

Ein cyf/Our ref: CAS-255792-W2Y0
Eich cyf/Your ref: P/24/0068

Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
CF48 4TQ

Dyddiad/Date: 28 May 2024

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONSTRUCTION OF 13 GARAGES

**LLEOLIAD/LOCATION: LAND ON THE SOUTH SIDE OF GOITRE-COED ROAD,
TREHARRIS CF46 5BB**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 May 2024.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition 1: Construction Environmental Management Plan

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Pollution Prevention

We note the proposal is for the construction of 13 vehicle garages on land south of Goitre-coed Road, Treharris and the planning application form states surface water will be dealt with via existing watercourse and main sewer. Given the size of the proposed development a Sustainable Drainage System (SuDS) to deal with surface water with approval from the SuDS Approval Body (SAB) will be required.

The land itself will require earthworks prior to construction due to the current topography of the land, which will cause exposed earth and therefore the potential for surface water pollution. Given the proximity to the Taff (56 metres away) we request a condition requiring the submission of a Construction Environmental Management Plan be attached to any planning permission granted.

Condition:

No development including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:

- Construction methods: Method statement, details of materials, how waste generated will be managed.
- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any surface drain.
- Soil Management: details of topsoil strip and storage
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification : A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

We advise that general pollution prevention guidance around working in or near water and construction sites can be found in

GPP5: gpp-5-works-and-maintenance-in-or-near-water.pdf

(netregs.org.uk) (netregs.org.uk) and

GPP6: gpp6-working-on-construction-and-demolition-sites.pdf

(netregs.org.uk) (netregs.org.uk)

This guidance should be used when developing any pollution prevention measures for the site.

European and Fully Protected Species

We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of European and Fully Protected Species under the Wildlife and Countryside Act 1981 (as amended), being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and Planning (paragraph 6.2.2) a survey may be required. Any survey should be carried out in accordance with best practice guidelines.

Please consult us again if any survey undertaken finds that European and fully Protected Species are present at the site, and you require further advice from us.

Ancient Woodland

We note the application site is an area of Ancient Woodland which would need to be cleared to accommodate the development. Our 'Advice to Planning Authorities considering Proposals affecting Ancient Woodland' can be found here [Natural Resources Wales / Advice to planning authorities considering proposals affecting ancient woodland](#).

Foul Drainage

We note the application form states foul water is to be disposed of via mains sewer and it is unknown as to whether there is to be connection to the existing drainage system. If foul drainage is required, we refer you to Welsh Government Circular 008/2018 on private drainage, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer. For your information, the DCWW foul line runs immediately adjacent to the site in Goitre-coed Road and permission from Dwr Cymru would be required to connect to this if foul drainage is required.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Annabelle Evans

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 65 5027

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.