There are so many areas in South Wales where it would be much more sensible to put a facility like this, but to put it in an already over populated area with plenty of domestic, business and tourism traffic pollution. It baffles me that we are constantly encouraged/enforced to be environmentally friendly and 'save the planet', yet Swansea council would consider burning tyres in a sort after community where people pay a lot of money to buy homes near respectable schools!

1. Burning tires release toxic chemicals into the atmosphere. Benzene, xylene, ethylene, and acetone are among the most dangerous compounds released during the burning of tires. These chemicals have been linked to cancer and birth defects. In addition, many people consider burning tires wasteful and unnecessary.
2. Burning tires creates hazardous solid waste. When tires burn, they leave behind black rubber particles called charcoal. Charcoal is a porous material that absorbs harmful chemicals from the air. If left untreated, charcoal can become a significant environmental hazard.
3. Burning tires emits greenhouse gasses. Carbon monoxide, methane, and nitrous oxide are three types of greenhouse gasses created during the burning of tires; however, each type poses different hazards. Carbon monoxide is a colorless, odorless, tasteless, and highly poisonous gas. Methane is a flammable gas that contributes to global warming, while nitrous oxide is a potent ozone-depleting substance.
4. Burning tires increases air pollution. Tires are considered a major source of air pollution because of their heavy use throughout the world. According to the Environmental Protection Agency (EPA), the average American burns about 30 pounds of tires per year. This amount of tire consumption creates a lot of pollutants that get into the air we breathe.
5. Burning tires harms humans. People who live near tire recycling facilities may experience respiratory problems due to the fumes emitted by the burning process. Children and pregnant women should avoid exposure to these fumes.
6. This could also impact house value and could be problematic for anybody looking to sell or buy property in the area as this although placed on an industrial estate is still in close proximity of housing estate, sports clubs, schools and play areas

This site stands to the West of Swansea. Any fumes, smoke or other forms of airborne pollution could scatter over an highly populated area of Swansea due to the prevailing South West wind. The area already has to put up with the noise from other industries on the site. The area already suffers from a high proportion of the population having lung and chest problems due to existing and previous pollutions. The existing roads and bridges are currently suffering from volumes of large commercial vehicles attempting to enter the site from Cwmbach Road and having to turn around due to the low bridges. What is known of the long term effects of ingestion of exhaust fumes from this plant? Possibly such a site as this could and should be placed well away from highly populated areas with better more industrialised transport links.

This is going to cause smell, noise and environmental pollution to where we live. It will also affect the cost of our homes. I object to this.

The proposed incineration facility would have detrimental impact on our young, our elderly and the wildlife of the area. So close to the Waunarlwydd common -- a Site of Importance for Nature Conservation (SINC).

Something like this needs to be away from built up areas and will clearly have a detrimental effect on health and living conditions of thousands of residents living in the vicinity.

It will have a negative effect on house prices and offers no positivity in this already declining state the government is providing for the citizens.

Objection to Tyregen UK Ltd's Application for a Part 2A Permit

Dear Pollution Control Division,

I am writing to object to Tyregen UK Ltd's application for a Part 2A Permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Waunarlwydd, Swansea.

As a member of the local community, I do not believe that such a facility is appropriate for our area. The potential negative impact on air quality, public health, and the environment is a significant concern. I strongly feel that this type of facility should not be located within our community.

If this application were to succeed we could be talking about 72 tonnes per day which equates to 504 tonnes per week and 26,208 tonnes per annum.

Where I live we would be impacted by it due to the prevailing winds.

I ask that Swansea Council reject this application in order to protect the well-being of local residents and the surrounding environment.

Yours sincerely,

Andrew J Crawford

Too close to a large number of homes, and potentially very harmful to health

There is no need to pollute the air with the burning of tyres, 20mph is to help with this so how can this be good for our lungs , living in the area where they propose to do this

I live close to this area have relatives in Gowerton and travel past most days . I am extremely worried for residents in close proximity to this proposal as despite reading up as much as I can there are no reassurances as to the effect on the air quality and environment. There are schools , doctors surgeries businesses nearby in addition to all the housing developments.Surely there are more suitable sites that could be developed further away from a densely populated area. i'm

We object to the site's relatively close proximity to residential housing given the nature of the toxic fumes likely to be emitted and the fact that the prevailing winds will direct these fumes to our neighbourhood. Several of my family members have breathing difficulties such as Angina and Asthma and such fumes could cause life threatening reactions.

Young children who are playing within the area the community rugby club will be affected greatly

It's ridiculous, what about the environment we will be choked when the smoke .thats not good for people's health and very thing will be covered in smog

No thank you we want fresh and clean air for our kids not polluted.

Subject: Objection to Tyregen UK Ltd. Application for Tyre Incineration Facility

Dear Swansea Council

I am writing to formally object to the application submitted by Tyregen UK Ltd. to open a tire incineration facility operating 24 hours a day, processing 72 metric tons of tires within that timeframe. I believe this development poses significant risks to the environment, public health, and the local community.

Environmental Concerns:

The process of burning 72 metric tons of tires daily will inevitably lead to the release of harmful pollutants into the air, including toxic chemicals such as dioxins, furans, and heavy metals. These pollutants can have devastating effects on both local wildlife and ecosystems. Additionally, tire incineration releases large quantities of carbon dioxide and other greenhouse gases, exacerbating the global climate crisis. Introducing a high-pollution facility in our area would not only harm the environment but also go against efforts to reduce carbon footprints.

Public Health Implications:

The constant emission of toxic substances from burning tires can have severe consequences on public health. Prolonged exposure to pollutants like sulfur oxides, nitrogen oxides, and volatile organic compounds (VOCs) increases the risk of respiratory diseases, heart conditions, and cancers. Vulnerable groups, including children, the elderly, and those with preexisting health conditions, will be particularly at risk from these emissions. A facility operating 24 hours a day increases the likelihood of continuous air quality deterioration, making it impossible for residents to avoid harmful exposure.

Impact on the Local Community:

The proposed facility's 24/7 operation will undoubtedly have a negative impact on the quality of life for local residents. Noise pollution, increased traffic from transporting large quantities of tires, and unpleasant odours from the burning process will severely disrupt daily life. This will likely decrease property values and deter people from moving into the area, damaging the local economy and community well-being.

Alternative Solutions:

While it is recognized that tire disposal is a challenge, incineration is not the best solution. Alternative, more sustainable options such as recycling and repurposing tires into construction materials or playground surfaces are available and much less damaging to the environment and public health. It is important that we consider cleaner, greener technologies that align with the long-term welfare of our community.

Conclusion:

In light of the significant environmental, health, and community concerns, I strongly urge the planning authority to reject the application for the tire incineration facility. The long-term negative consequences of allowing such a facility far outweigh any short-term economic benefits. I believe our community deserves better, and I hope

that the decision-makers will prioritize the health and safety of the public over industrial interests.

Thank you for your consideration of these objections.

I would like to object to the application on grounds of the bad environmental impact it will have, will potentially affect the health of those living nearby, and devaluation of property in the area.

This is bound to create pollution affecting the surrounding area, many houses in the vicinity, schools (particularly the Welsh media primary school) and rugby club. This application should be refused as we should be aiming for cleaner air in built up areas.

This is not ideal when we have multiple estates within a quarter of a mile with families. The smell would be alarming and would also leave the value of our homes at risk due to the estate becoming less desirable due to the noise, smell and pollution.

I am objecting to Tyregen UK Ltd's application for a Part 2A Permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Waunarlwydd, Swansea.

As a member of the local community, I do not believe that such a facility is appropriate for our area. The potential negative impact on air quality, public health, and the environment is a significant concern. I strongly feel that this type of facility should not be located within our community.

I ask that Swansea Council reject this application in order to protect the well-being of local residents and the surrounding environment.

Even if people are uninterested in the health/green aspect, if this goes ahead it may have an impact on house prices making it harder to sell your property or selling it for less.

<https://ecogreenequipment.com/how-does-burning-tires-affect-the-environment/>

1. Burning tires release toxic chemicals into the atmosphere. Benzene, xylene, ethylene, and acetone are among the most dangerous compounds released during the burning of tires. These chemicals have been linked to cancer and birth defects. In addition, many people consider burning tires wasteful and unnecessary.
2. Burning tires creates hazardous solid waste. When tires burn, they leave behind black rubber particles called charcoal. Charcoal is a porous material that absorbs harmful chemicals from the air. If left untreated, charcoal can become a significant environmental hazard.
3. Burning tires emits greenhouse gasses. Carbon monoxide, methane, and nitrous oxide are three types of greenhouse gasses created during the burning of tires; however, each type poses different hazards. Carbon monoxide is a colorless, odorless, tasteless, and highly poisonous gas. Methane is a flammable gas that contributes to global warming, while nitrous oxide is a potent ozone-depleting substance.
4. Burning tires increases air pollution. Tires are considered a major source of air pollution because of their heavy use throughout the world. According to the Environmental Protection Agency (EPA), the average American burns about 30 pounds of tires per year. This amount of tire consumption creates a lot of pollutants that get into the air we breathe.
5. Burning tires harms humans. People who live near tire recycling facilities may experience respiratory problems due to the fumes emitted by the burning process. Children and pregnant women should avoid exposure to these fumes.

Living in the close proximity of the old Alcoa site, we often experience noise and smell pollution emitted from current site operations. Its easily aggravated by wind direction, not an acceptable proposal.

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5. Burning tires harms humans. People who live near tire recycling facilities may experience respiratory problems due to the fumes emitted by the burning process. Children and pregnant women should avoid exposure to these fumes.

I also believe that it will affect house prices in the area making it harder to sell a property or having to sell it for a lesser amount.

I don't object to the incineration, I am objecting to the location which is in close proximity to housing estates.

Highly residential area, strongly object.

Don't build something like this in such a residential area surrounded by schools. Perhaps use part of port talbot steel works that is about the change and shrink.

No place for is so close to residential, waste might be "non-hazardous" but there are still heavy environmental repercussions.

Too close to the neighbouring schools. Will put the children at risk of carcinogens and also not fair on nature and the environment. Absolutely against the application! As I&m sure the rest of the village is aswell.

this would be horrendous for our community.

we live on Roseland road, and the wind blows from the west the smells from the estate a pretty bad now without an incinerator burning rubber tyres...

Pollution to local residents. Schools close by.

This kind of operation would increase the local and wider area pollution and air quality.

This would greatly increase the chances of poor health for people in the community and exasperate already existing conditions, such as asthma amongst people of all ages, including our children.

I object to this kind of operation in our local community.

Health concerns and the smell of rubber burning

Health hazard risk in the community.

Why can't tyres be shredded for things like horse riding school (wires extracted).

I object to the planning application, I'm concerned for the air quality and the type of waste that would be used to burn

I can't believe that in 2024 ANY company would be allowed to burn such a harmful substance, what happened to recycling? Tyres can be turned into many useful things, I am utterly appalled at the thought of this happening in the village I have spent my whole life in and at 54 probably will for the rest of my life, if this is stopped from happening that is. I very strongly object to this.

I have concerns regarding smell and pollution

We already have a waste water treatment plant that stinks quite often

This planning application is far too close to a busy residential village and school. This needs to be on a purpose built isolated location.

The smell for us that live near by of burning all the time

Do not want tyres burnt in our village

I strongly object this application. The level of pollution this will bring into such a small village, raises major concerns. The location is within such close proximity surrounded by two primary schools, a rugby field and football field, all of which are in constant use by many young children and families. This definitely raises grave concerns for health and wellbeing with such dangerous pollution being exposed constantly 24/7 with a capacity of 3 tonnes per hour being incinerated on a daily basis. Not only will this affect so many young children and their families, but Waunarlwydd also has 3 nursing homes. This exposure to elderly vulnerable people could have a devastating impact!

Commitment to a pollution free non toxic environment that has no chance of spillage of toxic substance is part of Swansea Councils manifesto for Protection of environment and Health. This goes against all manifesto and is highly objectionable on so many levels. Maybe this type of business should go offshore in the channel so that its far far away from all life and danger of health issues. The Toxic Organic Micropollutants are at best kept at levels that should equal close to zero as they kill all life over time. The fact the council is relying on a consultant (impartial or not, who knows) to issue the certificate is worrying as this type of furnace should NEVER go ahead near where people live. Have you as a council forgotten carbon black? I can see many issues in near future of health insurance claims against both the council and companies/ person (S) deciding on this if you allow this danger to go ahead.

Strongly object due to the environmental impact on the area, including local neighborhood's, schools and businesses.

Swansea is bad enough without a tyre incinerator with it being so close to residential schools and farm land it will have mass effect on everything this is a very bad idea y can't the tyres be shredded and recycled into playground floor or something that will supply safety to people not harm I myself thinks it a very bad idea as it will cause a lot of stress and harm to local people

This should not be in a residential area I would like to oppose this please

This isnt a green method of dealing with tyres. Some caught fire a few years back in Fforestfach and it took month to put it out.
its a heakth rish locally and will only increase emissions into the air.
There has to be a green process that doesnt need to put filth back into he air.

This facility if allowed to go ahead would seriously impact air quality and the health of the residents of waunarlwydd and the surrounding areas. Please do not allow this application to be approved.

This could cause an awful impact on the health of the community and cant be allowed. Its a disgrace.

Object

I feel this will be a danger to our health and the environment. I worry about having windows open with the smell during the summer month. The health effects of incinerating hazardous materials wherewe live. The ecological effects on local wildlife. This site is close to my house, I feel this should not be allowed to open. The house prices will fall and I will never to able to sell my home should I need to. Please do not allow this to go ahead. Would you want it where you and your children live.

I'm concerned about the effect it will have on my health and my 2 daughters we all suffer with asthma

I'm also concerned about the effects on the environment

And will I be able to enjoy my garden, put washing out without the fumes from the tyres being burned

My son plays for the local rugby team, Waunarlwydd. It is unconscionable that this would be allowed so close to where children play and exercise. With limited clean air spaces in the area already, the rugby ground is a safe space for our children. Burning rubber in close proximity would detrimentally affect their lung health. I would be appalled if this Tyregen application went through.

I do not support this permit.

Completely against this application.

This would be a health issue due to fumes especially people with illnesses such as myself with asthma, wouldnt be able to keep windows open due to smoke and fumes and the smell would be horrific , it wouldnt keep our air clean and also the wildlife in the surrounding areas would be effected

No Thank you, Swansea is a lovely town and a project like this would cause so many health issues for residents and neighbours of Swansea as well as sully the area with bad smells and pollution

Totally object to this my husband suffers with copd and my grandchildren with asthma. I do not want this in my door step

Please reconsider this.

I strongly object to the proposed incineration plant due increased air and noise pollution in an area that in close proximity to residential village. The co-location of such a plant so close to a residential area could have a significant affect on health should any safety exhaust cleaning measures fail, the likelihood of which is increased with the proposed 24/7 operating model. Furthermore my husband suffers with asthma and small increases in air pollutants exacerbates his condition. The plant would have a negative impact on neighbouring house prices with little job creation to offset the negative environmental impact. The plant would be better placed alongside similar plants in industrial areas sited further from residential areas.

This should not be allowed so close to the village. Why aren't these tyres being recycled?! Have you ever seen and smelt a tyre burning?! Surely burning 3 tonnes and hour is not good

Don't need this in our community

This would be detrimental to the local area- reducing air quality and impacting the health of the local community. It is too close to large residential areas which has the potential to grow with several proposed planning applications for large housing estates near by.

I am aware that planning permission has already been turned down for this project in NPT. I would like to register my objection to this project being proposed for Waunarlwydd. I am in my 70s and currently suffer badly with asthma and take medication to support my symptoms and really need clean air for my health. The village is a largely residential area with nursing homes, an over 50s retirement park, many schools and play areas for children. With the government working towards net zero we really do not need any further pollution to the area which inevitably will lead to the detriment of people's health. I therefore would like to strongly object to the proposal.

I am writing to formally object to the proposal for a tyre incineration factory in Waunarlwydd. As a resident of this village, I am deeply concerned about the potential environmental and health impacts this facility would have on our community, particularly on our children and vulnerable populations.

The primary issue with this proposal is the significant risk of air pollution. The incineration of tyres is known to release harmful chemicals and particulates into the atmosphere, which can lead to respiratory issues, cardiovascular diseases, and other serious health concerns. Waunarlwydd is a family-oriented village, with two schools at the heart of our community. The exposure of schoolchildren to these pollutants poses an unacceptable risk to their health and well-being.

In addition, the vast majority of families living in Waunarlwydd would be affected by the inevitable decline in air quality, noise pollution, and potential hazardous waste generated by such a facility.

Many of these families chose to live here for its safe and peaceful environment, and introducing a factory of this nature would greatly diminish the quality of life that we value so highly.

I strongly urge the council to reconsider this proposal, and instead explore more environmentally friendly and sustainable alternatives.

The health and safety of our children and community should be the top priority.

Thank you for considering my concerns. I trust the council will make the right decision to protect Waunarlwydd and its residents.

Living in Woodland Park which are more mobile homes I feel this would be disgusting to ruin the lovely fields and wildlife. It would also affect our health .

I am totally against this proposal by Tyregen, this application has already been rejected once by Neath Port Talbot Council, Waunarlwydd has a very large elderly community, plus 3 large nursing homes. This plant would have a detrimental effect on not only the Waunarlwydd community but also Gowerton. I myself suffer from ill health, this plant would not be beneficial for my Asthma. I am totally against this proposal.

I can hear the machinery etc working through the night as it is. I can hear when the windows are closed and even more so when its warm and windows are open the sound travels, like its right outside the house.
Burning tyres smells horrendous and lingers! Not environmentally friendly at all!

There are primary schools and nursing homes in this populated area. The air quality will be badly affected.

Disgraceful to think a small village like waunarlwydd is expected to have this kind of pollution on its doorstep.

This kind of large scale operation should be placed on the outskirts of villages , Swansea has numerous areas of waste land from old industrial sites.This kind of operation should be placed there away from schools and residential areas.

The smell and smoke so near to people houses Waunarlwydd is such a small area it will polute the whole of the community and also add to more traffic congestion to the area with extra lorries

I object this due to the impact it will have on the environment and quality of air. It will have a negative impact on our property prices. The noise of this operation will also have a negative impact on our health and wellbeing to live in a quiet peaceful area. We so have a lot of wildlife and this will also affect them. I strongly object this application.

My children play sport and Roseland Road and this development would be detrimental to their health

There is no need for this type of business to operate so close to residential areas. The 24/7 pollution from this will have a huge detrimental affect on peoples health as well as the local wildlife. There must be much more suitable places that this business can go that wont have such devastating effects on the community.

Disgraceful to allow more pollution that is already coming from that timet / Alcoa plant already

I wish to object as I feel the harmful fumes could damage myself and my families health. Both of my children have suffered with Asthma and my mum suffers with COPD, the fumes could seriously impact us

The proposed incinerator is close to residential areas that will adversely be affected by the plant which raises extremely serious concerns over future health effects caused by toxic emissions and odours released by the burning of tyres. Additionally, it is proposed to be a 24/7 continuous process, making it even worse, with no periods of relief for neighbours.

This is not only of concern for current residents but areas close to the site are designated for development of a further 1300(?) houses and will therefore affect an even greater number in the longer term.

