

Ein cyf/Our ref: CAS-302439-C2Q9
Eich cyf/Your ref: P/26/0022

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

Dyddiad/Date: 12 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: Discharge of conditions 3 & 4 of planning permission
P/25/0247 external finishes and ground conditions**

**LLEOLIAD/LOCATION: Willows House, Abercanaid Industrial Estate, Merthyr Tydfil,
CF48 1YF**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 04 March 2026.

We have concerns with the application as submitted. We do not recommend your Authority discharges condition 04 (land contamination) for the following reasons.

We recently provided advice (reference: CAS-299916-F6H9), dated 03 March 2026, which remains relevant.

Condition 04 - Land Contamination

We have reviewed the Phase 2 Contaminated Land Risk Assessment Report (Rhonddda Geotechnical Services, dated January 2026) and seek consideration of the following concerns before recommending the Discharge of Condition 4:

- Reference should be made to our comments made regarding the Phase 1 Contaminated Land Risk Assessment (Rhonddda Geotechnical Services, dated January 2026). The findings of the Phase 1 should inform the design and scope of the Phase 2, in order to assess and manage the risks from historic land contamination which is set out in [Land contamination risk management \(LCRM\)](#).
- The intrusive investigation included a limited scope of only 3no trial pits and 3no soil samples. This work has not been carried out in accordance with [BS 10175:2026 - Investigation of potentially contaminated sites](#). This standard provides recommendations and guidance for the investigation of land that may be affected by contamination and outlines a structured process for determining and managing risks through scientifically robust data collection related to soil, groundwater, surface water etc.
- The Phase 2 Contaminated Land Risk Assessment Report states that the 'trial pits were excavated to depths of 0.5m-0.7m', however the appended trial pit records

suggest the maximum depth reached was 1.0m below ground level. The extent of the made ground was not proven nor was the depth to groundwater. Although the report does include some qualitative assessment regarding the risk to controlled waters, the investigation has not fully followed [Development of land affected by contamination: A guide for developers' \(WLGA, 2023\)](#).

- The Phase 2 Contaminated Land Risk Assessment Report briefly discusses one remediation option, but a Remediation Strategy has not been submitted to support the discharge of Condition 4, part 3.

We advise that further information is supported in support of the application. Therefore, we do not recommend your authority discharges condition 04 (land contamination).

Other Matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Gemma James

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

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

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.