

Ein cyf/Our ref: CAS-291941-N2K1
Eich cyf/Your ref: P/22/0206

Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
CF48 4TQ

Dyddiad/Date: 05 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD / PROPOSAL: FIRST PERIODIC REVIEW OF OLD MINERALS PERMISSION (ROMP) AT VAYNOR QUARRY (PURSUANT TO ENVIRONMENT ACT 1995).

LLEOLIAD/LOCATION: VAYNOR QUARRY, UPPER VAYNOR ROAD, CEFN COED, MERTHYR TYDFIL, CF48 2LA.

Thank you for re-consulting Cyfoeth Naturiol Cymru /Natural Resources Wales (NRW) about the above, which we received on 30 October 2025.

We continue to have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected sites prior to the determination of this application. Further details are provided below.

Protected Sites

Our previous concerns over uncertainty of effects on key receptors including Cwm Taf Fechan Woodlands, Site of Special Scientific Interest (SSSI), Nant Glais Caves SSSI and the tufa springs Nant Glais 01 (NG01) and NG02 remain and we advise there should be a scheme of monitoring proposed which is then agreed by relevant parties and implemented ahead of quarrying recommencing on site.

As far as we are aware, no additional (new) work has been undertaken by the operator since our previous response ref. CAS-236472-Z8M2 dated 25 January 2024, to investigate potential hydrological linkages with Cwm Taf Fechan Woodlands SSSI, Nant Glais Caves SSSI or tufa springs NG01 and NG02. As such, we cannot conclude that there are no impact pathways and a scheme of monitoring must be submitted in support of the application to address this.

Drawing schematics and cross-sections provided by the applicant indicate that quarrying will proceed for the first 6 phases (i.e. up to 55 years of quarrying) above the winter water table. We consider the applicant should provide reasoning why in phase 6 some cut below the winter water table will take place.

Groundwater monitoring must be continued as part of the proposed quarry cut works to ensure that winter groundwater levels are not transgressed. The scope of this monitoring should be agreed and communicated with the Local Planning Authority and NRW.

The applicant is suggesting that this should be effected by way of a planning condition to only permit quarrying up to (but not beyond) the winter water level until a scheme of works has been submitted and agreed between the relevant parties (including representatives from NRW and the Mineral Planning Authorities).

The proposed cut levels are shown as being exactly at the winter water level. We advise that your Authority should request the monitoring data and the data interpretation that was used as the basis to define the winter water level and hence the proposed cut levels.

The Vaynor Quarry ROMP addendum, prepared by: SLR Consulting Limited, SLR Project No.: 407.013404.00001, dated 10 September 2025, Revision: 01, states that Stantec have evaluated the potential effects of working above the winter water table using the same data as was used to undertake the original Hydrogeological Impact Assessment. We expressed concerns regarding the reliability of this assessment and the modelling it contained with the various uncertainties it produced.

The model outputs produced excessive uncertainty in terms of predicted effects of resuming dewatering activities at Vaynor as part of recommencing quarrying. We suggested that the applicant design a monitoring scheme to try and reduce this uncertainty as a way of moving forward but this has not been undertaken to date.

We are concerned that there is inherent uncertainty in the accuracy of the winter water level and the applicant needs to demonstrate how the level has been calculated. In addition, excavation depth is drawn right up against the winter water level, leaving almost no margin for error. It would be prudent to build in a safety factor / buffer to prevent accidental breach of the winter water table if this scheme of working is to be progressed.

It is unclear whether the effects of climate change have been factored into the assessments of the new scheme of working. Given the extended timeframe that the assessment covers (first 6 phases, up to 55 years into the future); the effects of climate could be considerable over this time period and as such they must be fully taken account of as part of the assessments and evidenced appropriately.

Given the uncertainties associated with previous modelling undertaken and a lack of dipwells currently in representative locations to investigate and monitor potential impact pathways from dewatering the quarry, there still remains the need to develop a scheme of monitoring for the site which then needs to be agreed (by NRW and the Mineral Planning Authority) and implemented prior to the commencement of quarrying activities.

It appears that only two of the dipwells contain automated data loggers (level loggers). The other wells that the assessment of the new proposed scheme of working is based on are on a manual dipping (level reading) schedule presumably, given the frequency of readings and total number of readings over a defined time period.

While the data might show some broad trends, the large intervals between readings (and limited total number of readings) does limit the degree to which the data can be interpreted and used as a tool for understanding / predicting how the system functions and how relevant receptors could be affected.

Data should be collected from the existing and new dipwells for a significant period (A minimum of 6 months with data derived from data logging, with a focus on this data originating from the winter months) prior to any quarrying commencing, and continued throughout the progression of the quarry excavation. It would be preferable to install automated level loggers in all of the dipwells that are considered relevant to the scheme of monitoring in order that sufficient data are collected to accurately represent the hydrological situation at the quarry and key ecological receptors.

We note that the revised scheme of working will still affect tufa springs NG01 and NG02 with no mitigation currently being proposed. It is unclear what is proposed in the way of additional surveys to better understand the nature and magnitude of impacts and inform the design of appropriate mitigation measures.

At this stage, and unless or until the Applicant provides further information as set out in the appended letter, we are unable to advise the Mineral Planning Authority whether the likely hydrological and hydrogeological effects on the local environment (specifically the SSSI interest) can be avoided or, if not, mitigated appropriately (and secured/controlled through either regulatory regime). Your Authority may consider it necessary for this information to also be submitted with the ROMP application.

Previous Advice and Other Matters

- Our advice on Ornithology and Air Quality remains unchanged from our letter dated 3 February 2023 (referenced CAS-196624-S7P1).
- Our advice on Protected Species and Landscape remains unchanged from our letter dated 25 January 2024 (referenced CAS-196624-S7P1).

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

Lisa Jones

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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.