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07/12/2022

Annwyl Ms Owens/Dear Ms Owens

BWRIAD/PROPOSAL: RENOVATION AND EXTENSION OF BUILDING AND CHANGE OF USE FROM RETAIL AND OFFICE TO A BAR/RESTAURANT AND RESIDENTIAL (5 NO. FLATS).

LLEOLIAD/LOCATION: 120 - 121 HIGH STREET, MERTHYR TYDFIL, CF47 8BL.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales about the above, which we received on 17 November 2022.

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

Flood Risk

Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15. The [Flood Map for Planning \(FMfP\)](#) identifies the application site to be at risk of flooding and falls into Flood Zone 2 & 3, Rivers.

The planning application proposes renovation and extension and change of use from retail and office to a bar and restaurant (less vulnerable development) and residential (highly vulnerable development). We note that the proposed plans indicate the basement will be an auxiliary area and the ground floor will be the bar/restaurant. The first and second floors and the loft will be the residential element of the proposed development resulting in the introduction of highly vulnerable development into an area at risk of flooding. However, we note the residential development is likely to be above any flood depths should a flood event occur at this location.

Recognising the particular nature of this application this application presents an opportunity to raise awareness of the flood risk and incorporate flood resistance/resilience measures and make provisions for flood warning and emergency access/egress. To aid your decision making, you may wish to ask the applicant to submit an FCA. Alternatively,

the Applicant may decide to undertake an FCA for their own benefit.

The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be appropriate to the scale and nature of the development being proposed.

We may hold relevant flood risk data that can be used to assist with this assessment. Any requests for this data should be sent to our datadistribution@cyfoethnaturiolcymru.gov.uk email account.

If the building and/or access/egress routes are shown to flood during events up to and including a predicted 0.1% (plus an allowance for climate change) flood event, the FCA should propose suitable and appropriate mitigation measures to reduce the effects and consequences of flooding.

Flood resistance/resilience measures that could be incorporated into the development 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. Appropriate measures and advice is set out in the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', which is available at <https://www.gov.uk/government/publications/improving-the-flood-resistance-of-domestic-and-small-business-properties-interim-guidance> and information from CIRIA (www.ciria.org/flooding). Additional guidance can be found <https://www.gov.uk/prepare-for-flooding/future-flooding>

Please be aware that "Flood Resistance" measures i.e., prevention of floodwaters entering a building, are only recommended in situations where the flood depths do not exceed 600mm.

For further advice, please refer to our [website](#)

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 approve 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 - Bats

We have reviewed the following the bat survey submitted in support of the above application:

- 120-121 High Street, Merthyr Tydfil, Bat Survey, Issue 1, Version C, prepared by BE

Ecological, dated February 2022.

The survey has identified that no bats or evidence of bats was seen on the exterior or in the interior of the building and the building had low potential for roosting bats. We therefore have no comments to make on the application as submitted with regards to EPS - Bats.

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

Kate Glover

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