

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 to Carney Sweeny dated 7th May 2026. The email includes excerpts of text from Environmental Health and/or Contaminated Land Officers for which we have presented our responses below. The matters below were also discussed yesterday afternoon at a Teams Meeting with Helen Bowen and Leah Morgan,

Item 1

The report does not identify a sampling strategy / justify why they undertook this additional work - why did they do this? And

1. *What is their rationale for the location of each of the additional sample locations?*
2. *They have not provided an updated figure showing the locations of the sampling -*

Figure 2 is now updated with a date in Feb 2026, but the key shows all the sampling locations dates are Nov 2025 and before. Could we have an updated location plan - that links back to the answers to 1 & 2 above?

The Planning Officer has noted that different EHOs have been providing commentary to the Planning Authority. Remada's recent letter reference 769.15.02 dated 23rd April 2026 was prepared in reply to similar question, possibly raised by another EHO.

Item 2

'The additional information does not address the concerns raised.

The email exchange with Hannah predates the email that I refer to (above), and is her agreeing in principle to more sampling. In her email (as noted above) she is raising questions about the sampling that had not taken place when the email exchange attached took place. Hannah is querying whether enough samples were taken within the footprint of the former building to adequately characterise the site in line with good practice guidance.'

Remada Response to Items 1 & 2

When the Lidl store closed for redevelopment, Remada requested contact details for the Contaminated Land Officer and we had telephone conversation with Hannah Kent. During the conversation we proposed a post demolition sampling strategy as this would enable access to whole site area and accompanied this with sample locations and the potential contaminants to be analysed. The conversation was formalised by our email to Hannah dated 23rd October 2025 (pdf attached) to which she replied the following day and stated "Thanks for your email and the attached proposal/location information. Yes, I would be happy with the additional proposed intrusive sampling work".

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

Verification & Completion
Reports

WAMITAB

Waste Classification

www.remada.co.uk

0333 123 5222

Remada Ltd

Forward House
17 High Street
Henley in Arden
B95 5AA

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The email correspondence is appended and the ground investigation took place following demolition and was reported in an update to our Phase 2 report reference 769.02.04 dated 18.02.2026. Hence the date on the drawing in the report which was presented as Figure 2.

Item 3

I am in agreement that statistical analysis might not be appropriate for asbestos, however, the applicant has failed to provide sufficient evidence that the asbestos identified is isolated and not indicative of wider site conditions.

Item 4

Finally, I note that the letter report suggests updating the remediation strategy to include a membrane, if the applicant would like conditions discharged we must also be provided with an updated remediation strategy.'

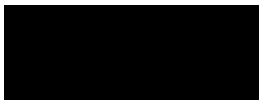
Remada Response to Items 3 & 4

Neither Remada's updated Phase 2 report or letter dated 769.15.02 dated 23rd April 2026 made a case that the identified asbestos is isolated. The letter states that there would be no exposure route in the proposed development. However, we accept that in a scenario where landscape cover soils were to be excavated, it could result in the exposure of Made Ground containing asbestos fibres. Consequently, we proposed the inclusion of a membrane in our letter dated 23rd April 2026. We have updated the Remediation Strategy 769.09.04 to this effect.

Verification

Remada will prepare a Verification Report as set out in the Remediation Strategy but please note that construction works are almost complete and that the landscape soils are being placed over a membrane this week.

Yours sincerely,



Greg Jones.
Director
Remada Ltd
07966 017009



Enclosure: pdf of email dated 24th October 2025 from Hannah Kent

Specialist in Land
Condition (SiLC)
National Quality Mark
Scheme
Due Diligence
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Subject: Re: P2025/0235 & P2025/0262 - Castle Retail Park Briton Ferry Road
Date: Friday 24 October 2025 at 12:00:16 British Summer Time
From: Hannah Kent
To: Greg Jones, Rahma Dwimunali
CC: Jessica King, Rob Mitchell, Rhydian Griffiths, Lyn McComas
Attachments: image005.jpg, image006.jpg, image007.jpg, image008.png, image009.png, image001.jpg, image002.png, image003.png

Hi Greg and all,

Thanks for your email and the attached proposal/location information. Yes, I would be happy with the additional proposed intrusive sampling work.

Many thanks

Hannah

[REDACTED]

Subject: Re: P2025/0235 & P2025/0262 - Castle Retail Park Briton Ferry Road

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Hi Hannah,

Rob Mitchell requested that I follow up your email below and our telephone conversation last week because Lidl's contractor is due to start demolition for the redevelopment in mid November.

