

By email only to: planning@npt.gov.uk and
TRBoothroyd@carmarthenshire.gov.uk

Our ref: Gwrhyd Quarry PA ref P2023/0861 (s73 PP
ref. P2010/0026)

2nd May 2024

Dear Mr. Davies

GWRHYD QUARRY - PLANNING APPLICATION REFERENCE P2023/0861 RESPONSE TO CONSULTEE COMMENTS

On behalf of Marshalls Mono Limited (Marshalls) I write in connection with the above planning application and am pleased to submit responses to comments made by Neath Port Talbot County Borough Council's (NPTCBC) Head of Engineering and Transport in their letter dated 15th April 2024.

Proposed s106 Draft Heads of Terms

NPTCBC Highways Comment

The payment is for the anticipated maintenance over the proposed development. The costs must be paid in full on signing of the agreement as previously agreed.

Applicant Response

The Applicant respectfully confirms that whilst the principle of section 106 contributions was discussed during the meeting with NPTCBC Highways, this did not extend to considering the overall cost and timing of payments. The Applicant would refrain from committing to an upfront payment without any notion of the scale of the required contribution.

The commuted sum confirmed to the Applicant following the meeting is not insignificant. Given NPTCBC's acceptance of the terms of s106 agreement in 2018, a change in approach which demands up-front full payment for highway maintenance expenditure that would be spread over several years seems an onerous and unreasonable imposition.

Therefore, the Applicant asks that NPTCBC accept staged payments to provide for the anticipated maintenance. May we suggest annual instalments over the 18-year life of the quarry to 2042 (£2758.55 per annum) which would align with planning obligation tests of 'necessity' and 'fairness and reasonableness'.

NPT Proposed Condition 12

NPTCBC Highways Comment

Retain individual highway routes/names in the condition to clearly identify the routes to be taken to and from the site. This scoping route has been previously agreed, however, there has been instance where HGVs etc have utilised alternative routes to the Quarry. With the specific highway names written in the condition there is no discrepancy or doubt.

Applicant Response

The Applicant accepts reference to the approved highway route identified in the 2018 s106 agreement (Plan 2 - The Public Highway – Gwrhyd Quarry) within Condition 12 and suggests the following additional wording (underlined).

All HGVs travelling to Gwrhyd Quarry will follow the approved route from the north via the A4068, Bryn Road, Coedffladau Road and Gwrhyd Road then turn left into the site access, with all HGVs leaving the site following the same route in the opposite direction following a right turn out of the site access. No HGVs travelling to/from the site will use any other route.

The site will be operated in accordance with the approved Heavy Good Delivery Plan, dated 4th July 2018.

Proposed Condition 14

NPTCBC Highways Comment

Agree to the omission of the right turn requirement wording if the planning authority deems it to be a repetition of the wording under Condition 12.

In relation to the cleaning of the vehicles, can the Applicant provide evidence to demonstrate that the signage approved under the 2018 application is still in situ, including a plan to show where within the site these signs are located? Agree to this additional request being removed if the planning authority are satisfied that the requirements of the 2018 planning consent were met and remain in place.

Applicant Response

Pictures of the in-situ signs and their approximate locations along the haul route are included at the end of this letter.

Proposed Condition 15

NPTCBC Highways Comment

NPTCBC Highways disagree with the Applicant's response. Increasing the variety of sizes and types of smaller vehicles could result in increased trip generation to and from the site, notwithstanding that the stone products are available through a variety of builders merchants for smaller purchasers all over the UK.

Applicant Response

There is some misunderstanding as to what it is that the Applicant is seeking to achieve through a limited broadening of the scope of Condition 15.

Gwrhyd Quarry is a local supplier of bespoke dimension stone products which are not stocked by Builders Merchants. Consequently, the Applicant seeks reasonable flexibility in the overall daily mix of vehicles to enable them to cater for the transportation of a small number of sub-3 tonne loads and in doing so remove the need for unnecessary HGV movements and the unsustainable and inefficient use of the local road network. The requirement for small loads relates to small quantities of stone products, such as dimension stone lintels etc.

The ongoing output of aggregate from the quarry is a separate element of the planning application, the purpose of which is to enable the sustainable processing of mineral waste which would otherwise be placed back into the void and consequently sterilised. The high-quality aggregates derived from the processed waste would be transported as bulk loads.

As set out in the Applicant's response of 29th February 2024, Condition 15 (c) of PP ref. P2010/0026 included:

No more than 5 vehicles with a carrying capacity not exceeding 3 tonnes and carrying quarry products shall depart from the site in any one day and up to a maximum of 15 in any 7-day period."

This Condition reflected the nature of the products produced at the quarry which on occasion require small volumes of bespoke materials (e.g. a builder collecting a single bespoke cut stone lintel or a local farmer collecting a single bag of dry-stone walling). It is neither sustainable nor economical to deliver a single item on an HGV (which the proposed revision to Condition 15 is seeking to avoid and ensure that the number of HGV movements delivering quarried products is restricted to the numbers proposed).

As is demonstrated in the data provided to NPTCBC, the demand for these small and specialist products is very limited, equating to only 25 loads per annum and up to 3 in any week. These movements already occur and have been safely and satisfactorily accommodated on the local road network under the established business activities at the site. These occasional customers visit the site in any event. Allowing them to leave with the specialist items they require would, therefore, have no significant highway impact and technically less impact than sending out an HGV specially to deliver what these limited customers could otherwise have taken away with them when they departed the site. It is not accepted that this low level of activity with small vehicles would give rise to a significant or unacceptable impact on the road network, as it would fall within the range of normal daily variations experienced on such routes.

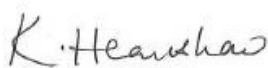
Therefore, the Applicant maintains that the following suggested wording for Condition 15 which was set out in the response letter dated 29th February 2024 would provide an appropriate and reasonable level of flexibility.

The total amount of quarried products leaving the site shall not exceed a total of 750 tonnes per week. Heavy Goods Vehicles utilised for the haulage of quarried products from the site shall not exceed the following combination of payloads:

- a) No Heavy Goods Vehicles with a payload exceeding 24 tonnes shall depart from the site for the removal of quarried products.*
- b) No more than 10 Heavy Goods Vehicles with a payload between 3 tonnes and 24 tonnes shall depart from the site in any working day for the removal of quarried products.*
- c) No more than 5 vehicles with a gross vehicle weight not exceeding 3.5 tonnes and carrying quarried products shall depart from the site in any one day and up to a maximum of 15 in any 7-day period.*

We trust that the above satisfies NPTCBC Highways.

Yours sincerely



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Enc. Approved signage installed at Gwrhyd Quarry
Cc. Marshalls Mono Limited
Artisan Stone Supplies Limited
Carter Jonas
The Hurlstone Partnership Limited

ON-SITE SIGNAGE





Wheel Cleaning Sign



Vehicle 'Turn Right' Sign



Operating Hours Sign