

Ein cyf/Our ref: CAS-289503-D5H3
Eich cyf/Your ref: P2025/0560

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

Dyddiad/Date: 22 October 2025 22 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: APPLICATION TO DISCHARGE PLANNING CONDITIONS 4 (FLOOD DEFENCE SCHEME), 6 (LAND CONTAMINATION – ASSESSMENT) AND 7 (LAND CONTAMINATION – REMEDIATION SCHEME) OF PLANNING PERMISSION P2024/0339 (MIXED USE DEVELOPMENT COMPRISING OF A FOOD STORE (USE CLASS A1) AND A SEPARATE COFFEE SHOP WITH DRIVE THRU (USE CLASS A3) TOGETHER WITH ASSOCIATED ACCESS ONTO AFAN WAY AND WATER STREET, CAR PARKING AND SERVICING, EXTERNAL LIGHTING, LANDSCAPING, DRAINAGE, AND OTHER ASSOCIATED SITE WORKS) GRANTED 11.06.2025

LLEOLIAD/LOCATION: BURROWS YARD, WATER STREET, ABERAVON, NEATH PORT TALBOT, SA12 6LL

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 01 October 2025.

We continue to have concerns with the application as submitted. We do not recommend your Authority discharges conditions 6 and 7 for the following reasons.

Several previous reports have been submitted which comprise tank removal validation works, ground investigations, or summaries of previous works at the site from between 2002 to 2018. The reports contain a lot of new information, including that there was a leaking underground tar tank in the north of the site, and there are brief details of a 7500 litre diesel spill at the former petrol station around 2002 however, it is unknown if any remedial works were undertaken in response to this. Previous ground investigations also identified two spill / plume locations in the former petrol station (one of diesel and one of petrol), and a remedial scheme was recommended however the remedial works were never undertaken.

We query the two light non-aqueous phase liquid (LNAPL) hotspots which were previously identified in investigations from around 2004 – 2007 at the former petrol station.

The Lee Remediation Limited report 'Ground Contamination Risks and Remediation Requirements' shows photos of the contamination encountered and includes drawings of the anticipated plume extents. It is reported that up to 1.34m of LNAPL was recorded in one of the boreholes (E4). Whilst we acknowledge the time which has passed since these reports, we query where this contamination has gone and if the identified plumes were targeted in more recent investigations? As the later investigations undertaken in 2018 by Arcadis and Groundtech Consulting in 2021 and 2024 did not encounter NAPL.

We query the understanding of the groundwater regime at the site (including groundwater levels and whether any perched water is present), and the groundwater movements over all seasons. For example, do groundwater levels fluctuate and might mobilise pockets of NAPL? It is noted from previous reports that LNAPL was recorded in 2004, but not in the same location in 2006, yet was recorded again over two monitoring rounds in 2007.

The previous reports also indicate that the NAPL was recorded at the water table circa 3m below ground level (bgl), whereas in the Supplementary Environmental Appraisal (Groundtech Consulting, June 2024) it is reported that it was only perched water which was impacted by contamination, and that perched water is not in continuity with groundwater within the estuarine alluvium aquifer, and also that the estuarine alluvium aquifer is confined and protected by an aquitard. Groundwater monitoring records in Appendix 7 (Groundtech Consulting, June 2024) indicate groundwater was measured at 2.75 – 2.92m bgl. It is noted that the majority of reports contain groundwater depths, as opposed to levels given in m AOD. It is considered that more information is required to support/clarify the hydrogeological regime.

It is also reported within the ESP Ltd Preliminary Geo-environmental Risk Assessment (June 2015) that the underground fuel tanks within the former petrol station were founded around 3-4m bgl, which would be within the estuarine alluvium. We therefore query this, noting Groundtech Consulting comments that hydrocarbon impact was found in shallow soils only. The recent trial trenches dug at the former petrol station went to 2.1m bgl. It was also noted that the soil sample from the July 2025 trial trenches exercise (TT202 at 1.4m) recorded higher concentrations of some TPHs and VOCs than those used within the Generic Quantitative Risk Assessment in Supplementary Environmental Appraisal (Groundtech Consulting, June 2024). We do not know if any changes in ground levels have occurred at the site since the earlier reports.

The Groundtech Consulting reports indicate that there is an aquitard below the site. We continue to query this as the new information provided has shown that three out of four boreholes drilled during the Arcadis 2018 ground investigation also show an absence of clay. Whilst we note that a clay layer appears to be present in the majority of locations, there is uncertainty as several logs across the site have recorded an absence of clay, which therefore may not be offering the suggested protective layer over the aquifer/groundwater.

With regards to the underground tar tank, we note your comment "*If encountered during the enabling works, this structure will be removed under a watching brief, with any residual contamination being removed and validated, the Clay barrier will be reinstated during the removal of the structure*". We advise that the tar tank is identified and removed, and that the methodology for this is incorporated into the Remedial Specification report. Previous reports by Ground Investigation Limited note the tank is laid some 6.2m bgl directly onto the gravels and is in continuity with groundwater.

It is noted that 660 litres of tar product was removed from the tank in 2007, yet the potential for tarry residues to remain is considered possible as the report recommended removal of remnant tar materials within the tank prior to development.

We therefore do not recommend the discharge of Conditions 6 and 7 at this time.

Other Matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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,

Louise Edwards

Uwch Cynghorydd - Cynllunio Datblygu/Senior Advisor - Development Planning
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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.