

Ein cyf/Our ref: CAS-311450-R5D8
Eich cyf/Your ref: P/26/0126

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

Dyddiad/Date: 30 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Discharge of conditions 3 (Bat boxes), 4 (Biodiversity enhancements), 8 (LEMP), 14 (Trunk watermains), 16 (Historic building recording and analysis) and 21 (Contamination) of planning permission P/25/0265

Lleoliad/Location: Land to the north of the Heads of the Valleys Road, off Rhymney Common Road, Dowlais, Merthyr Tydfil, CF48 2YG

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 17 June 2026.

We have **concerns** with the application as submitted. We do not recommend your Authority discharges condition 21 (land contamination) for the following reasons.

In our letter dated 22 January 2026 (ref. CAS-297003-Z0F2), we advised on the information submitted in the Site Investigation and Risk Assessment Report, prepared by Southern Testing Laboratories Limited, dated August 2025 (Reference. J15809). However, we understand that no further information has been submitted regarding additional intrusive investigation and our previous advice has not been addressed.

We have reviewed the Remediation Strategy and Verification Plan Report, Ref. V0996 (Southern Testing Laboratories Limited, dated June 2026). The report summary states that the Phase II investigation did not identify significant contamination in terms of the proposed commercial development. However, we advised in our letter dated 22 January 2026 that the potential sources of contamination identified in the Phase I Desk Study and Coal Mining Risk Assessment Report (Southern Testing Laboratories Limited, dated December 2024, Ref. J15809), were not fully targeted by the subsequent intrusive site investigation.

We note that the Remediation Strategy and Verification Plan Report summarises pollutant linkages. However, it does not consider controlled waters to be a receptor and has not provided adequate commentary or justification.

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.

Advice for the developer

We also recommend that developers should:

- Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#)
- Refer to '[Development of land affected by contamination: A guide for developers](#)' (WLGA, 2023) for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our [groundwater protection advice](#) on www.gov.uk

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Jessica Jones

Cynghorydd - Cynllunio Datblygu/Senior 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.