

General Environmental Health Planning Consultation Response

Planning Application Ref: P2025/0842

Address: 1 Henfaes Road Tonna Neath SA11 3DX

Planning Case Officer: Jessica King

Comments provided by: Aldona Rahman

Our Ref:

Date: 06/01/2026

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 Heath 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

We do not have any objection to the proposed development. Subject to comments below.

Observations and Comments

Contamination

The information provided does not add anything beyond what was submitted under planning application P2024/0818 and our comments dated 20th January 2025 for this application still stand regarding the Mine Gas Risk Assessment. Additionally, the reports identified a Radon risk of 5–10%.

The applicant is required to provide the following:

- A full risk assessment addressing mine gas with radon taken into consideration when assessing potential gas levels and proposed mitigation measures for the development.
- Appropriate chemical testing for any site-won materials intended for reuse.

- Testing of all imported materials to ensure they are suitable for the proposed use.
- Maintenance of a watching brief during development works.

I recommend that the following land contamination conditions be attached to any approval granted: LC01, LC03, LC04, LC05, MG01, MG02, and MG03. Once a contaminated land report assessing the site for this application has been received and reviewed, these conditions may then be considered for discharge.

Recommended Conditions

LC01 - 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: A Guide for Developers (WLGA, WAG & EAW, July 2006) 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 survey 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 – Remediation Strategy

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 - Verification Report

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.

LC05 - Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified, work on site shall cease immediately and shall be reported in writing to the Local Planning Authority. A Desk Study, Site Investigation, Risk Assessment and where necessary a Remediation Strategy must be undertaken in accordance with the following document:- Land Contamination: A Guide for Developers (WLGA, WAG & EAW, July 2006). This document shall be submitted to and agreed in writing with the Local Planning Authority. Prior to occupation of the development, a verification report which demonstrates the effectiveness of the agreed remediation, 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 off site receptors.

MG01– Preliminary Mine Gas Risk Assessment

No development shall take place until a preliminary mine gas risk assessment setting out recommendations, has been submitted to and approved in writing by the Local Planning Authority. The mine gas risk assessment shall be undertaken by a competent person as defined in the '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)'. It shall document the findings of each step of the decision tree in Figure 13.1 of the Decision support tool for mine gas risk assessment on page 35 of CL:AIRE – Good Practice for Risk Assessment for Coal Mine Gas Emissions.

Reason: In the interests of human health and to accord with Policy EN8 of the Local Development Plan

MG02 – Detailed Mine Gas Risk Assessment

Where the conclusions of the preliminary mine gas risk assessment required under condition number (xxxxx MG01) identifies the need for a Detailed Mine Gas Risk Assessment, a report detailing the outcome of the suitable site investigation and lines of evidence risk assessment 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) shall be submitted to and approved by the Local Planning Authority. If the Detailed Mine Gas Risk Assessment concludes remediation is required to mitigate the risk, the report shall also include a Remediation Scheme with full details of the design of gas protection measures and a Verification Plan as described in CIRIA C735 –'Good practice on the testing and verification of protection systems for buildings against hazardous ground gases'. The development shall be constructed in strict accordance with the scheme as approved. (See MG Informative 4)

Reason: In the interests of human health and to accord with Policy EN8 of the Local

Development Plan

MG03 – Mine Gas Verification Report

Prior to occupation or first use of the development hereby approved a Verification Report demonstrating that the gas protection has been installed in accordance with the scheme as approved under condition number (xxxxx MG02) and in accordance with CIRIA C735 –‘Good practice on the testing and verification of protection systems for buildings against hazardous ground gases’, shall be submitted to and approved by the Local Planning Authority.

Reason: In the interests of human health and to accord with Policy EN8 of the Local Development Plan

MG Informative 4 Extensions and alterations. (Where MG02-03 have been applied)

The applicant is made aware that all mitigating gas protection measures as approved and verified under this permission should be fully implemented within any future extension to the development. Notwithstanding if these extensions are permitted development. Installed and verified in accordance with CIRIA C735 –‘Good practice on the testing and verification of protection systems for buildings against hazardous ground gases’.