

Ein cyf/Our ref: CAS-314049-M8W3
Eich cyf/Your ref: P2026/0434

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

Dyddiad/Date: 06 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Construction of 12 employment units, including two trade counter units, together with mezzanine floors to Units 2 and 6, together with associated access, parking, servicing, landscaping, drainage and sustainable drainage works

Lleoliad/Location: Land At Cramic Way, Port Talbot, Neath Port Talbot, SA13 1RU

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 17 July 2026.

We have **concerns** with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching **conditions relating to land contamination** to any planning permission granted. Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

Land Contamination

We consider this site to be of high environmental sensitivity in respect of controlled waters. The site is underlain by a 'Secondary A' bedrock aquifer, and the Main River Afan forms the north west boundary.

We are also aware that there are potentially contaminative historical industrial land uses within close proximity to the site. For example, tin plate works/iron foundry/steel works/engineering works/tanks etc. Local historical maps also indicate that infrastructure associated with these former industries (e.g. railway sidings) may have been present on the application site.

Considering the above, we request that the following planning conditions are included in any planning permission granted for this proposal:

Condition

No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification

To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

Condition

Prior to the occupation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification

To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation, to prevent both future users of the land and neighbouring

land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

Condition

Prior to the occupation of the development, a long term monitoring plan for water quality and land contamination shall be submitted and approved in writing by the Local Planning Authority. The long term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken
- Timescales for the long term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required
- Timescales for submission of monitoring reports to the Local Planning Authority e.g. annually
- Details of any necessary contingency and remedial actions and timescales for actions
- Details confirming that the contingency and remedial actions have been carried out.

The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

Justification

A land contamination long term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on water quality.

Surface water drainage

Approval of the SuDS Approving Body (SAB) is required for the management of surface water on site.

We advise that infiltration of surface water drainage into the ground should only be permitted for parts of the site where it has been demonstrated there is no resultant unacceptable risk to controlled waters. This should be informed by ground investigations and/or remediation strategy. If this is not properly controlled, the development may create pathways for pollution to controlled waters.

Flood risk

The planning application proposes less vulnerable development, industrial units. The Flood Map for Planning identifies a small section of the application site to be at risk of flooding and within Flood Zone 2, TAN15 Defended Zone. However, the proposed buildings appear to be located within Flood Zone 1 of the Flood Map for Planning.

Given the location of flood risk shown to be affecting the application site (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.

Your authority may need to assess the potential flood risk when considering access/egress to the site.

European protected species

We note that the information submitted in support of the above application ('Preliminary Ecological Assessment' by Ecological Services Ltd, dated February 2026) has identified that European Protected Species are unlikely to be using the application site. We therefore have no comments to make on this matter.

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

Land Contamination

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [CL:AIRE Definition of Waste: Development Industry Code of Practice](#). This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

Pollution Prevention

Due to the proximity of the site to the River Afan, all works at the site should be carried out in accordance with Guidance for Pollution Prevention 5 (GPP5); 'Works and maintenance in or near water' [gpp-5-works-and-maintenance-in-or-near-water.pdf \(netregs.org.uk\)](#) and Pollution Prevention Guidelines 6 (PPG6), 'Working at construction and demolition sites' [ppg-6.pdf \(netregs.org.uk\)](#).

During the construction phase the applicant should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

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

Yn gywir / Yours faithfully,

Ashley Bosomworth

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.