

FloodSmart Plus



Site Address

Manettes
95-96 High Street
Merthyr Tydfil
CF47 8UP

Date updated

2021-11-29

Report Status

FINAL

Grid Reference

304945, 206380

Site Area

230 m²

Report Prepared for

MF Design & Build Ltd
9 Gurnos Rd
Merthyr Tydfil
CF47 9NL

Report Reference

75805R1



Flood Consequence Assessment

The Site is currently used in a 'Less Vulnerable' capacity as a retail unit and retail and storage space. Development proposals comprise the conversion of the first and second floors to residential accommodation, classed as 'Highly Vulnerable'.

The Site is located in Development Advice Map (DAM) Zone C2, which is an area of the floodplain without significant flood defence infrastructure. This is not generally in accordance with Table 9 of TAN15 (2004); however, it is understood from the pre-app correspondence that the proposals could potentially form part of the wider regeneration of the town centre, which in turn can contribute to its vitality and viability. The location of the flats on the first floor and second floor of the building would also greatly reduce the risk to the future occupants. The wider regeneration benefits and flood mitigation are considered to outweigh the level of flood risk identified.

The Flood Risk Assessment Wales (FRAW) and National Flood Hazard maps confirm:

- The Site has a Low to Very Low risk of flooding from rivers, which represents a 'worst case' undefended scenario;
- The Site has a Very Low to Low risk of flooding from surface water and small watercourses;
- Access and egress routes to the east could be constrained by a 'Danger for Most' Hazard rating. However, all units have access and egress routes to the west, which has a 'Low' hazard rating and would therefore be acceptable.

GeoSmart's Groundwater Flood Risk Screening (GW5) map indicates a Moderate risk of groundwater flooding at the Site.

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1. Executive summary



The Planning Policy Wales (PPW) 11th edition (2021) and Technical Advice Note 15 (TAN 15) (2004) requires Flood Consequence Assessments (FCA) to review flooding from all potential sources. A review has been undertaken of national environmental data sets to assess the potential flood risk to the Site. The review is provided within this concise interpretative report written by an experienced GeoSmart consultant.

Site analysis

Source of Flood Risk	Baseline	After Mitigation
River (fluvial) flooding	Low to Very Low ¹	Very Low
Sea (coastal/tidal) flooding	Very Low	N/A
Surface water (pluvial) and small watercourses flooding	Low to Very Low	Very Low
Groundwater flooding	Moderate	Low
Other flood risk factors present	No	N/A
Is any other further work recommended?	Yes	Yes (see below)

N/A = mitigation not required

¹ Model data was requested for the Site but was not provided within the time frame of this report. The National Hazard and Flood Risk Assessment Wales (FRAW) maps (2020) have been used to assess flood risk to the Site. The Site is at a Low to Very Low risk with a Low risk adjacent in the highway to the east.

Summary of existing and proposed development

The Site is currently used as an empty and derelict shop with the ground floor used as retail space and the first floor used for retail and storage purposes. A yard is present in the south-west of the Site.

Development proposals comprise the conversion of the ground floor retail space into two separate retail units, and the conversion of the first floor into four self-contained studio flats. Proposals also include the addition of a second floor, which will comprise two studio flats and one one-bedroom flat, and access to both floors from the rear road.

A topographic survey was not available to confirm the level of building floors or thresholds. In the absence of this information, analysis of Google StreetView imagery has been used and

indicates the building threshold is raised above the adjacent highway to the east with a ramped entrance by a minimum of approximately 0.15 m above kerb height (total 0.3 m above the adjacent highway).

The ground levels adjacent to the Site are approximately 178.9 mAOD; therefore the threshold level for the ground floor has been estimated at 179.2 mAOD.

Summary of flood risks

The flood risks from all sources have been assessed as part of this report and are as follows:

- According to the NRW's Development Advice Map (DAM) the Site is located entirely within Zone C2 which are areas of the floodplain without significant flood defence infrastructure (TAN15, 2004).
- According to the NRW's Flood Map for Planning, the Site is located primarily within Rivers and Seas – Flood Zone 3, with the north-west corner of the Site located within Flood Zone 2.
- According to Natural Resources Wales' (NRW) National Flood Hazard and Flood Risk Assessment Wales (FRAW) maps (2020), the Site is at Low to Very Low risk of fluvial flooding.
- Modelled flood elevation data was requested from NRW, although NRW stated in their response (Appendix B) that:

"the modelling in this area was carried out by Capita for Merthyr Council in 2015. Therefore, as we do not own the Intellectual Property Rights for this model, you would need to approach Merthyr Council/Capita."

The model data was then requested from Merthyr Council and their response can be found in Appendix B:

"I don't believe that we in Planning have access to the raw data from the modelling that was carried out by Capita in 2015. The FCA that was published at this time (in support of the proposals for a new bus station) is publicly available, and can be found under the application reference number P/16/0048".

The referenced FCA was not available through the planning portal and was requested on the 21st June 2021. Subsequently the FRA was requested on 11th November 2021. A response was not received within the timeframe of this report.

In the absence of detailed modelling, the NRW's National Hazard and FRAW Maps (2020) were used to derive flood levels and risks at the Site. The maps confirm the Site has a Very Low to Low risk of flooding from rivers.

Access to the east along the adjacent highway is at a Low risk with flood depths of up to 0.3 m in areas with an elevation of c. 178.9 mAOD (approximate flood level of 179.2 mAOD).

Access and egress routes to the east, could be constrained by a 'Danger for Most' Hazard rating. However, all units have access and egress routes to the west, which has a 'Low' hazard rating and would therefore be acceptable.

- According to NRW's FRAW risk of flooding from surface water (pluvial) and small watercourses map, the Site is at Very Low risk to Low of pluvial flooding.
- According to GeoSmart's Groundwater Flood Risk (GW5) Map, there is a Moderate potential for groundwater flooding at the Site, during a 1 % annual probability (1 in 100 year) event.
- The risk of flooding from artificial sources such as reservoirs, sewers and canals have been assessed:
 - o According to NRW's Risk of Flooding from Reservoir mapping, the Site is at risk of reservoir flooding;
 - o According to Ordnance Survey (OS) mapping, there are no canals within the vicinity of the Site; and
 - o Merthyr Tydfil Borough Council Flood Risk Management Plan (2013) does not confirm any incidence of sewer flooding within the Borough.

