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29/12/2020

Annwyl Ms Pulley/Dear Ms Pulley

BWRIAD/PROPOSAL: CONVERSION OF HOUSE TO TWO SELF-CONTAINED FLATS.

LLEOLIAD/LOCATION: 9 QUEENS TERRACE, CARLTON TERRACE, TROEDYRHIW.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales about the above, which we received on 11 December 2020.

We have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirement is met. Otherwise, we would object to this planning application.

Requirement: A Flood Consequences Assessment (FCA) is required to demonstrate the risks and consequences of flooding can be managed to an acceptable level.

Flood Consequences Assessment

The planning application proposes highly vulnerable development, conversion of house to two self-contained flats. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15. Our records also show that this site has previously flooded from the River Taff during the Troedyrhiw, December 1979 flood event.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate, through the submission of an FCA, that the potential consequences of flooding can be managed to an acceptable level.

We are unable to give you technical advice on the acceptability of flooding consequences, as no FCA has been submitted. Therefore, if the development can be justified, the above requirement should be met prior to the determination of the application. We can then

advise you whether the FCA is in accordance with the technical criteria in Appendix 1 of TAN15.

If an FCA is not submitted or any subsequent FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we **object** to the application. 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 proportionate to the development proposed. To help prepare an FCA, we have developed [guidance](#), which contains technical advice and recommendations.

The proposed layout results in contained bedrooms on the ground floor which is at risk from flooding. We consider there to be a lack of upper floor refuge for the ground floor residents, if needed in a flood event. On this basis the applicant may wish to consider amending the proposed layout to remove any bedrooms from the ground. Alternatively, if your authority consider it appropriate, the proposal could include a communal area on the upper floor for safe refuge purposes, i.e. a living room.

Finally, the application provides no details on issues surrounding access and egress from the property in a flood event. Matters regarding safe access and egress and emergency evacuation are for the planning authority to consider. If you have concerns regarding these matters, you should consider consulting other professional advisors on the acceptability of the proposals.

Please inform us, in accordance with paragraph 11.7 of TAN15, if you are minded to grant permission for the application contrary to our advice.

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