Many people in the locality suffered from asthma while the Alcoa factory was in production, although I think the evidence for this was anecdotal many ex-employees have stated that you could often see the aluminium glistening in the air. The point being that if such, relatively heavy, particles were in the air and able to affect peoples breathing in the surrounding area, then the lighter toxins resulting from an incineration process are more likely to be carried by weather conditions. Historically, incinerators in other areas, which were supposedly safe, were later found to have contaminated areas with carcinogenic pcb's etc., resulting in abnormally high instances of cancers and other health effects. Whilst it is / will be stated that this proposed incinerator is more modern and cleaner than those that caused adverse health conditions in the past, even Tyregen's own Permit Non Technical Summary carried out by APS states "OVERALL, it is considered that the risk of air quality impact..... upon human health and ecological habitats will LIKELY be 'insignificant'". This phrase and the term 'likely' suggests that even people who wrote the report are not entirely ruling out a significant adverse impact on air quality, therefore as there is doubt, rule it out

The same report uses similar terminology about odours and states there is "UNLIKELY to be significant odour produced as part of the process. IF ANY ODOUR IS RELEASED [i.e. acknowledging it might], the exhaust flue is located over 230 m away from the nearest sensitive property". Again this implies there is no certainty over the claims that there will be no odour affecting surrounding properties. However, as we can occasionally be affected by odours from the sewage plant, even further away, in unfavourable wind conditions, the fact that the incinerator is 230M away from the nearest significant property is not a mitigating factor.

The map on page 5 of the Air Emmission Risk Assessments has a key showing 'Sport and Leisure Facilities' but does not show the nearby sport facilities of Waunarlwydd RFC playing fields and tennis courts, and Waunarlwydd Galaxy AFC playing fields - which suggests any research by ASP is unreliable and/or incomplete or has chosen to ignore the fact.

Disappointed, and disgusting

This will affect local residents including local schools and residential homes

My kids are in ysgol login fach also play football & rugby for waunarlwydd its a built up area full of families with kids give them a chance not kill them 🙄

As a member of public who works in the Gowerton area and who also has family members who live in the area I feel that breathing in fumes of the material being incinerated is not good for the publics health who live and work in the area.

This is a residential area with a school a stones throw from the proposed site. This is a danger to health and well being. There are plenty of industrial areas in Swansea this could be situated.

How can incinerating tyres be anything other than hazardous with all the toxins it will release into the atmosphere. This is not a remote area, its near areas of interest for children and communities. The long term effects could be hugely detrimental to an already stretched NHS with children/adults suffering with more respiratory issues. Think again Swansea council and do right for the people, not a fast buck!!!

Supportive of local businesses in the area but this business so close to a village is surely not appropriate

There's a community and children in the immediate area. I have a small newborn and wouldn't expect the burning of any waste on any scale to be undertaken so close to a community, schools and playing fields

Not healthy for the environment.

Negative impact on the environment. No jobs to give . Natural river running past straight to the estuary. New housing developments in Gowerton and waunarlwydd already ongoing so more chemicals being released into the air over the houses .

Extremely bad for our health to be breathing in carcinogenic fumes or untested dirty smoke. Also I do not want my children exposed to this, especially with the plan for it to operate 24 hours per day.

Burning the tyres down there with our detrimental Factor on health and environment in the village its very close to schools and very well populated areas

Object to this consultation due to air quality and fumes/smell/pollutants over Waunarlwydd. We have a local primary school with young children, they should not be exposed to this. Also there are vulnerable adults with respiratory issues, also the pollution in relation to the land.

Children go to school in the area with breathing and chest problems already, worried this will make them worse.

In this day and age of environmentalism that is ludicrous

Crazy that's it's even being debated

Awful thing to plan in such a populated area. Far too many children in schools and residents around that this would be detrimental to their health!
When the old Mettoy factory caught fire on June 16th 2011, my parents unit was in the neighbouring building and I saw in very close vicinity the devastating state of the whole thing. We lived down the road too and for days we couldn't open the windows in the house because the smoke was so awful!
Why would you want to allow such a thing to go ahead and have any sort of risk in such a wonderful and populated area?!
I hope this never goes ahead and the council comes to their senses to object!
As a member of staff at a local school, I'm sure the children would be against it too, and especially their families!

This is a residential area with two primary schools close by. It is not a suitable location. I strongly object.

I object to this plan. Burning tyres will have a detrimental effect on local environment and general health of the people of waunarlwydd and surrounding areas.

This is a ludicrous idea, Opposed.

With 2 primary schools in the village and a number of elderly residential homes. This proposed development is absolutely scandalous.
100% objection to it.

I do not want my child growing up in an area that will continually have air pollution from the burning tyres

This is absolutely not acceptable. The health of residents, including elderly and children will be at risk!! Please do not let this pass!!!

Object due to the proximity to rugby playing fields and school.

Subject: Objection to Proposed Tyre Incineration Facility

Dear City and County of Swansea,

I am writing to formally object to the proposed construction of a tyre incineration facility in our local area. While I understand the need for sustainable waste management, I believe this facility poses significant risks to both the environment and the health of our community.

1. Air Quality and Health Concerns: Incinerating tyres releases harmful pollutants, including dioxins, particulate matter, and toxic chemicals that can have detrimental effects on air quality. Prolonged exposure to these pollutants can lead to respiratory issues, cardiovascular diseases, and other long-term health complications, especially for vulnerable populations such as children and the elderly.

2. Environmental Impact: Tyre incineration is not a truly sustainable solution, as it contributes to greenhouse gas emissions and climate change. Furthermore, the ash residue from burning tyres can contain hazardous materials, potentially contaminating local soil and water sources.

3. Property Value and Community Well-being: The presence of an incineration facility can lower property values and diminish the overall quality of life for residents. The noise, odour, and increased industrial traffic will disrupt the tranquility of our neighbourhood and negatively impact local businesses.

4. Alternative Solutions: Instead of incineration, I urge the council to explore greener alternatives such as tyre recycling and repurposing, which are more environmentally friendly and less harmful to public health.

I respectfully request that the planning committee reconsider this proposal, taking into account the long-term consequences for our community's health, environment, and well-being.

I object to this as I am very worried about the air quality due to having members of my family with asthma. I also worry how close it will be to houses and the oap chalet site and how it will affect their health.

I have close friends who own homes in the area. They say non toxic but this cannot be true. My son go the the local school.. this needs to be stopped.

Way too toxic to have in a small city such as Swansea. This must not happen.

Strongly object

Pollution

Please consider local area- close to many homes, some still being built, schools, sports clubs. This is not what we need for our community.
Please also consider environmental factors

Too close to the Waunarlwydd community

I object as it will be too much pollution in a built up area. It will increase problems with people with breathing problems. The smell will be awful. It is not suitable for a small village environment.

I would not want the incinerator so close to the village where by young son goes to schools, plays sports in the local clubs and often goes out with his friends to play in the village.

Awful environmental impact. I completely object to this polluting my local area.

I object towards this as Waunarlwydd Primary School is around the corner from the site and children shouldn't have to be out in their playground inhaling toxic fumes and smoke. I am also a resident of Waunarlwydd myself and I don't want to be inhaling any fumes myself either while out walking my pets and walking my children. I highly object to this.

I've lived in Waunarlwydd for 6 years now and have a 8 year old son,we do not want to be at risk of ingesting these chemicals/fumes,I am already battling breast cancer and the affects of chemotherapy,but I certainly don't want something so toxic to be near my home or my sons school.

My sons primary school is in Waunarlwydd as well as many friends who own properties. As much as they say this is 'non toxic'; I do not believe. I do not want this anywhere near our children and homes.

The application states there isn't going to be a significant risk of noise, pollution and odour but even a small amount of those things can have a really detrimental effect to someone's day to day life as well as to their physical and mental well-being. There must be no end of sites which are much further away from residential properties than this which would be better for this sort of thing. I thought we were supposed to be recycling things these days not burning them.

I object to this due to noise and air pollution. This will be very close to a residential area and will have a negative affect to those in the surrounding area.

The air pollution will adversely effect respiratory health, especially for children and those with chronic respiratory disease e.g.asthma, COPD.

The additional road traffic 24 hrs a day will increase noise, road pollution, and decrease road safety.

Great concern for local community - in close proximity to school (specifically Login Fach) and Waunarlwydd football and rugby clubs. There is a responsibility to keep the children and all people safe and from the inhalation of harmful chemicals.

I object to this in the strongest terms, I have read the environmental report and see it passes the current standards but is unlikely to pass future standards as the clean air act becomes more strict. I live virtually in line with the proposed site up on the hill, I do get emission particles from the factory as it is and I get the smell from the waste water treatment works in Gowerton, I do not see how we should suffer even more odours and increased emissions from vehicle movements and an incinerator. There are already tyre reclamation sites dotted around Swansea who do not incinerate. We all know that all processes that have emission legislation attached to them exceed and break these regulations which is not good for the people and environment. This same process has been turned by NPT Council previously and only a few years ago. This site is close to housing, schools, public areas. The creep forward of housing in Gowerton also brings this closer to them as you tackle the housing crisis. The residents do not want or need this extra burden upon us and our children. Please vote against this company that will incinerate 25,632 tonnes of tyres every year on its proposed licence currently. This will mean 1,709 extra HGV vehicles on the road to the factory just to deliver the waste tyres without those that will have to remove the spent product.

Too much pollution in a built up area. The smell is apparently appalling also. Not good for our children and family who already suffer with asthma.

My grandmother, mother, sister brother in law, niece and nephew all live in Waunarlwydd.

My Grandmother has a host of illnesses which will be exasperated from the pollution produced

Not to mention my mother, brother in law nephew all suffer from asthma. Which will affect them adversely once this facility is up and running.

This is an ill conceived plan that will only cause harm to vulnerable people and increase asthma rate in the village and surrounding areas

I object on environmental grounds. Waunarlwydd is a densely populated area, with its own local amenities, garage, post office, public houses, primary school and unfortunately an industrial park, in which this unit wishes to reside. I would ask Councillors to consider in an area that is already heavily trafficked with resultant CO2 emissions, whether granting planning permission to a company who, in their own application state 'NO SIGNIFICANT' environmental impact through the business, is acceptable? surely, our children and adult residents in this close knit community deserve better - there should be no environmental impact before any further industry in this area can be even considered. Until such time I wholeheartedly object.

The close proximity of many homes to the proposed development and the environmental impact.

The pollution from burning tyres would cause issues for all residents near by. My daughter has asthma and I would be very concerned over the air that she is breathing while walking to and from school, supporting her brothers playing rugby in the local club and even just opening our windows. The smell from fires are bad enough let alone the smell of burning rubber. This should not be allowed to happen near to residents

Enough pollution in that site already, Inco recycling aluminium waste,
Object due to the rugby field and children and people who will be affected.

I have real bad asthma and also a load of other health problems this is not good for the people who live around here or the environment

This could be an environmental disaster to our small village, added pollution to a community with several schools within the vicinity of this proposed facility

Due to potential fumes and health risks

Burning rubber!!! Will absolutely stink!!! Bad for health!!!!!!

I visit my elderly mother daily , she lives in meadowcroft close Waunarlwydd. I have real concerns of the risk this will pose to vulnerable people in the area like my mother

.

I object!!!!!!!!!!

There are more than enough industrial units

* Light pollution

* Noise pollution

* Traffic pollution

* Air pollution

Enough is enough

Against

Dont want it ridiculous

This plant is close to surround continuous urban fabric, including schools and sports facilities.

The environmental impact is noted within the provided information, this type of plant has no place close to such urbanised areas and required a more rural climate to support the treated emissions evidently present for almost 9000hrs a year

Strongly object to this. Both myself and daughter have asthma and I am positive this will do us a lot of harm health wise.

I have severe asthma and sarcoidosis I have had pneumonia and covid 3 times, this is an absolute nightmare for people who suffer from a respiratory disease
Having survived covid I will now have to breathe acrid toxic air
Despite it will be said there will be little pollution its obvious that burning tyres will cause issues
Will our council tax be reduced then to compensate the inconvenience I ask
definitely NO from me

24 hour tyre burning has absolutely no place in a populated area. Stuff like this should be relegated to unpopulated areas far away as wind will carry it far beyond. I do not want my daughter breathing in this air which will have implications on her health down the line.

Object

I strongly object to this proposal my wife suffers with unstable asthma as does my father who is in his 80s

She has recdntly recovered from pneumonia and has had covid 3 times the pollution that alcoa caused to the air previously has at last shifted in the area and it is not as bad as it once was

There are 3 nursing homes in Waunarlwyydd with vulnerable adults who will be affected by this also if it is to run 24hours it will be a constant hum and smell lingering in the air

It is absolutely amazing to me that after a pandemic that affected and killed so many people by attacking their respiratory systems that this would even be considered

This is extremely worrying regarding the environment and the potential health risks? Strongly opposed to this being in such a residential area and the areas surrounding being at risk.

No way

Harmful to the environment.

Massive reduction in local air quality impacting health.
Increase in airborne particulates.
Noise.

Object to the pollution this will cause. My grandmother lives in Waunarlwydd alongside my auntie and cousins with their children and this will hinder their way of life and ours when we visit

There is a lot of noise and air pollution down there already.

My son and husband have Asthma how will effect their health as well as residents who live in the area with other health conditions. The village has care/nursing/ residential homes how will this affect them? The environment, wild life and pets how will this affect them? There are 2 primary schools in the village how will this affect the children during play time? Has noise pollution been discussed as well as air pollution? How will this affect the value of the houses in the area? The park has just been refurbished but no one will want to go if there is smoke or nasty smells so what was the point in the council spending money time and effort on it. The same with the rugby fields people training yet choking on pollution! We are surrounded by farms how will this affect them? We already know the NHS is stretched let's push it further with pollution that will make residents ill shall we! My mother and grand mother live very close to this site and this will make their retirement a misery, this is shocking in this day and age. It is 2024 yet we continue to pollute in this manner?

This is near a residential area, if should not be allowed.

Object to this application due to proximity to schools playing fields and homes, And health risks to the public.

The village is far too small for this type of place. It would impact the local houses and people in a negative way. It would nothing to enhance the village and will make it more congested. Awful idea.

Too close to schools and residential properties

I object to this licence being granted. The wording on the SWIP application references 'unlikely to be significant odour produced' among other claims. This is our home environment and any 'potential risks to human health' shouldn't be a sentence that we're having to consider while going by our daily lives. Please do not allow this application. We have enough industry on the factory site at present. There are too many 'what ifs' in the application it's very wooly and is not giving any locals who have to breathe this air any level of respect or consideration.

Thanks

I cannot condone such an operation taking place in our residential area, near a school and hundreds of dwellings. My concern, as an asthma sufferer, would be, pollution control and quality of air.

Disgraceful knowing that there are two school, rugby pitch, park etc in the local area!

I object to the application because of the amount and nature of the pollutants that will be released. The community consists of a variety of vulnerable people from children to elderly. People with autoimmune diseases and will cause much harm to the community. Local sports clubs and their visitors and may deter people from visiting the area. Not only will this affect the neighbouring village of Waunarlwydd but will also affect the community of Portmead and Ravenhill.

My children go to school near here and play at the nearby park as well as playing rugby. I do not want them to inhale these fumes on a daily basis as it will affect their health.

Very concerned on the effects this will have on us with health, noise, pollution, environment , surely there is a better site than this that isn't so close to local school and so many residents where we deserve fresh clean air

I object to this application

This is wrong built up area schools nursing homes plus homes imagine smell please no way

My objection concerns the close proximity of this site to housing, including a residential site for the elderly
Also the environmental impact on the area and the hazardous emissions from the burning of tyres

I feel this is not an eco friendly way of disposing of tyres nor a sensible use of space in a residential area with school and old peoples home in close proximity

I strongly object to this planning application. With the sites proximity to a primary school Im concerned that this could affect the health of the children and the residents livings around the proposed site. Assuming that large lorries would travel to and from the site this would increase the pollution and with an increase in road users in an already congested area, it could potentially cause an increase in road traffic accidents.

I believe this will be detrimental to mine and other residents health it will pollute our air making it unhealthy to breath in also children old age and people suffering chronic health problems will suffer breathing in polluted air also the smell will linger in the air making it impossible to enjoy the outdoors and even hang out washing

I don't agree with this as there are local school in the area and mass pollution continuously

There are two primary schools near to this site plus rugby fields which run a number of teams of all ages that train during the week. Can they be sure of the smoke created and which direction it will be blown. No.

My mother lives in waunarlwydd and has ill health and I also take my children to visit her daily and I would not be happy for them to have to inhale this and the risk towards their health

Looking at the initial proposal and response, it seems the applicant hasn't really thought about implications to residents and the effect on the community, they state "Non hazardous," since when has toxic burning or smelting of rubber been non toxic? Apart from the impact on community and residential concerns such as schools and other amenities, there is the question of Net carbon neutral and emissions that will certainly be produced during the process. The main concern being public health and detriment to the surrounding areas. Even in a controlled environment this could have catastrophic consequences.

Object

No pollution in our village .

I do not support this and am objecting the application.

This type of business shouldnt be allowed to operate in the middle of a well populated village. It will cause untold pollution & health issues.

Concerning especially for the health of residents especially children and those attending the local schools.

Worried about health effects as I live very near this site. This is not welcome in our community

I wholeheartedly object to this application, in no uncertain terms is this safe for the surrounding environment. The risk to human health must be put first.

I would like to strongly object to this facility within the local area. Based on the relatively close proximity to local schools, rugby club, community centre that this would have on the wellbeing of residents and clean air. It has been widely accepted the impact on human health and the environment of burning tyres. I respectfully suggested that this is not a suitable site for the planned application.

This is far too close to schools, care homes and local amenities all used by the community. This is going to cause a detrimental impact to the health of those in our community. We have no idea the impact of burning such carcinogenic materials into the air or the long term impact on the health of our population. Given what we do know about pollution and hazards to agree to such a plan would be negligent, please do not do so.

This type of installation should be on an industrial estate and not in the middle of a rural village where people's health could be compromised..

I object strongly due to the health risks and possible noise pollution. As a Waunarlwydd resident I already have the noise pollution coming from the industrial site due to the high pitched noise coming from extractor fans that sometimes keep me awake at night. In the past we have had to deal with dust that used to settle on the windows and sills from the old Alcoa works. I do not wish for any more noise or air pollution from the site as I massively value my health and mental well being.

This is probably one of the worst ideas I've heard in a long time, apart from the carbon pollution and plausible affect on all residents, including schools and care residencies, the amount of pollution this would pump into our environment would be astronomical, so much for "Net Carbon Neutral!" There are many unpopulated places in Wales that could be used and without affecting anybody in the immediate vicinity.

With a child with asthma who plays regularly at Waunarlwydd RFC, and lives in Waunarlwydd, we as a family object to this proposal.

I oppose this proposition

I object!!! Surely this should not be allowed there's a school and many properties so close and uphill from the proposed site. Terrible for the local area

This is a residential area and would cause significant pollution

I grew up in Waunarlwydd living there for over 20 years and I think this is an absolutely ludicrous idea! No thought for any residents that live so close to this site, no thought for the rugby club and the welfare of its users. What happened to the clean air initiative? How about we bring something positive to Waunarlwydd? Always doom and gloom with this council it's an absolute farce. Why do you think NPT council turned it down? **STRONGLY OBJECT.**

The fall out of the emissions will be on to our property and there are 2 schools in the area we are in a clean energy age and this development is unacceptable and not wanted.

Not good for wauarlwydd community plus players that play in waun park plus people who play bowls .the air will be very polluted . Fire hazard plus not good for us as residents breathing in all the toxic waste.

The pollution from this will have a negative affect on the local residents health.

I run a childrens choir, Cor Plant Waunarlwydd from seion Chapel on Swansea road.
This choir has been run in this location for 60 years.