The flooding risks from artificial sources are deemed to be very low.

TAN15 (2004) confirms the flooding consequences associated with Emergency Services and Highly Vulnerable developments are not considered to be acceptable within DAM Zone C2. Plan allocations should not be made for such developments and planning applications not proposed. TAN15 (2021) confirms that the flooding consequences associated with Emergency Services and Highly Vulnerable developments are not considered to be acceptable within Rivers and Seas – Flood Zone 3.

The proposals are Highly Vulnerable in nature and the Site is located in DAM Zone C2 and Flood Zone 3, which is not generally in accordance with Table 9 of TAN15 (2004) and TAN15 (2021). However, from the pre-application correspondence from Merthyr Tydfil County Borough Council (Appendix A, and included below), it is understood that the wider regeneration benefits and flood mitigation proposed as part of the development are considered to outweigh the Low to Very Low flooding risks in this instance.

Additionally, proposals include residential accommodation (which is classed as Highly Vulnerable) on the 1st and 2nd floor only, with the ground floor remaining classed as Less Vulnerable. The proposed evacuation route to the rear of the Site would ensure that the flood risk to occupants would be acceptable. The proposed 2nd floor residential accommodation would be above the predicted flood level for all flood events considered and so would not increase the flood risk to an unacceptable level for the occupants.

Pre-application advice was requested from Merthyr Tydfil County Borough Council and was received on 4th November 2021 (Appendix D). The pre-application correspondence states:

"The building is located within a C2 Flood Risk Zone. Accordingly, Technical Advice Note (TAN) 15 (2004) is of particular relevance to the consideration of this proposal (until such a time when the draft TAN 15 comes into force). As you may be aware, TAN 15 defines Flood Zone C2 as 'areas of the floodplain without significant flood defence infrastructure' where only 'less vulnerable development' should be considered subject to an application of the justification tests and that highly vulnerable development' should not be considered. As residential premises are defined as 'highly vulnerable development', a fundamental policy objection would be raised to the proposed

roof extension as it would involve the development of new residential floor space in an area which is at risk from flooding.

The conversion of the existing building has the potential to form part of the wider regeneration of the town centre, which in turn can contribute to its vitality and viability. As such, the location of the four flats on the first floor of the building may be more acceptable, subject to a Flood Consequence Assessment (FCA) being submitted and adequately demonstrating that there would not be an unacceptable risk from flooding to people. The flood risk associated with the proposed development would need to be fully considered following consultation with Natural Resources Wales (NRW) during the planning application process."

Additionally, a planning application was submitted for the neighbouring property to the Site, which proposed a conversion of the first and second storey floors to residential flats and a ground floor retail unit; this development is therefore comparable to the proposed development at the Site. During its planning consultation, the neighbouring property did not receive objections in relation to flood risk from NRW during its consultation (Appendix E), which indicates the flood risk for the proposed development at this Site may be acceptable.

Proposed flood mitigation

In order to mitigate against any potential flooding, the following mitigation measures are proposed:

- Flood depths in the Low risk (1 % AEP event plus climate change proxy) fluvial and pluvial scenarios would be relatively shallow (up to 0.3 m), and would occur adjacent to the building. In order to provide freeboard for wave action (from passing vehicles), it is recommended that threshold levels at the eastern entrance to the Site are raised to 0.3 m above the flood level of c. 179.2 mAOD, to 179.5 mAOD. No flooding is expected to the west of the Site in both the fluvial and pluvial Low risk scenario, so threshold levels are not required to be raised to the west of the Site. In the event that threshold levels cannot be raised, a water exclusion strategy should be adopted.
- According to GeoSmart's GW5 Groundwater Flood Risk Map, the Site is at a Moderate risk of groundwater flooding from regional sources. Mitigation measures should be taken to reduce the groundwater flood risk for the development, including waterproof tanking of the ground floor, interceptor drains, automatic sump to extract flood water, and non-return flap valves on the proposed foul and surface water sewer lines.
- An evacuation plan should be designed and implemented at the Site. Evacuation should be through the rear of the Site, along Castle Yard, where no flooding is expected.
- Site management teams and occupants of the Site should be signed up to receive EA Flood Alerts and Flood Warnings.

2. Introduction



Background and purpose

This assessment has been undertaken by firstly compiling information concerning the Site and the surrounding area. The information gathered was then used to construct a 'conceptual site model', including an understanding of the appropriateness of the development as defined in the PPW (2021) and the source(s) of any flood risk present. Finally, a preliminary assessment of the steps that can be taken to manage any flood risk to the development was undertaken.

This report has been prepared with reference to the TAN 15 (2004) which supplements the PPW (2021). It is noted that an update to TAN 15 (2021) comes into effect from 1 June 2023, and any changes to planning policy identified within TAN 15 (2021) have also been included in the report.

The general approach of PPW, supported by the TAN, is to advise caution in respect of new development in areas at high risk of flooding by setting out a precautionary framework to guide planning decisions. The overarching aim of the precautionary framework is, in order of preference, to:

- Direct new development away from those areas which are at high risk of flooding; and
- Where development is considered to be in high-risk areas (Zone C) only those developments which can be justified on the basis of the tests outlined in section 6 and section 7 are located within such areas.

The purpose of this report is to provide clear and pragmatic advice regarding the nature and potential significance of flood hazards which may be present at the Site.

Report scope

A thorough review of a commercially available flood risk report and NRW supplied data indicating potential sources of flood risk to the Site from rivers and coastal sources, surface run-off (pluvial), groundwater and reservoirs, including historical flood information and modelled flood extent. Appropriate measures are recommended to manage and mitigate the flood risk to the property.

Information obtained from NRW and a review of Merthyr Tydfil Borough Council Local Flood Risk Management Strategy (2013) have been used to ascertain local flooding issues and, where appropriate, identify information to support a Sequential and/or Exception test required as part of the PPW (2021).

Using available data, the existing and future flood risks to and from the Site from all flood sources will be assessed in line with current best practice.

