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20/12/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CHANGE OF USE OF GROUND FLOOR FROM C2 RESIDENTIAL INSTITUTION TO A3 FOOD AND DRINK AND UPPER FLOORS FROM C2 RESIDENTIAL INSTITUTION TO C1 HOTELS, TO INCLUDE EXTENSIONS AND EXTERNAL ALTERATIONS

LLEOLIAD / LOCATION: 30-31 LOWER HIGH STREET, MERTHYR TYDFIL

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 30/11/2021.

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

Flood Risk

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

We note the application proposes a change of use from C2 Residential Institution to A3 Food and Drink at ground floor and from C2 Residential Institution to C1 Hotels at upper floors. As such at ground floor level it appears that the vulnerability is from high to low and at upper storeys remains at highly vulnerable. TAN15 describes highly vulnerable development (HVD) as development where the ability of occupants to decide on whether they wish to accept the risks to life and property associated with flooding or be able to manage the consequences of such a risk, is limited.

Given that the residential element of the proposal remains at first floor level and above, we have no objection to the proposal. Your authority must also be satisfied that the proposal is acceptable in flood risk terms, particularly with regard to access and egress and flood emergency procedures.

The developer should be made aware of the potential flood risks and advised to install flood-proofing measures as part of the development. 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. These could include flood barriers on ground floor doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels.

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](#)

It is for the planning authority (in consultation with other appropriate bodies) to be satisfied on the operational effectiveness of emergency plans and procedures or measures to address structural damage that may result from flooding. We do not normally comment on or approve the adequacy of flood emergency response 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. We confirm a flood alert service is available at this location.

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