Feel that having this planning would have a detrimental effect on the air quality in the area, also increase traffic on Swansea road, which is already busy, especially at school drop off, pick up times and also possibly affect access to parking while running choir practice

Don't need any more pollution here

This isn't good for the environment or ourselves and children

Having read deeply into these tyre incinerators, I am struggling to see why this has even got to planning with it being in a populated environment.

Feel that this facility. Will allow harmful pollutants that will affect the people of Waunarlwydd

Absolutely ridiculous idea! Far too close to several schools, care homes, residents etc. to be breathing in those toxic fumes day in day out!

Too close to school, playing fields and housing.

Will smell worse than port talbot , we have to many local schools around the area who don't want to b breathing in all the toxic fumes

No way. Too close to schools, residential area, etc. not good for anyone with underlying health conditions.

I am a Director of Waunarlwydd Galaxy AFC, we have over 300 children playing football close to Applicants site. I am concerned that the children will experience poor air quality when playing.

Health Environmental issues

Welsh government has reduced the speeds on the roads partly because of the pollution and this is the same for parts of the M4.

Don't understand why this is being even considered as this will increase pollution in the area and will bring down health levels for people living close by.

The area is already a high trafficked area with industrial units for businesses and lorry's going back and forth. There is no need for further polluting plants in the area.

My children play football and rugby within meters of this proposed site 4 times a week. Along with hundreds of children, this proposal increases health risk due to those children by increased pollution. This is a ridiculous site to be proposed with the school also within walking distance. Children have the right to clean air at school, and while they play sports! OBJECT OBJECT OBJECT

We are currently looking to buy a house just down the road from the proposed site and if this application is approved, it will put me off as I will be concerned about the affects that it will have to the local environment caused by pollution and my son going to school in Waunarlwydd and the health impacts this may cause. I don't think a facility like this should be located in such a densely populated area as if there is ever an issue with the pollution entering the environment around the facility, it cause huge issues for a lot of people.

Concerned about air pollution and health

I object to this on two counts: the environmental impact and the health implications on local people of burning waste.

To place such a facility within close boundaries of the village of Waunarlwydd would be both ludicrous and dangerous. Various facilities for outdoor activities for children are within spitting distance of the site and the health of those children should be considered a priority before such plans are granted to incineration facility

Concerned about our air pollution and health

Health risk to children
Air pollution
Not suitable place close to residential area

I am writing to formally oppose the application submitted by Tyregen UK Limited to Swansea Council for a permit to operate an incineration plant at the Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF. As a concerned neighbour and resident of this village, I believe the proposed incineration plant will have significant and detrimental effects on our community, including adverse impacts on public health, the environment, and the quality of life for all who live here.

Public Health Concerns

The incineration of waste, even non-hazardous waste, has been associated with the emission of harmful pollutants such as dioxins, furans, and particulate matter. These pollutants can have serious health implications, including respiratory issues, cardiovascular diseases, and even cancer. The proposed plants capacity of less than three tonnes per hour is still substantial enough to pose a risk to public health, particularly to vulnerable groups such as children and the elderly. Given the proximity of the site to residential areas, the risk of exposure to these pollutants is unacceptably high.

Impact on Schools and Children

Our village is home to several schools and educational institutions. Children are particularly susceptible to air pollution due to their developing respiratory systems. The presence of an incineration plant in close proximity to schools could lead to increased absenteeism due to health-related issues and negatively impact the overall well-being and academic performance of our students. It is imperative that we provide a safe and healthy environment for our children to learn and grow, and the installation of an incineration plant directly contradicts this objective.

Environmental Concerns

The proposed incineration plant will likely contribute to environmental degradation in our village. Incineration processes release greenhouse gases, contributing to climate change and global warming. Additionally, the by-products of incineration, such as ash and other residues, can contaminate local soil and water sources. This poses a threat to local wildlife and can disrupt the natural balance of our ecosystem. The long-term environmental impacts of such a facility are far-reaching and could irreversibly damage the natural beauty and biodiversity of our area.

Quality of Life and Community Well-being

The presence of an incineration plant in our village will undoubtedly affect the quality of life for all residents. Increased traffic from waste transport vehicles will lead to noise pollution and congestion, making our roads less safe for pedestrians and cyclists. The potential for unpleasant odours and visible emissions from the plant will further diminish the enjoyment of our homes and outdoor spaces. Our village prides itself on being a close-knit and welcoming community, and the introduction of an incineration plant threatens to undermine this identity.

Impact on Local Sports Clubs and Recreation

Our village is also home to several sports clubs and recreational facilities, which play a crucial role in promoting physical health, social interaction, and community cohesion. The pollutants emitted by the incineration plant could compromise the air quality in outdoor sports venues, making it unsafe for residents to participate in physical activities. This could lead to a decline in the usage of these facilities and negatively impact the health and well-being of our residents.

Conclusion

In light of the significant public health, environmental, and quality of life concerns outlined above, I strongly urge Swansea Council to reject Tyregen UK Limited's application for an incineration plant. Our village deserves to be protected from the adverse effects of such a facility, and it is the responsibility of the Council to ensure the well-being of all its residents.

This application does not offer enough information to give me confidence in the project.

No. I object to the development of the tyre incinerator plant at this location.
Given the history of operations close by, I have no faith in the authorities to uphold the standards they have requested.
Neither do I have any belief that said authorities have any interest in maintaining the area, or the surrounding environment.
It was not long ago, that parts of the bluebell woodlands was built on, so that the industrial estate could be extended.
It simply adds insult to injury, that an incinerator could be suggested at this location.

How can burning tyres be classed as non hazardous!

No thank you, we don't want a black toxic smog hanging over our village, especially as we have asthma and lung problems

This site is close to our local rugby club, where my children and other family members play. It also near the primary school that my family members attend. I feel this site would cause a long term risk to all our health.

This will affect peoples health in waunarlwydd and should not be given permission. It wasn't allowed in Meath so shouldn't be allowed here. I've already got breast cancer and am immune suppressed. Please disallow this monstrosity I cannot be good for residents or the environment

I live down the road from here. I think it would be absolutely ridiculous to put something like this in the middle of a residential area. The health of our community will be put at risk. Not to mention the noise pollution that this would cause. I am strongly opposed to this application.

I would like to object to this plan. I am very concerned about the increased air pollution caused by burning tyres. There are a number of childrens activities in the local area that promote children being healthy but if they are breathing in polluted air then that will have health issues associated. The area also has local residents who will be affected.

As an elderly resident live in nearby I;m deeply concerned the impact this will have on my health and the continuous noise and pollution

I am member of the public who live nearby and this kind of pollution is going to be so near to where I live and detrimental to my health and the surrounding environment.

I strongly object to this proposal. I suffer from asthma I feel the pollutants that may occur from this would be detrimental to my health.

The effect on everyones health with this going on so near to a residence area could have severe consequences for elderly people and children living nearby but also expose everyone to the pollution

I object - there is no way this should be allowed amongst a residential community, in the vicinity of primary schools and also rugby and football pitches where children play.

The pollution and noise throughout 24 hrs in a village that has already gone over capacity will be detrimental to so many peoples health. There are so many elderly people and young adults living in the village.

Unacceptable level of pollution.
Totally opposed to this in our or any village.

This should not be in waunarlydd especially near schools

I object to the proposal of tyregen as it could have a major impact on the area

Not suitable as being so close to a busy rugby/sports club that caters for varying ages of the public with varying health conditions. There's also neighbouring schools/ nursing homes facing the same issues. Waunarlwydd is also a highly populated residential area.

Object! On behalf of all the young children & adults who like to keep themselves active healthy at the rugby club who should not be subjected to toxic fumes whilst maintaining their own health through exercise!

The environment and local air quality will have a deteriorate significantly if the incineration of tyres goes ahead. The local woodland wildlife and birds will be affected. Then you have the local schools, elderly residential properties, and local community sports clubs where children from newborn to teenagers frequent daily, will all be affected.

Harmful to people's health

Health hazard to close to Waunarlwydd and schools close by

How can you even entertain this when the government want zero emissions there a school with children just around the corner not to mention wildlife this will destroy and other considerations stop this now

Object! Not good for the children in the area!

As a local resident, this facility its operation will have a negative impact on the health of many local residents, my wife & mother in law have health issues. This facility should not be permitted to operate.

There is enough pollution [noise and smoke] from that site already without adding to it.

This simply just cannot happen. I live not far from this and have two little girls they love spending all day out the garden in the summer. This would be devastating.

I strongly object against this proposal

Reasons

1. Toxic fumes going into the air
2. Air pollution
3. Unpleasant smells
4. Risk to people's health
5. Close to school
6. Close to people's homes
7. Close to nursing home
8. Not good for the environment

This should not be allowed

Appreciate we need these facilities but not in a residential area with a number of schools and playing fields in the area. Can it not be located on an enterprise zone for example? Strongly object as this will impact on people's health.

Just why would the people of Waunarlwydd area want this. It's disgusting

I object to this being in the village where I live. This is a built up residential area. This is not good for our health and wellbeing or for the environment

I dont agree with this application

Dont want that pollution in this village!

Massive reduction in air quality.

Youve reduced road speed limits because of pollution levels so you say, and you want to put this in a residential area. Go build in a field in the middle of nowhere!

Absolutely not! How ridiculous

Too close to schools and residential areas. The last tyre fire in Fforestfach caused massive problems for the surrounding area for days. I just see this as an accident waiting to happen and my child missing school if it does because the air will be polluted.

Absolutely stupid idea as a mechanic myself I understand the health issues this can cause and to do it next to a school is just pure stupidity

My children attend school in waunarlwydd, I completely object to this planning application with huge concerns for the health and wellbeing of the residents.

Poor location choice to be letting fumes spread. This area is residential and has nursing homes and schools nearby

This would be hazardous, environmentally unfriendly , and a health risk to residents of Waunarlwydd. Please refuse .

There is a primary school in the area. Children shouldn't have to be outside in their play yard playing with the smell of burning tyres. Also I am a resident of Waunarlwydd I do not want to be smelling burning tyres daily. It is not good for people's health.

I stand against this completely. This area is extremely build up neighbourhood. There are a number of schools within very close proximity.

My child attends YGG Y login Fach, which is only a few minutes from where this is planned on being build. This will have a massive hindrance to these school children and will have an effect on their health. They will not be able to play outside in their yard without breathing in the smell of burning and fumes within their system. This will be a serious health hazard for anyone living near

We do not need another factory burning any type of material! This is so close to our village of waunarkwydd it is unacceptable. The fumes will affect residents health and well-being! My husband and daughter has asthma and we do not need any fumes locally coming through our windows and making them worse! This is not a suitable area for such burning activity

We dont need this. There are already at least 5 facilities within Swansea council area that recycle tyres into construction materials. Why do we now also need to burn. Should be recycling not burning!

It's not healthy breathing in these fumes every day!!!

I strongly oppose the application due to the noise and air pollution (including health implications)that it would create for residents.

This is not acceptable. The village of Waunarlwydd surround the proposed site for this. I'm sure this could never be agreed to, due to the emissions this would create. Surely resident health is the biggest priority of our local council.

Pollution of the air and myself as I have COPD

The smell will be vile and bad for the environment bad for all ages with breathing problems

Dirty disgusting idea bad for health

Dear Sirs,

We are appalled to learn of this application.

We are totally opposed to this.

Kindly deny this application.

We are pensioners.

We do not want smells or contamination anywhere near us.

We love sitting out in our garden - If you allow this - it will mean that we cannot enjoy our peace, the garden. Of invite friends & family over. Plus our washing will be contaminated.

Thank you

The village of waunarlwydd does not need this, it's so close to homes and schools won't be able to open windows or doors

Dreadful plan for the local area. Impact on public health has potential to be hugely detrimental.

Objection to Planning Application for Proposed Pyrolysis Plant on Behalf of Waunarlwydd RFC

Dear Sir/Madam,

Waunarlwydd RFC are writing to formally object to the proposed pyrolysis plant, which is located approximately 635 meters from Waunarlwydd RFC, where over 300 young people regularly play sport. Our objection is based on the potential health risks associated with air pollution from the facility, particularly in relation to emissions of nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), volatile organic compounds (VOCs), and other hazardous substances.

1. **Air Quality and Public Health Risks**

The emissions from the pyrolysis plant, as detailed in the air emission risk assessment, include nitrogen oxides (NO_x), fine particulate matter (PM₁₀ and PM_{2.5}), benzene, 1,3-butadiene, dioxins, and heavy metals such as arsenic, cadmium, and nickel. These pollutants are known to have serious health impacts, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing respiratory conditions.

- **Nitrogen Dioxide (NO₂)**: The plant's predicted process contribution (PC) for NO₂ is as high as 21.7% of the annual Air Quality Assessment Level (AQAL), a significant level that cannot be ignored. Long-term exposure to NO₂ is linked to respiratory issues and exacerbation of asthma, which could severely affect young athletes who regularly train and compete on the rugby fields.

- **Particulate Matter (PM₁₀ and PM_{2.5})**: PM₁₀ and PM_{2.5}, which contribute to respiratory and cardiovascular diseases, also pose significant risks. Although the predicted contribution of PM₁₀ emissions is lower, the plant still contributes 1.3% of the AQAL. Children and young people, who are the primary users of the Waunarlwydd RFC grounds, are particularly susceptible to the harmful effects of particulates, especially during intense physical activity.

- **Volatile Organic Compounds (VOCs)**: The emissions of benzene and 1,3-butadiene are of particular concern, with the process contribution of 1,3-butadiene reaching 45.9% of the AQAL. Benzene and butadiene are classified as carcinogenic and can lead to long-term health risks, including leukemia. This presents an unacceptable risk to the health of hundreds of children who spend significant time outdoors at Waunarlwydd RFC.

- **Heavy Metals**: The assessment reveals significant levels of arsenic and cadmium emissions from the plant. Arsenic, even at low concentrations, is associated with increased cancer risks. The background levels of arsenic in the area already account for 16% of the AQAL, which, when combined with the plant's emissions, could lead to cumulative health risks.

2. **Potential Non-Compliance with Air Quality Standards**

The proximity of the proposed facility to the Waunarlwydd RFC grounds raises significant concerns about the plant's ability to comply with air quality standards and objectives. The UK's Air Quality Objectives (AQOs) and European Air Quality Limit Values (AQALs) are set to protect public health, and any exceedance can result in serious consequences for local residents and young athletes.

According to the assessment, the levels of NO₂, benzene, and 1,3-butadiene emissions are concerning, particularly given that the cumulative exposure from both background concentrations and plant emissions could lead to exceedances of the AQALs. The assessment has not adequately considered the potential for cumulative impacts from other sources of pollution in the area.

3. **Health Implications for Sensitive Receptors, Including Waunarlwydd RFC**

Waunarlwydd RFC, where over 300 young people regularly participate in rugby and other sports, is located approximately 635 meters from the proposed plant. The Environment Agency's guidance highlights that health impacts cannot be ruled out if predicted contributions are greater than 1% of the AQAL for long-term exposure. The predicted contributions for NO₂, PM₁₀, and VOCs from the plant exceed this threshold, posing significant risks to the health of young athletes who are exposed to higher levels of air pollutants during physical exertion.

The impact on clean air at Waunarlwydd RFC is particularly concerning as exercise increases the rate at which pollutants are inhaled. The long-term exposure of children and young adults to harmful pollutants while engaging in regular physical activity could lead to serious respiratory issues, which would not only affect their health but also their ability to engage in sport.

4. **Uncertainty in Air Quality Predictions**

The report also acknowledges several uncertainties in the air quality predictions. The use of worst-case assumptions in the modelling suggests that the actual impacts could be even greater than predicted. This uncertainty, combined with the significant health risks associated with the plant's emissions, makes the proposal unacceptable, particularly when considering the health of young people and the community at Waunarlwydd RFC.

5. **Request for Refusal**

Given the potential health risks posed by the emissions from the pyrolysis plant and the significant uncertainty surrounding the predicted air quality impacts, we respectfully urge the council to refuse planning permission for the proposed development. The health and well-being of the local community, including the hundreds of children who regularly play at Waunarlwydd RFC, should take precedence over this industrial development. Clean air is essential for their growth,

development, and participation in sport, and this proposal would jeopardise that.

Thank you for considering our objection.

As an elderly couple we strongly object the application due to health and environmental issues.

With so many children living and going to school in the area this is not something that should be done so close by regardless of the measures in place to eliminate air pollution.

I strongly object, not only will a tyre incinerator facility in Waunarlwydd be horrifically detrimental to the local environment, I have significant concerns about its close proximity to two primary schools (one of which my child attends) the health implications for local residents, including residential homes for the elderly.

Very concerned about pollution the smell ,black smoke and ash particles increase of traffic and noise,i remember the chaos and smell when the tyre factory in Fforestfach caught fire

My daughter goes to login fach school and I would like her to be able to play out in the play ground in fresh air. Not toxic or the smell of burning rubber

My daughter currently attends the Welsh school in Waunarlwydd and the pollution th plant would cause to the area would have an affect on her health. She suffers with asthma and this would only make it worse.

I object to this application on the grounds of the proximity of the site to two primary schools and to nursing home facilities. I do not feel it is an appropriate location for such activity to take place. Not only on the grounds of air quality and pollution but also on the grounds of increased fire risk in a highly residential area

The smell from this type of industry will be absolutely awful. We will not be able to open our windows or put washing on the line because of the smell also people with breathing problems will be put at risk.
This is not a good move for this village.

Why would this happen in a village and catchment area of schools? And nursing homes? May as well just get the kids to help you-why wait to wreck their little lungs?

I am concerned about the environmental and public health effects of tyre incineration within the vicinity of the village of Waunarlwydd, with the potential for smoke, dust and other carcinogenic materials being carried into the local atmosphere, residences and schools by wind. This may well have lasting health effects on the local community.

Additionally, living in a property that backs on to the industrial estate (with exception of a railway line), I strongly object to smoke continuously being in the air around my property due to it being unsightly, smell and dirt that may rest on washed clothes, vehicles, property and damage to the natural environment and wildlife in the area.

Absolute joke with schools around and family village

I object

Strong concerns over emissions impact on health.

I object to this as I live close by and my family members have severe asthma

I strongly object to the application of a tyre insinuation plant to be built in such a built up area that has daily routes to main schools that children are walking daily. Also with a nursing home almost next to it aswell. The risks involved for the harmful toxics to be around with these vulnerable age groups so close by, such a built up area of people and homes and the effects it will have on the environment is ridiculous and should not be allowed.

This would be a terrible addition to our village. Causing significant environmental and health damage.

Considering there are 2 Primary Schools and 3 Care Homes in our village, I wouldn't like this on our door step

Not happy with the amount of pollutants in environment already and this extra stress on environment for all animals including humans, and nature is too much. Ill health is increasing at a huge rate putting more pressure on services and this will add to it, let alone the damage to environment .

The fumes would be toxic to Denver Road and Ystrad Road

Don't want the application to be successful

As an asthmatic who plays sport in the area this will not be good for people's health and wellbeing. There are other options to burning tyres such as recycling them into reusable materials. Eliminate, reduce, re-use, recycle - not burn in a public area.

I am an asthmatic and feel this will have detrimental effects long term on my health. I am objecting to this. Furthermore, the harm this will have on the environment is devastating and find it hard to believe it is being proposed in such a built up area with no care for residents.

Na

Being a member of the local community I wish to submit my opposal to this business being allowed to operate in our village. Having a son with severe heart and lung issues I have extreme concerns of the impact such a business will have on his health. Also other implications it will mean i.e. noise, smell and environmental factors.

As a resident of the community I strongly object to a business of this nature being permitted to operate in our village, so close by to primary schools, nursing homes and residential dwellings and the impact this will have on health of the people of the local community. For myself personally with children with health complications.

