

Ein cyf/Our ref: CAS-241839-Q2P7

Eich cyf/Your ref: P/23/0145

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

Dyddiad/Date: 14 November 2023

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ERECTION OF TWO DWELLINGS

LLEOLIAD/LOCATION: WINFIELD, 10 SCHOOL ROAD, TROEDYRHIW, MERTHYR TYDFIL, CF48 4JS

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC) / Natural Resources Wales (NRW) about the above, which we received on 31 October 2023.

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

Flood Risk

The planning application proposes highly vulnerable development (residential). The application site is within Zone A and Zone B of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). However, our [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding and is partially within Flood Zone 2 (Rivers). As confirmed in the [letter](#) from Welsh Government dated 15 December 2021, the FMfP represents better and more up-to-date information on areas at flood risk than the DAM.

We have reviewed the Flood Consequences Assessment (FCA) undertaken by GeoSmart Information Ltd, dated 4 August 2023, reference 79872.02R1. Our advice to you is that we are satisfied that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection to the application on flood risk grounds, as submitted.

For this development, the data that has been used within the FCA has been obtained under license from NRW using the Hydraulic Modelling at Merthyr Tydfil Colliery Site Report (2017). However, since completion, there may be material changes that could

impact the results of this model. This may include topography/survey data, updates to the methodology for calculating hydrological flows and updates to Hydraulic modelling software. We are unable to confirm the validity of the data presented in the FCA, as it is unclear if the data has been checked and verified as suitable for use. On receipt of the data supplied under licence, the consultant was advised of these constraints and the need to verify the data before use.

Section 4 of the FCA indicates that the proposed finished floor levels will be set at 140.9m AOD. The FCA provides a predicted 1% plus climate change maximum fluvial flood level of 138.86m, and a predicted 0.1% plus climate change maximum fluvial flood level of 140.9m. We note that Figure 18 illustrates that the site is flood free during a predicted 1% plus climate change scenario. On this basis, we do not object to the development in line with A1.14.

Within the FCA, Figure 17 illustrates that the southwest boundary of the site may flood up to 300mm, which does not exceed the criteria for depth i.e., 600mm of Table A1.15.

We note that there are no assessments of flood velocity or rate of rise within the FCA, however, as the flood extent during a 0.1% plus climate change scenario only reaches the southwest boundary of the site, it can be assumed that the velocity for the site would be 0m/s and the rate of rise would be 0. On this basis, we do not object to the development in line with A1.15.

All criteria relevant to this proposal under A1.12 of TAN 15 has generally been complied with in Section 5 and 7 of the FCA.

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.

European Protected Species

We note the Walkover Preliminary Ecological Appraisal by Little Wing Ecology, dated 17 July 2023. We recommend you seek the advice of your in-house ecologist in relation to this report, and to determine whether any species-specific surveys for European Protected Species' (EPS) are required. Any species-specific surveys should be carried out in accordance with best practice guidelines.

Please consult us again if any species-specific survey undertaken finds 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.

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

Yn gywir / Yours faithfully,

Sarah Lund

Cynllunio Datblygu Cyngorydd / Development Planning Advisor
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.