

Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

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

06/01/2023

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONSTRUCT REAR EXTENSION TO PROVIDE A TWO-STOREY WORKSHOP

LLEOLIAD / LOCATION: UNIT 1 CYFARTHFA INDUSTRIAL ESTATE MERTHYR TYDFIL CF47 8PE

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 7th December 2022

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

Flood Risk

The planning application proposes less vulnerable development of a rear extension to an existing workshop and showroom. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 3 (Rivers).

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

Paragraph 3.1 of the FCA correctly states that there is no detailed flood modelling available in this area. Without detailed flood modelling and data, it will be difficult to thoroughly assess the risks and consequences of flooding, including whether the extension could result in an

increase of flood risk elsewhere. As such, we cannot advise you on whether the proposal meets the technical criteria set out in Appendix 1 of TAN15. However, to require the applicant to commission detailed flood modelling would be too onerous for this type of proposal.

Given the above, we have applied our professional judgement and consider there to be a low risk of the extension increasing flood risk elsewhere. Therefore, we do not seek further detailed assessment on this matter. We also note that the FCA has recommended flood management in the form of resistance/resilience measures, as well as signing the building up to NRW's flood warning system to reduce the impact in the event of flooding to the application site. If your authority are satisfied, this seems a sensible approach.

Taking the above into consideration we have no objections to the proposals, as submitted. 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.

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,

Ryan Rees

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