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19/02/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CHANGE OF USE OF GROUND FLOOR COMMERCIAL UNIT TO RESIDENTIAL USE.

LLEOLIAD / LOCATION: YR HEN STORDY, LADYSMITH PLACE, MERTHYR ROAD, TROEDYRHIW, MERTHYR TYDFIL, CF48 4JH.

Thank you for re-consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 15 January 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 (housing). Our Flood Risk Map confirms the site to be entirely within Zone C2 of the Development Advice Map (DAM) as contained in TAN15. Our records also show that the site has previously flooded from the River Taff during the 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 of TAN15 do not apply to highly vulnerable development in Zone C2.

Notwithstanding this policy position, we acknowledge receipt of your email dated 15 October 2020 providing overriding reasons for considering the application. We have therefore reviewed the updated FCA submitted in support of the application, prepared by Blandford Consulting, dated 11 November 2020, to provide you with technical advice on the acceptability of flooding consequences in accordance with Appendix 1 of TAN15.

Our advice to you is that the FCA demonstrates that the risks and consequences of flooding can be managed to an acceptable level. Therefore, we have no objection to the application as submitted.

The FCA states that the new internal FFL for the development will be 139.095m AOD. Based on these FFLs, the FCA shows:

- During a 1% (1 in 100 year) plus 20% for climate change annual probability fluvial flood event, the predicted flood level is 138.87m AOD. Internally the FFL of the development is above the predicted flood level. Thus, the development meets the requirements of A1.14 of TAN15.
- During a 0.1% (1 in 1000 year) annual probability fluvial flood event, the predicted flood level is 140.07m AOD. Based on the proposed FFL, the development is predicted to flood to a maximum depth of 975mm and is therefore outside the tolerable limits of A1.15 of TAN 15.
- We note that the rear garden will remain as existing at a level of 138.410m AOD. During a 1% (1 in 100 year) plus 20% for climate change annual probability fluvial flood event, the rear garden of the development is predicted to flood to a maximum depth of 460mm. However, given that these areas serve the existing highly vulnerable development, we have no adverse comments to make.

In accordance with the advice in Welsh Government's Policy Clarification Letter 'Guidance on Climate Change Allowances for Planning Purposes', a climate change allowance (CCA) of 25% should be applied to the 1% (1 in 100 year) fluvial flood event. A CCA of 20% has been applied. However, in consideration of the FFL of the building in relation to the predicted flood levels, in this instance, we have no adverse comments to make regarding the use of the lower CCA.

The FCA has proposed the management of flood risk by recommending an evacuation route, the preparation of a flood evacuation plan, the incorporation of flood resistant/resilient materials in the design of the development and the occupants/owners sign up to the flood warning service.

We advise you that no information has been provided on the rate of rise or speed of inundation as per A1.15 of TAN15 and the Welsh Government's CPO Letter (Planning Policy on Flood Risk and Insurance Industry Changes) on 9 January 2014. If you are minded to request this information from the Applicant, we would be happy to provide further advice.

Further Advice

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.

Advice to 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 Development](#)', 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

Paige Minahan

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