

Ein cyf/Our ref: CAS-258192-C8T5
Eich cyf/Your ref: P/24/0026

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

Dyddiad/Date: 14 June 2024

Annwyl Marlene/Dear Marlene,

BWRIAD/PROPOSAL: EXISTING DERELICT STRUCTURE (FORMER DOCTORS SURGERY) TO BE CONVERTED INTO TWO SINGLE BEDROOM MAISONNETTES WITH SLEEPING ACCOMODATION ON FIRST FLOOR. NEW ROOF WITH RAISED RIDGE LEVEL. EXISTING BUILDING TO CHANGE OF USE TO CLASS C3.

LLEOLIAD/LOCATION: FORMER MOUNT VIEW SURGERY, BRIDGE STREET, ABERFAN.

We have received additional technical information from the applicant's flood risk consultant for the above application. This information came to us directly via email on 22 May 2024 and we attach a copy for your records.

To avoid any further delay to the determination of this application, we have reviewed the additional information and provide you with our technical advice on the risks and consequences of flooding.

We remind you that the planning application proposes highly vulnerable development (two single bedroom maisonettes). The site is shown to be within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). In addition, the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 (Rivers).

Section 6 of TAN15 therefore requires your Authority to determine whether the development at this location is justified. 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 that the potential consequences of flooding can be managed to an acceptable level.

Based on the submitted flood consequences assessment (FCA), the FCA addendum note and the above referenced email (all prepared by Aegaea consultants), we are satisfied that the potential consequences of flooding have been shown to be manageable to an acceptable level. **We therefore have no objections to the proposal as submitted.**

We were previously satisfied with the applicant's assessment of flood risk from the river Taff. Although the application site benefits from flood defences (comprising embankments), the original FCA hadn't included an assessment of the flood defences if they were to breach, and equally there was no justification why an assessment was not undertaken. Further, the full allowance of climate change was not adequately assessed in the applicant's original FCA. At this location, a 25% increase to the rivers hydrological flow should be assessed.

Therefore an addendum note to the applicant's FCA was submitted (undated) and our previous response explained that this information satisfactorily assessed the climate change allowance and showed the site to be flood free in the 1% annual probability flood event plus climate change allowance on the river Taff. It also showed the predicted annual probability flood levels (in the 1% with climate change allowance event and in the 0.1% present day event) are at least 500mm below the crest level of the flood defences. Given this information, we were satisfied a breach assessment wasn't necessary to assess TAN15 criteria.

However, in our previous response we highlighted that the applicant should carry out an assessment of flood risk from the ordinary watercourse that flows immediately north of the application site. This was missing in the original FCA and addendum. The email from Aegaea consultants from 22 May 2024 provides this assessment.

We are satisfied with the methodology used by the consultant and agree with them that detailed flood risk modelling is disproportionate given the scale of the proposal. Their assessment shows that in the event of the ordinary watercourse channel blocking, or a lack of capacity in the channel or culvert, flood waters are likely to overtop the opposite bank to the application site. The flood waters are then likely to flow westwards onto Cotteral Street and then down Bridge Street and beyond. This mechanism of flooding is reflected in the extract of the surface water flood map in the consultant's email.

As with any flood risk from ordinary watercourses and culverts, it is good practice to consult your Authority's own drainage team (as the Lead Local Flood Authority) who may hold relevant information. This may include knowledge on how the culvert reacts in times of flooding and whether it is prone to blocking. We would defer to the Lead Local Flood Authority if they have concerns or conflicting information regarding this source of flooding.

We advise the applicant's flood risk information is submitted to your Authority and placed on the planning file. If you have any queries on the above advice, please do not hesitate to contact us.

Yn gywir / Yours faithfully

James Davies

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

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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.

CC Oliver Harvey, Aegaea Consultants via email