I'm worried about air pollution in this area! This is an area near primary schools, homes and woodland I feel this would be detrimental to the environment and quality of life of people living near by.

We struggle enough with pollution in Waunarlwydd as it is. I still have a child that walks to school and the air is atrocious. Placing this facility in the village, or anywhere, in this day and age is plain stupidity.

I am firmly against this application. Although it claims to incinerate only non-hazardous waste, burning tyres inevitably leads to increased pollution in the area. This will have a significant impact on local families, particularly those with existing respiratory conditions. For instance, I suffer from asthma and have been negatively affected by similar businesses in the past.

Additionally, there is a care home for the elderly located very close to the proposed site, where many residents already struggle with breathing issues. The nearby school also raises concerns, as the children's health could be compromised by the increased pollution.

Living nearby, I have already noticed excessive heavy traffic caused by the factories in the area. Adding more trucks to the roads would only worsen the situation. This proposal also threatens the well-being of local wildlife. For these reasons, I urge you to reconsider.

I've been informed that it was rejected in Neath Port Talbot, therefore we do not need or want this either.

You cannot put tyre pollution in a highly populated area. This would cause highly toxic pollution.

As someone with a bad chest and children in school down wind from proposed site. It's not an ideal place. Not good for the environment not good for people's health and definitely not good for people living near by.

I am VERY concerned about this project being so close to local communities where there are a number of small children and near to a primary school which would be full of young children 5 days per week. I am also concerned for the air quality of the surrounding areas for the elderly and young people living nearby. I would also like to comment on the close proximity to greenery which is what helps us breathe giving off the essential oxygen for us to breathe. If this plant affects the wildlife then it could have a detrimental impact on everyone and everything

I feel that the application for an incineration plant within a small village is inappropriate and unnecessary. The factory is proposed to be within a small community and in close proximity to 2 primary schools. Assuming the tyres will need to be transported via HGV, the roads are also unsuitable. We have had instances in the past of HGVs trying to enter the industrial estate ignoring the low bridge warnings and getting stuck on a sharp bend, the extra traffic of this type of vehicle is not wanted nor needed within the village.

I am also concerned about the emissions and smell from the constant use of the incinerator, alongside the additional noise as living in close proximity to the industrial estate we already experience the noise that comes from the existing factories there already.

I strongly feel as though an industrial estate which is further afield from existing homes would be more appropriate for this type of application.

I have children who attend a primary school that will be impacted by the fumes that would be caused as a result of this operation. This facility would be detrimental to the health of all people in the area and in particular the young children and the elderly (there are multiple schools and nursing homes that would be affected).

This will cause pollution that will affect the ill health of my family who have asthma and COPD. I am also concerned as to how it will impact upon my children's health long term. I strongly object to this.

19.5 hours per day of pollution as well as being foul smelling, who in their right mind would allow this in a small village?

This application in a residential area is not sensible. Burning tyres and incineration of waste in a populated area will cause risk to residents health. I oppose this application being accepted.

To whom it may concern,

I am writing to formally lodge my objection to the recent application by Tyregen UK Limited for a permit to operate an incineration plant for non-hazardous waste at Westfield Industrial Estate, Unit 2, Waunarlwydd, SA5 4SF. This proposed facility would be situated dangerously close to residential areas, including the community where I reside, as well as schools such as the one my daughter attends. It is deeply concerning that a project of this nature, with the potential to emit pollutants into the local environment, is being considered in such proximity to homes and educational institutions.

Proximity to Residential Areas and Schools

The installation is intended to operate at a capacity of less than 3 tonnes per hour, but the scale of the operation does not diminish the potential harm it could inflict on the local population, particularly children. The proposed site is alarmingly close to a residential area and within a short distance of a school, which is an unacceptable risk. Children, including my daughter and her peers, are far more vulnerable to the adverse effects of air pollution, particularly respiratory conditions, due to their developing lungs.

There is mounting evidence linking air pollution from industrial sources, such as incineration plants, to serious health conditions, including asthma, chronic obstructive pulmonary disease (COPD), and even long-term cardiovascular complications. Exposing children to this level of environmental hazard is not only irresponsible but borders on negligence. I am not prepared to accept that my daughter or any other child should be placed in harm's way due to poor planning decisions by the local council and Tyregen UK Limited.

Concerns Over Environmental and Health Impacts

The incineration process, even for non-hazardous waste, releases harmful particulate matter, nitrogen oxides, and volatile organic compounds into the atmosphere. While the application may attempt to downplay the severity of these emissions, there is no guarantee that the mitigation measures proposed will adequately protect residents or schoolchildren from the cumulative effects of exposure over time.

As a parent and a member of this community, I find it wholly unacceptable that we are expected to bear the brunt of increased pollution while the company profits from such an operation. The children of this area, including my own daughter, deserve clean air and a safe environment in which to grow up, not one blighted by industrial emissions.

Lack of Accountability and Request for Compensation

Should the council approve this application, it raises a serious question about accountability. Will Tyregen UK Limited or the council be prepared to provide compensation upfront for the illnesses, respiratory symptoms, pain, and suffering that are likely to arise from prolonged exposure to the pollutants emitted by this plant? The health of our community should not be collateral damage for the benefit of

corporate interests, and if this incineration plant goes ahead, there should be financial and legal mechanisms in place to ensure that all affected residents receive compensation.

I will not stand by idly and allow my daughter or other children in the community to suffer because of short-sighted, profit-driven decisions. If the council permits this application to proceed, I will personally make it my mission to ensure that all those who have contributed to allowing such an atrocity to take place are held professionally and financially accountable for any harm caused.

Conclusion

In light of the above concerns, I urge Swansea Council to reject this application in the best interests of the health and well-being of local residents, and more importantly, the children who will be disproportionately affected by the pollution that this incineration plant would bring. There are countless other areas, far from residential neighbourhoods and schools, where such an installation could be located without endangering public health. I strongly suggest that Tyregen UK Limited explore these options rather than imposing unnecessary risks on our community.

To allow this incineration plant to be established so close to homes and a school would demonstrate a grave disregard for the duty of care that local authorities owe to their residents. The community, and more specifically, its children, must come first.

I thought this was 2024. We should be doing better!

My child is in school in waunarlwydd the burning of tyres would be detrimental to her health along with the other children in the schools in waunarlwydd

Near residential properties which will decrease in value.
All the health risks and pollution it will cause.

We have a yard right next to where this application is for a 3 meter flue is not tall enough depending on wind conditions will fill the yard with toxic waste all day every day

As a local resident I object to this proposal on the grounds that myself & my family do not want to be breathing in all the fumes this plant would generate.

I live in close proximity to this site and am strongly against this proposal due to probable environmental issues causing possible health issues

Due to the past history of tyre fires causing pollution, smell and long time smouldering afterwards I object to this plant being too near our village.

Two schools in Waunarlwydd 3 in Gowerton it's also right next to 2 care homes of which most have breathing problems as it is. Impact on wildlife.

It would be horrendous here. Air Pollution is not great now but to add this. I have asthma and sleep apnoea. Please don't do this to me!

I strongly disagree to this happening in our area .

This area is becoming a trap for pollution not only through traffic, noise (all through the night, constant machinery clanging) and the smell from sewage works, we shall now have to endure more pollution.

The traffic through Waunarlwydd/Gowerton has now become unbearable, where the roads become gridlocked, indicative of a major problem. It is a thoroughfare to and from Swansea West, North Gower and the M4, therefore extra traffic for this proposed development would only exacerbate this problem. Allowing this would set a precedent for further development. The area is already struggling with pollution.

Object to pollution by rubber burning

Worries about air pollution with a child who's was born premature and suffers with asthma

I strongly disagree to this happening in our area .

This will be distractions for the community and the health of all, breathing in all that waste

It right behind my house and smoke and pollution be horrendous

Ive got Cancer and suffering bad chest infection alot

To think your even going to consider an application from a company wishing to burn tyres within a built up area, which includes two schools and three residential care homes, is astounding.

Im sure common sense will prevail and this outrageous application will of course be denied.

If not Im sure there will be uproar and an immediate request for an inquiry into the whole application process.

Waunarlwydd is a small village and this is not something that will benefit Waunarlwydd in the slightest, there are schools and school children in the vicinity and we dont want smoke and fumes 25 hours a day, it would not bring jobs, it would not bring revenue, it is simply not needed.

Bad for everyones health and the wildlife

This will have a serious and detrimental effect the the health of residents both young and old. The environmental impact let alone the health impact will be catosphical in the area. The damage caused by years of heavy industry in the area is finally being noticed.

My Child goes to Ysgol Logan Fach, and plays for Waunarlwydd RFC I don't believe burning tyres in the area is at all good for their health! In a world where emissions and pollution is vital and we are all told to do our part to help save the planet for the future generations this is certainly not something that should be opening up on a local communities doorstep. I wholeheartedly reject this application.

Many Thanks

Very concerned about thsi proposal and the impact the business use would have on everyone health.

If this goes ahead it will have serious consequences on people's health

Having a young family I am deeply concerned about the impact on air pollution/environment

I am a mother of two children who live in the waunarlwydd area and am concerned about the air pollution. I don't want my children breathing in burning fumes.

I strongly object to the application to build a tyre incineration plant in a built-up area, particularly near routes frequently used by children walking daily to and from local schools. Tyre incineration releases harmful pollutants, posing serious health risks, including respiratory issues and long-term environmental damage. Locating such a facility in a residential area endangers the well-being of the community, especially vulnerable populations like the elderly and children. The safety, air quality, and overall health of residents should take precedence over industrial development. A more suitable, isolated location must be considered for such a project.

The emissions will have a detrimental effect on the community. The document attached suggests batch burning of 5.5 hours per day with a minimum of 3 batches per day. The smell and pollution of the area will have health implications, lower the cost of the housing market and release more emissions. The application has already been refused by NPTCBC.

My children go to the primary school, the burning of anything is dangerously for the health of children and my parents live on that street I am concerned for their health if this went ahead, it should not be possible for something like this in a residential area

Don't think it'll be good for the area having added up all the pros and cons. Great that it will provide jobs but the constant waste burning although not hazardous I still believe will not be great for the area or the city.

A horrendous plan to which I strongly object to on grounds of pollution and importantly the health implications for the two primary schools in close proximity and all those residents living in the surrounding areas.

As a country we are working towards net zero in terms of carbon emissions.

I believe polluting incinerators such as this pump out terrible volumes of toxic gases and will be detrimental to our green/environmental efforts elsewhere in Swansea.

Visibly smoke plumes would look terrible.

I don't believe the company would be able to make emissions from burning tyres ever safe to happen near where people live.

Please don't inflict this on us.

I am concerned of the impact of burning tyres in a residential area, the impact on the environment, possible health implications for those that live nearby including myself and my family.

So close to a residential area. The health ramifications too.

I object to this proposal

Not good for people health and obstruction it will course

I don't want to have this plant near my home with the constant smell of Smoke and the effect on the environment

I work in the area, I don't want to be around those chemicals burning

This factory is very close to three schools and football and rugby facilities for children.

A facility like this should not be built so close to a residential area, due to issues with air quality and noise pollution. I strongly object, along with all other local residents I've spoken to.

Living at 12 Roseland Road and the pollution and dirt that will be produced from this will be no good for our health or our homes. It is too close to home it needs to be done in a rural area.

I strongly object to this application. We already have IMCO on the same burning no one knows what through the night you can see the smoke billowing out the last thing this area needs is more toxic fumes for the public to inhale.

I strongly object to this application. We already have IMCO on the same site burning, no one knows what. You can smell and see the fumes billowing from that factory into the atmosphere all night. The last thing this area needs is more toxic fumes for the public to inhale. This is a public health concern.

Too much pollution!!!

.

Do not want this facility this close to my family home

Don't want any more Lorry's and traffic on the roads in the area, congestion is high enough as it is. Air pollution it also too high

KFC is stinking half that area there is no need to get worse

This is a built up, community area with a number of new housing sites adding to the environmental (air pollution/ green house gas) and traffic conditions. Additionally, there will be a need to dispose of potentially toxic ash following the incineration process.

There are two primary schools nearby where children should be entitled to safe and clean environments, ensuring good health during their early development, particularly outdoors.

We have 2 schools, multiple sports teams who train in the village along with elderly care homes residential areas.

Everyone has seen the health and environmental impact of the steel works in port talbot, it is unbelievable that this has even been considered for such a built up village. Very poor planning and will be disgusted in the council if this is approved!

With family members that suffer with breathing related illness having this factory would be detrimental to the health of not only mtly family but many others in the Gowerton and Waunarlwydd villages.

Facility would be too close to a number of local schools, walking routes and residential areas.

Road speeds in the area (and surrounding areas) have been reduced to help with air pollution but this would affect the air in the area.

Overall I can only see negatives for the local community and do not support this.

The fumes from burning tyres could cause health issues in the local area, this type of activity should take place away from built up areas

As the crow flies and so the wind, this is extremely close to homes but also schools within Waunarlwydd and Gowerton. I urge you to look at Arial images of this and note the proximity of 2 primary schools and 2 secondary schools but also where this industrial area lies to Gowerton, Waunarlwydd and Fforestfach.

We see road speeds reduced for emissions across Wales but this is then being allowed in urbanised areas, crazy! Hopefully sense will prevail in this case and such operations should be carried out at sites further from 3 large villages.

I object to this kind of operation in such close proximity to residential areas where such pollution could adversely affect people's health and affect their quality of life.

This could cause a huge amount of issues towards our natural surroundings, air purity and not to mention Waunarlwydd is densely populated with children and they do not deserve to be breathing is toxic air.

There are 2 schools in Waunarlwydd, along with a rugby and football club, the pollution this would put into the air is hazardous and this will impact the health of children and local residents.

These business need to be in a secluded area not close to residential homes.

This proposed installation is in close proximity to houses in Roseland Road and other properties in Waunarlwydd. We all ready get noise and pollution/smells from this industrial site. Also planning permission has been given for houses to be built at the bottom of Roseland Road and the intent for further development even closer to the site from Fforestfach to Garngoch.

The access to and from the site via Waunarlwydd will present significant pollution and congestion problems in an already congested area. Access from anywhere will add to the pollution levels via exhaust fumes and emissions before any processes the Plant say they will undertake to reduce any pollutants escaping.

There several schools in the near vicinity as well as residential areas. This Plant will impact on their wellbeing and standard of living. Asthma suffers and those with respiratory illnesses will undoubtedly suffer leading to a detriment in public health. The sheer weight of the delivery vehicles will take its toll on the roads in the area, many of which are already pothole ridden.

The noise produced by any factory, let alone this one can be heard in Gowerton where I live over a mile away.

Noise and pollution can only have a negative impact on wildlife in the area let alone humans.

I strongly object to having an incinerator plant so close to my home. Especially when it concerns burning tyres, the company that wants to install it will most probably promise to keep emissions under control but if anything goes wrong we are the people it will effect and no machinery is fool proof so it is a disaster waiting to happen. Where are they going to store the tyres waiting to be incinerated? What if they catch fire? We all saw the affects of burning tyres in Fforestfach a couple of years ago and they want to put a collection point of tyres very near a highly populated area. Where is the sense?

Has there ever been any incidents with these incinerators in the past? There is so much we do not know about this process but there is one guarantee - things do go wrong and we are the ones that pay the price.

Please do not allow this plan to be passed.

I would like to object to an incinerator being used at this site due to the hazardous products produced through this process.

Air pollutants such as particulate matter, which cause lung and heart diseases

Heavy metals such as lead and mercury, which cause neurological diseases

Toxic chemicals, such as PFAS and dioxins, which cause cancer and other health problems

These chemicals and pollutants enter the air, water and food supply near incinerators and get into people's bodies when they breathe, drink, and eat contaminants.

They need to think of a better way to reduce waste products.

This level of toxic emission in the middle of a village and stones throw from the school is unreal. I cant believe there is any need to object, as surely this cant go ahead.

Two primary schools in the local area, pollution, consequence of poor health, unsightly, small quiet village - this development will have a significant impact. I strongly object.

My children go to the school just up the road and I have serious concerns for their health if this was to go ahead

I would like to strongly object against this proposed planning application.

The comments in the application around odour / smell are not satisfactory. Saying things like it “may also release odorous emissions” and “unlikely to be significant odour” is simply not acceptable. In a development as significant as this, this level of detail needs to be absolutely clear and further assurances are needed.

I’d also disagree on the implication that 230m away from a “sensitive property” is a significant distance. It isn’t. Many residential houses, nursing homes and schools are nearby. Has this actually been measured and what is meant by “sensitive property”?

This is essentially burning tyres. The council is obliged to investigate this aspect further as the information to date is subpar.

I strongly oppose this application. Due to the nature of business, whilst stating it will be incinerating non hazardous waste, by the very nature of burning tyres this will create further high amounts of pollution in the area. Family homes within the local area will be affected and this will contribute to respiratory problems for some. I myself suffer from asthma and have previously been affected by businesses of this nature. There is also a care home for the elderly almost immediately next to the proposed site where many in the residents have breathing and respiratory issues. Not to mention the nearby school which this proposal in turn would present issues to the children's health.

Living at my address there is already too much heavy traffic due to the factories already there and further amounts of trucks coming to Waunarlwydd would increase traffic, presenting more problems. This proposal also presents issues to local wildlife. I strongly oppose this application

Saying there may be an odour is not acceptable. This needs investigating further. I live close to this site and do not want to smell burning tyres all day long.

I have a very young daughter and live close to this site. I am extremely concerned about pollution and the impact this will have on our lives.

I am

Doing my bit with my family to help the environment by having electric cars etc and recycling as much as possible and I feel this will pollute the environment to much . I know everyone is trying

To save our planet environment as best we can but this isn't the best idea to put this where it's not far from wildlife and it will undo basically all the hard efforts everyone is trying to do to save our planet. I am not a green person but I try my hardest to make sure that the environment is one that comes first when it comes to things like this and I don't wanna be breathing in unclean air

I am writing to formally object to the proposed pyrolysis plant at unit 2 Westfield Industrial Estate SA5 4SF, which is located approximately 640 meters from my residential property. My objection is based on the potential health risks associated with air pollution from the facility, particularly in relation to emissions of nitrogen dioxide (NO₂), particulate matter (PM₁₀ and PM_{2.5}), volatile organic compounds (VOCs), and other hazardous substances.

1. ****Air Quality and Public Health Risks****

The emissions from the pyrolysis plant, as detailed in the air emission risk assessment, include nitrogen oxides (NO_x), fine particulate matter (PM₁₀ and PM_{2.5}), benzene, 1,3-butadiene, dioxins, and heavy metals such as arsenic, cadmium, and nickel . These pollutants are known to have serious health impacts, particularly for vulnerable populations such as children, the elderly, and individuals with pre-existing respiratory conditions.

- ****Nitrogen Dioxide (NO₂)****: The plant's predicted process contribution (PC) for NO₂ is as high as 21.7% of the annual Air Quality Assessment Level (AQAL), a significant level that cannot be ignored . Long-term exposure to NO₂ is linked to respiratory issues and exacerbation of asthma.

- ****Particulate Matter (PM₁₀ and PM_{2.5})****: PM₁₀ and PM_{2.5}, which contribute to respiratory and cardiovascular diseases, also pose significant risks. Although the predicted contribution of PM₁₀ emissions is lower, the plant still contributes 1.3% of the AQAL . This is particularly concerning given the proximity of residential areas where vulnerable individuals could be exposed to harmful particulates.

- ****Volatile Organic Compounds (VOCs)****: The emissions of benzene and 1,3-butadiene are of particular concern, with the process contribution of 1,3-butadiene reaching 45.9% of the AQAL . Benzene and butadiene are classified as carcinogenic and can lead to long-term health risks, including leukemia.

