

Ein cyf/Our ref: CAS-304836-V3T7  
Eich cyf/Your ref: P/26/0049

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

Dyddiad/Date: 22 April 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: Construct 2 detached dwellings**

**LLEOLIAD/LOCATION: Cwm Woods Grove, Off Upper Colliers Row, Heolgerrig, Merthyr Tydfil**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 01 April 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 flood risk and pollution prevention. If this information is not provided, we would object to this planning application. Further details are provided below.**

### **Flood Risk**

Our records show that there may be an existing culvert beneath the site. However, we are not aware of the exact line and level of this.

We are opposed to any proposal to build over existing culverts on main rivers or ordinary watercourses due to flood risk, health and safety considerations, increased maintenance costs and difficulties to undertake works and/or future improvements. This would also preclude any future options to restore the watercourse back to an open channel.

We refer you to our position statement for more information (please see attachment to covering email). Please note that the position statement relates to ordinary watercourses as well as main rivers.

We therefore advise that further information should be provided to confirm the location of the culvert in relation to the proposed development: a survey should be undertaken to establish the exact line and depth/level of the culvert and ensure that any buildings are located outside the zone of influence of the existing culvert, if necessary.

The Zone of Influence should not have buildings situated on the ground surface within the 45 degree zone either side of the outer walls of the culvert and taken upwards to the

surface from its invert level. For example, if the existing invert level to the culvert is 3 metres below ground level then no buildings should be located within 3 metres from the outer walls of the culvert.

## **Pollution Prevention**

There is a watercourse within 38 metres to the north of the site and 198 metres to the south of the site.

The site slopes toward the highway's drainage situated on Upper Collier's Row, and Pantycelyn, both of which are likely to discharge into the unnamed watercourse at the end of the culverted section running through site.

The applicant should ensure they have adequate and substantial surface water mitigation in place before any groundworks commence.

We note that the application does not include any plans or methodology for the storage of fuel on site.

To prevent the risk of sediment or fuel runoff during the construction phase the applicant should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. The applicant should refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the [NetRegs website](#).

Any pollution incidents that occur during the project should be reported immediately to NRW via 0300 065 3000 or [Natural Resources Wales / Report an environmental incident](#).

## **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.