

Ein cyf/Our ref: CAS-267427-N3Z6
Eich cyf/Your ref: P/24/0251

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

Dyddiad/Date: 18 November 2024

Annwyl Ms Glover/Dear Ms Glover

BWRIAD/PROPOSAL: DEMOLITION OF FORMER PRIMARY SCHOOL.

LLEOLIAD/LOCATION: YSGOL Y GRAIG (FORMER), BREWERY LANE, CEFN COED.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 29 October 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 – Demolition Environmental Management Plan (DEMP)**

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

Protected Sites – Cwm Taf Fechan Woodlands Special Site of Scientific Interest (SSSI)

The proposed development site is approximately 25m from the Cwm Taf Fechan Woodlands SSSI. There is a lack of pollution prevention measures at the site during the demolition phase, particularly the potential for silt/contaminated water runoff given the proximity to the Taff Fechan SSSI.

Condition – Demolition Environmental Management Plan (DEMP)

No development or phase of development, including demolition or site clearance, shall commence until a Demolition Environmental Management Plan (DEMP) has been submitted to and approved in writing by the Local Planning Authority. The DEMP should include:

- Demolition methods: details of materials, how waste generated will be managed;

- General Site Management: details of the demolition programme including timetable, details of site clearance; details of site demolition and 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.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- DEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- 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 DEMP shall be implemented as approved during the demolition, site preparation and construction phases of the development.

Justification: A DEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development or phase of development or specified activity and implemented for the protection of the environment during demolition and construction.

Further advice

European Protected Species - Bats

We note the 'Ecological Impact Assessment Report', prepared by Wildwood Ecology, dated 11/01/2023, submitted in support of the above application. The report states that it will remain valid for a period of 18 months to until March 2024 and that bat roosts were identified during activity surveys.

We refer you to your authority's ecologist with regards to the need for any updated survey. Please re-consult NRW if you require our advice on any updated surveys submitted.

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

Andrew Hurst

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.