



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-161125-D9X1
Eich cyf/Your ref: P/21/0261

Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
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Merthyr Tydfil County Borough
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ebost/email:
southeastplanning@cyfoethnaturiolcymru.gov.uk

23/08/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: PROVISION OF DWELLING (LIVE/WORK) TOGETHER WITH PARKING, LANDSCAPING AND ECOLOGICAL ENHANCEMENTS.

LLEOLIAD / LOCATION: LAND SOUTH OF UNIT 7 EFI INDUSTRIAL ESTATE, MERTHYR TYDFIL, CF47 8RB.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 26 July 2021.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the Applicant regarding Protected Species. If this information is not provided, we would object to this planning application. Further details are provided below.

Protected Species

We note that the LPA Ecologist has raised concerns regarding the quality of the Ecological Report, prepared by Elite Ecology, version 2, dated June 2021, submitted in support of the above application. We concur with the LPA Ecologist that the report seems to contain inaccurate and insufficient information, including information relating to protected species, and we therefore support the request for a revised report. Please consult us again once in receipt of any new/amended reports.

Flood Risk

Our Flood Risk Map confirms the application site lies partially within Zone C2 of the Development Advice Map (DAM) as contained in TAN15.

We note that no built development is proposed within this area. Given this and the location of flood risk shown to be affecting the application site (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks to these areas.

In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development.

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](#).

Flood Risk Activity Permit

Please advise the Applicant that the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in, under, over or within 8 metres of the bank top of the River Taff, a designated “main river”. Further advice and guidance is available on our [website](#).

Advice to Applicant

We recommend you consider the future insurability of this development now. Although we have no involvement in this matter we would advise you to review the Association of British Insurers published paper, ‘[Climate Adaptation: Guidance on Insurance Issues for New Developments](#)’, to help you ensure any properties are as flood proof as possible and insurable.

Pollution Prevention – Advice to Applicant

Due to the proximity of the site to the River Taff, all works at the site must be carried out in accordance with GPP5 and PPG6: ‘Works and maintenance in or near water’ and ‘Working at construction and demolition sites’ which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>.

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

Paige Minahan

Cynghorydd - Cynllunio Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales