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Caroline Pulley
Merthyr Tydfil County Borough
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Ffôn/Phone:

10/05/2021

Annwyl Ms Pulley/Dear Ms Pulley

BWRIAD/PROPOSAL: CONVERSION OF HOUSE TO TWO SELF-CONTAINED FLATS.

LLEOLIAD/LOCATION: 9 QUEENS TERRACE, CARLTON TERRACE, TROEDYRHIW.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales about the above, which we received on 20 April 2021.

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

Flood Risk

The planning application proposes highly vulnerable development, conversion of house to two self-contained flats. Our Flood Risk Map confirms the site to be entirely within Zone C2 of the Development Advice Map (DAM) contained in TAN15. Our records also show that this site has previously flooded from the River Taff during the Troedyrhiw, December 1979 flood event.

We refer you to Section 6 of TAN15 and the Chief Planning Officer [letter](#) from 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 do not apply to highly vulnerable development in Zone C2.

Notwithstanding this policy position, we have reviewed the FCA submitted in support of the application to provide you with technical advice on the acceptability of flooding consequences in accordance with Appendix 1 of TAN15.

We have reviewed the following Flood Consequences Assessment (FCA) submitted in support of this application:

- Flood Consequence Assessment for Planning, 9 Queens Terrace, Troedyrhiw, Merthyr

Tydfil, CF48 4ER, Reference: 90364-DavisonWood-QueensTrrc, V1.0 180321, prepared by UNDA, dated March 2021.

We are satisfied that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection to the application as submitted; please see the attached Annex for further details.

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

Andrew Hurst

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

Annex

The FCA states:

- Ground topography ranges from approximately 145.40m AOD to 140.10m AOD, with the site sloping from west to east.
- The finished ground level of the existing building is elevated above street level on Queens Terrace.
- Based on Lidar, the finished ground floor level is approximately 141.70m AOD.

A1.14 & A1.15 TAN15

The proposed house to be converted lies outside of the flood extents. Therefore, the property is predicted to be flood free in both the 1% (1 in 100 year) plus climate change and the 0.1% (1 in 1000 year) flood events.

Therefore, the proposed development is compliant with A1.14 & A1.15 of TAN15.