

Ein cyf/Our ref: CAS- 318726-R6N1
Eich cyf/Your ref: P/26/0194

Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
CF48 4TQ

Dyddiad/Date: 24 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of ground floor to A3 use and 1st 2nd & 3rd floors to 2 self contained flats

Lleoliad/Location: 114 High Street Merthyr Tydfil CF47 8AP

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 10 September 2026.

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 ground floor to class A3 (food and drink), and the change of use of the upper floors to two flats. This introduces residential use of the upper floors, which is defined as highly vulnerable development in Technical Advice Note 15: Development, flooding and coastal erosion (TAN15), dated 2025. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 Rivers.

As the highly vulnerable element of the scheme is located above ground level, we are satisfied it is elevated from any flood risk. A less vulnerable use (commercial) is proposed on the ground floor. As such we do not require an FCA to advise you on the consequences of flooding to and from the new residential properties.

However, it is for planning authorities to determine whether the risks and consequences of flooding are acceptable. You should therefore be satisfied that the proposal has fully considered access requirements, including evacuation routes used in an emergency flood event. As such you may require the applicant to submit a flood consequences assessment (FCA) which covers appropriate access/evacuation routes from the proposed development (see Figure 2 in TAN15 – Technical requirements of an FCA).

The applicant may also find this beneficial for awareness raising, informing emergency plans, and the provision of flood resilient design and resistance measures. Guidance on resilient design can be found in Chapter 13 of TAN15 which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience. We also provide advice on preparing for a flood which may be useful for the developer or occupant of the proposal.

If an FCA is submitted, we can provide you with advice on its findings to inform your decision making.

Other matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Heather McDowell

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.