An indication of potential flood risk from the Site to downstream receptors is provided where the proposed development increases run-off from the Site.

Report limitations

It is noted that the findings presented in this report are based on a desk study of information supplied by third parties. Whilst we assume that all information is representative of past and present conditions, we can offer no guarantee as to its validity and a proportionate programme of site investigations would be required to fully verify these findings.

This report excludes consideration of potential hazards arising from any activities at the Site other than normal use and occupancy for the intended land uses. Hazards associated with any other activities have not been assessed and must be subject to a specific risk assessment by the parties responsible for those activities.

Datasets

The following table shows the sources of information that have been consulted as part of this report:

Table 1. Datasets consulted to obtain confirmation of sources of flooding and risk

Source of flooding	Datasets consulted			
	Commercial Flood Maps	FRMS*	Natural Resources Wales (Appendices B and C)	OS Data
Historical	X	X	X	
River (Fluvial) / Sea (tidal)	X	X	X	
Surface water (pluvial)	X	X	X	
Groundwater	X	X		
Sewer		X		
Culvert/bridges		X		X
Reservoir		X	X	

* Merthyr Tydfil Borough Council Local Flood Risk Management Strategy (2013).

3. Site analysis



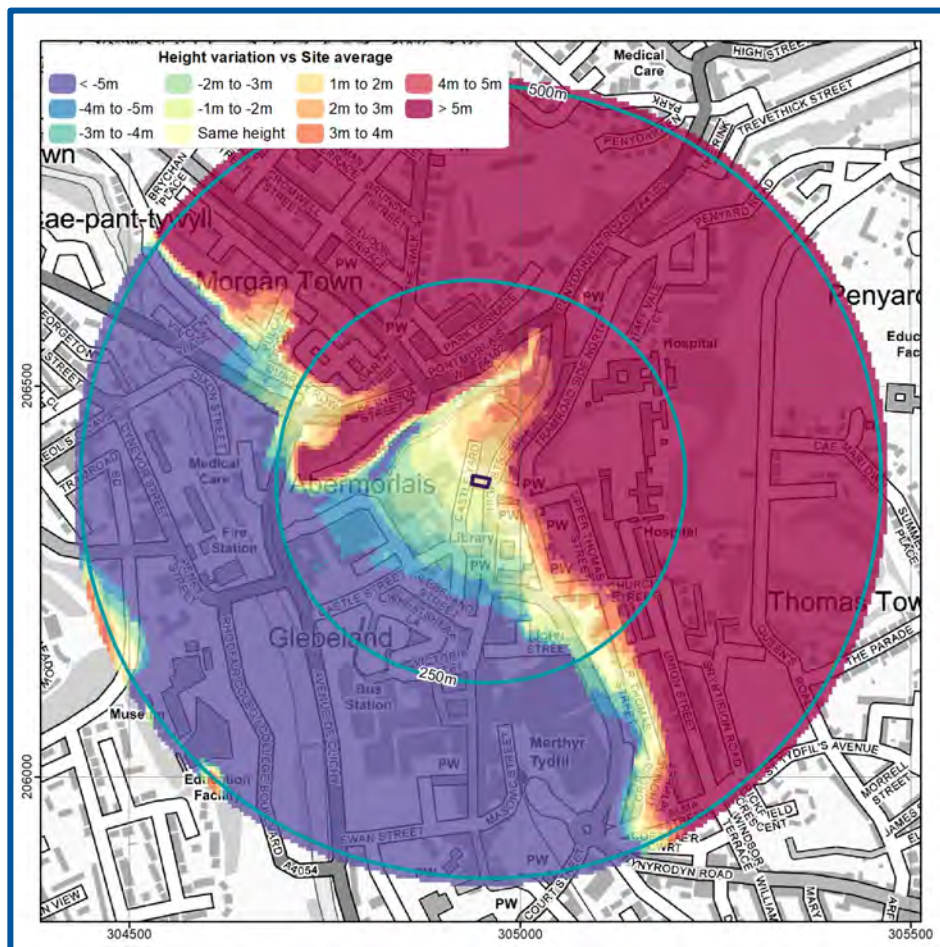
Site information

The Site is located in Merthyr Tydfil County Borough Council in a setting of commercial and residential land use at National Grid Reference SO 04945 06380. Site plans and drawings are provided in Appendix A.

LiDAR ground elevation data indicates the general ground levels on the Site are between 178.6 and 179.0 mAOD with the Site falling gradually in a southerly direction. This is based on elevation data obtained for the Site from the Lle Portal to a 1 m resolution with a vertical accuracy of ± 0.15 m (Appendix C).

A topographic survey was not available to confirm the level of building floors or thresholds. In the absence of this information, analysis of Google StreetView imagery has been used and indicates the building threshold is raised above the adjacent highway to the east with a ramped entrance by a minimum of approximately 0.15 m above kerb height (total 0.3 m above the adjacent highway).

Figure 1. Site Location and Relative Elevations (GeoSmart, 2021).



