

GWRHYD QUARRY - PLANNING APPLICATION REFERENCE P2023/0861

By email only to:

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

2nd July 2024

Dear Mr. Davies

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 Natural Resources Wales (NRW) in their letter dated 1st July 2024.

Condition 34 – Water Management

NRW Comment

We have reviewed the submitted Topographic Survey dated 12th April 2024 and have the following comments.

The survey information confirms that W21 (soakaway feature) is downgradient from the sump where water is collected in the bottom corner of the quarry floor. This is contrary to what we had understood to be the position previously. Our concerns and position, in relation to this groundwater feature W21 remain unchanged. Please see our previous letter, ref. CAS-243061-D5H1 dated 30/01/2024.

Furthermore, we suspect that there are other basal water losses through the quarry floor which, reappear on the upper side of the track adjacent to the fence line forming the quarry boundary. These water issues did not appear to be contaminated with silt during our last site inspection, however, the weather conditions at the time were favourable. As part of the sites ongoing monitoring commitment, we request that the toe of the slope directly beneath the quarry be regularly monitored by the operator for water issues, particularly during and following rainfall, with a photographic log kept by the operator which, should be made available for inspection upon request.

Applicant Response

In addition to the ongoing monitoring commitments at the Site, the Operator agrees to undertake monitoring for water issues at the toe of the slope directly beneath the Quarry.

Method Statement

NRW Comment

In our letter dated 10th May 2024 we requested a method statement on the removal of the engineered soakaway from the quarry to the groundwater feature. We wait to be reconsulted when this document is available.

Applicant Response

Please find enclosed a suggested Method Statement with further supporting information.

Condition 37 – Restoration Strategy

NRW Comment

Regarding the restoration proposals, previous (natural) hydrology should be replicated in the site restoration designs. It appears on the Proposed Restoration Concept Plan (170-01-REST/02) that two areas within the quarry void area will be retained for the purposes of supporting ephemeral seasonal wetlands. We request further detail on what will be the water storage capacity of each of these areas and will there be a requirement to engineer any above ground structures to retain water in these areas.

Furthermore, we note from the plans submitted that two water features will be formed within the existing void – further consideration of the implications of this is needed, especially from a water resources and potentially reservoir safety perspective, together with the likelihood for water quality chemistry pollution from acid rock drainage.

We recommend that an additional commitment in relation to soil handling and storage is sought from the operator to the safe stripping, handling, storage and conservation of soil resources on site, in line with DEFRA Guidance Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. We would defer to the recommendation of the Mineral Planning Officer if there were more appropriate and up to date guidance in relation to managing soil at quarries.

Applicant Response

As set out in our letter dated 29th February 2024, at this stage the restoration scheme is conceptual; only as extraction progresses will the geology/quality of bedrock be known. Therefore, the ratio of winnable mineral to waste is subject to change and, in turn, this will impact on material balance and restoration profile/levels.

A detailed Restoration Plan would be provided in accordance with the requirements of Condition 38 (see Table 2M of the Planning Statement for PA ref. P2023/0861) at which stage the Planting Plan would also be reviewed and amended as appropriate.

The Operator will be more than happy to provide the additional details requested by NRW (water storage capacity, any engineering requirements, water resources / reservoir safety, water quality chemistry, acid rock drainage, etc.) in the detailed restoration plan submission required under Condition 38.

Regarding soil handling and storage, all parts of the site subject to mineral extraction have been stripped of topsoil which is stored in bunds as illustrated on the submitted application plans. The matters raised by NRW have already been considered in detail both as part of this application and previously approved permissions and form part of the active operations at the Quarry. The following conditions and submissions are already in place at the Quarry in relation to soil handling and storage:

- Table 2J of Planning Statement – Condition 20 regarding soil storage.
- Table 2M of Planning Statement – Condition 38 detailed restoration scheme will include details of re-spreading of overburden, subsoil and topsoil and method of soil replacement.
- Table 2N of Planning Statement – Condition 39 aftercare scheme will comprise details of soil preparation.

We also refer NRW to the commitment to ongoing compliance with the following conditions that relate to soils as set out in Table 4 of the Planning Statement:

- 11, 17, 18, 19, 21, 22.

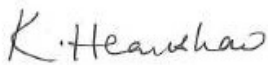
Planning condition 18 states that:

All topsoil and subsoils shall be stripped stored and conserved in accordance with the proposals set out in the Environmental Statement or as modified in the Supplementary Information submitted (May 2010).

Section B1 of the Environmental Statement refers to the *Good Practice Guide for Handling Soils* (MAFF 2000). The MAFF guidance has since been superseded by the *DEFRA* publication '*Good Practice Guide for Handling Soils in Mineral Workings*, July 2021. It is understood that the new guide was prepared by the same author of the original MAFF 2000 guide and follows a similar format. If it is deemed necessary, the wording of Planning Condition 18 could be amended accordingly to refer to the 2021 Guide.

We welcome the opportunity to discuss the above matters in more detail as a matter of urgency as delays in determining this planning application are now impacting on the operation of the Quarry.

Yours sincerely



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Enc. Method Statement
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Artisan Stone Supplies Limited
Carter Jonas
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