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15/03/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CHANGE OF USE OF FIRST FLOOR FROM OFFICE SPACE (B1 USE CLASS) TO 6 NO. ONE BEDROOM FLATS (C3 USE CLASS)

LLEOLIAD / LOCATION: FIRST FLOORS MILBOURNE CHAMBERS 56 - 57 GLEBELAND STREET AND 117-119 HIGH STREET MERTHYR TYDFIL

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 01/03/2022.

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

Flood Risk

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 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 do not apply to highly vulnerable development in Zone C2.

It is for your Authority to consider the above further.

Notwithstanding this policy position we have reviewed the Flood Consequences Assessment submitted in support of the above application, titled 'Flood Consequence Assessment (FCA), Clocktower Building, Glebeland Street, CNC Property Fund Management Ltd, CDGA-9506-REP01-R0, August 2018' by C D Gray & Associates LTD.

Whilst the proposal will result in highly vulnerable development being introduced into an area of flood risk, this will be elevated above the flood risk, 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.

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.

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.

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