

Ein cyf/Our ref: CAS-249062-Y1P1
Eich cyf/Your ref: P/24/0026

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

Dyddiad/Date: 11 March 2024

Annwyl Marlene/Dear Marlene,

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

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

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 February 2024.

We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (residential). Our Flood Risk Map confirms the site to be entirely within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 for Rivers.

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 Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the FCA undertaken by Aegaea, dated January 2024, reference AEG3298_CF48_Aberfan_01. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

Technical Advice

During the 1% (defended) event the FCA states that the site will remain unaffected (Section 3.10). The NRW (2010) flood model does not account for 25% allowance for climate change (CC) but the FCA includes a broad assessment of the design flood level for the 1% +CC (25%) event. This results in a design flood level of 129.49 metres Above Ordnance Datum (mAOD) which is confirmed as 0.12metres below the existing floor level on the site. We would question whether the 5% increase on flood flows would only result in an increase in depth of 10mm compared to the 1% +CC (20%) event at 129.48m.

There has been no assessment of a breach (or evidence to support why a breach has not been undertaken) of the existing flood defences (comprising embankments) adjacent to the proposed site. We are aware that this site did flood during the 1998 floods from an overland flood flow route, which came from the River Taff further upstream of the proposed site. The route flowed southwards along the B4285 into the builder's yard immediately north of this development. This flood event has not been reported in the submitted FCA, only the 1979 event (Section 3.8).

Section 3.22 states that 'NRW have not provided any data regarding flood defence failure or breach'. Please note that this is a matter for the consultant to assess within the FCA. With regards to criterion A1.12 of TAN 15, the FCA has also not considered whether the existing flood defences are structurally adequate to withstand the 0.1% event.

During the 0.1% event (undefended), the site is reported to flood to a depth of 1.09 metres, based on an existing floor level of 129.61mAOD and a corresponding flood level of 130.70mAOD. No flood velocities, rate of rise or speed of inundation has been provided to assess the other criteria under A1.15 of TAN15. Please note, the 0.1% present day undefended scenario represents a modelled worst-case scenario. If the model data is showing a depth of 1.09m in this event, this may indicate flooding to the site during a 1% +CC (25%) event, which is required to be assessed against A1.14, as detailed above.

To summarise, we advise the following points are considered in a revised FCA:

1. Establish the flood levels in the channel for the 25% increase climate change allowance (additional 5% on the design flows within the model obtained under license). Compare these levels with the crest level of the existing flood embankment adjacent to and upstream of the site (along the right bank).
2. Providing flood levels for the 1% +CC (25%) and 0.1% event are at least 500mm below the crest level of the defences, we consider a breach assessment may not be necessary, however this should be fully justified within the FCA.
3. If the design food levels are within 500mm of the crest, then a full assessment of a breach of the defences will be necessary.

If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we object to this application.

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.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors 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 flood 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.

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

Eleanor Sullivan

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.