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Development

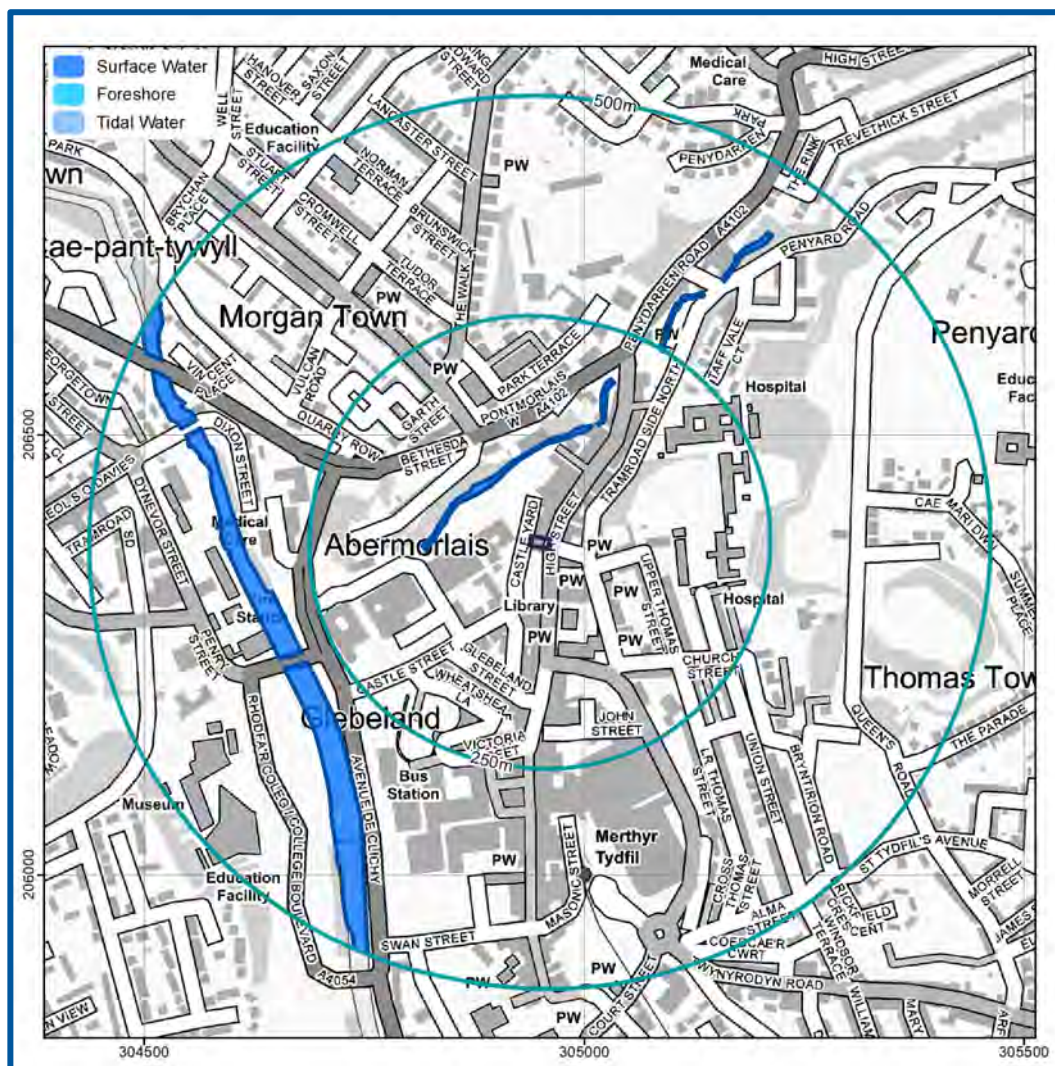
The Site is currently used as an empty and derelict shop with the ground floor used as retail space and the first floor used for retail and storage purposes. A yard is present in the south-west of the Site.

Development proposals comprise the conversion of the ground floor retail space into two separate retail units, and the conversion of the first floor into four self-contained studio flats. Proposals also include the addition of a second floor, which will comprise two studio flats and one one-bedroom flat, and access to both floors from the rear road. Site plans are included within Appendix A.

The existing development is classed as Less Vulnerable and the proposed development is classed as Highly Vulnerable according to Table 9 (Summary of Policy Requirements) in TAN 15 (2004). The effect of the overall development will result in an increase in number of occupants and/or users of the building and will result in the change of use, nature or times of occupation. The estimated lifespan of the development is 100 years.

Hydrological features

Figure 2. Surface water features (NRW, 2021)



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The River Taff is located approximately 290 to the west.

The Nant Morlais is located approximately 70 m to the north west.

Proximity to relevant infrastructure

A bridge over the River Taff is 460 m (Bethesda Road) and 400 m to the north west (Dixon Street), 290 m to the west (A4054) and 530 m to the south west (A4054).

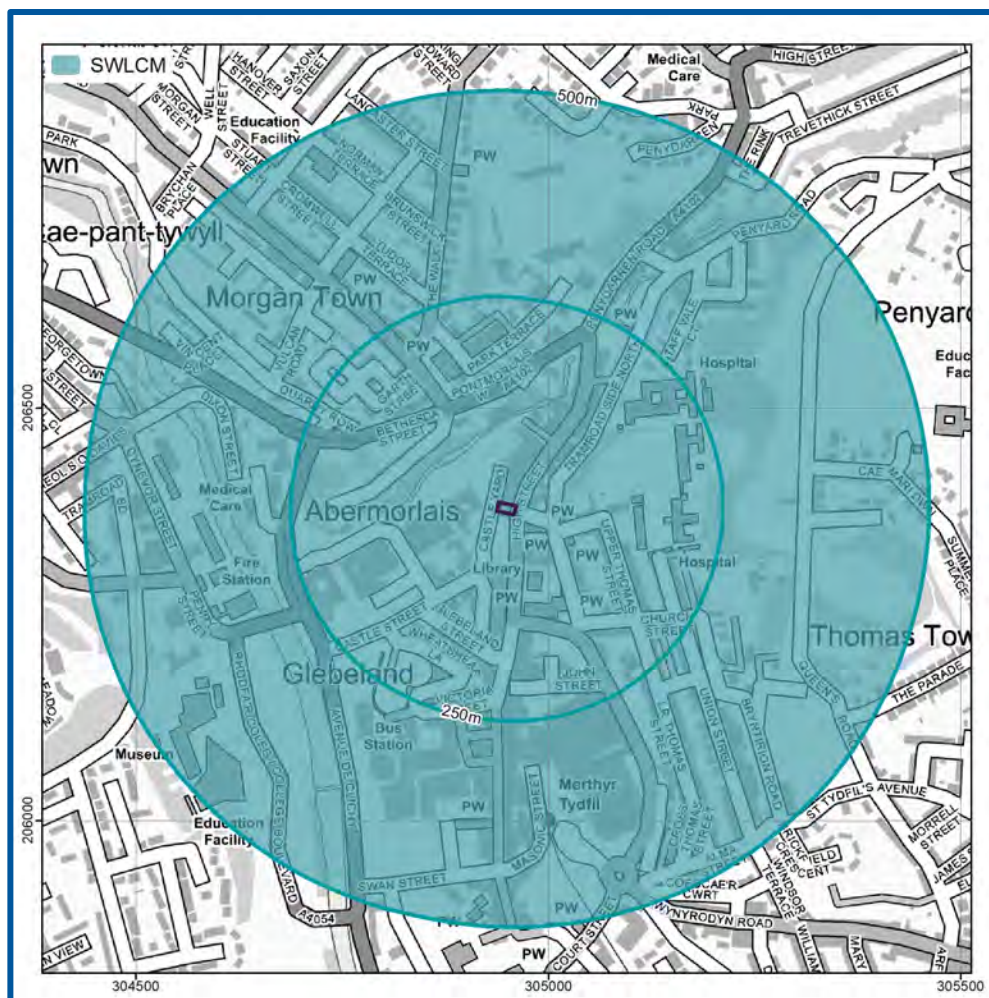
The Nant Morlais is culverted 120 m to the west and 140 m and 190 to the north east.

