

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

ebost/email:
southeastplanning@cyfoethnaturiolcymru.gov.uk

08/03/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF FIRST FLOOR TO 4 FLATS AND CREATION OF AN ADDITIONAL STOREY TO PROVIDE OFFICE ACCOMMODATION. PROPOSAL TO INCLUDE VARIOUS EXTERNAL REFURBISHMENT WORKS TO THE BUILDING

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 17/02/2022.

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

The planning application proposes highly vulnerable development (housing). Our Flood Risk Map confirms the application site lies entirely within Zone C2 of the Development Advice Map (DAM) as contained in TAN15 and the Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and falls into Flood Zones 2 and 3 (Rivers).

We refer you to Section 6 of TAN15 and the Chief Planning Officer letter for Welsh Government, dated 9 January 2014, which affirms that **highly vulnerable development should not be permitted in Zone C2** (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 of TAN 15 do not apply to highly vulnerable development in Zone C2.

It is for your Authority to consider the above further.

We note the proposal will result in highly vulnerable development being introduced into an area of flood risk, that this highly vulnerable development will be at first floor level, and there is no change in vulnerability use at ground floor level. Therefore, we have no objection to the application as submitted, in relation to flood risk.

Your Authority should be satisfied that the proposal is acceptable in terms of flood risk, particularly with regard to access and egress considerations and for emergency planning purposes, as such you may wish to require an FCA from the applicant to aid your decision making

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15. We cannot advise you 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 flooding 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.

The Applicant may also decide to undertake an FCA for their own benefit, for example, awareness raising, to inform an evacuation plan, provision of flood resistance and/or resilience measures.

We refer the applicant to our [website](#) for further advice and guidance is 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](#)

Further Advice for 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.

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.

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