

Ein cyf/Our ref: CAS-298691-C1R3
Eich cyf/Your ref: P/24/0196

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

Dyddiad/Date: 04 February 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ERECTION OF HYDROGEN ELECTROLYSER PLANT FACILITY (8 MEGAWATTS) INCLUDING ASSOCIATED STORAGE CONTAINERS, SUPPORT INFRASTRUCTURE, CCTV, SECURITY FENCE AND LANDSCAPING

LLEOLIAD/LOCATION: LAND AT PENGARNDDU INDUSTRIAL ESTATE, DOWLAIS, MERTHYR TYDFIL

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 29 January 2026.

We have no objection to the proposed development as submitted and provide the following advice.

Drainage

The revised planning application form and the Revised Planning Statement by Alder King (April 2025) confirm foul drainage and trade effluent from the proposed development will discharge to the mains sewer. We therefore have no comments to make on the application as submitted in respect of drainage.

European Protected Species

The Revised PEA by Western Ecology (May 2024) has identified European protected species are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of European protected species. We recommend you discuss the need to secure further measures/avoidance measures with your internal ecological advisor.

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.

Advice for the Developer

Environmental Permitting Regulations

The production of hydrogen by any process requires an installations permit from us and will be regulated by us. Proposals which meet the conditions for the low risk permitting of electrolytic production of hydrogen will be able to use the following application process: [Natural Resources Wales / Apply for a permit to produce hydrogen by electrolysis](#). The developer will need to check the proposal qualifies for the low risk permit process for hydrogen production facilities. If the proposal does not qualify, a bespoke installations permit would be required. Please refer to: [Natural Resources Wales / Apply for an Environmental Permit for a new installation](#). One of the conditions is a limit on water abstraction volume. If abstracting water from surface or groundwater an abstraction/impoundment licence may be required: [Natural Resources Wales / Find out if you need a water abstraction or impoundment licence](#).

Another option is to apply for a Low Impact Installation (LII) permit. If the criteria for LII are met, a simpler permitting approach applies but all other aspects of the Environmental Permitting Regulations (EPR) still need to be addressed in the permit application. LII sites are expected to require minimal regulatory effort. To qualify, the proposal must have a low environmental impact due to its design. Low impact installation criteria can be found here: [Natural Resources Wales / Find out if your installation qualifies for a low impact Environmental Permit](#).

Control of Major Accident Hazards Regulations

If the proposal includes 5 tonnes or more of hydrogen storage which is at the Lower Tier threshold for notification of the Control of Major Accident Hazards (COMAH) Regulations Competent Authority (UK Health & Safety Executive and Natural Resources Wales), the company will become a duty holder under the COMAH regime. Details about how to notify and about duty holder requirements are on the HSE website: [Control of major accident hazards - Notifications \(hse.gov.uk\)](#).

For storing quantities of hydrogen less than 5 tonnes (2 tonnes or more), a Hazardous Substances Consent will still be required: [HSE: Land use planning - Hazardous substances consent](#).

Pollution Prevention

There is a watercourse approximately 65m from the development site. During the construction phase you should ensure appropriate pollution prevention measures are employed to protect the nearby watercourse during construction. Guidance for Pollution Prevention (GPP) documents are available on the [NetRegs website](#). We refer to GPP 5: Works and maintenance in or near water, and GPP 6: Working at construction and demolition sites.

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

Yn gywir / Yours faithfully

Sarah Lund

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.