

27 October 2025

Craddys
63 Macrae Road
Eden Office Park
Ham Green
Bristol
BS20 0DD

For the attention of Chris Jarman,

Re: Afan Way, Port Talbot

Dear Chris,

We have received the recent National Resource Wales (NRW) comments referenced P2025/0574 and P2025/0560, dated 22 October 2025. Please see below our responses to each of the comments made by NRW.

NRW Comments and Responses

1. 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.

Previous investigations are superseded by the most recent phases of investigation undertaken by Groundtech Consulting, the Arcadis reports also supersede the historical reports. BHE4 undertaken by Ecologia in 2002 recorded free product up to circa 1.3m in thickness, testing of the sample indicated petrol/diesel is the source with significantly high BTEX and MTBE present alongside 50% TPH. The free product was highly localised to the eastern area of site. The response zone of the standpipe was poorly constructed and targeted the alluvium as well as the underlying aquifer meaning it is hard to determine where the free phase and impaction is actually present. The response zones in the Groundtech (2024) investigation targeted the underlying Secondary A gravel Aquifer in accordance with EA Groundwater Risk Assessment Guidance. The wells were triangulated across the PFS area in accordance with NRW guidance. CP04 from a previous phase of work was also constructed immediately west providing better coverage. As reported, it was shown that no elevated hydrocarbons were present, in addition no free phase was observed. It is important to note that residual concentrations of petrol range speciated hydrocarbons was present in CP101 to CP103, with the highest concentrations being in CP102, but below the EQS/DWS. The recent testing (2025) confirm these findings. Groundtech are in agreement that localised LNAPL may be present in the alluvium, photographs from the Quantum investigation showed small pockets of free product. The free 1.3m of free product is considered to be an overestimation or highly localises sump. Any LNAPL encountered during the enabling works will be removed in accordance with the Remediation Specification (GRO-21252-4313). The perched water above the clay alluvium is not providing base flow to the River Afan and is seasonal. This is largely absent and will be absent when the new drainage system is installed. The Remediation Specification will be revised to reflect the possible LNAPL concentrations and request a part time supervision from Groundtech.

With regards to the current absence of LNAPL, the 1.3m of LNAPL is likely to be an overestimation. LNAPL is indicated to have migrated through sand/coarse silt bands in the alluvium soils over the course of twenty years. During the removal of the tanks in 2006, validation and removal of the bulk of the contamination was undertaken. This is discussed in the GIL PFS Validation Report referenced 'p220a.01.lt.validation.doc.' However, some residual hydrocarbon contamination exists in the Made Ground in this area of site.

A watching brief will be maintained during the enabling works.

2. 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.

We agree that groundwater rebound may occur and mobilise potential NAPL but only rebound in the perched groundwater when present. The groundwater is highly localised and confined above the clay alluvium. Any LNAPL encountered during the enabling works will be removed and included in the enabling works verification report for approval. The Remediation Specification will be revised to reflect the possible NAPL concentrations and request a part time supervision from Groundtech. The aquifer is confined and under pressure. The groundwater is indicated to rise above the cohesive strata when penetrated as shown by the depth of groundwater during the monitoring.

3. 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.

The perched groundwater above the clay alluvium beneath the site contains perched groundwater, the cohesive deposits of the alluvium have prevented the migration of groundwater/contaminants to the underlying Secondary A gravel Aquifer. The groundwater table is present in the underlying gravel aquifer. Shallow groundwater has been encountered above the gravel in the monitoring wells, often above the response zone. As mentioned above, the aquifer is confined and under pressure. Therefore, the groundwater is indicated to rise above the cohesive strata when penetrated as shown by the depth of groundwater during the monitoring.

4. 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.

As discussed earlier there is residual contamination in the Made Ground, high concentrations of speciated hydrocarbons and VOCs have been recorded in the Made Ground and surface of the alluvium clay locally, however testing of the groundwater in underlying aquifer has shown there has been no impactation. Any visual/olfactory evidence of contamination encountered during the enabling works will be removed under

supervision from Groundtech Consulting. During turnover, excavations will be deepened in the PFS area, a watching brief will be undertaken and if clay layer is absent, a barrier to an agreed thickness will be installed. NRW are welcomed out during the enabling works, specifically in the PFS area to observe the watching brief.

5. 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.

There is a significant aquitard beneath the site, especially in the PFS area. All previous exploratory hole logs at the proposed drive thru unit have been assessed and an aquitard of between 0.5m and 2.3m exists. In the area of the proposed Aldi store, there are localised areas where clay is absent. The enabling works will allow for the removal of any visual/olfactory evidence of contamination prior to piling. In addition, the proposed Aldi store is to be constructed a significant distance away from the PFS. The logs in the wider site area where clay is absent are still alluvium with high fine content which will act as an aquitard. The point sources such as USTs will be investigated during the turnover and if a clay layer is absent, a barrier will be reinstated.

6. 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.

Agreed, the Remediation Specification will be updated.

7. 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.

Agreed, the Remediation Specification will be updated and this will be dealt with during the enabling works. A comprehensive completion report will be produced.

8. We previously queried the depth, strata, location and density of proposed piles, and note Groundtech Consulting's response that "This information is to be provided by the chosen piling company". However, that information would need to be submitted and taken into consideration as part of a piling risk assessment.

This information will be included in the updated Piling Risk Assessment.

9. We also advise that there are currently uncertainties with regards to the conceptual model and contamination risk at the site, therefore we consider that the piling risk assessment should be carried out after these details have been confirmed.

We will update the Piling Risk Assessment with details of the piling depth, strata, location and density following confirmation of the CSM with NRW.

Please do not hesitate to contact the undersigned if you have any queries.

Yours Sincerely
For Groundtech Consulting Limited



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