Hydrogeological features

British Geological Survey (BGS) mapping indicates no recorded superficial geology mapped beneath the Site (BGS, 2021).

BGS mapping indicates the underlying bedrock geology (Figure 3) consists of the South Wales Lower Coal Measures Formation (SWLCM) (sandstone) and is classified as a Secondary (A) Aquifer (BGS 2021).

Figure 3. Bedrock Geology (BGS, 2021)



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The Site does not lie within a groundwater Source Protection Zone (SPZ) (EA, 2021).

A review of the BGS borehole database (BGS, 2021) indicates the most relevant borehole record ref: SO00NW536 is 40 m west, at an elevation of 177.97 mAOD and indicates gravel and boulders to 5.5 m below ground level (bgl), underlain by silty mudstone to 6.60 m bgl and shaly mudstone to 7.5 m bgl, at which the borehole ended. Water seepage was recorded to rise to 3.4 m bgl overnight following the borehole.

The hydrogeological characteristics suggest there is potential for a groundwater table beneath the Site.

Groundwater levels may rise in the bedrock aquifer in response to high river events, subject to the hydraulic continuity between the driving water level, the groundwater system and the Site.

4. Flood risk to the development



Historical flood events

According to the NRW's Recorded Flood Extents Map, no historical flood events have been recorded at the Site (NRW, 2021).

The purpose of historical flood data is to provide information on where and why flooding may have occurred in the past. The absence of any recorded events does not mean flooding has never occurred on-Site or that flooding will never occur at the Site.

Rivers (fluvial) / Sea (coastal/tidal) flooding

The predominant flood risk at the Site is from flooding from rivers, termed as fluvial flooding. The Site is located in an inland location and the risk of flooding from coastal and tidal processes are therefore considered to be Very Low.

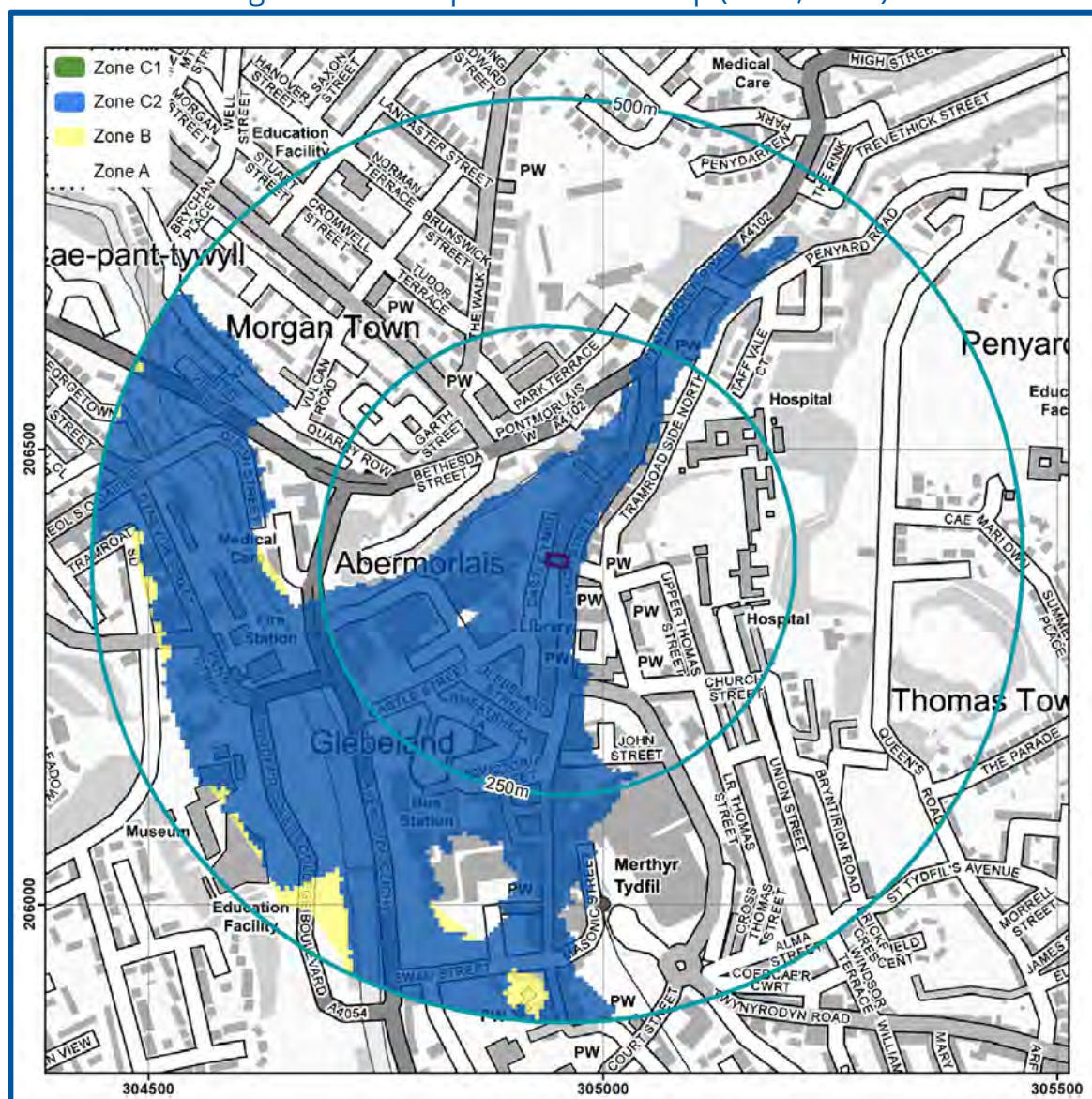
River (fluvial) flooding occurs during times of heavy rainfall or snow melt when watercourses' capacity can be exceeded, over topping the banks and flood defences.

