

Ein cyf/Our ref: CAS-313758-T8J7
Eich cyf/Your ref: P/26/0155

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

Dyddiad/Date: 29 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of Use of a building used for the storage of waste, plant and equipment to a renewable energy facility, including the construction of flue and ancillary works

Lleoliad/Location: Hampshire Demolition Group, Penygarnddu Industrial Estate, Merthyr Tydfil, CF48 2TA

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 14 July 2026.

We have **concerns** with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding **protected sites**. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected sites and air quality

Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr Site of Special Scientific Interest

The Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr Site of Special Scientific Interest (SSSI) is located approximately 35 metres (m) north of the application site. The SSSI has features of particular sensitivity to air quality changes.

We have concerns that inadequate information has been submitted to demonstrate that the proposed development will not damage the notified features of the Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr SSSI.

Paragraph 6.4.26 of Planning Policy Wales (PPW) (edition 12) states that:

“...proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are clearly

understood and development should be refused where there are adverse impacts on the features for which a site has been designated.”

We consider that the development is likely to damage the notified features of the Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr SSSI.

The Air Quality Assessment prepared by DustScanAQ, dated July 2026, states:

“It can therefore be concluded that the proposed development would not result in significant impacts on air quality is therefore not considered to conflict with national, regional and local air quality planning policy.”

Whilst this assessment considers human and residential receptors, it does not assess ecological receptors or consider the potential impacts on designated sites.

The Mynyddoedd Llangynidr a Llangatwg, Cefn yr Ystrad a Chomin Merthyr SSSI has not been considered within the assessment. The SSSI supports a range of features of particular sensitivity to air quality changes, including habitats, animal species, plant species, and species assemblages. In particular, the lichen and bryophyte assemblages are likely to be sensitive to atmospheric pollution and nitrogen deposition. We advise that habitat features associated with the SSSI occur within 3 km of the development site, with wet and dry heath communities located within 35 m of the site. Given the proximity and sensitivity of these receptors, the Air Quality Assessment should be updated to consider the SSSI and assess the potential impacts of the proposed development on its notified features.

In the absence of this information, we cannot rule out damage to the notified features of the SSSI from the proposed development. We therefore recommend that planning permission should only be granted if additional information is provided which demonstrates that the proposed development will not damage the notified features of the SSSI.

Ultimately, the decision as to whether the proposed development should proceed is entirely a matter for your authority, having followed the step-wise approach in PPW. Our advice above focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

Should you be minded to grant planning permission in the absence of this additional information, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended). We also direct you to paragraph 6.4.28 of PPW which states that if you are minded to grant planning permission against our advice, then you must notify Welsh Ministers.

Usk Bat Sites Special Area of Conservation

The Usk Bat Sites Special Area of Conservation (SAC) is located approximately 10 km from the application site.

We have concerns that a likely significant effect from the proposed development on the SAC cannot be ruled out. We advise that further information is required to adequately consider the potential impacts on the features of the protected site and in particular to

enable your Authority to carry out a Habitats Regulations Assessment under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as amended).

The Usk Bat Sites SAC has not been considered within the Air Quality Assessment. The SAC has habitat features of particular sensitivity to air quality changes. The Air Quality Assessment must consider ecological receptors and assess potential impacts on the SAC. The Air Quality Assessment should be updated to include such an assessment.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC, SPA, or Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC, SPA, or Ramsar Site.

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

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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.