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26/05/2022

Annwyl Ms Sanders/Dear Ms Sanders

BWRIAD/PROPOSAL: CONVERSION OF GROUND FLOOR FROM 1 RETAIL UNIT TO 2 A1 UNITS AND FIRST FLOOR TO 4 FLATS. PROPOSAL TO INCLUDE VARIOUS EXTERNAL REFURBISHMENT WORKS TO BUILDING, INCLUDING NEW SHOP FRONTS, NEW WINDOWS AND THE RE-BUILDING OF A REAR EXTENSION.

LLEOLIAD/LOCATION: 96 HIGH STREET, MERTHYR TYDFIL, CF47 8UD.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales about the above, which we received on 16 May 2022.

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

Flood Risk

The planning application proposes less vulnerable at ground floor level – conversion of retail unit to 2 A1 units and highly vulnerable development at first floor level - change of use to 4 flats. 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 FZ 2 & 3, Rivers and the TAN15 Defended Zone.

The proposed development will result in a HVD use being introduced into an area of flood risk. However, this will be elevated above the flood risk and there is no change in the vulnerability use at the ground floor level.

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. We have reviewed the following FCA undertaken:

- Flood Consequence Assessment, Manettes, 95-96 High Street, Merthyr Tydfil, CF47 8UP, Report reference: 75805R1, prepared by Geosmart Information, dated 2021-11-29
- A topographic survey was not available to confirm the level of building floors or thresholds.
- The ground levels adjacent to the Site are approximately 178.9m AOD; therefore the threshold level for the ground floor has been estimated at 179.2m AOD.

A1.14 TAN15

The FCA has used hazard maps to assess the flood risk to the site. This will not provide a comprehensive response as it is not based on model outputs. Figure 5 in the FCA indicates the site is predicted to be flood free in the 1% (1 in 100 year) flood event. However, this does not include an allowance for climate change.

Due to the absence of definitive finished floor levels and predicted flood levels with an allowance for climate change we are unable to advise whether the proposed development is compliant with A1.14 of TAN15.

A1.15 TAN15

The FCA has used hazard maps to assess the flood risk to the site. This will not provide a comprehensive response as it is not based on model outputs. Figure 6 in the FCA indicates the site is predicted to be flood free in the 0.1% (1 in 1000 year) flood event.

Due to the absence of definitive finished floor levels and predicted flood levels we are unable to advise whether the proposed development is compliant with A1.15 of TAN15.

A1.12 TAN15

Mitigation Measures

The FCA has recommended the use of flood resilient materials and that the development sign up to NRW's flood warning system.

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 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 report submitted in support of the application:

- Bat Emergence and Re-Entrance Survey, Manettes 95-96 High Street and Barcode 92-94 High Street, Merthyr Tydfil, CF47 8UP, Issue 4, prepared by Arbtech, dated 21/04/2022.

We note that the above report was produced to support applications at Barcode 92-94 High Street and Manettes 95-96 High Street. The proposals which form part of this application (P/22/0111) will not impact upon Barcode and that the application relates solely to 96 High Street (Manettes).

We note that the report submitted in support of the above application has identified that bats were not using the application site (Manettes – 95-96 High Street). We therefore have no comments to make on the application as submitted.

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

Andrew Hurst

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