



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-185876-M3R3
Eich cyf/Your ref: P/22/0078

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28/04/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Change of use from care home to emergency and temporary supported living accommodation along with a community hub for service support providers.

LLEOLIAD / LOCATION: MARSH HOUSE, 15 DYNEVOR STREET, MERTHYR TYDFIL, CF48 1AY.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 24/04/2022.

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

Flood Risk

The planning application proposes highly vulnerable development (emergency and temporary supported living accommodation). Our Flood Risk Map confirms the application site lies entirely within Zone C2 of the Development Advice Maps (DAM) as contained in TAN15, and the Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers.

We note that the existing use of the site would be classed as highly vulnerable (care home), and that a highly vulnerable use will remain with the proposed development. We also note from the submitted documents (Funding Submission, written by Redstart, dated: 18/03/2022, ref: CS/ 102180, rev: A) that there will be an overall decrease in bedrooms in the building from 50 to 32, with a decrease in the number of bedrooms on the ground floor from 17 to 11. On this basis, we have no objection to the development as proposed.

We also note in the Funding Submission (written by Redstart, dated: 18/03/2022, ref: CS/ 102180, rev: A) reference to proposed landscaping works, and that these will be done

ensuring the work 'maintains existing surface levels'. If this changes, and changes to ground levels are proposed, please re-consult us.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures, and measures to address structural damage that may result from flooding. Please note, we do not normally comment on or grant the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

The Applicant may also undertake a flood consequences assessment (FCA) for their own benefit, to investigate other options for incorporating flood resistance and/or resilience measures into the design, for awareness raising and to develop a flood plan for the occupants.

In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development. These could include flood barriers on ground floor doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels.

We refer the applicant to our [website](#) for further advice and guidance is available. Additional guidance including the leaflet "Prepare your Property for flooding" can be found [here](#).

The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', can be found [here](#)

European Protected Species

We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of bats or otters, European Protected Species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and Planning (paragraph 6.2.2) surveys may be required.

NRW therefore has no comments to make on the application, as submitted. Please consult us again if any survey undertaken finds that EPS are present at the site and you require further advice from us.

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

Works Near a Watercourse

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

Flood Risk Activity Permit

Please advise the Applicant that the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in, under, over or within 8 metres of the bank top of the River Taff, a designated "main river". Further advice and guidance is available on our website at:

<http://www.naturalresources.wales/permits-and-permissions/flood-risk-activities/flood-risk-activity-permits-information/?lang=en>

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

Yn gywir / Yours faithfully

Charlotte Morgan

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning
Cyfoeth Naturiol Cymru / Natural Resources Wales