



T Richard Jones (Betws) Ltd
Betws Industrial Park
Foundry Road
Ammanford
Carms
SA18 2LS

FAO Rob Collard

22181/E1/RG

12 December 2024

Dear Sirs,

Re: Blaendulais- Additional Ground Investigation Conditions P2023/0877

We are very pleased to submit our clarification of our answers to Planning Conditions, to ensure the authority that the Conditions have been correctly assessed and dealt with.

NPTCC have imposed Planning Conditions, the geotechnical and geoenvironmental conditions 3,4 and 5 being:

Condition 3

Notwithstanding the submitted information, no development shall commence on site until an assessment of the nature and extent of contamination affecting the application site area has been submitted to and approved in writing by the Local Planning Authority. This assessment must be carried out by or under the direction of a suitably qualified competent person in accordance with BS10175 (2011) 'Investigation of Potentially Contaminated Sites Code of Practice' and shall assess any contamination on the site, whether or not it originates on the site. The report of the findings shall include:

- i. a desk top study to identify all previous uses at the site and potential contaminants associated with those uses and the impacts from those contaminants on land and controlled waters. The desk study shall establish a 'conceptual site model' (CSM) which identifies and assesses all identified potential source, pathway, and receptor linkages:*
- ii. an intrusive investigation to assess the extent, scale and nature of contamination which may be present, if identified as required by the desk top study:*
- iii. an assessment of the potential risks to: - human health, - groundwater and surface waters - adjoining land, - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, ecological systems, -*

- archaeological sites and ancient monuments; and - any other receptors identified at*
(i)
iv. *an appraisal of remedial options, and justification for the preferred remedial option(s).*

Reason: To ensure that information provided for the assessment of the risks from land contamination to the future users of the land, neighbouring land, controlled waters, property and ecological systems is sufficient to enable a proper assessment, and to ensure compliance with Policies SP16 and EN8 of the Neath Port Talbot Local Development Plan.

Condition 4

Prior to the commencement of any development works a scheme to investigate and monitor the site for the presence of gases being generated at the site or land adjoining thereto, including a plan of the area to be monitored, shall be submitted to and approved in writing by the Local Planning Authority. Following completion of an approved monitoring scheme, in the event that gases are being generated the proposed details of appropriate gas protection measures to ensure the safe and inoffensive dispersal or management of gases and to prevent lateral migration of gases into or from land surrounding the application site shall be submitted to and approved in writing by the Local Planning Authority. All required gas protection measures shall be implemented as approved and appropriately verified before occupation of any part of the development which has been permitted and the approved protection measures shall be retained and maintained until such time as the Local Planning Authority agrees in writing that the measures are no longer required. A copy of the verification certificate should be submitted to the Local Planning Authority prior to the first beneficial use of the site.*

** 'Gases' include landfill gases, vapours from contaminated land sites, and naturally occurring methane and carbon dioxide, but does not include radon gas. Gas monitoring programmes should be designed in line with current best practice as detailed in CIRIA 665 (Construction Industry Research and Information Association) and/or BS8485 2007 Code of Practice for the Characterisation and Remediation from Ground Gas in Affected Developments.*

Reason: To ensure that risks from the presence of gases to the future users of the land and buildings and neighbouring land and buildings are minimised, and to ensure the provision of appropriate mitigation measures to ensure the development can be carried out safely without unacceptable risks to workers, neighbours, future occupiers and other offsite receptors, and to ensure compliance with Policies SP16 and EN8 of the Neath Port Talbot Local Development Plan.

Condition 5

No development shall commence on site until a remediation scheme to bring the site to a condition suitable for the intended use by removing any unacceptable risks to human health, buildings, other property and the natural and historic environment shall be prepared and submitted to and approved in writing with the Local Planning Authority. The scheme shall include all works to be undertaken, proposed remediation objectives, remediation criteria and

site management procedures. The measures proposed within the remediation scheme shall be implemented in accordance with an agreed programme of works.

Reason: To ensure that risks from land contamination to the 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, and to ensure compliance with Policies SP16 and EN8 of the Neath Port Talbot Local Development Plan.

Comments

The site and its local environment have been assessed by SGS within reports 22181_R1_Rev1, 22181_R2_Rev5 and 22181_R3_Rev2.

R1 comprised an assessment of the investigation by others at the site immediately adjacent (and overlapping) to the south of the site. This assessment showed no site contamination and a Gas Categorisation of CS1 (very low risk). The recommendations were to develop a reactive strategy.

R2 comprised an additional investigation of the current red boundary, immediately to the north of the area assessed in R1. This again found no contamination or ground gas. R2 recommends that additional investigation be undertaken in the eastern site area, once the wooded zone is cleared. This being because the Phase 1 noted some rail sidings in the east, which could not be investigated, due to those trees.

R3 is the Reactive Strategy as required in the R1 document.

Condition 3

To accommodate this condition, a Phase 1 desk study was undertaken at the site, and the adjacent site. This developed an understanding of the site regime, and allowed design of both investigations.

The two ground investigations covered a large area of the site and adjacent site, showing very similar conditions.

Discussions with the EHO noted that their remaining concern was potential contamination in the eastern area. We have recommended further assessment of the eastern area, once access is available. No specific remediation strategy has been developed, as we have found no risks.

Condition 4

Gas monitoring has been undertaken at the site and adjacent site over a period of over 2 years. Both investigations noted CS1 Very Low Risk, requiring no gas barriers and no remediation strategy.

Conditions 5

No Remediation Strategy is required, as no risk from contamination or ground gas has been identified.

Conclusions

Conditions 3, 4 and 5 have been considered, and the risk from contamination and ground gas has been shown to be very low. Provided that additional testing of soil contamination is undertaken in the eastern area during clearance, we consider the site to be suitable to proceed with the proposed development.

We thank you very much for this opportunity and look forward to working with you on this project. We trust that we have correctly interpreted your requirements, and that the above is acceptable. Should you require further clarification or information please do not hesitate to contact us.

Yours faithfully

For and on Behalf of Spectrum Geo Services

Please Respond to:

Rob Griffiths

BSc (Hons), MSc, FGS, CGeol