

General Environmental Health Planning Consultation Response

Planning Application Ref: P2025/0754

Address: Cardonnel Court Cardonnel Road Skewen Neath Port Talbot SA10 6BS

Planning Case Officer: Claire Hall

Comments provided by: Hannah Kent

Our Ref: PLC37684

Date: 24th November 2025

Construction of a residential care facility with associated works

The General Environmental Health Planning Consultation response to the above application has considered the following relevant areas:

Noise	☐	Air Quality	☐	Contaminated Land	☒
Odour	☐	Housing	☐	Other (please specify)	☐

The Environmental Health Team, in responding to the above application, provides the following substantive response:

No Comment	☐
No Objection subject to conditions (see the specified conditions below)	☒
Requires further information (see details below)	☐
Objection (on the grounds set out below)	☐

Overall Recommendation

I have no objections to the proposals subject to conditions.

Observations and Comments

Our historical maps show that this site has a history dating back to the 19th century. The 1881 map shows that railway sidings were already near the site, with the site itself being marshland with a spring to the northwest and quarry further northwest. The 1921 mapping shows a small building in the northern corner of the site adjacent to the mineral railway and an old quarry to the north along the railway siding. The 1940 map shows the building on site has increased in size.

Due to the proximity to the quarrying and the railway sidings, it is highly likely that the land will have become contaminated with uses associated with the colliery and the railway, its

sidings and (potentially industrial), buildings which are connected to railway lines coming off the main tracks. Further, areas of the marshland are noted as being infilled, which is likely to have locally sourced materials such as quarry spoil and other waste materials, resulting in further contaminants. Contaminants associated with aforementioned will include Polychlorinated Biphenyls (PCB), Polycyclic Aromatic Hydrocarbons (PAH), herbicides, Creosote, ash, sulphate metals, hydrocarbons, and asbestos.

Additionally, due to the various buildings associated with Cardonnel Court, it is possible that asbestos containing materials (ACM), may be present within the buildings on site. This will require investigation and reporting prior to redevelopment. We would encourage the developer undertake a full destructive asbestos survey to ensure that all notifiable asbestos is appropriately dealt with.

*There may also be a potential for mine gas associated with being within a coal mining area. Following the mine gas incident at Gorebridge (Midlothian, Scotland) during 2013/2014, the subsequent findings of research commissioned by Scottish Government, and the publication of new industry best practice guidance it has been concluded that **for all new development located within the Coal Mining Reporting Areas (i.e. both Low and High Risk Development Areas), the Local Planning Authority will require a Mine Gas Risk Assessment (MGRA) to be undertaken.** This may be relatively simple process as the site is noted by the Coal Authority to be in the Low Risk Area with detailed assessments more likely to be required in the High Risk Area. The need for any mine gas risk assessment would be identified during a phase I desk study assessment, the recommendations of which should be followed as necessary.*

As part of Welsh Governments ambition to end Wales's contribution to climate change by 2050, and to improve the quality of the air that we breathe, Welsh Government published the Electric Vehicle Charging Strategy in April 2021. We therefore encourage the installation of Electric Vehicle Charging Points which will support Welsh Government's decarbonisation targets and meet with Welsh Government Electric Vehicle Charging Strategy.

Recommended Conditions

LC01 – Contaminated Land Site Investigation

Prior to the commencement of work on site a scheme to assess the nature and extent of any contamination on the site, and confirmation of whether or not it originates on the site shall be submitted to and agreed in writing with the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons in accordance with the following document:- Land Contamination: Development of Land Affected by Contamination Developers Guide 2023 and shall be submitted as a written report which 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) identifying all plausible pollutant linkages to be assessed.*

- (ii) *a comprehensive intrusive site investigation of the extent, scale and nature of contamination.*
- (iii) *an assessment of the potential risks to:*
 - *human health,*
 - *ground waters 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.*
- (iv) *an appraisal of remedial options, and proposal of 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.*

LC03 - Site Remediation Scheme

Prior to the commencement of work on site 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 historical environment shall be prepared and submitted to and agreed 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.*

LC04 - Implementation and Verification of Approved Remediation Scheme.

Prior to beneficial use of the proposed development commencing, a verification report which demonstrates the effectiveness of the agreed remediation works carried out in accordance with condition (Please insert the condition number requiring remediation to be carried out) shall be submitted to and agreed in writing with the Local Planning Authority.

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.*

Footnote: *All contaminated land investigations must be undertaken by a suitably competent person in accordance with the Welsh Local Government Association, Natural Resources*

Wales & Welsh Government “The Development of Land Affected by Contamination: A Guide for Developers (version 4) 2023”, and, BS 10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites. Code of Practice.

Informatives

I would also recommend that the developer consider the following:

Destructive Asbestos Survey of Buildings:

A destructive asbestos survey is required to be submitted to Building Control to ensure that risks from asbestos to the environment, future users of the land and neighbouring land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors. Prior to the commencement of works on site, a destructive asbestos survey of buildings should be submitted by the applicant to Building Control.

- *The survey must locate and identify all asbestos containing materials before any structural work begins at a stated location or on stated equipment at the premises.*
- *Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out. Development shall not be carried out other than in accordance with the approved details.*

FOOTNOTE: *Asbestos cement sheet and textured coating (artex) materials may be removed by non-licensed contractors, but should be done in accordance with the guidance: <https://www.hse.gov.uk/pubns/guidance/a14.pdf> HSE - Asbestos: Asbestos essentials. Most other asbestos materials must be removed by a contractor licensed by the Health and Safety Executive. If at any stage during the demolition process asbestos is suspected, the work should stop immediately, and the material should be investigated. Details are required to be submitted to Building Control prior to commencement of works to ensure that risks from asbestos to the environment, future users of the land and neighbouring land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors.*

Electric Vehicle Charge Points - Advisory

In line with the Welsh Governments decarbonisation targets, Welsh Government published the Electric Vehicle Charging Strategy, setting out its plans for charging electric cars and vans in Wales. In the interest of supporting and encouraging low emission vehicles, in the interest of air quality enhancement, and to comply with the aims and objectives of the Electric Vehicle Charging Strategy. We would encourage the provision of electric vehicle charge points and recommend the following minimum standard for numbers and power output:

- *One Standard Electric Vehicle Charging Point providing a continuous supply of at least 16A (3.5kW) for at least 10% of parking spaces*
- *A Standard Electric Vehicle Charging Point is one which is capable of providing a continuous supply of at least 16A (3.5kW) and up to 32A (7kW). The higher output is*

more likely to be futureproof.

- *For developments where some or all of the parking is likely to be used for shorter stay parking (30mins to 4 hours) then Fast (7-23kW) or Rapid (43kW+) charging points may be more appropriate. If Fast or Rapid charging points are proposed together with restrictions on the times that vehicles are allowed to be parked at these points then a lower number of charging points may be sufficient.*
- *The electrical supply of the final installation should allow the charging equipment to operate at full rated capacity.*
- *The installation must comply with all applicable electrical requirements in force at the time of installation.*

MG Informative 1 – Preliminary Mine Gas Assessment – Low Risk Mining Area

The applicant is made aware that the development lies in an area of historic mining activity which may be a potential source of ground gas. No development should take place until a mine gas risk assessment has been undertaken. The mine gas risk assessment shall be undertaken by a competent person as defined in the National Planning Policy Framework and conducted in accordance with 'CL:AIRE – Good Practice for Risk Assessment for Coal Mine Gas Emissions, October 2021' and having regard to current guidance – 'Land Contamination: Risk Management (LCRM; 2020)' the recommendations of the report shall be fully implemented within the approved development.
