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21/12/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CHANGE OF USE FROM A2 TO B1 OF GROUND FLOOR

LLEOLIAD / LOCATION: 5 PONTMORLAIS HIGH STREET MERTHYR TYDFIL

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 02/12/2021.

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.

We note the application proposes a change of use from A2 to B1 of the ground floor. As such at ground floor level the vulnerability of the development remains as less vulnerable. Recognising the particular nature of this application, NRW has no objection to the proposals and requires no further information. Your Authority must also be satisfied that the proposal is acceptable in flood risk terms, particularly with regard to access and egress and flood emergency procedures.

To aid your decision making, you may consider asking the applicant to submit a Flood Consequences Assessment (FCA). The applicant may also decide to undertake a FCA for their own benefit, for example, awareness raising, inform an evacuation plan, provision of flood resistance and/or resilience measures. A FCA ensures all parties are aware of the risks to and from the proposed development and ensures that the risks and consequences of flooding are minimised as far as possible. 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.

A FCA should establish what the predicted flood risk is to the building and its access/ egress routes, this will provide a better understanding of the risks and consequences of flooding. 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.

This application presents an opportunity to raise awareness of the flood risk to the current/ future occupiers of the property, incorporate flood resistance/resilience measures, and make provisions for flood warning and emergency access/ egress. Dependant on the level of risk posed, the FCA should consider each of these matters and make appropriate recommendations.

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](#)

It is for the planning authority (in consultation with other appropriate bodies) to be satisfied on the operational effectiveness of emergency plans and procedures or measures to address structural damage that may result from flooding. We suggest you consult other professional advisors (e.g. Emergency Planners, Emergency Services, Building Control) on the acceptability of proposals and on matters we cannot advise on, such as, emergency plans, procedures and measures to address structural damage that may result from flooding. We do not normally comment on or approve the adequacy of flood emergency response 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 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; Good Practice Guidelines 3rd Edition’ published by the Bat Conservation Trust 2016.

Please consult us again if any survey undertaken finds that bats are present at the site and you require further advice from us.

Foul Drainage

We note the application form contains no details of foul drainage. The application site is located in a sewered area and as such should connect to main sewer. If this is not the case 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

Annabelle Evans

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