We agree that additional ground investigation would be beneficial and to achieve this demolition of the existing store footprint would remove constraints to exploratory locations. We accept that NRW may have additional comments and due to this we would also propose groundwater monitoring along the boundary to Cryddan Brook as it is a receptor associated with the underlying superficial deposits. We would sample and test the Made Ground and natural soils for Asbestos, pH, Fraction of Organic Carbon, Cyanide, Phenols, TPHCWG, BTEX and PAH(16) as per the recently prepared Phase 1. Groundwater samples would be scheduled for the same except Asbestos and FOC. We have not proposed supplementary ground gas monitoring as the Remediation Strategy requires CS2 Ground Gas protection measures based our initial findings. We submit the above information as updated Phase 2 report.

Lidl would greatly appreciate your consent to the investigation that is proposed on the attached drawing as this will enable the redevelopment to proceed.

Regards,
Greg Jones

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Date: Wednesday, 22 October 2025 at 20:07

To: Rahma Dwimunali



Subject: Re: P2025/0235 & P2025/0262 - Castle Retail Park Briton Ferry Road

Hi Rahma & Rob,

I'm afraid it is not me that has contact with NRW. Jessica may have some contact details for NRW? I don't alas, sorry! There will be a public contact number which you can find for them, but I suspect getting through to the correct person may not be easy.

I have again advised Jess that I am not happy with the contaminated land reports - this was detailed in my initial response, and little has changed. That is, the resubmitted reports have not addressed the issue (of basing an intrusive investigation / phase II assessment on the information discovered in a phase I assessment) - A desk-based (phase I) assessment that identifies the history of the site. Then linking the history of the site, and the locations of potential contamination, with the intrusive investigation. . For example, a tank was identified as being somewhere on the site - and there were buildings where industrial processes occurred - these are the areas where I would expect testing to have occurred, amongst others. But, as the report states, the intrusive sampling was undertaken for the purposes of identifying the geotechnical stability of the site - for the purposes of designing foundations - and samples of soil were taken from these areas. These locations do not correlate with the site's history, and therefore, there is no justification for these locations being chosen to identify contamination hotspots. I think additionally, there is the issue that Lidl have changed their plans to incorporate a larger footprint (so I have been told by Greg), but the contaminated land reports were not amended to include this area.

While I acknowledge that a report was amended to include the history of the site, this in itself did not address my concerns - which were that the intrusive sampling was not based on the historical information - potential sources of contamination on site.

So, the issue is that I am not satisfied that the intrusive sampling has been robust and it does not link to sites of potential contaminants... so there remains a possibility that contamination hotspots are not identified and remain on site. Therefore, there is a risk that contaminants could mobilise creating a pathway between the source of the contamination and a "receiver". In the case of NRW, I think they will say the same and will have concerns that the nearby watercourse may be polluted by contaminants on site.

I hope you can appreciate that we have to do our jobs and ensure that we get this right, and

until NRW have responded, further work should not be planned without their input. Furthermore, I gave detailed feedback the last time I responded - this was not followed. What was provided was a section in a report showing the history of the site - this did not link to the intrusive investigation, which was the issue. A contaminated land investigation must link to a site's history, identifying possible contaminants and their locations, this does not always correlate with a site investigation for the purposes of geotechnical information to assist in designing foundations/building footprint.

I hope this clarifies the situation,

Kind regards

Hannah

Miss Hannah Kent

Planning & Contaminated Land Consultant / Ymgynghorydd Cynllunio a Thir Halogedig
Environmental Health / Iechyd Yr Amgylchedd

Neath Port Talbot County Borough Council / Cyngor Bwrdeistref Sirol Castell-nedd Port Talbot

The Quays / Y Ceiau

Brunel Way / Ffordd Brunel

Baglan Energy Park / Parc Ynni Baglan

Neath / Castell Nedd

SA11 2GG

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

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From: Rahma Dwimunali <[REDACTED]>
Sent: Tuesday, October 21, 2025 10:41 AM

Subject: P2025/0235 & P2025/0262 - Castle Retail Park Briton Ferry Road

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Dear Hannah,

I am the planning agent for planning refs. P2025/0235 & P2025/0262. Further to Greg's email below, I understand that you have spoken to Greg about the discharge of condition applications last Thursday and that you are awaiting comments from NRW before you can make further comments towards the applications.