- ****Heavy Metals****: The assessment reveals significant levels of arsenic and cadmium emissions from the plant . Arsenic, even at low concentrations, is associated with increased cancer risks. The background levels of arsenic in the area already account for 16% of the AQAL, which, when combined with the plant's emissions, could lead to cumulative health risks .

2. ****Potential Non-Compliance with Air Quality Standards****

The proximity of the proposed facility to residential areas, including my property, raises significant concerns about the plant's ability to comply with air quality standards and objectives. The UK's Air Quality Objectives (AQOs) and European Air Quality Limit Values (AQALs) are set to protect public health, and any exceedance can result in serious consequences for local residents.

According to the assessment, the levels of NO₂, benzene, and 1,3-butadiene

emissions are concerning, particularly given that the cumulative exposure from both background concentrations and plant emissions could lead to exceedances of the AQALs . The assessment has not adequately considered the potential for cumulative impacts from other sources of pollution in the area.

3. **Health Implications for Sensitive Receptors**

Sensitive receptors, such as residential areas, schools, and care homes, are located within close proximity to the proposed plant. The Environment Agency's guidance highlights that health impacts cannot be ruled out if predicted contributions are greater than 1% of the AQAL for long-term exposure . The predicted contributions for NO₂, PM₁₀, and VOCs from the plant exceed this threshold, posing significant risks to nearby residents, including my family.

4. **Uncertainty in Air Quality Predictions**

The report also acknowledges several uncertainties in the air quality predictions . The use of worst-case assumptions in the modelling suggests that the actual impacts could be even greater than predicted. This uncertainty, combined with the significant health risks associated with the plant's emissions, makes the proposal unacceptable.

5. **Request for Refusal**

Given the potential health risks posed by the emissions from the pyrolysis plant and the significant uncertainty surrounding the predicted air quality impacts, I respectfully urge the council to refuse planning permission for the proposed development. The health and well-being of the local community should take precedence, and the risks associated with this facility are too great to be ignored.

Object!!!!!! As a young family we do not want anything being incinerated in our area let alone tyres! Its a big nope from us

As a local resident living in near to this facility, I am very concerned about what the impact on our health and wellbeing would be if this is given the go ahead, myself and my child are asthmatic, and since I had covid my asthma has already worsened, my child was also born premature and has a weakness with her chest. my bedroom window and the whole front of my home faces this facility, i overlook it from upstairs, will I be unable to have my windows open? Will I be unable to sit in the comfort of my garden? The affects are unknown currently as the facility is not up and running. I am planning on spending and enjoying the rest of my life in my home I want to be able to do that as I am now, without fear for my health from fumes. The government are aiming to reduce emissions, if this is approved then this is an increase in emissions in a residential area, with carehomes, and schools. What will happen if it gets approved

and starts affecting residents lives? Do we all have to then sell/move homes just to be able to breathe easy and be able to have our windows open for fresh air? This development is a great concern to myself and many others, and I am putting my objection forward. We moved here to be able to enjoy the outdoors and would like to be able to continue to do so.

I live in the village. Extra pollution, noise and the roads can't take anymore trucks

Appendix B

Mr. Dennis Egan
Tyregen UK Limited
108 Cecil Road
Gorseinon
Swansea
SA4 4BY

Please ask for: Tom Price
Direct Line: 01792 635600
E-Mail: pollution@swansea.gov.uk
Our Ref: K67332
Your Ref:
Date: 31st January 2025

Dear Mr. Egan,

THE ENVIRONMENTAL PERMITTING (ENGLAND & WALES) REGULATIONS 2016
TYREGEN UK LIMITED. SMALL WASTE INCINERATION PLANT APPLICATION

I am currently going through the file of information that you have submitted by post and will respond shortly. As a result of the site visit before Christmas, please could you provide answers to the following:

1. Please confirm the final height of the stack for the installation. The application refers to a 3-metre stack. There is concern over this height as there is 17.5 metre building adjacent to propose location.
2. Describe the operation of the hydro seal? What is its purpose and function.
3. Please describe the desulphurisation process and how the syngas is cleaned.
4. Please confirm the method of Dust Filtration to be used and how it will work?
5. In section 3.10 of the Non-Technical Summary reference is made to the removal of wastewater. Please explain what the process is, why and how this process is carried out?
6. In section 7.4 of the Non-Technical Summary reference is made to the secondary combustion temperature and residence time. It proposes to use pyrometers to produce temperature map in the furnace. Please provide an update on how this is progressing and supply any proposals.
7. Can you provide an update on a firing diagram for the furnace? Is there any information or manual on the operation of the furnace?
8. What are your plans for dealing with the oil and solid deposits from the pyrolysis process?

Cont'd...

9. Energy recovery is reference within section 10.2 of the non-technical summary. Please describe how the proposals will be carried out.
10. Where is the location for the LPG tank, 32 tonne tank referenced in application?
11. How and where will the pyrolysis gas be stored?
12. Please can you provide an update on the fire prevention management procedures.
13. Where is the location of the 2 * 10,000 litre water tanks?
14. How is the bypass switch activated? Please describe how it is monitored is it linked to the abatement processes?
15. What continuous monitoring systems will be utilised? Which manufacturer company?
16. What environmental management system is to be used what is the accreditation?
17. Confirmation of the batch process is required. Can you set out how it will be carried out, the maximum throughput/capacity of the unit per hour. Please provide the timeline and description of each batch process and the volumes involved.
18. The installation is a high-risk process. Your documentation must consider the likelihood and seriousness of potential environmental impacts.
19. What is the lifespan of the plant slash furnace?
20. Please describe the fire suppression systems to be utilised for firefighting measures. Can you also include the measures to ensure containment of fire water etc.
21. Please describe the risks to soil and groundwater that the installation may cause and how these will be managed to ensure there is no risk to the environment.
22. Where will temperature be measured in the primary combustion chamber?
23. Within the secondary combustion chamber, it is stated that one auxiliary burner will be located. Please update where this will be located and how it will be monitored.

Cont'd...

24. Please confirm the financial ability of the company to operate a facility of this nature.

I look forward to receiving your responses.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Price'. The signature is fluid and cursive, with a large, sweeping initial 'P'.

TOM PRICE
DIVISIONAL ENVIRONMENTAL HEALTH OFFICER
POLLUTION CONTROL & PRIVATE SECTOR HOUSING

Appendix C



Kalaco
Air Pollution Services

Chapel House, Barton Manor, Bristol, BS2 0RL
Tel: 01179 112434. Email: team@kalaco.co.uk

Environmental Permit Questions

Response Note: Pyrolysis Plant, Swansea

Client: Tyregen (De Metals) Ltd

Reference: APS_E1027B_B1-1

Date Published: 3 March 2025

Rev.	Date	Description	Prepared	Reviewed	Authorised
01	27/02/2025	Draft	TW	KL	KL
01	03/03/2025	Minor text updates	KL	KL	KL

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1. Introduction

- 1.1. This Environmental Permit Questions Response Note has been prepared by Air Pollution Services (APS), part of Kalaco (Kalaco Group) in support of the proposed facility at Unit 2, Westfield Industrial Estate, Waunarlwyd, Swansea, SA5 4SF (herein the 'Proposed Facility').
- 1.2. The Proposed Facility is classified as a small waste incinerator plant (SWIP) as set out in article 44 of the Industrial Emissions Directive (IED) and Schedule 13a of the Environmental Permitting Regulations (EPR) and thus requires an environmental permit to operate. A permit application (ref: K67332) was submitted to Swansea Council (SC) in October 2023 and was supported by the following:
 - Non-Technical Summary – Pyrolysis Plant, Swansea, E1027_NTS-5;
 - Air Emission Risk Assessment (AERA) – Pyrolysis Plant, Swansea, E1027A_A1-3; and
 - Modelling files.
- 1.3. A letter was issued on 31/01/2025 by SC with 24 questions to resolve prior to determination of the permit application. These 24 questions are outlined in section 2 along with responses. These responses have been provided by the client and should be considered in the context of the supporting documentation submitted.
- 1.4. This has been marked as confidential given the private data contained such as company balance sheets, and is only for SC to make a determination.

2. Environmental Permit Questions and Responses

Question 1

- 2.1. Please confirm the final height of the stack for the installation. The application refers to a 3-metre stack. There is concern over this height as there is 17.5 m building adjacent to proposed location.
- 2.2. Response:

"The stack outlet is 12 m from ground level and the adjacent building height is 11.4 m at the eaves and approximately 12 m at the apex of the ridge. Figure 1 shows the modelled stack location in relation to modelled buildings. At the time of completing the dispersion modelling assessment a 3m stack was proposed, however this has since been revised to 12 m. The original modelling is considered a highly conservative assessment as a 12 m outlet is expected to provide considerably improved dispersion conditions and a likely reduced risk of impacts."



Figure 1: Modelled Stack Location and Modelled Buildings

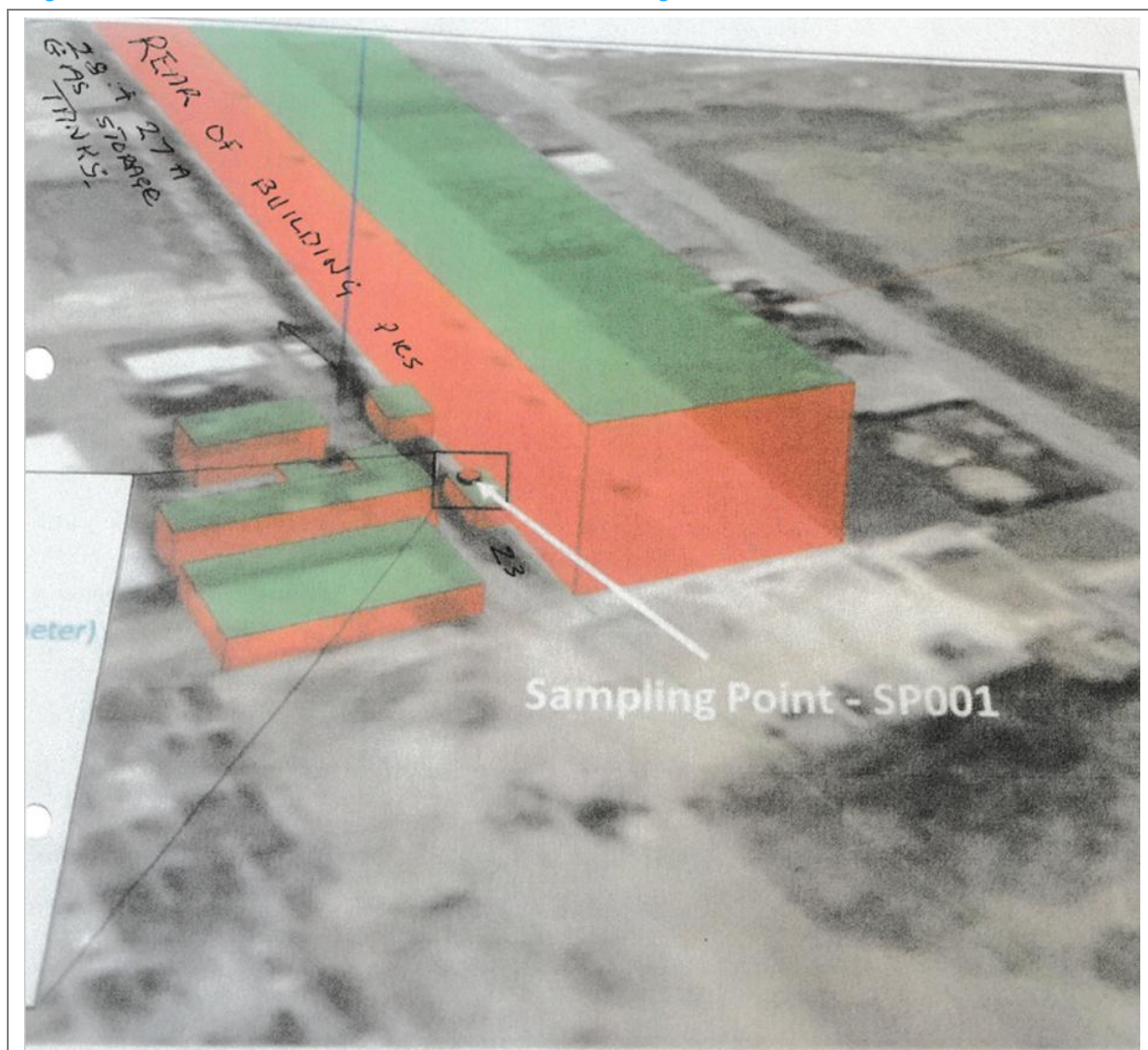


Figure notes: Image provided by the Client.



Figure 2: Stack Location – Ground Level View ^{a b}



Figure notes:

a Image provided by the Client.

b The location that the stack exits the building is above the tank marked P23, 3m above ground level. An additional stack of 9 m length will be connected vertically to this outlet to bring the stack outlet to 12 m, which is above the eaves of the adjacent building.

Question 2

2.3. Describe the operation of the hydro seal? What is its purpose and function.

2.4. Response:

“The function of the Hydroseal is to clean the syngas which fuels the burners.

First the vapour gas is received directly from the manifold. From the tyre pyrolysis oil (TPO) tanks there is one pipe either side taking the gas up into the Hydroseal which is 50% water. This process cleanses the gas of any remaining oil, creating oil water for disposal.

The remaining cleaned gas has a higher calorific value than the natural gas, and is then directed by pipes to the gas burners and oil desulphurisation plant.

This creates a circular process. The natural gas feed to the burners is automatically shut down and the pyrolysis plant begins to power itself from this point on, 100% fuelled by clean syngas.”

Question 3

2.5. Please describe the desulphurisation process and how the syngas is cleaned.

2.6. Response:

“The Desulphurisation process is within the Hydroseal (see Figure 3 for the Hydroseal (water seal) location in the process flow diagram). The syngas enters the Hydroseal tank which holds 30% water.



The syngas floats on top of water. Bubbles and rises to the outlet pipe, it is directed to the gas burners, any oil will fall into the water and at this stage the syngas is 100 % cleaned. There are no chemicals used.

The contaminated water is changed every 3 days along with Tower scrubbers contaminated Water in to the same 10,000 litre holding tank."

Figure 3: Hydroseal (Water seal) desulphurisation

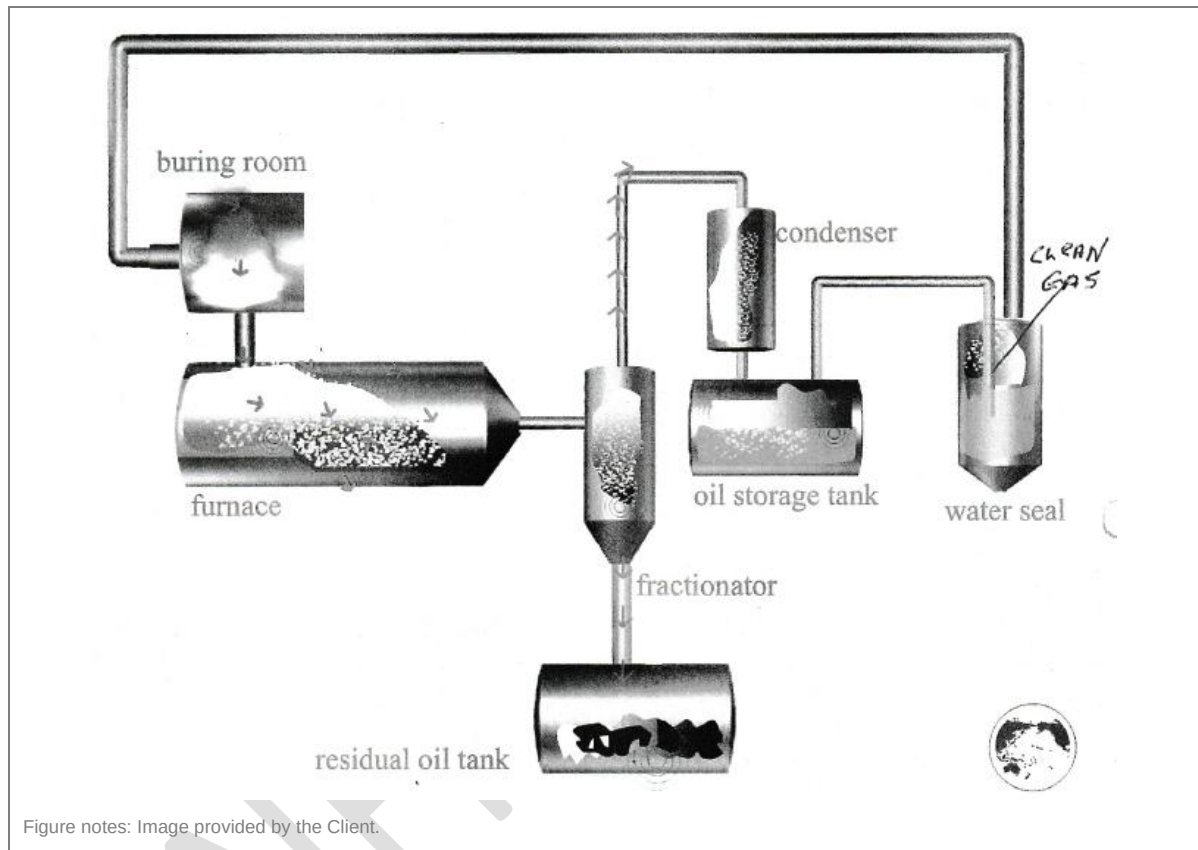


Figure notes: Image provided by the Client.

"The following is a description of the abatement process to ensure the exhaust gas emissions from the burners to the chimney stack for the pyrolysis process are free of dioxins and furans and dust (see Figure 4).

The combustion furnace room containing the burners will achieve a temperature above 850°C. This will be maintained for a minimum of 2 seconds within the furnace room to destroy dioxins and furans at this stage.

In the furnace room, oxygen is added so it reacts with unburnt carbonaceous matter increasing the temperature above 900°C.

The cracking of hydrocarbons virtually removes all oxygenated organics resulting in an increased presence of polyaromatics (insoluble in water). These can be removed by separation in water treatment.

Exhaust gas cools from 900°C to between 300°C and 340°C when it leaves the furnace room via the draft fan.



It then is sucked up by the induced fan to a heat exchanger which rapidly cools the temperature to 150°C.

From here the dirty gas enters the bottom of the first tower scrubbers' tank holding 1,000 litres of water.

When the dirty gas enters the tank, there is a perforated plate with 1mm holes and ceramic filters attached above. The filters are installed so that as the pressurised dirty gas raises any dust particle, they are captured cleaned and deposited in the wastewater tank at the bottom. This system is described as a plate demister / mist eliminator, and is the best available technique (BAT) commonly used in other industrial processes.

1.6 m above the first filters a secondary perforated plate is installed. Above this plate a blade is welded from the wall of the tower. This enables a consistent downward flow spray (4x4 sprays at 75 PSI), to cool the exhaust gas temperature to 80°C as it rises.

As the exhaust reaches the ceramic rings, all the acids and dust are captured, cleaned and collected after filtration and deposited in the wastewater tank at the bottom.

After filtration the gas is rapidly cooled in the scrubber to 80°C then repeated 3 or 4 times. Each time the temperature will drop 25% which from that point is below / outside the range of reaction temperature suitable for the formation of dioxins and furans.

The rapid cooling from 900°C to 340°C and then to 80°C also avoids the re-emergence of dioxins and furans from the de novo effect synthesis range for dioxins and furans formation.