The Development Advice Map (DAM) is used for development planning matters; this confirms that currently, the Site is located within Zone C2 (TAN15, 2004).

Table 2: Development Advice Map Classification

Description of Zone	Zone
Considered to be at little or no risk of fluvial or tidal/coastal flooding.	A
Areas known to have been flooded in the past evidenced by sedimentary deposits.	B
Areas of the floodplain which are developed and served by significant infrastructure, including flood defences.	C1
Areas of the floodplain without significant flood defence infrastructure.	C2

Figure 7. Development Advice Map (NRW, 2021)



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TAN 15 (2021) requires the use of the Flood Map for Planning. This confirms that from 1 June 2023, the Site will be classified as primarily located in Rivers and Seas – Flood Zone 3. An area in the north-west of the Site is classed as being in Rivers and Seas – Flood Zone 2.

Table 3: Flood Map for Planning Classification

Description of Zone	Zone
Less than 1 in 1000 (0.1%) (plus climate change) chance of flooding in a given year.	1

Less than 1 in 100 (1%) but greater than 1 in 1000 (0.1%) chance of fluvial or pluvial flooding in a given year, including climate change, or less than 1 in 200 (0.5%) but greater than 1 in 1000 (0.1%) chance of coastal or tidal flooding in a given year, including climate change.	2
A greater than 1 in 100 (1%) chance of fluvial or pluvial flooding in a given year, including climate change, or a greater than 1 in 200 (0.5%) chance of coastal or tidal flooding in a given year, including climate change.	3

Flood defences

Guidance
Sites that are located close to flood defences are likely to be zones where rapid inundation will occur in the event of the flood defences being overtopped or breached. A Site located close to flood defences (within 250 m) may require a more detailed FRA subject to local topography.

There are no flood defences within the vicinity of the Site.

National Flood Hazard Maps

The National Flood Hazard (NFH) and Flood Risk Assessment Wales (FRAW) maps were published in the Summer of 2020, these show results for an undefended scenario which means the modelling and mapping process explicitly excluded any flood defences.

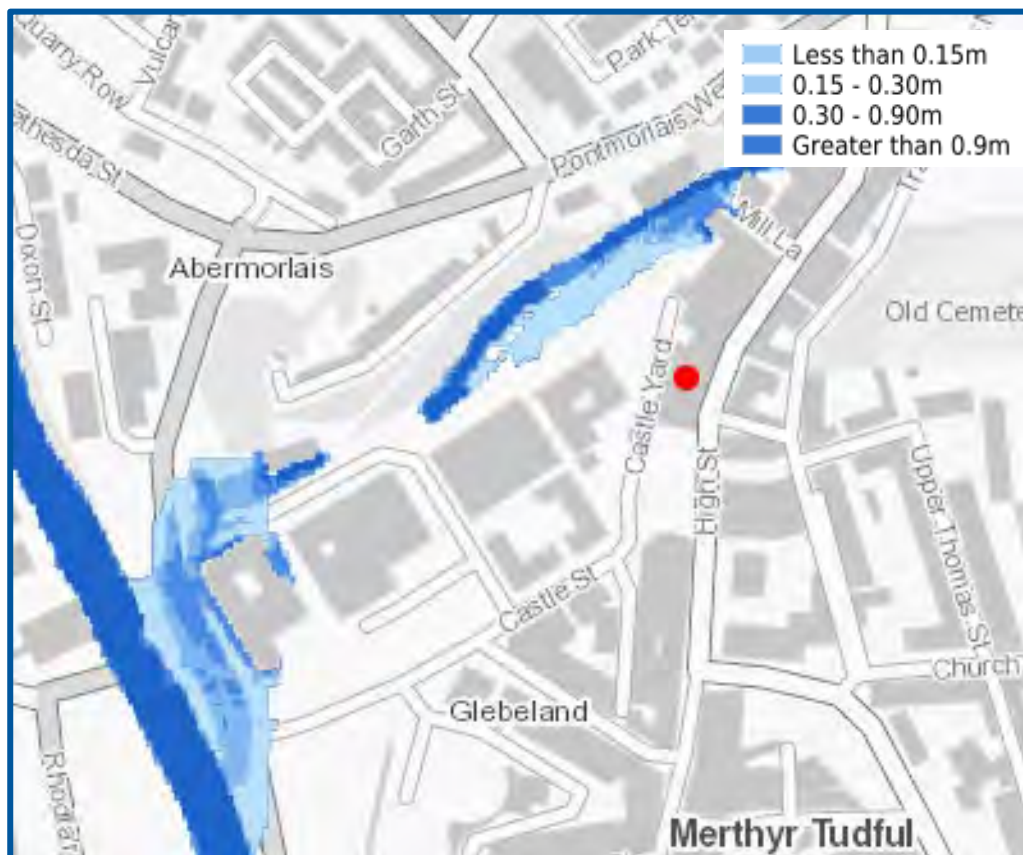
The maps do not currently have an official status for setting planning policy, as set out in Tan 15 (2004), but TAN 15 (2021) uses the FRAW map as one of the two maps for the Wales Flood Map, which include the updated flood zone classifications.

Both NFH and FRAW maps have been included in order to understand the probability of the flood event that is most likely to affect the Site.

The NFH map indicates the Site is at a Very Low to Low risk of fluvial flooding. The majority of the Site is at Low risk of river flooding, although the depth of flooding in building areas cannot be confirmed. Fluvial flooding is expected to occur along the High Street in a Low risk event, with the majority of flood depths up to 0.3 m (although there is potential for flood depths up to 0.9 m in some areas of the highway), which could affect the access to the retail units to the east. However, Finished Floor Levels for the ground floor of the Site are estimated at 0.3 m above the maximum level of the highway adjacent to the Site, so fluvial flooding is unlikely to significantly impact the Site in this event.

