

Planning Statement

Response to Cymru Natural Resources Wales letter (CAS-278746-R0G9) dated 09 May 2025

Condition 4 – Remediation Strategy

The exact nature of the activities required to construct the various buildings and infrastructure have not been detailed. The recent Site Investigation Report stated that *“At the outset it should be appreciated that only a small proportion of the area to be developed has been investigated and consequently the recommendations made, and opinions expressed in this report can only be applied to such conditions as were encountered in the exploratory holes.*

The exploratory holes indicate a nature and degree of similarity to the extent that we consider them likely to be representative of the natural ground conditions. However, no guarantee can be given.

Due to the site having been previously developed, and the nature of Made Ground, localised variations in thickness and composition should be anticipated and hence interpolation or extrapolation from the exploratory holes to adjoining areas should only be undertaken with caution.”

Together with the unknown nature of the civil engineering works that will be required for the site, this means that the potential for remediation cannot be ruled out at this time given the Made Ground at the site. Therefore, we would not recommend the discharge of Condition 4.

In relation to the above comments on Condition 4, we seek clarification on whether it is our construction techniques or sequence that you require us to provide.

The design is a piled raft foundation that will limit the amount of reduced level dig required to construct the building. The design depth of the precast concrete piles is 12m, which passes through any made ground, and there are no thickened pile caps as the piles will connect directly into the ground floor slab, which is approximately 600mm thick. The deepest excavation will be in relation to the flue base, which is 800mm thick. With the concrete blinding below, an excavation of approximately 1000mm will be required. Drawings 50795-BGH-EC-XX-DR-S-1030-C1 and 50795-BGH-EC-XX-DR-S-1025-C1 depict the proposed slab and flue base depths. Even when considering the depth of the proposed excavation for the flue base, we will be significantly shallower than any recorded water levels within the boreholes, as noted in the site investigation.

The existing area for construction was developed when the main factory was built in 2015 and is currently a tarmacadam services yard/hard standing. While the statement quoted in the response to Condition 4 (extracted from the site investigation report dated March 2025) confirmed that only a small proportion of the area to be developed has been investigated, this is typical for most site investigations. Based on the proposed method of construction and the low levels of recorded risk listed within Table 4 of the conceptual ground model (page 20 of the site investigation), we believe that the potential for ground remediation is minimal. Nevertheless, if anything is discovered during the works that may cause an environmental concern, we will stop all works, report the findings, and seek appropriate advice on how to proceed.

Condition 5 – Piling

Page 15 of the Ground Investigation Report states *“for the proposed piled foundations, a method should be selected that minimises the risks of groundwater pollution. In this regard, we understand that an ‘Environmental Assessment for Foundation Piling’ has been prepared for the site and submitted to the Local Authority by a third party”*.

We have reviewed the Environmental Assessment for Foundation Piling (‘Environmental Assessment for Foundation Piling’ unauthored, undated) and note that some key information has not been included, namely type of piling proposed, depths and what strata the piles would be founded in, including if in groundwater and the density of piles layout, and whether the density could be reduced and the reasoning behind this.

This additional information should be submitted, along with a piling risk assessment and the foundation design, as this must align with the detailed infrastructure design, which is likely to be a work in progress currently. Without this information, we would not recommend the discharge of Condition 5.

The type of piling is precast driven concrete piles as confirmed withing Environmental Risk Assessment - Driven Precast Piles.pdf and the design calculations 2028022-AGE-01-XX-CA-X-0601 P01 DPC Bearing Piles.pdf.

The depths and type of strata the piles would be founded in, including if in groundwater and the density of piles layout, and whether the density could be reduced and the reasoning behind this is covered in the piling design calculations pack 2028022-AGE-01-XX-CA-X-0601 P01 DPC Bearing Piles.pdf.

Condition 6 – Construction Environmental Management Plan (CEMP)

The site will need to be developed under a bespoke CEMP, given the contamination profile. The CEMP should make allowance for monitoring and for temporary drainage control, given the presence of Made Ground. This will need to be submitted before we can recommend the discharge of this condition.

Within the site CEMP (Sofidel Biomass Env Plan_v03 REVA 110425), section 3.1.2 covers the monitoring of water and section 5.5 explains that we will sample any groundwater should it be present in any excavation before it is determined how it is dealt with.

Are NRW aware that the proposed site is within an existing service yard with surface water drainage design that has previously been approved as part of the initial build back in 2015 (I have marked the new building's location within the footprint of the existing Intertissue site on the attached existing site drainage drawing – 507712.pdf).

Hopefully, the above and the supporting information is sufficient, but if any further information is required, please let me know.