

Ein cyf/Our Ref: CAS-268919-Y7T5
Eich cyf/Your Ref: P/24/0193

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

Dyddiad/Date: 9 December 2024

Annwyl Ms Glover/Dear Ms Glover

BWRIAD/PROPOSAL: SUB-DIVISION OF SINGLE DWELLING INTO TWO DWELLINGS.

LLEOLIAD/LOCATION: 17 QUARRY ROW, MERTHYR TYDFIL, CF47 8PS.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, with additional information which we received on 21 November 2024.

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

Flood Risk

The planning application proposes highly vulnerable development, sub-division of single dwelling into two dwellings. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15. Our [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 2 & 3 – Rivers.

The proposed potential intensification of use may create more pressure on emergency services should evacuation be required. However, we note from the plans submitted that the two proposed dwellings have access to the upper floors should a flood event occur at this location.

We have reviewed the following Flood Consequences Assessment (FCA) submitted in support of the application:

- Flood Consequence Assessment, 17 Quarry Row, Merthyr Tydfil, CF47 8PS.

The FCA states:

- The Finished Floor Level is not indicated to change and there will be no additional bedrooms to the ground floor, with one less bedroom proposed on the first floor.

- The building footprint is located in the area of the site that is at a higher elevation, with ground levels approximately 173.3 - 173.47mAOD across the footprint.

A1.14 TAN15

Section 1.7 of the FCA assumes the Finished Floor Level (FFL) of the dwelling is 173.35m AOD.

Section 2.2 of the FCA indicates a flood level of 172.68m AOD during a 1% (1 in 100 year) AEP + climate change event.

Dwelling

Therefore based on a FFL of 173.35m AOD the proposed dwelling is predicted to be flood free in this event. Therefore, this aspect of the proposed development is compliant with A1.14 TAN15.

External Areas

However, external areas are predicted to flood during this event which is not complaint with A1.15 TAN15 but we note the application is for sub division of an existing dwelling with no external works.

A1.15 TAN15

Section 1.7 of the FCA assumes the Finished Floor Level (FFL) of the dwelling is 173.35m AOD.

Section 2.2 of the FCA indicates a flood level of 174.04m AOD during the 0.1% (1 in 1000 year) AEP flood event.

Therefore based on a FFL of 173.35m AOD the proposed dwelling is predicted to be flood to a depth of 690mm during the 0.1% (1 in 1000 year) AEP flood event and to a depth of 1.27m during the 0.1% (1 in 1000 year) AEP flood event plus climate change flood event. These depths exceed the tolerable limits as prescribed in A1.15 TAN 15. Therefore the proposed development is not compliant with A1.15 TAN15.

A1.12 TAN15

Flood Risk Elsewhere

Section 4 indicates there will no alterations to the building footprint, therefore, this proposal will not increase flooding elsewhere

Further advice

Foul Drainage

No information has been provided regarding the disposal of foul waters from the proposed development. We refer you to Welsh Government Circular 008/2018 on the use of private sewerage in new developments, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer. We advise you that the proposed development is in a publicly sewered area.

Please consult us again if foul sewage from the proposed development is to be disposed of by a private sewerage system.

European Protected Species – Bats

We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of bats, a 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) a bat survey may be required.

The survey should be carried out in accordance with 'Bat Surveys for Professional Ecologists; Good Practice Guidelines 4th Edition' published by the Bat Conservation Trust 2023.

Please consult us again if any survey undertaken finds that bats 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. If you have any queries on the above, please do not hesitate to contact us.

Yn gywir/Yours faithfully

Andrew Hurst

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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.