After passing through the third tower, the exhaust gas goes through a demister plate above the sprays stripping carbon black from the stream, providing a final clean prior to chimney stack entry ensuring confidence that there are no dioxins and furans present."

Figure 4: Tower Scrubbers

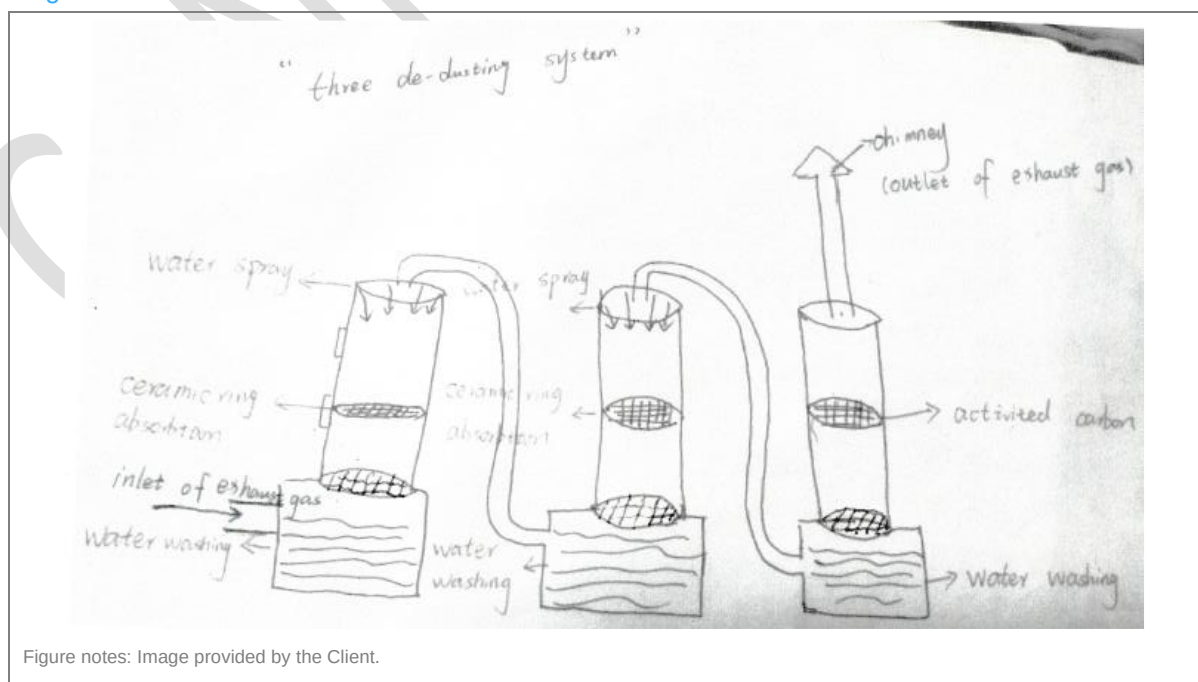


Figure notes: Image provided by the Client.



Question 4

2.7. Please confirm the method of Dust Filtration to be used and how it will work?

2.8. Response:

“Utilises ceramic filtration plates and exhaust gas cooling. Full explanation included in response to question 3.”

Question 5

2.9. In section 3.10 of the Non-Technical Summary reference is made to the removal of wastewater. Please explain what the process is, why and how this process is carried out?

2.10. Response:

“Pressurised dirty gas pushes dust particulates through ceramic filters which captures them, this is then stored in a wastewater tank. Acids and further dust from the cooled exhaust gas is also captured and stored in the wastewater. Further discussion of this is included in the response to question 3.

Once the wastewater tank is full, Egan Waste Services will dispose of the water and solids and provide Tyregen (De Metals) with the appropriate paperwork. An indicative example of the wastewater tank is shown in Figure 5.”

Figure 5: Wastewater Tank Indicative Example



Figure notes: Image provided by the Client.

Question 6

2.11. In section 7.4 of the Non-Technical Summary reference is made to the secondary combustion temperature and residence time. It proposes to use pyrometers to produce temperature map in the furnace. Please provide an update on how this is progressing and supply any proposals.

2.12. Response:



"The precise details are not determined currently but at the time of installation the electrical company will provide the pertinent details and full explanation of the process. The permit will be subject to a requirement for the 850 °C temperature for 2 seconds. This will be confirmed as part of the commissioning to ensure the plant is compliant with a permit. The plant will only be operated in accordance with the permit."

Question 7

2.13. Can you provide an update on a firing diagram for the furnace? Is there any information or manual on the operation of the furnace?

2.14. Response:

"As with the response to question 6, the electrical company will provide the details at installation including the furnace manual. The plant will only be operated in accordance with the permit."

Question 8

2.15. What are your plans for dealing with the oil and solid deposits from the pyrolysis process?

2.16. Response:

"Similarly, as with the response to question 5, waste oils will be captured by filters and taken off site by Egan Waste Services and provided with the necessary paperwork. There are not expected to be solids for disposal other than fine particles which will be captured on filters and removed when filters are serviced. Any black carbon is recovered, processed onsite to produce a fine powder using a micro mill to a particle size of ~ 20 µm. This is then removed."

Question 9

2.17. Energy recovery is reference within section 10.2 of the non-technical summary. Please describe how the proposals will be carried out.

2.18. Response:

"Similarly, as with the response to questions 6 and 7, precise details of the energy recovery process will be provided by the energy company on installation. The plant will only be operated in accordance with the permit."

Question 10

2.19. Where is the location for the LPG tank, 32 tonne tank referenced in application?

2.20. Response:

"The liquefied petroleum gas (LPG) tank will be located outside at the rear of the building. Figure 6 shows the tank and Figure 7 identifies its intended location."



Figure 6: LPG tank



Figure notes: Image provided by the Client.

Figure 7: LPG Tank Proposed Location



Figure notes: Image provided by the Client.



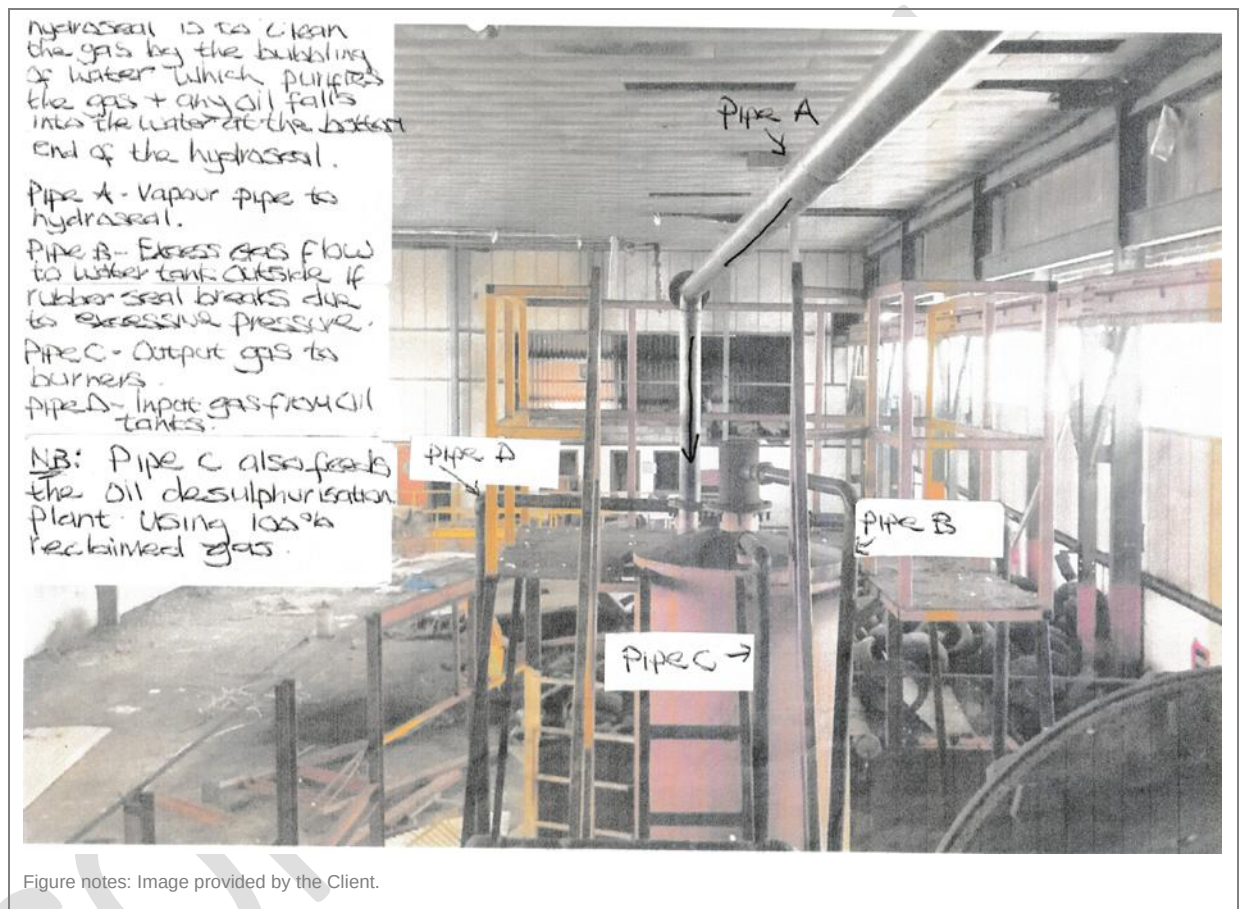
Question 11

2.21. How and where will the pyrolysis gas be stored?

2.22. Response:

"Excess pyrolysis gas goes to a water tank outside the building (following cleaning by hydroséal). Figure 8 shows the plant input and output pipes. Typically pipe B will transmit the clean gas to the water tank. In the event of a rubber seal breakage due to excess pressure, excess gas will be transmitted to the burners via pipe C."

Figure 8: Plant Pipe Diagram



Question 12

2.23. Please can you provide an update on the fire prevention management procedures.

2.24. Response:

"This will be written up when the commissioning of the plant takes place. The plant will only be operated in accordance with the permit and the relevant health and safety policies, environmental management systems and fire prevention management plan."

Question 13

2.25. Where is the location of the 2 x 10,000 litre water tanks?

2.26. Response:

"Outside at rear of building (near LPG tanks), sited underground. Location identified in Figure 7."



Question 14

2.27. How is the bypass switch activated? Please describe how it is monitored, and is it linked to the abatement processes?

2.28. Response:

"A programmable logic controller (PLC) helps manage the process by monitoring conditions. It is connected to the bypass switch and will activate under specified conditions. Precise details are not determined at this stage and will be determined at the commissioning stage by the electrical engineers. The plant will only be operated in accordance with the permit."

Question 15

2.29. What continuous monitoring systems will be utilised? Which manufacturer company?

2.30. Response:

"Stack monitoring provided by CES Environmental Monitoring including DOAC particulate monitoring with MCERTS and or TUV certification to the standards required under WID and BS:EN 14181."

Question 16

2.31. What environmental management system is to be used what is the accreditation?

2.32. Response:

"Accreditation provided in response to question 15. The environmental management system (EMS) will be in accordance with the requirements of ISO 14001:2015, although ISO accreditation will not be sought unless it is a requirement of the permit."

Question 17

2.33. Confirmation of the batch process is required. Can you set out how it will be carried out, the maximum throughput/capacity of the unit per hour. Please provide the timeline and description of each batch process and the volumes involved.

2.34. Response:

"The reactor for a batch has a maximum capacity of 12 tons. There is a semi-automatic loader which the manufacturer recommends a capacity of seven tons per batch."

Pyrolysis batches take seven hours including the loading, pyrolytic transformation and unloading.

Once a batch of processed material is loaded into the pyrolysis retort the main gate is closed which makes the retort airtight. The reactor is then heated by two burners fuelled initially by natural gas. When the temperature in the retort reaches 160°C - 180°C. The rubber begins to crack. The process produces syngas which under its own pressure enters the manifold. This separates the syngas from heavy oil gas. The carbon black falls to the bottom of the retort which is discharged after the 3rd batch.

The heavy oil falls into a residual tank which is pumped out.



The light syngas oil climbs upwards and directed via pipes into two condensers which cool the syngas into pyrolysis diesel oil before being moved to TPO storage tanks underneath the condensers. From here the TPO is sent for refining via desulphurisation.”

Question 18

2.35. The installation is a high-risk process. Your documentation must consider the likelihood and seriousness of potential environmental impacts.

2.36. Response:

“The installation is carried out by Chinese manufacturing engineers. At this stage, 6 operators will be employed to assist the manufacturing engineers and learn the whole function of the pyrolysis plant. Then additional training will be provided over 3 months following the commissioning of the plant. One engineer will stay for 6 months following commissioning to provide additional support.

After installation and on startup, the plant will be filled with 2 tons of water and taken up to maximum temperature. This exercise will show if there are any leaks in the system prior to charging with tyres.

Once engineers are satisfied, 500 kg of tyres will be initially charged. Then the same on each consecutive day up to 7 days so that the plant and brickwork is bedded in quietly.

The PLC electrical engineer will stay and train operators. The manufacturing engineers also have good experience with PLCs so can provide additional support to the operators.

All risks have been considered to ensure safe operation and negligible environmental impacts. Beyond those already set out, should SC request more specific information, it can be provided.”

Question 19

2.37. What is the lifespan of the plant slash furnace?

2.38. Response:

“Expected plant life is 10 years, the same as the brickwork.”

Question 20

2.39. Please describe the fire suppression systems to be utilised for firefighting measures. Can you also include the measures to ensure containment of fire water etc.

2.40. Response:

“Sprinkler systems will be utilised, and all water used will flow into drainage system connected to 10 l holding tanks. The fire brigade will also have access to the water. This will be written up formally as discussed in the response to question 12.”

Question 21

2.41. Please describe the risks to soil and groundwater that the installation may cause and how these will be managed to ensure there is no risk to the environment.

2.42. Response:



"All floors inside the building are concreted with drains embedding into the flooring. The drains led to the underground water tanks, submersible pumps will be used for any overspill into drains. Inside the buildings oil storage tanks will have a wall around each tank, all water discharges and oil will be pumped into outside tanks. Outside of the building where tanks are standing will be concreted with steel mesh of 6 inches. All tanks will be bunded and have walls around each tank. Any rainwater will be channelled into drains. Any water associated with the process will be captured in the drainage system and contained."

Question 22

2.43. Where will temperature be measured in the primary combustion chamber?

2.44. Response:

"There will be 4 temperature gauges and 4 sensors in the furnace room connected to the PLC and they will make contact with the burners and pressure gauges. In terms of the pressure gauges; there will be one on the manifold and one on each side of the TPO oil storage tanks (for gas to hydroseal). All pressure gauges will also be connected to the PLC. To control any potential oversupply of gas to the plant, the plant is run on negative pressure. If the pressure rises the gas and burners will be turned off by the PLC and come back on when pressure gauge returns to normal. Then the retort will call for the correct temperature. This eliminates any excess gas and prevention of emergency stoppages."

Question 23

2.45. Within the secondary combustion chamber, it is stated that one auxiliary burner will be located. Please update where this will be located and how it will be monitored.

2.46. Response:

"The pipe from the plant that turns to the right, exiting the furnace room towards the heat exchanger, will house the burner and is controlled by PLC monitoring. This is shown in the drawing by Element Digital Engineering provided in the SWIP Application."

Question 24

2.47. Please confirm the financial ability of the company to operate a facility of this nature.

2.48. Response:

"Tyregen DE Metals Ltd are the operators with initial funding provided by investors."

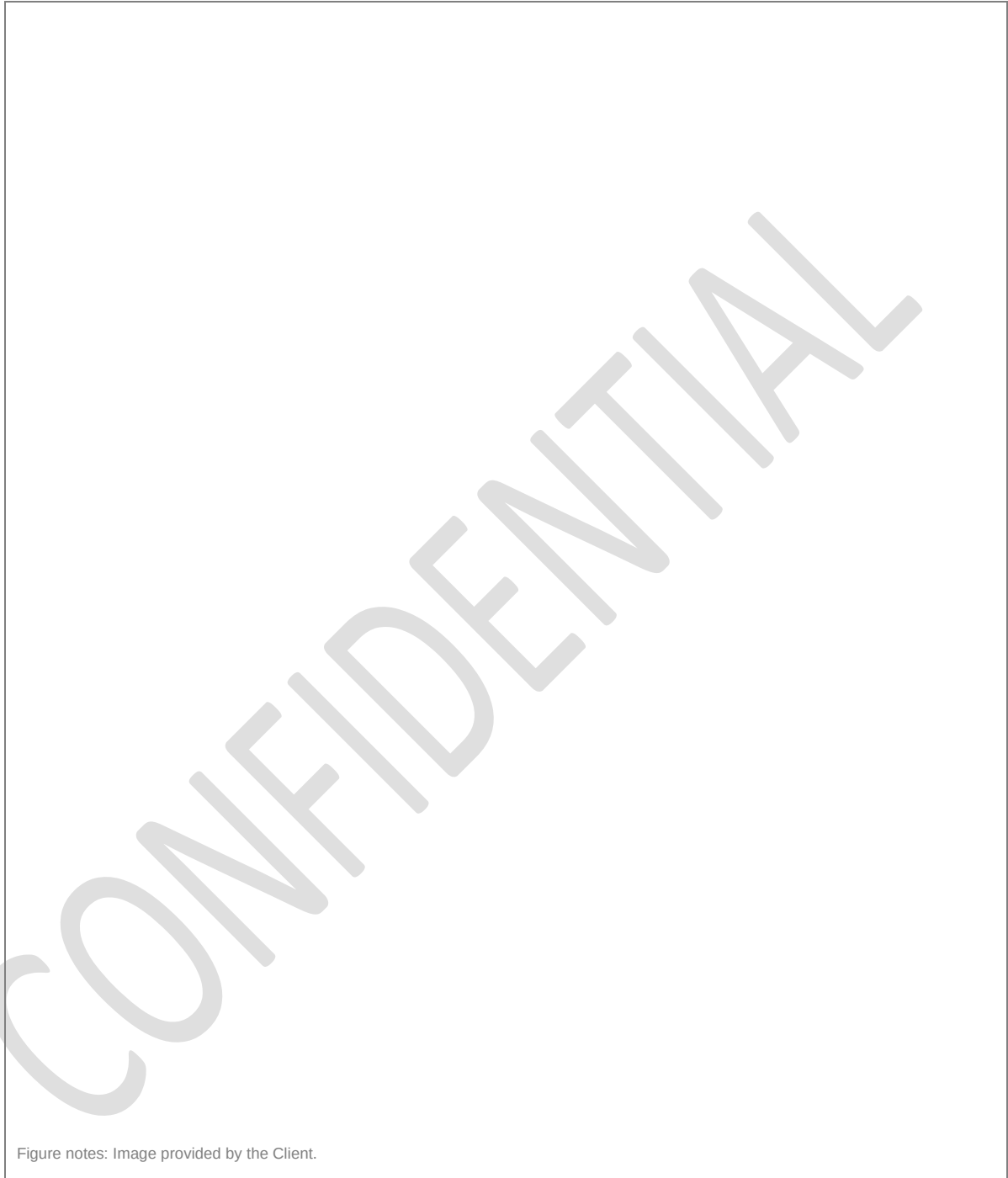
The remainder of the response to this question has been removed on confidentiality grounds.

-



Balance sheet for the operator for years 2022 and 2023 (up to 30 June 2023) is provided in Figure 9.”

