

Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

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

ebost/email:
southeastplanning@cyfoethnaturiolcymru.gov.uk

08/02/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: NEW BRIDGE OVER THE RIVER TAFF

LLEOLIAD / LOCATION: AT RHYDYCAR BRIDGE (OFF AVENUE DE CLICHY)

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14/1/22.

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

Given the location of the proposal (construction of new bridge and removal of existing bridge) and the potential for works (involving excavation works and heavy plant) to adversely impact on the environment we request the following condition be attached to any planning permission granted.

Condition

No development or phase of 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 should include:

- Construction methods: 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 watercourse or surface drain.

- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- 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
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- 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
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

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

We refer the applicant to pollution prevention measures and guidance which can be found on the [NetRegs website](#). Guidance for Pollution Prevention (GPP) 1, 5 and 21 will be of particular relevance.

Additional Advice

We note the intention to divert the nearby DCWW foul main that crosses the river onto the proposed bridge (forming part of the bridge superstructure). We advise you consult DCWW regarding this.

Flood Risk

Our Flood Risk Map confirms the application site lies within Zone C2 of the Development Advice Maps (DAM) as contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers.

We note Drawing 002-GA-01, General Arrangement shows that the 1000 year flood level is 163.44m AOD and that the soffit of the proposed bridge is above this level. We further note that the proposal is for a single span structure with no piers within the watercourse. Therefore we have no concerns from a flood risk perspective and confirm a Flood Consequences Assessment is not required for this proposal.

Our advice is based on the information available on your website, however, we note the drawings are labelled as draft. Therefore if the design of the bridge is changed NRW needs to be reconsulted.

Flood Risk Activity Permit (FRAP)

A FRAP will be required for these works, please contact Carl Llewellyn via carl.llewellyn@cyfoethnaturiolcymru.gov.uk to discuss this further.

Land Contamination and Controlled Waters

We request the following informative be imposed on any planning permission granted.

Informative/ advice to applicant:

The treatment and disposal of contaminated soils and groundwater is regulated by waste legislation and requires an environmental permit.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the [CL:AIRE Definition of Waste: Development Industry Code of Practice](#). This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, Natural Resources Wales should be contacted for advice at an early stage to avoid any delays.

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