

## **Environmental Health**

No objection to the proposed re-development in principle, subject to the information submitted. The applicant would need to demonstrate that the development would not result in any environmental or public impacts (as advised below).

### **Noise**

- The development of a Tesco store will likely include condenser fans for cooling along with a possibly of other fixed plant and equipment. Consideration of noise impacts to neighbouring noise sensitive premises will be required in line with BS4142 guidance. Noise from any fixed plant will need to meet a noise level of 5db below background noise levels.

### **Contaminated Land**

- There may be some contamination associated with the use of the property as a house as a dwelling such as fuel oils, and/or development related materials, following change of use to a club. Before any development works commence on an area of land it must be determined whether or not it is contaminated and what works may need to be carried out to make the land 'suitable for use'.
- Due to the age of the building/s, it is likely that asbestos will be present within some or all of the buildings on site and potentially the surrounding area. It is the developer's responsibility to ensure that final ground conditions are fit for the end use of the site.

### **Lighting**

- Artificial lighting has the potential to increase artificial lighting levels locally impacting biodiversity and the amenity of nearby dwellings.

### **Air Quality & Net Zero**

- In an application of this nature, it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy Framework. A condition requiring charging points is therefore necessary.

### **Demolition & Construction**

- The site is surrounded by other residential dwellings that will be impacted during the demolition, construction and landscaping phase of the development.
- There is a likelihood of the presence of asbestos containing materials (ACM), in the buildings. In order to prevent the release of asbestos fibres into the environment during the demolition process, the developer will need to ensure the appropriate investigations and controls are in place.

[Whilst it is a building control matter to ensure that asbestos is identified through asbestos surveys of buildings prior to redevelopment or demolition, should a developer undertake work that results in the release of asbestos fibres into the environment, environmental health and the health and safety executive have responsibilities to investigate and ensure ACM's are effectively controlled to prevent environmental and public health impacts].

I have reviewed the pre-application for the Tesco store and suggest that the applicant provides further information at formal application stage:

1. Phase I & Phase II Contaminated Land Assessment,
2. Demolition Method Statement & Environmental Management Plan (DMSEMP)
3. Construction Environmental Management Plan
4. Artificial Lighting Plan

5. Electric Vehicle Charging Points

6. Destructive Asbestos Survey of Buildings – *this is a building control requirement, but becomes an environmental health & HSE issue if any asbestos is released into the environment*

7. Energy saving and renewable technologies should be considered for this development in addition to the electric vehicle charge points, such as solar panels, ground source heat pumps etc in the interests of carbon saving and energy efficiency

## **Highways & Drainage**

The following concerns have been identified:

1. The proposed development does not comply with the Neath Port Talbot County Borough Council (NPTCBC) Parking Standards (October 2016). The site is located within Zone 4 and has a gross floor area of 321 m<sup>2</sup>. In accordance with Section 4.3 – Shops, the minimum parking requirement for this type of development is two commercial vehicle spaces, sixteen non-operational spaces, one disabled parking space, and appropriate cycle parking facilities. The submitted proposal provides only seven parking spaces, which represents a significant shortfall against the required standard. This deficiency is likely to result in overspill parking on Heol Cae Gurwen, creating potential congestion and highway safety concerns.
2. The road fronting the property is an A-classified highway that experiences consistently high traffic volumes and is designated by the Council as a traffic-sensitive route. The surrounding residential area has limited off-street parking provision, resulting in informal parking arrangements for local dwellings. Introducing a development of this nature with insufficient customer parking is likely to exacerbate existing parking pressures and lead to increase on-street parking along this busy section of road, creating potential congestion and safety concerns.
3. There is an established car garage located on the opposite side of the road, which attracts a high volume of customers. Many of these customers park their vehicles on the highway due to limited on-site provision. While this existing situation is not directly related to the proposed store, introducing a retail development with inadequate parking facilities would compound the current parking pressures. This is likely to result in further on-street parking along an already busy section of road, increasing congestion and potential safety risks.
4. The submitted feasibility drawing includes an auto-tracking layout for a rigid vehicle; however, the tracking path conflicts with the back of the footway when reversing into the designated space and also encroaches on the kerblines on the opposite side of the property. To enable a full assessment, a detailed CAD drawing must be provided so that we can undertake its own vehicle tracking analysis on the proposal.
5. The southern access point is currently substandard and does not meet the requirements set out in the Neath Port Talbot Highway Technical Design Guide. To achieve compliance, the access width must be increased to 5.5 metres.
6. A plan needs to be submitted detailing vehicle visibility splays when exiting the site. The required splay shall be in accordance with TAN18 which for a 30mph road traffic speed limit (Page 44 TAN 18, Table A) would be a splay of 90m in