Figure 9: Plant Operator Balance Sheet



3. Glossary

AERA	Air Emission Risk Assessment
APS	Air Pollution Services
BAT	Best Available Technique



EPR	Environmental Permitting Regulations
IED	Industrial Emissions Directive
LPG	Liquified Petroleum Gas
PLC	Programmable Logic Controller
SC	Swansea Council
SWIP	Small Waste Incinerator Plant
TPO	Tyre Pyrolysis Oil

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Appendix D

Information Request ref: K67332/TG/FIN/A

Swansea Council
The Environmental Permitting (England and Wales) Regulations
2016. Schedule 5, paragraph 4

Further Information Notice

To Mr Dennis Egan. Managing Director. Tyregen UK Ltd. Argyle House. 10 West Street,
Gorseinon, Swansea. Wales. SA4 4AA.

Swansea Council ("the Council"), in the exercise of the powers conferred upon
it by paragraph 4 of Schedule 5 of the Environmental Permitting (England and
Wales) Regulations 2016 ("the 2016 Regulations") hereby requires you-

(a) to furnish the Council at the address set out above the information
specified in the Schedule attached to this Notice ("the Schedule"), being
information which the Council requires for the purpose of determining your
application dated 30th January 2024;

(b) to furnish that information in writing in the format specified in the schedule;

(c) to furnish that information by the date specified in the Schedule attached
to this Notice.

Signed on behalf of Swansea Council



... Date.....27th March 2025.....

TOM PRICE
DIVISIONAL ENVIRONMENTAL HEALTH OFFICER

An authorised officer of the Council.

EP Permit ref: K67332

Information Request ref: K67332/TG/FIN/A

Schedule

	Information to be supplied to the Council: with reference to your response note APS_E1027B_B1-1, dated 3 rd March 2025	Format of the Submission	Deadline for the Submission
1	In section 2.2 you have provided confirmation that the stack height will be 12m from ground level and that the adjacent building height is 11.4m at the eaves and approximately 12m at the apex of the ridge. However, to clarify, in your response (APS_E1027A_B1-1) dated 10th January 2024, you stated 'The stack (flue) height will be 3m above ground. All air emission risk assessment modelling involved the stack height being modelled at 3m above ground. The reference to 12m is a typo and should be ignored. Within your Non-Technical Summary (E1027_NTS-5 page 4) it states that 'the plant itself will be housed within a 17.5m tall building'. Please can you provide final confirmation of the buildings, heights used in the dispersion modelling as contradiction of parameters has been submitted. Please also confirm the implications of conflicting parameters upon the dispersion modelling.	Written	4 weeks from the date of this notice
2	Please confirm the source/location of the image provided for Figure 2: stack Location – Ground Level View ^{ab}	Written	4 weeks from the date of this notice
3	In section 2.6 you state, 'The contaminated water is changed every 3 days along with Tower scrubbers contaminated water in to the same 10,000 litre holding tank'. Please advise the volumes of contaminated water involved per change.	Written	4 weeks from the date of this notice
4	In section 2.10 it is advised that Egan Waste Services will dispose of the water and solids and provide Tyregen (De Metals) with the appropriate paperwork. Please explain how the company Tyregen (De Metals) is involved? The operator has been confirmed in your response (APS_E1027A_B1-1) dated 10 th January 2024, as Tyregen UK Ltd.	Written	4 weeks from the date of this notice
5	There is the potential for contaminated water to be released during disposal processes. Please can you confirm if the drainage systems, referred to within your application, that run to	Written	4 weeks from the date of this notice

	your storage tanks are already in place or to be installed? If to be installed, how will you ensure that all waters will be captured for storage.		
7	In section 2.14 regarding the firing diagram for the furnace, you confirm that 'the electrical company will provide the details at installation including the furnace manual.' Please can you confirm if the furnace manual exists already and if so why it has not been submitted as part of the application.	Written	4 weeks from the date of this notice
8	In section 2.16 reference is made to the processing of carbon black on site to produce a fine powder. This will be considered as a directly associated activity; please could you supply further specification of this activity and the abatement methods to be utilized.	Written	4 weeks from the date of this notice
10	Section 2.22 – Please provide clarification on the roles of pipes B & C. In the text response it states 'Typically pipe B will transmit the clean gas to the water tank. In the event of a rubber seal breakage due to excess pressure, excess gas will be transmitted to the burners via pipe C' However, the annotations in Figure 8: Plant Pipe Diagram state 'Pipe B – Excess gas flow to water tank outside if rubber seal breaks due to excessive pressure. Pipe C – Output gas to burners'. Please confirm the process should a rubber seal break due to excessive pressure.	Written	4 weeks from the date of this notice
11	In section 2.24 reference is made to the provision of health and safety policies, environmental management systems and fire prevention management plan to be written up upon commissioning. Given the high-risk nature of the proposed facility, the proximity of residential properties and the high volume of responses received, during the consultation stage, expressing concern I would require information to set out the response to fire/explosion and prevention of harm.	Written	4 weeks from the date of this notice
12	In section 2.26 reference is made to the 2 x10,000 L underground water tanks. Can you confirm that these have not been installed yet.	Written	4 weeks from the date of this notice
13	In section 2.28 reference is made to activation of the bypass switch. Please can you confirm that if Bypass occurs that an unabated release does not occur.	Written	4 weeks from the date of this notice
14	In section 2.30 reference is made to stack monitoring being provided by CES	Written	4 weeks from the date of this notice

	Environmental Monitoring. This does not match the information you provided in your submission received in January 2025. Please confirm your intentions for monitoring of stack emissions.		
15	In Section 2.36 reference is made to the installation being carried out by Chinese manufacturing engineers. It is also advised that 'all risks have been considered to ensure safe operation and negligible environmental impacts'. Please can you provide information/evidence from the Chinese manufacturing engineers to support these statements.	Written	4 weeks from the date of this notice
16	In section 2.40 reference is made to fire suppression systems. Can you set out how the proposed drainage system will contain firewater? Given the high-risk nature of the proposed facility a significant volume of water would be required should an incident take place. Please set out how these measures have been considered. Have you been in contact with the Fire Service, what plans are in place for the wider site for fire mitigation.	Written	4 weeks from the date of this notice
17	In section 2.42 it is advised that the drains will flow to the underground water tanks. Given the multiple bunded areas that may have water collecting, at what stages will the underground tanks be emptied and what consideration will be made for provision of potential fire water.	Written	4 weeks from the date of this notice
18	In section 2.43 the question asks where temperature will be measured in the primary combustion chamber. The answer in section 2.44 stated where the pressure gauges will be located but does not say where temperature will be measured.	Written	4 weeks from the date of this notice
19	In section 2.48 financial information is supplied for Tyregen DE Metals Ltd. Please can you explain what involvement this company has in the application. You have confirmed previously that the operator will be a company called Tyregen UK Ltd. Please provide the financial ability for Tyregen UK Ltd to operate a facility of this nature.	Written	4 weeks from the date of this notice

Signed on behalf of Swansea Council



..... Date.....27th March 2025.....

TOM PRICE

DIVISIONAL ENVIRONMENTAL HEALTH OFFICER

An authorised officer of the Council.

Appendix E



Kalaco
Air Pollution Services

Chapel House, Barton Manor, Bristol, BS2 0RL
Tel: 01179 112434. Email: team@kalaco.co.uk

Environmental Permit Questions

Response Note: Pyrolysis Plant, Swansea

Client: Tyregen De Metals Ltd

Reference: APS_E1027B_B2-1

Date Published: 28 April 2025

Rev.	Date	Description	Prepared	Reviewed	Authorised
01	28/04/2025	Issued	GB	CH	CH

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1. Introduction

- 1.1. This Environmental Permit Questions Response Note has been prepared by Kalaco (Formerly Air Pollution Services), in support of the proposed facility at Unit 2, Westfield Industrial Estate, Waunarlwyd, Swansea, SA5 4SF (herein the 'Proposed Facility').
- 1.2. The Proposed Facility is classified as a small waste incinerator plant ([SWIP](#)) as set out in article 44 of the Industrial Emissions Directive ([IED](#)) and Schedule 13a of the Environmental Permitting Regulations ([EPR](#)) and thus requires an environmental permit to operate. A permit application (ref: K67332) was submitted to Swansea Council ([SC](#)) in October 2023 and was supported by the following:
 - Non-Technical Summary – Pyrolysis Plant, Swansea, E1027_NTS-5;
 - Air Emission Risk Assessment ([AERA](#)) – Pyrolysis Plant, Swansea, E1027A_A1-3;
 - Modelling files; and
 - Report to respond to regulator questions – Permit Application Response Note E1027B-B1-2
- 1.3. A letter was issued on 31/01/2025 by SC containing 24 questions to be resolved prior to the determination of the permit application. These questions were answered by the applicant in a previous report (reference APS_E1027A_B1-1) dated 10/01/2024.
- 1.4. SC issued an additional letter on 27/03/2025 containing 17 outstanding questions to be resolved. These are provided in Section 2 with the corresponding responses (no questions numbered 6 and 9 were provided, the final question is numbered 19). These responses, which should be considered in the context of the submitted supporting documentation, have been provided by Tyregen DE Metals Ltd, the client.
- 1.5. This submission has been marked confidential due to the inclusion of business sensitive data and is only provided to enable SC to make a determination. It should not be used for any other purpose.
- 1.6. The operator will ensure that the facility operates in compliance with the permit and that the equipment conforms to UK regulations. The operator will provide confirmation and assurances regarding each element of the facility and the permit to the regulator.
- 1.7. The operator is aware that if the facility does not conform to the requirements of the permit, it will be in breach of the permit, and regulatory action against the operator is expected.

2. Environmental Permit Questions and Responses

Question 1

In section 2.2 you have provided confirmation that the stack height will be 12m from ground level and that the adjacent building height is 11.4m on the eaves and approximately 12m at the apex of the ridge.

However, to clarify, in your response (APS_E1027A_B1-1) dated 10th January 2024, you stated 'The stack (flue) height will be 3m above ground. All air emission risk assessment modelling involved the stack height being modelled at 3m above ground. The reference to 12m is a typo and should be ignored.'



Within your Non-Technical Summary (E1027_NTS-5 page 4) it states that ‘the plant itself will be housed within a 17.5m tall building’.

Please can you provide final confirmation of the buildings, heights used in the dispersion modelling as contradiction of parameters has been submitted. Please also confirm the implications of conflicting parameters upon the dispersion modelling.

- 2.1. Response:
- 2.2. “The exhaust from the plant will exit the building at a height of 3 m. The drainpipe shown exiting the building in Figure 1 represents the location where the proposed flue will exit. An additional 9 m of flue will be installed on top of the flue (where it exits the building and shown in Figure 1), resulting in a total height of 12 m above ground level.
- 2.3. The eaves of the building housing the pyrolysis plant is 11.4 m high. Other buildings on the site range in height from 2.5 m to 4.4 m.
- 2.4. Table 1 provides the modelled heights and parameters used in the original modelling. The modelled flue height of 3 m does not reflect the actual flue height of 12 m. The building housing the pyrolysis plant is 11.4 m high in reality, whereas it was modelled at a height of 17.5 m. The modelled exhaust flue and buildings are shown in Figure 2.
- 2.5. The modelled heights of the exhaust flue and the building would represent worst-case conditions, as a reduced flue height typically leads to less dispersion of air pollutants and a greater likelihood of higher concentrations. Additionally, a higher modelled building height would also inhibit dispersion. In reality, the increased height of the flue stack and the lower actual building height will aid in the dispersion of exhaust gases. Therefore, the modelling represents worst-case air quality impacts on human health and ecological receptors.”



Figure 1: Buildings at the Facility (where proposed exhaust flue exist the building)



Figure notes: Image provided by the Client.

Table 1: Actual and Modelled Parameters

Parameters	Actual Height (m)	Modelled Height (m)
Exhaust Flue	12.0	3.0
Building Housing Pyrolysis Plant	11.4	17.5
Building / structures near and below the exhaust flue	2.5 – 4.4	2.5 – 4.4



Figure 2: Modelled Stack Location and Modelled Buildings

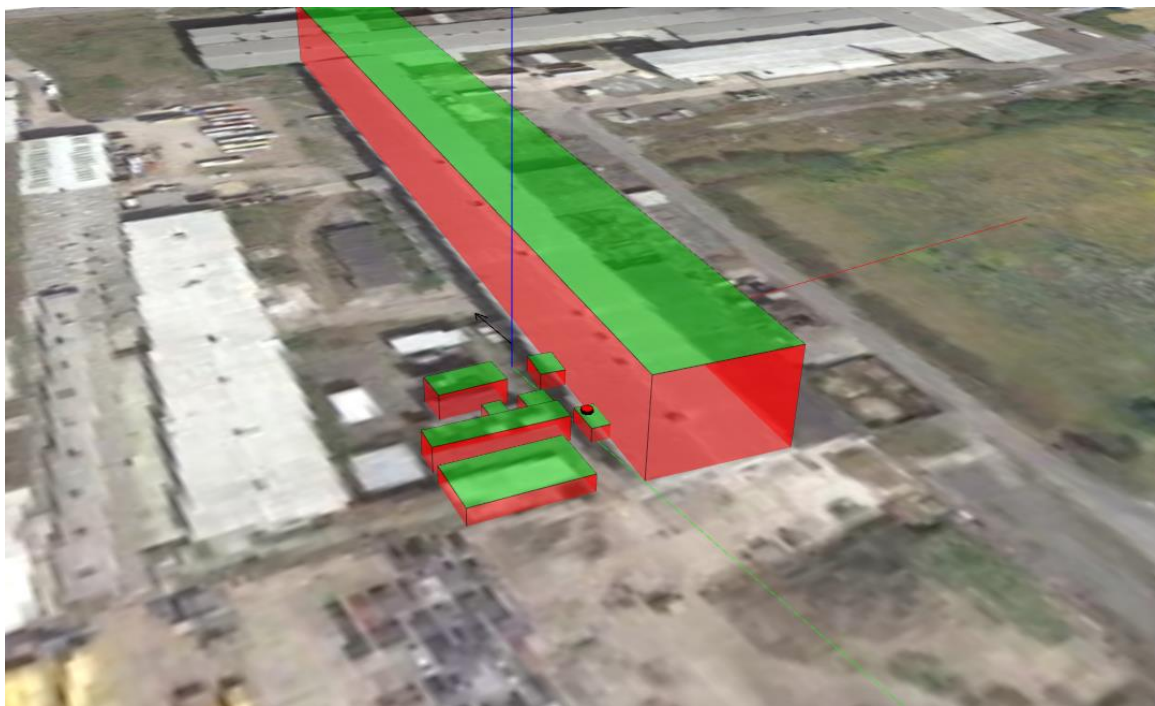


Figure notes: Image provided by the Client.

Question 2

Please confirm the source/location of the image provided for Figure 2: stack Location – Ground Level View

2.6. Response:

2.7. “The image was taken by the client and provided to Kalaco as supporting evidence. It was used to provide context regarding the potential layout of the facility. However, the image was taken at a different site, not at the location of the proposed facility. Therefore, the Council should not consider this image in relation to the proposed site.”

Question 3

In section 2.6 you state, ‘The contaminated water is changed every 3 days along with Tower scrubbers contaminated water into the same 10,000 litre holding tank’. Please advise the volumes of contaminated water involved per change.

2.8. Response:

2.9. “The tower scrubbers have an approximate capacity of 1,000 litres per tank, with three tanks in total. During each change, approximately 900 litres of water is discharged per tank, resulting in a total of approximately 2,700 litres of contaminated water per cycle. This water contains solids removed from the combustible gas during the scrubbing process.

2.10. There will be four underground holding tanks on-site, each with a capacity of 10,000 litres. These tanks will be emptied approximately every 11 days by Egan Waste Services Ltd. All disposal activities will be documented, and the appropriate paperwork will be issued to operator.



- 2.11. In addition, water discharged from the hydroseal system will contain oil. This will be processed through an on-site oil-water separator. Recovered oil will be processed alongside other oil produced from the pyrolysis reactor. The separated water will be directed to a 30,000-litre cooling tower, which is part of the site's closed-loop system, meaning no wastewater is discharged from this process."

Question 4

In section 2.10 it is advised that Egan Waste Services will dispose of the water and solids and provide Tyregen (De Metals) with the appropriate paperwork. Please explain how the company Tyregen (De Metals) is involved? The operator has been confirmed in your response (APS_E1027A_B1-1) dated 10th January 2024, as Tyregen UK Ltd.

- 2.12. Response:
- 2.13. "Tyregen UK Ltd is the sole operator of the facility and is fully responsible for all operational and regulatory obligations. Tyregen (De Metals) Ltd is a separate legal entity established for patent and intellectual property purposes only. It has no involvement in the operation or permitting of the site.
- 2.14. All documentation from Egan Waste Services, including waste transfer notes, will be issued to Tyregen UK Ltd as the designated operator."

Question 5

There is the potential for contaminated water to be released during disposal processes. Please can you confirm if the drainage systems, referred to within your application, that run to your storage tanks are already in place or to be installed? If to be installed, how will you ensure that all waters will be captured for storage.

- 2.15. Response:
- 2.16. "At present, the drainage system has not yet been installed at the site. Installation will be undertaken by qualified civil engineers as part of the wider infrastructure works, which will be completed during the installation of the pyrolysis tyre processing lines and the carbon black milling plant.
- 2.17. The drainage system will include both surface and underground elements and will be designed to ensure the full capture and containment of potentially contaminated water. It will direct all such waters to designated storage tanks, in accordance with regulatory requirements.
- 2.18. All drainage works will be subject to inspection, testing, and verification to ensure compliance with the relevant environmental and permitting standards. The design will ensure that no water is permitted to accumulate or remain on the factory floor, and that all runoff is appropriately managed and contained."

Question 7

In section 2.14 regarding the firing diagram for the furnace, you confirm that 'the electrical company will provide the details at installation including the furnace manual.' Please can you confirm if the furnace manual exists already and if so why it has not been submitted as part of the application.

- 2.19. Response:



-
- 2.20. "The firing diagram and furnace manual are not currently available and will be provided by the appointed engineers upon installation of the equipment in the United Kingdom.
- 2.21. It has been confirmed by the appointed engineers that development of the firing diagram is dependent on the physical installation of the system and cannot be completed in advance. They have advised that this documentation, along with the relevant certificates and operating details, will be made available prior to the commencement of any operational activities.
- 2.22. It is proposed that submission and approval of this documentation be included as a condition of the permit, ensuring that no manufacturing or processing can begin until all reports, firing diagrams, and supporting documentation have been reviewed and approved by the regulator.
- 2.23. The current application does not seek permission for any research and development activities. Information on furnace operating parameters, including the requirement to achieve a minimum temperature of 850°C held for two seconds, has already been included in the application under IED compliance requirements."

Question 8

In section 2.16 reference is made to the processing of carbon black on site to produce a fine powder. This will be considered as a directly associated activity; please could you supply further specification of this activity and the abatement methods to be utilized.

- 2.24. Response:
- 2.25. "Following discharge from the reactor, carbon black is transported via a cyclone separator to a 5-tonne hopper. The carbon black at this stage typically consists of particles in the range of 1–5 mm, similar to the input size of shredded tyre rubber.
- 2.26. From the hopper, the material is transported to the carbon black micro-milling bay. A 1-tonne bulk bag is hoisted and discharged into a soundproof, enclosed micro mill. Here, the carbon black is milled down to a particle size of approximately 20 µm.
- 2.27. The milled material is then collected in sealed 1-tonne bags via an enclosed cyclone system, ensuring containment of fine particulate matter during processing and packaging.
- 2.28. This process is fully enclosed to prevent emissions of particulate matter. Dust and emissions control will be managed through integrated cyclone separation systems and enclosed handling equipment, which are designed to meet relevant environmental and occupational health standards. The processed carbon black is then transported for use in tyre manufacturing.
- 2.29. Specifications for the final product include N110 for tread rubber applications and N327 for sidewall components. All handling, milling, and packaging stages are conducted within a controlled environment to minimise dust release and ensure compliance with applicable environmental permit conditions."