The NFH map also indicates that the Site is located within the South Wales Valleys flood risk area. The maps confirm that there is a Very Low risk of flooding from the sea.

Figure 4. 1 in 30 year (High risk) map for river flooding



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Figure 5. 1 in 100 year (Medium risk) map for river flooding



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Figure 6. 1 in 1000 year (Low risk) map for river flooding



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Model data

GeoSmart undertook a Flood Consequence Assessment for 172-174 High Street (the neighbouring Site; ref: 74542). As this Site is located within NRW's fluvial floodplain, modelled flood elevation data was requested from NRW. However, NRW stated in their response (Appendix B) that:

"the modelling in this area was carried out by Capita for Merthyr Council in 2015. Therefore, as we do not own the Intellectual Property Rights for this model, you would need to approach Merthyr Council/Capita."

The model data was requested from Merthyr Council and their response can be found in Appendix B:

"I don't believe that we in Planning have access to the raw data from the modelling that was carried out by Capita in 2015. The FCA that was published at this time (in support of the proposals for a new bus station) is publicly available, and can be found under the application reference number P/16/0048"

The referenced FCA was not available through the planning portal and was requested on the 21st June 2021. No response was received. The FCA was requested for a second time on 12th November to aid the FCA for the current Site. However, a response was not received within the timeframe of this report.

The National Hazard Maps have been used to assess flood risk.

Climate change factors

In accordance with the Welsh Governments Climate change allowances for planning purposes, CL-03-16 guidance (2016), allowances should be made for increased river levels and flows to proposed development, where applicable.

However, as no flood level for the Site can be interpolated, a climate change flood level also cannot be interpolated. The National Hazard Low risk maps represent the risk in a 0.1 % AEP event, and has been used in proxy of a climate change flood level.

In a Low fluvial flood risk event, the High Street is expected to experience fluvial flooding. Flood depths in the highway are expected to reach up to 0.3 m, with some areas of the highway potentially having flood depths of up to 0.9 m. Flood depths immediately adjacent to the east of the Site are up to 0.15 m. The maximum elevation of the highway adjacent to the east of the Site is c. 178.9 mAOD, which indicates that the maximum flood level would be c. 179.2 mAOD in this area.

According to visual inspection of the Site using Google StreetView, the building is raised above the adjacent highway with a ramped entrance approximately 0.15 m above kerb height (total 0.3 m above the adjacent highway). This indicates that in a Low risk fluvial event, the Site is unlikely to experience any flooding, and therefore climate change is unlikely to significantly increase the risk of fluvial flooding at the Site.

Surface water (pluvial) flooding

Surface water flooding occurs when intense rainfall exceeds the infiltration capacity of the ground and overwhelms the drainage systems. It can occur in most locations even at higher elevations and at significant distances from river and coastal floodplains.

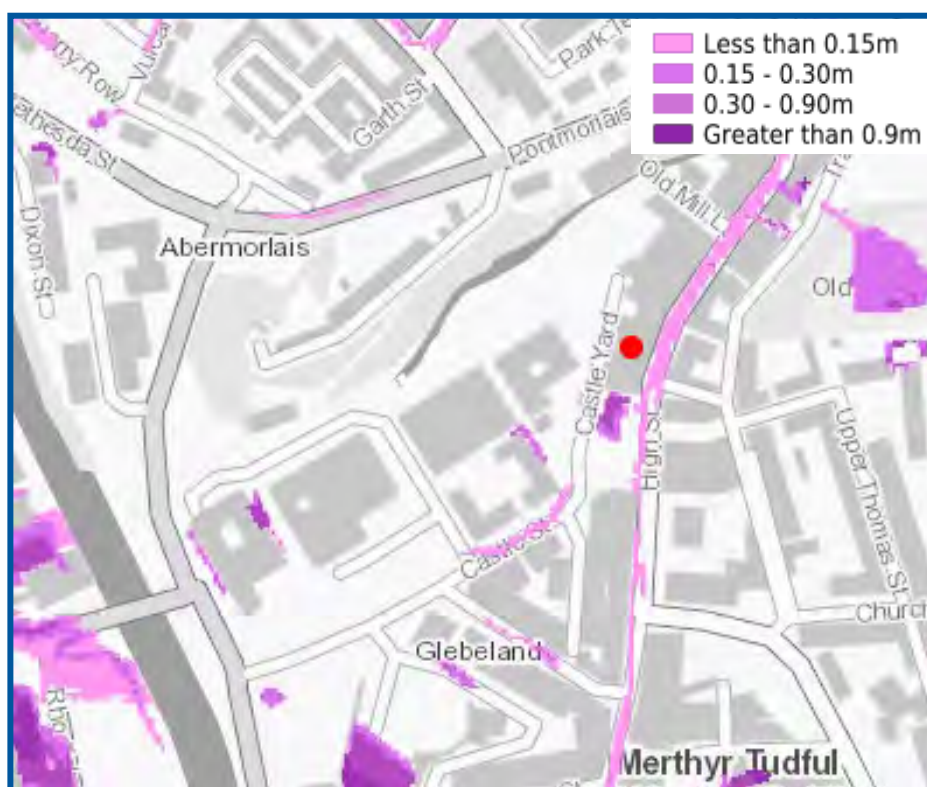
According to the National Flood Hazards Map's Flood Risk from Surface Water and Small Watercourses map, there is a Very Low risk of pluvial flooding at the Site.

Guidance

According to NRW's surface water flood risk map the Site is at:

- Very Low risk - chance of flooding of less than 1 in 1000 (0.1%).
- Low risk - chance of flooding of between a 1 in 1000 & 1 in 100 (0.1% and 1%).
- Medium risk - chance of flooding of between a 1 in 100 and 1 in 30 (1% and 3.3%).

Figure 7. NFH Flood Risk from Surface Water and Small Watercourses medium flood risk map (NRW, 2021)



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The area of the High Street highway adjacent to the east of the Site is at a High risk of pluvial flooding with anticipated maximum flood depths of up to 0.15 m. In a Low risk event, anticipated flood depths are up to 0.30 m. This may affect access to the retail units, although it is noted that rear access to Castle Yard is available for both the retail units and upper floor

residential accommodation. The NFH maps indicate that surface water is not expected to be immediately adjacent to the eastern boundary of the Site in the High or Medium risk scenarios.

