

Ein cyf/Our ref: CAS-299916-F6H9  
Eich cyf/Your ref: P/26/0022

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

Dyddiad/Date: 03 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

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

**LLEOLIAD/LOCATION: JLC Groundwork Contractors Ltd Willow Works Abercanaid  
Industrial Estate Abercanaid Merthyr Tydfil CF48 1YF**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 06 February 2026.

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

#### **Condition 04 - Land Contamination**

We have reviewed the Phase 1 Contaminated Land Risk Assessment (Rhondda Geotechnical Services, dated January 2026).

We advise that the applicant has only submitted supporting information for part 1 (preliminary risk assessment) of Condition 4.

The Phase 1 Contaminated Land Risk Assessment uses data commissioned for a nearby site (e.g. extracts from historical maps and environmental data collated for a different site). Although the report states the information 'has been taken directly from the report with minor distance adjustments where necessary', we consider this a limitation and query the accuracy of the data presented.

The Phase 1 Contaminated Land Risk Assessment has identified several historical industrial land uses within very close proximity to the site which could possibly give rise to contamination (e.g. spoil tipping just to the north, wire works / metal processing factory immediately adjacent to the west, Gas Works and associated features to south/southeast and a dairy). However, there appears to be limited commentary within the report regarding the potential sources of contamination and subsequent contaminants of concern.

We note that an intrusive investigation is proposed at this site, which is welcomed. We recommend that [BS 10175:2026 Investigation of potentially contaminated sites – Code of Practice](#) is followed to progress any intrusive investigation at the site and the information be submitted in support of Discharge of Condition 4.

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

### Further Advice

We recommend the developers should:

1. Follow the risk management framework provided in [Land contamination risk management \(LCRM\)](#)
2. 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.
3. Refer to our [groundwater protection advice](#) on [www.gov.uk](http://www.gov.uk)

### **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](mailto: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.