Question 10

Section 2.22 – Please provide clarification on the roles of pipes B & C. In the text response it states 'Typically pipe B will transmit the clean gas to the water tank. In the event of a rubber seal breakage due to excess pressure, excess gas will be transmitted to the burners via pipe C'



However, the annotations in Figure 8: Plant Pipe Diagram state 'Pipe B – Excess gas flow to water tank outside if rubber seal breaks due to excessive pressure. Pipe C – Output gas to burners'.

Please confirm the process should a rubber seal break due to excessive pressure.

2.30. Response:

2.31. "Pipe B is designed to carry excess gas to the water tank outside in the event of a rubber seal breakage due to excessive pressure, where the gas is safely processed. Pipe C directs gas to the furnace burners, and any surplus gas is sent to the burner in the oil desulphurisation plant, ensuring complete gas combustion.

2.32. Gas flow in the system is unidirectional, and the design prevents reverse flow. Upon plant shutdown, the gas supply to both internal and external burners is immediately cut off.

2.33. If a rubber seal breaks due to excessive pressure, the gas is automatically diverted through Pipe B to the external water tank under its own pressure. The system includes integrated alarms that are triggered in such events, and the programmable logic controller (PLC) system will shut down gas flow within seconds, ensuring safe containment and system protection."

Question 11

In section 2.24 reference is made to the provision of health and safety policies, environmental management systems and fire prevention management plan to be written up upon commissioning.

Given the high-risk nature of the proposed facility, the proximity of residential properties and the high volume of responses received, during the consultation stage, expressing concern I would require information to set out the response to fire/explosion and prevention of harm.

2.34. Response:

2.35. "In the event of excessive gas buildup, the system includes a safety valve with an aluminium plate, which must be replaced weekly. If excessive gas occurs, the aluminium seal will break, triggering an automatic shutdown of the plant. The gas will then be safely directed through the system to a water tank located outside the rear of the building.

2.36. Tyres will be separated into steel and fibre components and shredded into 1-5mm pieces. This process will prevent turbulence and excessive gas buildup, ensuring safe operation.

2.37. If the pressure exceeds 1 MPa, the gas supply to the furnace room will be automatically shut off by the PLC. The gas will only be allowed to flow when required based on temperature demands, ensuring that the system operates safely and preventing any risk of explosion."

Question 12

In section 2.26 reference is made to the 2 x10,000 L underground water tanks. Can you confirm that these have not been installed yet.

2.38. Response:

2.39. "As present there are no underground tanks at the site."



Question 13

In section 2.28 reference is made to activation of the bypass switch. Please can you confirm that if Bypass occurs that an unabated release does not occur.

- 2.40. Response:
- 2.41. “There will be a bypass switch as part of the manual electrical system. This switch stops the airflow to the furnace room and provides the quickest method for shutting down the plant in an emergency situation. The exact behaviour of the bypass in relation to the PLC system is currently unknown.
- 2.42. In the previous applications of the plant, the bypass switch functioned by turning off the draft fan, which would also cut the gas supply to the abatement plant, effectively deactivating the abatement system. This would prevent any unabated release, as the entire abatement system would be switched off.
- 2.43. The facility will have a new system, the precise location of the bypass switch is yet to be determined. It will be indicated on the new electrical drawings once the installation takes place. However, the bypass switch will not deactivate the abatement system if it is still running. The abatement system must remain operational to prevent any potential unabated emissions.”

Question 14

In section 2.30, reference is made to stack monitoring being provided by CES Environmental Monitoring. This does not match the information you provided in your submission received in January 2025. Please confirm your intentions for monitoring of stack emissions.

- 2.44. Response:
- 2.45. “The CEMS (Continuous Emissions Monitoring System) will be operated in compliance with MCerts standards, with maintenance and calibration carried out according to the manufacturer's guidelines. The service and calibration records will be retained for a minimum of 5 years. During plant operation, key parameters such as temperature, pressure, oxygen levels, and residence time will be continuously monitored and recorded.
- 2.46. The monitoring system will include an alarm feature that detects and alerts operators to any potential deviations in emission levels, ensuring that emissions do not exceed the specified limits. This system is designed to prevent excessive emissions and ensure compliance with environmental standards. The monitoring results will be submitted as required by the permit.”

Question 15

In Section 2.36 reference is made to the installation being carried out by Chinese manufacturing engineers. It is also advised that ‘all risks have been considered to ensure safe operation and negligible environmental impacts’. Please can you provide information/evidence from the Chinese manufacturing engineers to support these statements.

- 2.47. Response:
- 2.48. “All manufacturers are required to provide a CE certificate, which is approved by testing laboratories. As part of the certification process, each company undergoes comprehensive training facilitated by testing laboratories. This training covers all aspects of the manufacturing process,



from the steel used to the individual components. Upon completion, the company is issued a CE certificate, equivalent to the ISO 14000 standard.

- 2.49. Additionally, each engineer involved in the installation is required to undergo specific training by the manufacturer. After completing the training, engineers are issued a certificate confirming they are qualified to install the machinery safely and in compliance with all relevant safety standards.
- 2.50. Regarding the design of the Pyrolysis plant, Digital Engineering Services has provided the necessary digital dynamics to demonstrate that the plant can achieve a minimum temperature of 850°C, maintained for 2 seconds, as required by IED regulations. This was submitted to SC in October 2024 and SC were successfully satisfied in January 2025.
- 2.51. The SWIP application cannot be applied for until the facility application for a permit has achieved the "duly made" status. Furthermore, the updated technical drawings follow British standards, and all motors and pumps are Siemens-branded. The only components manufactured in China are the Pyrolysis retort and the steel structure. While most manufacturers in China use boiler plate gauge 10–12, 16-gauge steel has been specifically requested for use in the construction, as this is standard for ensuring long-term durability and safety.

Question 16

In section 2.40 reference is made to fire suppression systems. Can you set out how the proposed drainage system will contain firewater? Given the high-risk nature of the proposed facility a significant volume of water would be required should an incident take place. Please set out how these measures have been considered. Have you been in contact with the Fire Service, what plans are in place for the wider site for fire mitigation.

- 2.52. Response:
- 2.53. “The facility has been designed with an integrated drainage system capable of containing and managing water used by the fire suppression system. In the event of a fire, the water used to suppress it will be captured through the site’s dedicated drainage infrastructure. This system is designed to channel the firewater to underground containment tanks, ensuring it does not escape the site or cause environmental contamination.
- 2.54. Where appropriate, the collected firewater may be recycled and reused in the suppression effort, subject to safety and operational feasibility. This closed-loop system helps conserve resources while managing firewater effectively.
- 2.55. Following the completion of the drainage system, a full capacity test using a water tanker will be conducted to ensure the system performs as intended and meets all required safety and containment standards.
- 2.56. Consideration has been given to the high-risk nature of the facility, and discussions with the local Fire Service are planned to ensure coordination and compliance with fire safety regulations. A broader fire mitigation strategy for the site is under development, including provisions for fire breaks, safe access routes, and emergency response protocols in alignment with regulatory guidance.”



Question 17

In section 2.42 it is advised that the drains will flow to the underground water tanks. Given the multiple bunded areas that may have water collecting, at what stages will the underground tanks be emptied and what consideration will be made for provision of potential fire water.

- 2.57. Response:
- 2.58. “In the event of a fire, the facility is equipped with two underground water storage tanks, each with a capacity of 10,000 litres—equivalent to the combined capacity of approximately 10 fire engines. These tanks are located at the rear of the building and are designated for emergency use only.
- 2.59. Industry guidance indicates that three fire engines are typically dispatched to industrial facilities in the event of a fire. Additionally, a fire hydrant is located approximately 0.4 miles from the facility, providing an additional water source if needed.
- 2.60. The facility will have four 10,000-litre tanks on site. Two of the tanks will be designated for fire emergencies, one will be used for abatement (with the water changed every 11 days), and one will hold hydroseal containing contaminated water and oil (also changed every 11 days).
- 2.61. Following a fire event, any water collected in the two tanks will be managed by Egan Waste. This process includes filtering the water and pumping it into the facility’s cooling tower where feasible. Any remaining surplus water will be safely removed from the site by Egan Waste.

Question 18

In section 2.43 the question asks where temperature will be measured in the primary combustion chamber. The answer in section 2.44 stated where the pressure gauges will be located but does not say where temperature will be measured.

- 2.62. Response:
- 2.63. “The facility will be equipped with a programmable logic controller (PLC) system that continuously monitors both pressure and temperature. This system is installed on the plant’s main control manifold. The PLC will be located within a monitoring room where the tyre lines are located as well.
- 2.64. Temperature in the primary combustion chamber will be measured using sensors positioned within the combustion zone to accurately reflect core operating conditions.
- 2.65. The PLC will be monitored in real-time by qualified electrical and digital engineers to ensure all parameters remain within designated safe operating ranges. This continuous monitoring significantly reduces the risk of parameter deviation and helps prevent potential incidents such as fires or system failures.”

Question 19

In section 2.48 financial information is supplied for Tyregen DE Metals Ltd. Please can you explain what involvement this company has in the application. You have confirmed previously that the operator will be a company called Tyregen UK Ltd. Please provide the financial ability for Tyregen UK Ltd to operate a facility of this nature.

- 2.66. Response:



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- 2.67. “Tyregan DE metals Ltd has no involvement in the operations of Tyregan UK Ltd. The sole purpose of Tyregan DE Metals Ltd is hold and manage patents. The company does not have any operational or financial connection to the operation of the facility.
- 2.68. The financial capability of Tyregan UK Ltd to operate a facility of this nature will be demonstrated through audited financial statements and other financial forms.”

3. Glossary

AERA	Air Emission Risk Assessment
APS	Air Pollution Services
BAT	Best Available Technique
EPR	Environmental Permitting Regulations
IED	Industrial Emissions Directive
LPG	Liquified Petroleum Gas
PLC	Programmable Logic Controller
SC	Swansea Council
SWIP	Small Waste Incinerator Plant

Appendix F

From:
To:
Cc:
Subject: Fwd: SWIP Permit
Date: 16 July 2025 17:18:59
Attachments:

***** WARNING – THIS IS AN EXTERNAL EMAIL *****
Do not click links/open attachments unless you recognise the sender and know the content is safe.

Dear Mr Price

Thank you for sharing the draft decision notice in relation to the application from Tyregen UK Ltd for a Small Waste Incineration Plant permit to operate an installation at Unit 2, Westfield Industrial Estate.

We are particularly disappointed with this draft notice, which we feel is unwarranted on the basis of the guidance and evidence provided, considers information that is irrelevant to the application and displays a misunderstanding of key parts of the application.

You have concluded that this permit application should be refused on the basis that Tyregen is unlikely to operate the regulated facility in accordance with the environmental permit, due to the following reasons:

- Insufficient technical competence
- Inadequate environmental management systems

In relation to Management Systems, your decision states the following:

‘At this time, Swansea Council has not been provided with a CE certificate. Swansea Council does not have sufficient information to satisfy that the facility will be able to operate in accordance with an environmental permit.’

The council therefore specifies only one element of absent information under its assertion that it ‘does not have sufficient information’. This is hard to read as Tyregen has CE certification for each element of the installation and would have provided such as evidence if this information had been requested.

The decision also states that:

‘The applicant has submitted CFD evidence as part of their application. However, a valid confidentiality application was submitted and so this information will not be shared within this draft determination document.’

You will of course be aware that CFD modelling, per the stated guidance, is the preferred method to support validation of information provided by applicants. This statement, therefore, is particularly concerning as it seems to assert that, due to the CFD evidence provided being assessed as confidential, that it cannot be considered as part of the actual determination. Please could you confirm as a matter of urgency the meaning of your wording ‘so this information will not be shared within this draft determination document’? Does this in fact mean that Swansea Council has discounted the CFD evidence as part of the application? If so, this would contradict the basic principle of applying confidentiality to any information submitted for permit purposes. The guidance also clearly provides the regulator with scope to allow key information, such as the firing diagram, to be approved as a necessary condition of a permit award. On the reasoning provided in the draft decisions, it is hard to understand why this approach was not taken.

In relation to Operator technical competence, you have set out the following concerns:

- The likelihood and seriousness of environmental impacts from the installation due to fire, explosion and release of gas.
- The ground conditions present at the site, there are areas of unmade ground (outside the building) and varied condition of the existing slab.

With regard to the first point about the environmental impacts due to fire, explosion and release of gas, Tyregen agrees that there is the potential for serious environmental impacts due to the nature of the operation. However, as you will be aware, the term ‘likelihood’ has a specific

meaning in standard risk management. Its use here in the draft determination confuses the issue of how to approach handling the risk of environmental impact.

Tyregen would **manage** the risk of environmental impact through its Environmental Management System, health and safety systems and practices. It would also put in place critical **mitigation** measures (as set out in the responses) prior to the commencement of any operation. Again, this is a standard approach that can be ensured via the provision of strict conditions. While Tyregen has not provided certain information in relation to the above at this stage, it does not follow that this makes environmental impacts from the installation either more likely or more serious.

Linked to this point is the section in the determination about the ground conditions, and the presence of hazardous material on site. This section displays significant misunderstanding of the proposals/information provided, and conflates issues relating to a third party on a separate site with the matter in hand.

Tyregen has responded to say that it would put in place a closed drainage system with substantial water retention capacity to **manage** the risk of contamination to land and groundwater. The draft determination points to unmade ground and the 'high-risk nature of the facility' as justification to consider the **likelihood** of contamination as high. Again, this ignores a key point in relation to likelihood of contamination, which would be the effectiveness of the risk management actions to be undertaken – namely the design and quality of the closed drainage system, which Tyregen has clearly said it will implement.

In relation to the concerns about unmade ground, it should be evident that this area is outside of the Unit 2 demise. The references here do not acknowledge that the water in the closed drainage system will flow to the storage tanks via pipes that would lay underground. In any event, if Swansea Council has concerns in relation to the external ground, why couldn't it specify that the relevant area should be included in the design of the closed drainage system as a condition? This solution is achievable particularly as the underground tanks are outside of the unit's demise. Furthermore, it should also be understood that, upon completion of the closed drainage system, Tyregen would extensively test the capacity, effectiveness and integrity of the system, and would want to ensure that Swansea Council was party to the outcomes of testing – again, this element of the application could be handled under the provision of strict conditions. We are of course aware of the sensitive nature of this application, but equally you will be aware that the broad substance of the objections from local residents point to fundamental misunderstandings. It is in the interests of all parties that decisions of this nature are made on the basis of full understanding of the facts. We hope this letter has been of some assistance to you in that regard.

Yours sincerely

Matty Peacock

Director – Tyregen UK Ltd

Support	I believe the decision to refuse the permit is ridiculous. By refusing this you are preventing the start of a new British industry. We currently send all of our tyres to India which is causing extreme problems. Why not make this a new British industry and create plenty of jobs ? Enough proof and regulations have been put into place so I do not understand the problem. Seems to be alot of scaremongering going on with this permit on social media. It is new technology so no one local completely understands the process. I'm looking forward to the decision.
Objection	I object to the SWIP Pollution will be caused in an area close to housing and we should be looking to more environmentally friendly alternatives
Objection	I object to Tyregen opening an incinerator in the area due to the potential pollution created in the neighbourhood.
Objection	We live in a small village in a beautiful area and really don't think that permission should be given for a Tyre waste disposal Unit near a populated area. The smell would be awful and damaging to the local residents and environment. We also have schools in our local area and children should not be exposed to this type of waste disposal pollution. I am 100% against this proposal and feel that this type of waste disposal should be in an unpopulated area and not anywhere near where people live and spend their leisure time.
Objection	Serious concerns about the environmental impact on air quality
Objection	Serious concerns about the environmental impact on air quality

Objection	Wauarlwyydd is a very pretty village, we don't need some smelly company polluting the air around us, an incinerator like this should be placed out of populated areas. I am strongly against this proposal
Objection	This SWIP in My opinion would affect the air quality in the surrounding area in an adverse way.
Objection	I totally object to these plans for our village
Objection	We already have enough pollution in this area with the water works close by and the immense traffic pollution this would cause even more to such a close proximity to the already bad air quality
Objection	I object to a small waste incineration plant in Wauarlwyydd. I feel the fumes and pollution would damage health in a well populated area.
Objection	My wife and I would like to make you aware that where Tyregen UK Limited wish to opertate at Westfield Industrial Estate, Wauarlwyydd is not in a rural backwater and is ,indeed, part of a city. The process of pyrolysis involves incineration. It can produce gases and chemicals which can be toxic, harmful to public health and potentially dangerous. In the western state of Maharashtra in India in January, 2025 an explosion at a pyrolysis plant resulted in the deaths of four people including two women and two children.After the explosion soot, dying vegetation and polluted waterways were discovered. Additionally local people complained of persistent coughs and eye problems. Tyregen Uk Limited propose incinerating 7,650 tonnes of waste tyres each year in this unsuitable location.

	Is it safe for this to happen?
Support	Dear Pollution Control Team, I am writing in response to Swansea Council's Draft Notice of Decision dated 29 July 2025 regarding Tyregen UK Ltd's application for an Environmental Permit to operate a Small Waste Incineration Plant (SWIP) at Unit 2, Westfield Industrial Estate, Waunarlwydd. I respectfully submit my representation in support of the application and urge the Council to grant the permit, subject to robust conditions, for the reasons outlined below. --- 1. Air Quality and Emissions Control Modern pyrolysis technology, when operated to best practice standards, can meet or exceed SWIP emissions limits under the Environmental Permitting Regulations 2016. There are multiple operational examples in the UK and EU where similar plants function safely in compliance with strict air quality targets. If the Council has residual concerns, these can be addressed through permit conditions such as: Installation of advanced flue gas cleaning and filtration systems. Continuous emissions monitoring with real-time reporting to the regulator. Annual independent audits. --- 2. Fire Safety and Risk Mitigation Concerns over fire risk are valid for any waste facility, but these can be mitigated through:

	Fire suppression systems and thermal monitoring. Segregated storage of raw tyres and processed material. Staff training and emergency response plans. These measures can be made mandatory through permit conditions and reviewed during periodic inspections. --- 3. Proximity to Sensitive Receptors While the location is within an industrial estate, I recognise its proximity to a school and nursing home. This can be managed via: Limited operating hours to avoid peak school times. Noise reduction measures and enclosed processing. Designated HGV routing to avoid residential streets. Such operational controls are common in the waste sector and effective in reducing local impact. --- 4. Environmental & Economic Benefits Approving the permit would deliver tangible environmental and local economic benefits: Waste diversion: The facility would process around 7,650 tonnes/year of waste tyres, reducing landfill and illegal dumping. Circular economy: Pyrolysis produces reusable fuel oil, carbon black, and
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	recovered steel, reducing reliance on virgin materials. Local jobs: The project represents investment in Swansea's green economy, creating skilled employment opportunities. --- 5. Conclusion I believe the identified risks can be effectively mitigated through enforceable permit conditions rather than outright refusal. The Council has the regulatory tools to ensure compliance, safeguard public health, and still enable a project that offers environmental and economic value to the city. I therefore urge Swansea Council to reconsider the draft refusal and approve the permit with robust environmental safeguards in place. Thank you for considering my representation.
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