

Jessica King
Senior Planning Officer
Neath Port Talbot County Borough Council
Civic Centre
Port Talbot
SA13 1PJ

Dear Jessica,

RE: Lidl Castle Retail Park - P2026/0109

We are in receipt of your email dated 16th April 2026 requesting revised information to address the Contaminated Land Team's comments. A pdf of your email is appended.

It is understood that the Contaminated Land Team does not accept Remada's argument that elevated concentrations of PAH and Asbestos will be under the building footprint and therefore do not pose a risk. The Contaminated Land Team does not accept this argument *'because there is no statistical analysis or risk assessment to demonstrate that these locations are hotspots and not representative of the wider site conditions'*.

CL:AIRE Bulletin TB12, 2006 Statistical Assessment of Contaminated Land: Some Implications of the Mean Value Test' reviewed CLR 7 and concluded that the Mean Value Test 'is often inappropriate in real world cases'. As the site-specific contaminant data is specific to samples of anthropogenic Made Ground and not contaminants in natural soils it is considered inappropriate to assess the data set by statistical analysis.

PAHs

Elevated concentrations of PAHs were detected at HDTP1 beneath proposed store footprint and TP6 and TP9 beneath the proposed car park. Samples from beneath zones of proposed landscape did not record elevated concentrations of PAHs.

Remada's Phase 2 referred LCM/CIEH S4ULs as the GAC for Commercial Land Use and estimated a Soil Organic Matter of 6%. As there is no exposure route for direct contact beneath the store footprint and car park, the applicable exposure route would be inhalation. In landscape zones, Remada's Remedation Strategy recommended 0.3m of clean cover. Whilst the concentrations of benzo(b)fluoranthene, Benzo(a)pyrene and Dibenz(a,h)Anthracene exceeded the applicable GAC, the contribution to total exposure by inhalation of indoor vapour is 0.0%, and for outdoor exposure less <0.1% (LQM, CIEH S4ULs for Human Health Risk Assessment Table 18-63. Therefore, there would be negligible risk to end users of the site.

Asbestos

Asbestos was detected at HDTP3, TP1, TP2 & TP3 beneath the proposed store footprint and at TP9 beneath the proposed car park. Samples from beneath zones of proposed landscape did not record detected concentrations of asbestos.

A presentation by Paul Nathanail on asbestos in soil and made ground is available at www.silc.co.uk. Nathanail states that 'unlike most other contaminants, soil concentrations are not sufficient on their own to assess risks'. Therefore a statistical analysis would not be of benefit. Nathanail also states that *'It is the release of asbestos fibres into the air that poses a risk' i.e., bound vs friable, asbestos cement vs lagging vs free fibres, good condition*

Specialist in Land
Condition (SiLC)

National Quality Mark
Scheme

Due Diligence

Audit

Desk Study

Intrusive Ground
Investigation

Human Health Risk
Assessment

Water Resource Risk
Assessment

Mining Risk Assessment

Preliminary Foundation
Design Recommendations

Remediation Strategies &
Method Statements

Pre-acquisition Advice

Abnormal Cost
Assessment

Materials Management
Plans & Declarations

UST Decommissioning

Soil Bio-remediation

Soil Stabilisation

In-situ Groundwater
Remediation

EA Remediation Permit

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Forward House
17 High Street
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vs weathered/ degraded, depth, moisture content, soil type, surface cover (vegetative or hard surfacing), land use/ receptor activities.

As there is no exposure route for fibres in Made Ground beneath the building footprint and car park to become airborne and to be inhaled by site users, there is no risk. Risks to construction works during groundworks should be assessed in accordance with CAR-soil guidance and usually by the contractor undertaking the works.

We would propose that the Remediation Strategy is updated and that a membrane is laid over Made Ground in zones of proposed landscape in order to ensure that Made Ground potentially containing asbestos fibres is not inadvertently excavated at a future date.

The Contaminate land Team has also stated that the *'information submitted doesn't include a rationale for the sampling strategy and I would also like to see demonstration that the sampling strategy and particularly the density complies with BS10175 Investigation of potentially contaminated sites – Code of practice'*. Additional sampling was requested by the EHO (Hannah Kent) and Remada's proposed sampling locations were subsequently approved by her in an email to Carney Sweeney dated 24th October 2025.

