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27/07/2020

Annwyl Ms Pulley/Dear Ms Pulley

BWRIAD/PROPOSAL: CONVERSION OF FIRST AND SECOND FLOORS TO PROVIDE 4 FLATS WITH ASSOCIATED EXTERNAL ALTERATIONS (TO INCLUDE EXTERNAL STAIRCASE AND NEW ENTRANCE DOORS TO FIRST AND SECOND FLOORS).

LLEOLIAD/LOCATION: 3-4 PONTMORLAIS HIGH STREET, MERTHYR TYDFIL.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales about the above, which we received on 24 July 2020.

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

Flood Risk

As you are aware, the proposed development site lies entirely within Zone C2 as defined by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15) (July 2004). Our Flood Map, which is updated on a quarterly basis, confirms the site to be within the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the Nant Morlais, a designated main river.

We note that the proposal is for conversion 1st and 2nd floors from one residential dwelling to 4 flats with no change of use of the restaurant on the ground floor. Therefore, the proposed development is likely to be above any flood levels should a flood event occur at this location.

Therefore, recognising the particular nature of this application this application presents an opportunity to raise awareness of the flood risk and incorporate flood resistance/resilience measures and make provisions for flood warning and emergency access/egress. To aid your decision making, you may wish to ask the applicant to submit an FCA. Alternatively, the Applicant may decide to undertake an FCA for their own benefit.

The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be appropriate to the scale and nature of the development being proposed.

We may hold relevant flood risk data that can be used to assist with this assessment. Any requests for this data should be sent to our datadistribution@cyfoethnaturiolcymru.gov.uk email account.

If the building and/or access/egress routes are shown to flood during events up to and including a predicted 0.1% (plus an allowance for climate change) flood event, the FCA should propose suitable and appropriate mitigation measures to reduce the effects and consequences of flooding.

Flood resistance/resilience measures that could be incorporated into the development 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. Appropriate measures and advice is set out in the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', which is available at <https://www.gov.uk/government/publications/improving-the-flood-resistance-of-domestic-and-small-business-properties-interim-guidance> and information from CIRIA (www.ciria.org/flooding). Additional guidance can be found <https://www.gov.uk/prepare-for-flooding/future-flooding>

Please be aware that "Flood Resistance" measures i.e. prevention of floodwaters entering a building, are only recommended in situations where the flood depths do not exceed 600mm.

For further advice, please refer to our [website](#)

If you have concerns regarding matters that we cannot advise you on, such as emergency plans, procedures and measures to address structural damage that may result from flooding, you should consider consulting other professional advisors on the acceptability of the developer's proposals. Please note, 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.

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