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ebost/email:
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21/09/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF FIRST AND SECOND FLOORS TO PROVIDE 2 FLATS, NEW SHOP FRONT AND ASSOCIATED EXTERNAL WORKS TO BUILDING.

LLEOLIAD / LOCATION: 30 VICTORIA STREET, MERTHYR TYDFIL, CF47 8BW.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14 September 2021.

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

Flood Risk

Our Flood Risk Map confirms the application site lies entirely within Zone C2 of the Development Advice Maps (DAM) as contained in TAN15.

Given the nature of the proposed development, the retention of highly vulnerable development at first floor and above which is elevated above the flood risk, and the retention of less vulnerable development at ground floor (and in the absence of a flood consequences assessment), we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development.

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 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](#).

Further Advice

The proposal presents a potential increase in risk given the potential intensification of use of the upper floors, which may create more pressure on emergency services should evacuation be required. If you have concerns regarding matters that we cannot advise you on, such as emergency plans, procedures and measures to address structural damage that may result from flooding, you should consider consulting other professional advisors on the acceptability of the developer's proposals.

The Applicant could undertake an FCA for their own benefit, to explore suitable options for incorporating flood resistance and/or resilience measures into the design and to develop a flood plan for the occupants. To help prepare an FCA, we have developed [guidance](#), which contains technical advice and recommendations.

Notwithstanding the above advice, please be aware that TAN 15 and the Development Advice Map (published in 2004) are being replaced. The new TAN 15 and Flood Map for Planning will be available from 28th September 2021 to allow local planning authorities, developers, planning consultees and the public to prepare for when they come into force. The changes will then come into effect on **Wednesday 1 December 2021** and from this date onwards, applications will be determined based on the new TAN 15 and Flood Map for Planning. We therefore advise you to consider how this change may affect your determination of this application. Should you require further advice from us once the new TAN 15 has been published, please reconsult 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.

If you have any queries on 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