

Neath and Port Talbot County Council
The Quays
Brunel Way
Baglan Energy Park
Briton Ferry
SA11 2GG

20/07/2021

Dear Sir/Madam,

PROPOSAL: Development of a Global Centre of Rail Excellence, comprising of two test tracks of loop configuration being an electrified high speed rolling stock test track of 6.9km in length and an electrified low speed infrastructure test track of 4.5km, with overhead line equipment (OLE) and dual platform station test environment; together with operations and control offices (including staff accommodation and welfare), shunter cabins (2 no.), research and development education and training, rolling stock storage sidings and maintenance/cleaning/decommissioning facilities; associated, drainage, internal vehicular accesses, branch line rail connection, staff and visitor car parking, lighting, electrical infrastructure (including substations and lineside shore supplies and transformers), fencing (perimeter security, acoustic and stock proof), land reformation and hard and soft landscaping, together with demolition of existing buildings/structures.

LOCATION: Land At And Surrounding Nant Helen Open Cast Coal Site, Neath Port Talbot

Thank you for consulting Natural Resources Wales (NRW) on additional information about the above, which we received on 24/06/2021. Our comments below refer to changes made to Chapter 7 (Biodiversity) and Chapter 14 (Air Quality) of the Environment Statement only. Please refer to our response of 30/04/2021 for all other comments/advice which are still applicable to this case.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the Environmental Statement and associated Appendices and Figures are included in the approved plans and documents condition on the decision notice and by attaching the following conditions to any planning permission granted:

Condition 1 – Landscape Strategy: No development or phase of development, shall commence until a site wide landscape strategy has been submitted to and approved in writing by the Local Planning Authority.

Condition 2 – Construction Environmental Management Plan: No development or phase of development, including site clearance, shall commence until a site wide Construction Environmental Management Plan has been submitted to and approved in writing by the Local Planning Authority.

Condition 3 – Environmental Management and Monitoring Plan: Prior to the operation of the development, or phase of development, an Environmental Management and Monitoring Plan, detailing strategies for the management, maintenance and monitoring measures of the ecological, environmental and landscape features at the site shall be submitted to and approved in writing by the Local Planning Authority.

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Landscape

We have reviewed the amended documents submitted and we are satisfied that the discrepancies we originally identified between plans have now been rectified and both habitat and landscape mitigation drawings (Plan 003B ILLUSTRATIVE MASTERPLAN ISSUE 02; Plan003A & figure 1.6A ILLUSTRATIVE MASTERPLAN ISSUE 02; Fig 7.9 HABITAT CREATION AND ENHANCEMENT - HABITATS P01.4) are in line with landscape mitigation planting as proposed for the approved earthwork plan 20/0738/FUL. Please refer to our response letter of 30/04/2021 for comments on landscape and recommendations on conditions to be used.

Protected Sites

Sensitive Aerial Receptors – NO_x and SO₂

We have reviewed the amended Chapters 7 and 14 of the Environmental Statement (ES). We are satisfied these chapters have been amended to address the concerns we raised in our response letter of 30/04/2021.

Further information has been submitted to provide justification for the use of baseline data from the chosen meteorological stations and an updated model to illustrate a more realistic air emissions scenario based on modern locomotives which are currently in use rather than the older diesel engines on which the first submitted model was based upon.

It has also been clarified that the use of diesel engines would be limited to the first five years of the development as these will be phased out and replaced with electric and hydrogen trains. Deposition of NO_x and SO₂ on the nearby Gorsllwyn Onllwyn SSSI and its sensitive features (raised bog to fens with acid grassland habitat feature - National Vegetation Classification M17a) will therefore be much lower than first suggested and for a limited time period. The deposition levels are considered as insignificant, and once all trains using the test facility have switched to zero emission locomotives negligible operational effects are predicted.

Based on the information submitted, we therefore consider that the proposed development is not likely to damage the features for which Gorsllwyn Onllwyn SSSI is of special interest.

Please refer to our letter of 30/04/2021 for comments on air quality and dust control measures and recommended conditions.

Other Matters

Our comments above only relate specifically to matters included on our consultation topic list, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not *rule out the potential for the proposed development to affect other environmental interests*.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Yours sincerely,

Cinzia Sertorio

Advisor - Development Planning
Natural Resources Wales