



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-172558-V9H9
Eich cyf/Your ref: P/21/0225

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23/11/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: PROPOSED EXTENSION TO ALDI STORES, DEMOLITION OF THE EXISTING CAR SALES BUILDING, BOUNDARY WALL, AND FORECOURT TO FACILITATE EXTENSION, RE-CONFIGURATION OF THE EXISTING CAR PARK AND OTHER EXTERNAL WORKS.

LLEOLIAD / LOCATION: ALDI FOODSTORE LTD AND SIMON JONES CARS PLYMOUTH STREET MERTHYR TYDFIL

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 3 November 2021.

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the document identified below is included in the approved plans and documents condition on the decision notice:

- *'Response to NRW Comments'* by Craddys, ref 11867w0005, dated 2 November 2021
- *'Proposed Site Plan'*, Drawing Number 1504 Rev P2 by Kendall Kingscott, dated 18 May 2021 (Proposed Site Plan)

Please note, without the inclusion of this/these document(s) we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes less vulnerable development (retail). Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15.

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 FRA, that the potential consequences of flooding can be managed to an acceptable level.

Previously we advised a revised Flood Consequences Assessment (FCA) was required to demonstrate the risks and consequences of flooding could be managed to an acceptable level and for the lifetime of the development.

We note the following documents and plans submitted in support of the application:

- ‘*Proposed Site Plan*’, Drawing Number 1504 Rev P2 by Kendall Kingscott, dated 18 May 2021 (Proposed Site Plan)
- ‘*Response to NRW Comments*’ by Craddys, ref 11867w0004, dated 27 August 2021 (August FCA)
- ‘*Response to NRW Comments*’ by Craddys, ref 11867w0005, dated 2 November 2021 (November FCA)

We note and have considered the revised submitted FCAs and finished floor levels of the proposed extension and ground level of the extended car parking area which are incorporated into the Proposed Site Plan.

The November FCA states flood data has been obtained from “*Wallingford HydroSolutions Ltd. currently preparing a flood model on behalf of Merthyr Tydfil Borough Council. The model is aimed at determining flood risk to the area principally from the Nant Morlais, but includes the River Taff*”. Given the scale and nature of this development, we are satisfied with the flood data used to inform the FCA.

The Proposed Site Plan confirms the finished floor level for the proposed extension to the existing retail unit will be set at 162.95m AOD and the Proposed Site Plan indicates the ground level of the extended parking area to be set at 162.77m AOD.

Advice on A1.14: Flood Risk in the 1.0% flood event

The November FCA demonstrates that with a predicted flood level of 162.91m AOD in the 1.0% plus climate change allowance (CCA) event the proposed extension with a FFL of 162.95m AOD will not experience flooding and, therefore, meets the requirements of A1.14.

We note the carpark is currently at risk of flooding and will continue to be at risk of flooding post development and have no further advice on A1.14.

Condition

We recommend that you should only grant planning permission if the November FCA and Proposed Plan identified above are included in the approved plans and documents condition on the decision notice.

Advice on A1.15: Flood Risk in the 0.1% (1 in 1000 year) plus CCA flood event

The November FCA demonstrates that with a predicted flood level of 163.25m AOD in the 0.1% (1 in 1000 year) plus CCA event the proposed extension with a FFL of 162.95m AOD, will experience flooding of up to 0.3m. This is within the tolerable limits (600mm) set out in A1.15 of TAN15.

During the same event the November FCA demonstrates that with a predicted flood level of 163.83 m AOD the parking area will experience flood depths of up to 1.06 m. This is not within the tolerable limits (600mm) set out in A1.15 of TAN15.

The November FCA states in the pre-development scenario during this event, flood depths in the existing car park reach around 1.2m, the maximum rate of rise of flood waters is around 0.67m/hr and maximum flood flow velocities reach around 3m/s.

We can advise that the existing maximum flood depths and velocities in the carpark means the flood hazard is 'Danger for All'. "Danger for All" includes the emergency services.

NRW do not comment on whether safe access and egress can be achieved to and from a site as this is a matter for emergency services to determine.

We note there is no assessment in terms of rate of rise for the proposed development.

A1.12 Criteria

Flood risk elsewhere

The August FCA, supported with drawing number 11867sk0001 Rev C by Craddys, dated 27 August 2021 and advises that the proposal will result not there will be no unacceptable loss of fluvial floodplain storage. We are satisfied with this conclusion.

Emergency Access/egress

TAN15 advises that access routes should be shown to be operational under all conditions. It is for your authority to determine whether you consider this risk to be acceptable. We do not comment on whether safe access and egress can be achieved to and from a site as this is a matter for emergency services to determine.

In terms of A1.12 and A1.15 criteria, it is for your authority to be satisfied that the consequences of flooding in this event are acceptable and it allows occupants/users to be evacuated or rescued, should it be necessary. We recommend you consider consulting other professional advisors on matters such as emergency plans, evacuation procedures and measures to address structural damage that may result from flooding.

Please note, we do not normally comment on or approve the adequacy of flood emergency response 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.

We also previously provided comments on other areas of interest please refer to our response reference CAS-157378-J9X8 dated 30 July 2021.

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.

Advice for the Developer

Works Near a Watercourse

Due to the proximity of the site to watercourses, all works at the site must be carried out in accordance with GPP5 and PPG6: 'Works in, near or over watercourses' and 'Working at construction and demolition sites' which are available on the following website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Kate Glover

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