Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-309974-H5M9
Eich cyf/Your ref: P2026/0342

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

Dyddiad/Date: 30 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Details to be agreed in association with planning conditions 03 (Construction Method Statement), 04 (Construction Environmental Management Plan), 06 (Contamination Assessment), 08 (Landscaping and Planting Works), 11 (Cycle Storage and Parking), 12 (EV Charging),13 (Refuse and Recycling Strategy) and 14 (Ecological Walkover Survey) of planning permission P2024/0212 granted on 01.05.2025.

Lleoliad/Location: Unit D, North Bank Road, The Docks, Port Talbot, SA13 1RE

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 01 June 2026.

We have **concerns** with the application as submitted. We do not recommend your Authority discharges condition 6 for the following reasons.

Condition 6 – Contamination assessment

We have read the Tier 2 Geotechnical and Geoenvironmental Report (Terrafirma, May 2026) and provide the following comments:

A ground investigation undertaken at the site in January 2026 encountered visual and olfactory evidence of petroleum hydrocarbon impact within one of the boreholes. It is reported in 6.2 that currently there is insufficient information available and further phases of investigation will be required to collect additional data and to inform the conceptual site model. In 9.2 it recommends that further assessment of risks to controlled waters is undertaken, and we agree with this. Site investigation should be undertaken in line with BS 10175:2026 Investigation of potentially contaminated sites – Code of practice.

Therefore works are ongoing/outstanding for parts ii, iii and iv of Condition 6.

In 9.2 the report also recommends a piling works risk assessment, which we also agree with. A piling works risk assessment should be undertaken in line with the following guidance: *Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention* (CL:AIRE, March 2025).

Therefore, we do not recommend the discharge of Condition 6 as further works are required.

Conditions 3, 4

We have reviewed the Construction Environmental Management Plan (CEMP) (by GJP, dated May 2026) and the Construction Method Statement (by GJP, dated May 2026).

We are satisfied that conditions 3 and 4 can be discharged.

Conditions 8, 11, 12, 13, 14

We do not have any comment to make on the development with regards to conditions 8, 11, 12, 13, or 14 as we did not request these.

Please note that our decision not to comment does not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

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.

Advice for the developer

- 1. Follow the risk management framework provided in Land contamination risk management (LCRM)
- 2. Refer 'Development of land affected by contamination: A guide for developers'(WLGA, 2023) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- 3. Environment Agency's (2017) 'Approach to Groundwater Protection'

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

Yn gywir / Yours faithfully,

Samuel Price

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.