

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

Ein cyf/Our ref: CAS-282429-P8C3
Eich cyf/Your ref: P/25/0165

Dyddiad/Date: 20 June 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: DEMOLITION, GROUND RECLAMATION AND REMEDIATION AND OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED (EXCEPT FOR THE MAIN ACCESS POINTS) FOR THE COMPREHENSIVE REDEVELOPMENT OF THE FORMER HOOVER SITE TO CREATE A NEW NEIGHBOURHOOD, INCLUDING UP TO 441 NEW HOMES, 1.5 HECTARES OF EMPLOYMENT LAND (INCLUDING B1 (BUSINESS), B2 (GENERAL INDUSTRIAL), B8 (STORAGE AND DISTRIBUTION) AND SUI GENERIS USES), COMMUNITY HUB (INCLUDING A1 (SHOPS), A2 (FINANCIAL AND PROFESSIONAL SERVICES) A3 (FOOD AND DRINK), B1 (BUSINESS), D1 (NONRESIDENTIAL INSTITUTIONS) AND SUI GENERIS USES, COMMUNITY HEAT HUB, METRO TATION AND TRANSPORT HUB (INCLUDING TRANSPORT INTERCHANGE AND PARKING), A NETWORK OF OPEN SPACES (INCLUDING PARKLAND, ACTIVE TRAVEL ROUTES, AREAS FOR INFORMAL RECREATION AND SUDS ATTENUATION FEATURES) TOGETHER WITH ASSOCIATED WORKS, INCLUDING IMPROVEMENT/WORKS TO THE HIGHWAY NETWORK.

**LLEOLIAD/LOCATION:FORMER HOOVERS SITE, PENTREBACH ROAD
PENTREBACH, CF48 4TU**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 19 June 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following

Condition: Land affected by contamination
Condition: Contamination verification report
Condition: Unsuspected contamination
Condition: Surface water drainage
Condition: Piling
Condition: Construction Environment Management Plan

Please note, without these conditions, we would be likely to object to the planning application. Further details are provided below.

Land Contamination

We have reviewed the Ground Investigation report prepared by Redstart, dated February 2024.

We agree with the recommendations in section 9 to carry out further site investigation and groundwater monitoring. To secure recommendations, we would request the following conditions should a full/formal application be received:

Condition: Land affected by contamination

No phase of the development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:

- all previous uses
- potential contaminants associated with those uses
- a conceptual model of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

Justification: To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination

Condition: Contamination verification report

Prior to the occupation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

Justification:

To ensure the methods identified in the verification plan have been implemented and completed and the risk associated with the contamination at the site has been remediated prior to occupation or operation. To prevent unacceptable risks to controlled waters and ecological systems.

Condition: Unsuspected contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification:

To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks. A site investigation may not uncover all instances of contamination and this condition ensures that contamination encountered during the development phase is dealt with appropriately.

Condition: Piling

No development shall commence until details of piling or any other foundation designs using penetrative methods sufficient to demonstrate that there is no unacceptable risk to groundwater have been submitted to and approved in writing by the Local Planning Authority. The piling/foundation designs shall be implemented in accordance with the approved details.

Justification: Piling/foundation details should be submitted to ensure there is no unacceptable risk to groundwater during construction and methods/design are agreed prior to the commencement of development.

Informative: Surface water drainage

We would advise an informative is included on any decision notice informing the applicant to obtain the approval of the SuDS Approving Body (SAB) for their management of surface water.

We advise that infiltration of surface water drainage into the ground should only be permitted for parts of the site where it has been demonstrated there is no resultant unacceptable risk to controlled waters. This should be informed by the ground/site investigations and/or remediation strategy. If this is not properly controlled, the development may create pathways for pollution to controlled waters.

Pollution Prevention

Given the site is adjacent to a main river, the River Taff, we would recommend a Construction Environmental Management Plan is submitted to protect the riverine column during construction.

Condition: Construction Environmental Management Plan

No development, including site clearance, shall commence until a final version of 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 the timetable and details of any 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 drainage.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- CEMP Masterplan: details of the extent and phasing of development.
- 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.

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

The planning application proposes highly vulnerable development (residential and mixed use). The Flood Map for Planning identifies the application site to be outside risk of flooding.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

We have reviewed the Drainage Strategy Report and Flood Statement undertaken by Quad Consult – dated 4 April 2025. Our advice to you is that the FCA satisfactorily demonstrates that the risks and consequences of flooding are manageable to an acceptable level.

Protected Species

We have reviewed the following information submitted in support of the application:

- Preliminary Ecological Assessment prepared by Redstart dated May 2022.

We note that the submitted report has identified that bats may be present at the application site. However, section 6.1 of the report advises that further survey work is required in the form of emergence surveys. We concur with this advice.

We advise that the additional survey work recommended in the report is undertaken and results submitted prior to determination of the application. Surveys should be undertaken in accordance with published best practice. If evidence of bat use is found, suitable avoidance, mitigation or compensation measures should also be provided as appropriate to the species and their use of the site.

Based on the draft application, as submitted, we would be unable to provide the planning authority with any assurance that the proposal would not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

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,

Rhian Isaac

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.