either direction. There shall be no obstructions higher than 600mm in height within these splay areas to allow for a safe unobstructed egress from the site.

7. Pedestrian vision splays of 2.4 metres by 2.4 metres (measured back from back of footway) shall be provided and maintained each side of each access within which nothing over 600mm in height shall be erected or allowed to grow.

SAB approval will be required prior to any work commencing. To commence work is a breach of SAB approval required under Paragraph 7 (1) Schedule 3 of the Flood and Water Management Act 2010 whereby legal action will be taken by the Authority under The Sustainable Drainage (Enforcement) (Wales) Order 2018. Guidance and applications can be found on [www.npt.gov.uk/sab](http://www.npt.gov.uk/sab).

## **Biodiversity**

Prior to determination of the application the following information is required to be submitted to inform the decision:

- An Extended Phase 1 habitat survey, this should include the identification of the presence of S7 Environment (Wales) Act habitats and species, sites that meet SINC criteria, in addition to protected species. A balance of S7/SINC habitat loss/gain to the scheme should be included. The results of this survey should inform the requirement for further specific surveys, such as bird, bat and reptile surveys. The bat survey that was submitted with the application in 2023 will be out of date now so that will need to be updated.
- A biodiversity record search from the South East Wales Biodiversity Records Centre (SEWBRc) should be undertaken to inform the required surveys and the assessment.
- An assessment of the impacts upon areas identified as sites of importance for nature conservation (SINC) and all areas that would meet the criteria of a SINC. NB details of identified SINC are available from SEWBRc and the criteria are available from the Wales Biodiversity Partnership website.
- An assessment of ecosystem resilience (Section 2 Environment (Wales) Act 2016); this shall particularly consider:  
*(a) diversity between and within ecosystems; (b) the connections between and within ecosystems; (c) the scale of ecosystems;*  
*(d) the condition of ecosystems (including their structure and functioning); (e) the adaptability of ecosystems.*
- An assessment of impacts upon bird habitat (Conservation of Habitats and Species Regulations 2017 as amended); this should ideally be based on up-to-date survey information (including breeding, foraging and wintering requirements).
- Proposals for mitigation/compensation for any adverse impacts identified in the above assessments.
- Details of biodiversity enhancement measures in line with Planning Policy Wales 12 (2024).
- Details of how the Stepwise Approach has been considered (PPW 12, 6.4.15).
- In line with Chapter 6 of PPW 12 any tree to be removed will be required to be replaced with 3 trees of a similar type and compensatory size for every 1 lost. This

must be onsite, or immediately adjacent to the site. The applicant will need to demonstrate how this will be achieved prior to any permissions being given.

### **Structures (Demolition)**

The former bar demolition & site clearance works are to adhere to the requirements and legislations as listed. An outlined method statement be submitted for the works; describing the building site and safe method for carrying out demolition and disposal of all arising in accordance with the code of practices as listed.

*BS6187: code of practice for demolition.*

*H&S Executive Guidance Notes for Demolition and*

*Construction (Design and management) regulations 2015*

*BS5228-1 2008 Noise and vibration-control on construction and open sites.*

*(IAQM) Institute of Air Quality management; Guidance of the assessment from dust and construction.*

Also to include for; description of the building construction, and any hazardous material to be stripped/disposed of site to NRW (Natural Resources Wales) requirements.

A method statement for carrying out the works, inc. risk assessment and means for eliminating , reducing, and controlling hazards.

Means of safe site access, suitable plant use, control of noise, vibration, dust control, etc. all in line with the above legislations.