

Summary of Responses from Aneurin Bevan University Health Board to the proposed Nant Llesg open cast development by Miller Argent

In the area of the proposed development, measures of population health are higher (worse) than for the rest of the Local Authority and Health Board areas. We would wish for this to be taken into account when the Local Authority is considering whether the proposed prevention and mitigation measures are sufficient to satisfy the Authority of limited adverse impacts on health.

On the basis of information supplied we are advised that breaches of health-based Air Quality Objectives are unlikely but wished to know if CCBC Environmental Health Department concurred with this view. The need for robust long term air quality monitoring was highlighted.

With regard to visible dust particles (nuisance dust) we were aware that Environmental Health Specialists had queried the effectiveness of proposed mitigation measures for both coal and light dust types. Robust long term dust monitoring for 'nuisance' dust was recommended should permission for the development proceed.

We commented that it was important that 'dust prevention measures were sufficient to prevent both 'nuisance' dust and exposure to PM10 for the most sensitive receptors and that planning conditions reflect this requirement.' We asked for confirmation from the Local Authority, as managers of local air quality, that they were satisfied regarding impacts on local air quality, noise nuisance and the Environmental management system. We stated, 'until Caerphilly County Borough Council is satisfied, then as a Health Board, we cannot be, and thus need confirmation of this to reassure us', and 'we would like confirmation that CCBC as Regulator is satisfied that the monitoring/sampling regime, should plan permission re granted, will be robust enough taking into account the nature of the work'. These assurances have so far not been received.

The potential for noise nuisance, particularly off site was a concern and further information from the applicant had been requested but not received to date, making comment difficult.

We highlighted that, 'a coherent and robust environmental management system is required and is currently missing from the documentation. Such a system should be agreed with CCBC.'

We stated, 'There is considerable community anxiety concerning impact on physical and mental health and wellbeing, environmental impact and lack of confidence in the plan for eventual remediation. A formal industrial liaison group should be established to ensure continuing communication and assurance to residents.'

Improvements suggested in the Health impact Assessment Support Unit's appraisal included; 'vulnerable groups considered to be affected by the proposal should be listed within the report.'

It was highlighted that 'Cumulative impacts should be considered more comprehensively as part of the Health Impact Assessment or as cross references. With regards to consultation there was no description of the members of the Community Forum or link to any information about this group or how members were identified', 'any HIA participatory workshop should be reflective of all the community and organisational stakeholders and not be so limited in nature'.

Dr G Richardson 9/6/15