Could you please confirm if you have heard from NRW? If not, could you please provide the contact details of NRW?

I look forward to hearing from you.

Kind regards,

Rahma

Rahma Dwimunali
Planner

Tel: [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]

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Birmingham Cardiff Exeter London



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From: Greg Jones <greg.jones@remada.co.uk>

Sent: 15 October 2025 10:16

To: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: P2025/0235 & P2025/0262 - Castle Retail Park Briton Ferry Road

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Good morning Jessica,

Peter Waldren at Carney Sweeney asked to me contact Hannah Kent regarding ground investigation reports for Lidl's development at Briton Ferry Road, Neath. However, Hannah doesn't have a direct phone number, the Environmental Health/Contaminated Land department do not have a departmental phone number and general enquiries are not permitted to give me her email address. A request for call back via the planning department help desk has been unanswered.

Could I ask you to forward my comments (below) to Hannah or alternatively could you give me Hannah's email address so that we can resolve the concerns that have been raised.

In summary, Hannah has commented that Remada's Ground Investigation appeared to be carried out for geotechnical reasons and that exploratory locations do not align with the proposed layout.

I agree with Hannah's comments because Remada's ground investigation was carried out for a previously envisaged extension of the existing Lidl store and did not include a Phase 1 assessment. Prior to Remada's involvement, Lidl had employed Opus to produce a Phase 1 report and to investigate the land on which the adjacent gym is located.

Lidl have since updated their layout and Remada reports (listed below) present the revised layout following demolition of both buildings. Accordingly, Remada's exploratory locations do not align with the proposed layout and Opus' exploratory locations related only to the proposed car park.

As the building footprints would be most easily investigated following demolition, I would like to agree a post demolition investigation sampling plan that forms part of an updated Remediation Strategy in order to provide Hannah with confidence in the data and the assessment that has been submitted to date.

The latest issues of Remada's reports for the site are listed below:

769.01.03 Coal Mining Risk Assessment prepared for the proposed extension but re-issued with the current layout.

769.02.03 Intrusive Investigation prepared for the proposed extension but re-issued with the current layout.

769.03: No report.

769.04: No report.

769.05.02 Supplementary groundwater investigation to address NRW comments (re-issued with current layout).

769.06: No report.

769.07.01 Infiltration tests.

769.08.01 Ferroscons of floor slabs and foundations.

769.09.02 Remediation Strategy (re-issued with current layout)

769.10.01 Phase 1 (prepared out of sequence due as per comments above).

Regards,
Greg Jones
Remada Ltd

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



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General Requirements

- 01. Soft strip.
- 02. Demolish existing Lidl, Gym and Poundstretcher' buildings including removal of existing surfacing.
- 03. Break floor slabs and relic foundations to formation level.
- 04. Turnover made ground to remove obstructions to construction. Remada to be consulted regarding chemical analysis at this stage.
- 05. Chase out redundant services
- 06. Crush site-won concrete for reuse
- 07. Regrade site and compact made ground / 6F2 in accordance with engineer's specification.
- 08. Imported fill to comply with Table 2
- 09. If potential previously unidentified contamination is identified, consult Remada.

Landscaping

Landscaping materials to comply with Table 2.

Historical Cryddan Brook

Protection of Cryddan Brook

Historical Sidings & subsequent Coal Yard

Historical Tin Plate Works

Historical Japan Works & Subsequent Melyn Works

Ground Gas

CS2 Gas protection measures required as a minimum within proposed development.

Legend

Previous Exploratory Holes

- Cable Percussive Borehole Location 2020
- Hand Excavated Inspection Pit 2020
- Groundwater samples March 2022
- River water sample 2022
- Opus window sample holes 2016

Existing Footprint

Proposed GI November 2025

- TPxx Trial Pit to prove depth to natural soil and to sample Made Ground
- WSxx Monitoring Well

Notes

Proposed site layout plan reproduced from client-supplied HTC Architects's Proposed Lidl Site Plan, drawing ref: 2782-P4403-Rev H dated October 2024.

Overlay of 1935 historical map on existing and proposed layout

Issue	Approved	Date

Project Title
Briton Ferry Road, Neath

Drawing Title
Remediation Activities & Supplementary Ground Investigation

Client
Lidl Great Britain Ltd

Scale	Drawn	Size
as shown	GJ	A4
Date	Job No.	Figure No.
23.10.25	769.12	01

Drawing Reference
769.12 Fig1

REMADA
GEO CONSULTANTS