Yours sincerely,

Greg Jones.
Director
Remada Ltd
07966 017009
greg.jones@remada.co.uk

Enclosure: pdf of email containing Contaminated Land Team comments.

Specialist in Land
Condition (SiLC)
National Quality Mark
Scheme
Due Diligence
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Human Health Risk
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Hi Greg & Krysia,

We have now received comments from the Contaminated Land (CL) team in relation to the discharge of conditions 6 & 7 for Lidl, Briton Ferry.

Could you please provide revised information to address the CL team's comments below?

To address concerns raised by my colleague Aldona Rahman the applicant has provided a Phase 2 Ground Investigation Report No: 769.02.04 dated February 2026 which includes details of sampling taken under the now demolished buildings. These samples were requested to supplement gaps in the initial site investigation because the buildings were still in situ.

The report has identified elevated concentrations of PAH and has also identified asbestos in a number of samples, however, it argues that these locations will be under the building and therefore do not pose a risk.

We do not accept this argument because there is no statistical analysis or risk assessment to demonstrate that these locations are hotspots and not representative of the wider site conditions. The dataset must be considered as a whole, including all rounds of site investigation and an appropriate CSM for the site produced based on all sample results. If it is proposed to eliminate data from the assessment this must be done appropriately with the use of statistical analysis and relevant guidance.

The risk assessment needs to be reviewed to consider samples from all phases of site investigation, the remediation strategy needs to be reviewed to reflect the additional rounds of sampling and identified risks. The current remediation strategy does not consider exposure to PAH or asbestos and as such is not suitable to address the risks identified in the most recent round of site investigation.

The information submitted doesn't include a rationale for the sampling strategy and I would also like to see demonstration that the sampling strategy and particularly the density complies with BS10175 Investigation of potentially contaminated sites – Code of practice.

I look forward to hearing from you.

Kind regards,

Rahma

Rahma Dwimunali
Planner

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Email:

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Subject: Lidl Castle Retail Park - P2026/0109

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Dear Rahma,

I have been in correspondence with the Contaminated Land team during the course of the application as different officers have been looking at this case over the past year, between the application, initial CD application and this application.

I have received the following CL response received today. The officer has not recommended the agreement of conditions 6 and 7 as further information is required.

To address concerns raised by my colleague Aldona Rahman the applicant has provided a Phase 2 Ground Investigation Report No: 769.02.04 dated February 2026 which includes details of sampling taken under the now demolished buildings. These samples were requested to supplement gaps in the initial site investigation because the buildings were still in situ.

The report has identified elevated concentrations of PAH and has also identified asbestos in a number of samples, however, it argues that these locations will be under the building and therefore do not pose a risk.

We do not accept this argument because there is no statistical analysis or risk assessment to demonstrate that these locations are hotspots and not representative of the wider site conditions. The dataset must be considered as a whole, including all rounds of site investigation and an appropriate CSM for the site produced based on all sample results. If it is proposed to eliminate data from the assessment this must be done appropriately with the use of statistical analysis and relevant guidance.

The risk assessment needs to be reviewed to consider samples from all phases of site investigation, the remediation strategy needs to be reviewed to reflect the additional rounds of sampling and identified risks. The current remediation strategy does not consider exposure to

PAH or asbestos and as such is not suitable to address the risks identified in the most recent round of site investigation.

The information submitted doesn't include a rationale for the sampling strategy and I would also like to see demonstration that the sampling strategy and particularly the density complies with BS10175 Investigation of potentially contaminated sites – Code of practice.

With regard to the comments above I would not be able to agree the discharge of the above conditions, however I would be grateful if you could confirm if you would like to submit revised details to address the CL officers concerns.

If so, can I request a 4 week extension of time to allow the information to be drafted and reconsulted.

Should you not wish to provide revised information I will progress to determination, which is likely to be a recommendation for refusal.

Kind regards,
Jessica King

Swyddog Cynllunio Uwch - Rheolaeth Datblygu / Senior Planning Officer – Development Management

Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot / Neath Port Talbot County Borough Council
Tel/ Ffôn: 01639 686002

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Os hoffech ddefnyddio'r Gymraeg wrth ddelio â'r Cyngor os gwelwch yn dda cliciwch [yma](#)



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