

Ein cyf/Our ref: CAS-252670-J9V1
Eich cyf/Your ref: P/24/0026

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

Dyddiad/Date: 25 April 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.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 28 March 2024.

We continue to 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 (2 no. single bedroom maisonettes) Our Flood Risk Map confirms the site to be 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 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 addendum to support the previous FCA undertaken by Aegaea, dated 22nd January 2024, reference AEG3298_CF48_Aberfan_01. Our advice to you is that the assessment fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

Technical Advice

The figures used for the 1% (1:100 year) and 1% plus 20% Climate Change Allowance (CCA) are inconsistent with the calculation that follows, possibly a typing error (i.e. 131.00 used instead of 130.00).

If the figures applied are as below, then the calculated 1% plus 25% CCA flood level would be **130.35mAOD** and not 131.35mAOD as shown.

Accepted Predicted Flood Levels

- 1% (1:100 year): 130.00mAOD
- 1% (1:100 year) plus 20% CCA: 130.28mAOD
- 0.1% (1:1000 year): 131.28mAOD

However, based on the 130.35m AOD figure, the addendum now demonstrates how the extra 5% on climate change allowance has been derived.

It has been demonstrated that the existing crest level of 132.00mAOD to the flood embankment adjacent to the site is greater than 500mm above the design flood levels assessed.

As previously advised, providing flood levels for the 1% plus 25% CCA and 0.1% event are at least 500mm below the crest level of the defences, we consider a breach assessment is not necessary in this instance. However, this should be fully justified within the FCA. It is acknowledged that the requirements for a breach of the defences is not required due to the degree of freeboard available within the adjacent scheme covering the above design flood events.

In reviewing the FCA again, we have also identified the follow point that require further consideration and addressing to ensure a complete FCA/assessment:

1. There has been no assessment of the risk of flooding from the Ordinary Watercourse that flows immediately north of the proposed development site boundary and enters a culvert at this point. This is potentially a separate source / risk that requires consideration, in addition to the River Taff, should the culvert block before it flows beneath Bridge Street. As assessment of the capacity of the channel and inlet to the culvert and likelihood of blockage should be included.

Other Recommendations to the FCA

2. The NRW Flood Risk Assessment Wales (FRAW) data has no relevance to planning and should be omitted from the FCA or caveated accordingly as not suitable for planning purposes.

3. Sections 3.18, 3.23, 4.3 and other sections of the FCA – '**Right bank**' should be amended to '**Left bank**', as the right bank is the same side as the development site. These are established by looking downstream within the channel and not upstream.

If point 1 is satisfactorily addressed and demonstrates the application site is designed to be flood free in the 1% plus 25% CCA, we would have no objection to the application. However, if further information demonstrates that the consequences of flooding cannot be acceptably managed over the lifetime of the development, then we would continue to have concerns with 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

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.