

Ein cyf/Our ref: CAS-302399-F2Q1  
Eich cyf/Your ref: P/26/0044

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

Dyddiad/Date: 24 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: Provision of one traveller pitch, dayroom, static and touring caravan (relocation of existing static caravan to higher ground with ecological enhancements)**

**LLEOLIAD/LOCATION: Land To The Rear Of Ynysygored Cottages, Aberfan Road, Aberfan, Merthyr Tydfil, CF48 4QD**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 04 March 2026.

**We have no comments in relation to flood risk because section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN 15), clearly states that “No new highly vulnerable development on greenfield land should be permitted in zone 3 regardless of the conclusion of any Flood Consequences Assessments and NRW will not consider these conclusions.”**

### **Flood Risk**

We have no comment to make with regards to flood risk, as explained above.

As you are aware the planning application proposes highly vulnerable development (residential). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 Rivers and the Recorded Flood Extent of the December 1979 flood event.

The decision as to whether a development should be considered contrary to TAN 15 policy is entirely a matter for your Authority. However, we would remind you that under the Town & Country Planning (Flood Risk Area Development) (Notification) (Wales) Direction 2025, where the Planning Authority is minded to grant permission, there is a requirement to refer such applications to Welsh Government. We have no further comment to make with regards to flood risk.

Should your view on the nature of the land proposed for development differ to that set out above, please reconsult us.

## European Protected Species

We note that the information submitted in support of the above application (Ecological Appraisal Report by I&G Ecological Consulting, version 1.1, dated 23/08/2023 and Reptile Mitigation Method Statement by I&G Ecological Consulting Ltd, version 1.0, dated 11/09/2023) has identified that European Protected Species (EPS) are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of EPS.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

## 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,

**Heather McDowell**

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.