

Ein cyf/Our ref: CAS-262457-J2B8
Eich cyf/Your ref: P/24/0191

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

Dyddiad/Date: 27 August 2024

Annwyl Kate/Dear Kate,

BWRIAD/PROPOSAL: Construction of new synthetic pitch and erection of associated fences, barriers and storage container. Erection of flood lighting around new synthetic pitch and existing running track.

LLEOLIAD/LOCATION: Afon Taf High School, Yew Street, Troedyrhiw, Merthyr Tydfil, CF48 4ED

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 August 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: Construction Environmental Management Plan (CEMP)

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

Pollution Prevention: Construction Environmental Management Plan

The site is located within 25 metres of the River Taff, a designated main river. To reduce the risk of pollution to these controlled waters during the construction phase of the development, we advise that a condition for a Construction Environment Management Plan (CEMP) is attached to any planning permission granted. Further details are provided below:

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.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management;
- 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

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.

Flood Risk

Our Flood Risk Map confirms the application site lies entirely C2 of the Development Advice Maps (DAM) as contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 Rivers.

The proposed development will comprise a new synthetic sports pitch (and associated works) within the grounds and boundary of the existing school. Given the nature of the proposed development, and that it is located within an existing school site, we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks. We refer the applicant to our [website](#) for further advice and guidance is available. Additional guidance including the leaflet “Prepare your Property for flooding” can be found [here](#).

Notwithstanding, we note a Flood Consequence Assessment has been submitted in support of the application and we therefore provide our technical advice for your information below.

Technical Advice

We have reviewed the submitted FCA undertaken by Wallingford HydroSolution Ltd, dated 24 May 2024.

Section 2.2 of the FCA states that the ground levels range between 134.26 and 134.70 mAOD. Section 3.2.2 of the FCA indicates that, during the 1% (1 in 100 year) event plus

climate change allowance (CCA), the site is predicted to experience average flood depths of 0.09m.

During the 0.1% (1 in 1000 year) event, the FCA indicates that the site is predicted to be inundated with flood depths ranging between 1.16 and 1.54m.

With regards to flooding elsewhere, Section 4.3 indicates the two proposed shelters and associated lights will have negligible impact on flooding elsewhere and any detriment would be largely contained within the site boundary of the school. Furthermore, there are no indication of any ground raising. Therefore, we consider the proposal is unlikely to increase flooding elsewhere.

Please note our technical advice is limited to fluvial flood risk and consequences. The proposal may be at risk from other sources, such as groundwater flooding or pluvial (surface water) flooding. We advise you to seek advice from your drainage department as the Lead Local Flood Authority on this matter.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or approve the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

European Protected Species (EPS)

We note the submission of a preliminary ecological appraisal by Wildwood Ecology (dated 28/06/2024). We advise you liaise with your authority's ecologist regarding its content, including its assessment, conclusions and recommendations.

Should your ecologist require our advice, please reconsult us specifying what you seek our advice on, as per our checklist.

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

Eleanor Sullivan

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

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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.