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20/06/2022

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CHANGE OF USE OF FIRST AND SECOND FLOORS OF 42-43 PONTMORLAIS AND PART OF THE SECOND FLOOR OF 39 PONTMORLAIS TO CREATE TWO FLATS WITH INSERTION OF ROOFLIGHTS AND EXTERNAL STEEL STAIRS.

LLEOLIAD / LOCATION: 39 & 42 - 43 PONTMORLAIS, HIGH STREET, MERTHYR TYDFIL.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 31 May 2022.

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

Flood Risk

The planning application proposes the change of use of the first and second floors, from less vulnerable development (retail) to highly vulnerable development (two residential flats). Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map contained in TAN15 and the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Rivers.

Given the nature of the proposed development, the proposal will result in highly vulnerable development being introduced into an area of flood risk, however, this will be elevated above the flood risk and there is no change in the vulnerability use at the ground floor level, we consider the risk could be acceptable subject to the developer being made aware of the potential flood risks.

Section 6 of TAN15 requires your Authority to determine whether the development at this location is justified. We refer your Authority to the justification tests set out in section 6.2.

You 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.

We recommend you consult other professional advisors (e.g. Emergency Planners, Emergency Services, Building Control) on the acceptability of proposals and on matters we cannot advise on, 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 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.

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](#)

European Protected Species

We note the proposal includes insertion of rooflights. We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of any 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.

NRW therefore has no comments to make on the application, as submitted. 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

Kate Glover

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