

Ein cyf/Our ref: CAS-257188-M9J9
Eich cyf/Your ref: P2023/0861

Neath Port Talbot County Borough Council
The Quays
Briton Ferry
SA11 2GG

Dyddiad/Date: 01 July 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Proposed restoration, quarry lateral extension and erection of new saw shed without compliance with Conditions 3, 4, 5, 7, 8, 12, 13, 14, 15, 16, 20, 34, 37, 38, 39, 41, 46, 47, 52 and 57 of planning permission ref. P2010/0026 dated 18 August 2011 to allow for an extension to the time period for the development, revisions to the phased Working and Restoration Programme, an updated Drainage and Surface Water Management Plan, a wider product range for sale and export and greater flexibility in the HGVs serving the site.

LLEOLIAD/LOCATION: Gwrhyd Specialist Quarry Gwrhyd Uchaf Farm Gwrhyd Road Pontardawe Swansea Neath Port Talbot SA9 2SB.

Thank you for reconsulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 30 May 2024.

We have concerns with the application as submitted. We have reviewed the conditions in the proposal and consider that Condition 34 (Water Management) and Condition 37 (Restoration Strategy) fall within our remit. We do not recommend your Authority varies conditions 34 and 37 for the following reasons.

We remain concerned over the pollution risk that this untreated and uncontrolled silt laden water poses to groundwater and surface water features in the locality.

Condition 34 – Water Management

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.

Method statement

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.

Condition 37 – Restoration Strategy

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.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *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 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.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

G Cuthbert

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.