Figure 7 shows the National Flood Hazards Map's Flood Risk from Surface Water and Small Watercourses map for a Medium (1 in 100 year) risk scenario, and confirms that the Site is not expected to flood in this scenario. However, surface water is predicted to be present on the High Street, with anticipated flood depths of up to 0.15 m.

According to the NRW's Flood Map for Planning, the Site is located in Surface Water and Small Watercourses – Flood Zone 1 (TAN 15, 2021).

Analysis of OS mapping, ground elevation data and the NRW's pluvial flow route mapping confirms the Site is not located on a potential overland flow route. There is likely to be an overland flow route along the High Street to the south but this does not intercept the Site. The contribution of Nant Morlais to the pluvial flooding expected along the High Street is unclear.

Climate change may lead to an increase in rainfall intensity which affects river levels, land and urban drainage systems. Rainfall intensity for small and urban catchments may increase from 5 to 20 % (central estimate) or 10 % to 40 % (Upper estimate) over the period to 2115 (EA, 2021).

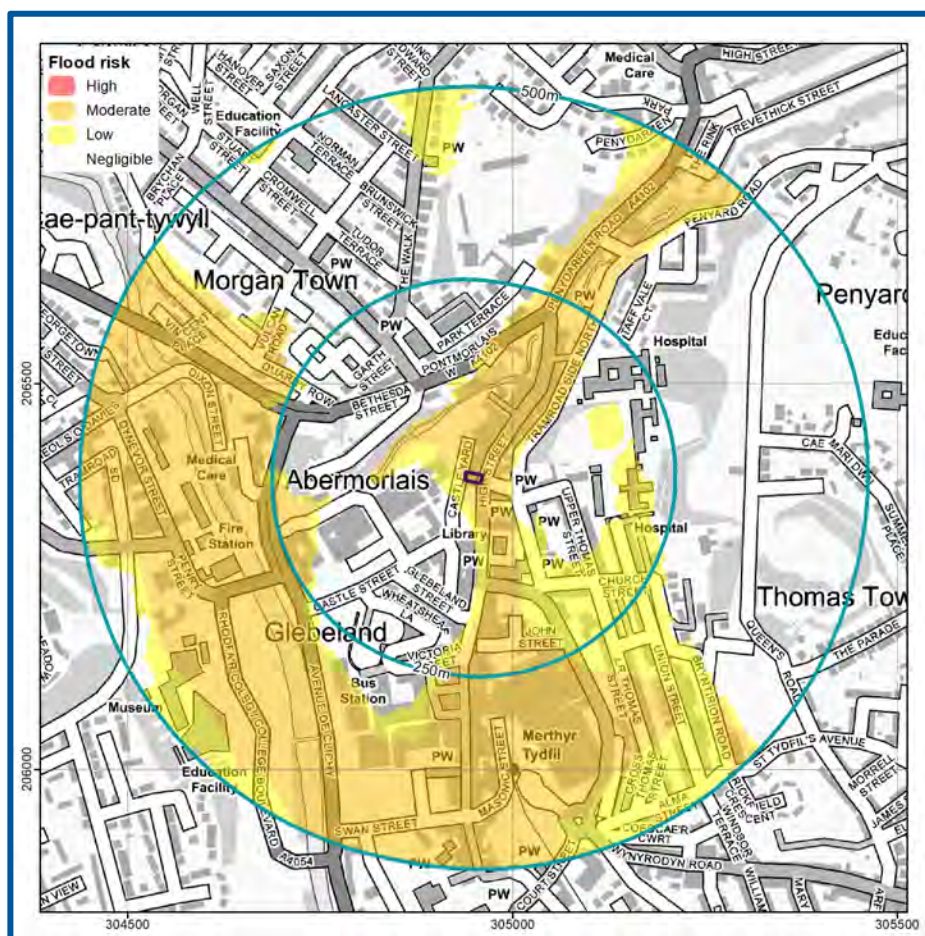
On-Site surface water drainage systems should be designed appropriately to manage the run-off.

Groundwater flooding

Groundwater flooding occurs when sub-surface water emerges from the ground at the surface or into Made Ground and structures. This may be as a result of persistent rainfall that recharges aquifers until they are full; or may be as a result of high river levels, or tides, driving water through near-surface deposits. Flooding may last a long time compared to surface water flooding, from weeks to months. Hence the amount of damage that is caused to property may be substantially higher.

Groundwater Flood Risk screening data (Figure 8) indicates there is a Moderate risk of groundwater flooding at surface in the vicinity from permeable bedrock and superficial during a 1 in 100 year event.

Figure 8. GeoSmart GW5 Groundwater Flood Risk Map (GeoSmart, 2021)



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Mapped classes combine likelihood, possible severity and the uncertainty associated with predicting the subsurface system. The map is a national scale screening tool to prompt site-specific assessment where the impact of groundwater flooding would have significant adverse consequences. Mapping limitations and a number of local factors may reduce groundwater flood risk to land and property even where it lies within mapped groundwater flood risk zones, which do not mean that groundwater floods will occur across the whole of the risk area.

A site-specific assessment has been undertaken to refine the groundwater risk screening information on the basis of site-specific datasets (see Section 3) including the NRW's fluvial and tidal floodplain data (where available) to develop a conceptual groundwater model. The risk rating is refined further using the vulnerability of receptors including occupants and the existing and proposed Site layout, including the presence of basements and buried infrastructure. The presence of any nearby or on-Site surface water features such as drainage ditches, which could intercept groundwater have also been considered.

Based on a review of (limited) site specific data:

- Groundwater levels may rise in the bedrock aquifer in response to high river events.
- A spring line has not been identified in the vicinity of the Site.

- BGS borehole ref SO00NW536 recorded a water seepage to rise to 3.4 m bgl, subject to seasonal variation. The borehole indicates the underlying geology at the Site is likely to have a high permeability.

The site-specific assessment suggests there is potential for groundwater levels in the 100 year event to emerge above the ground surface, and groundwater levels at the Site are relatively shallow. Therefore, groundwater has a moderate potential to emerge above the surface.

However, the ground floor of the Site is classed Less Vulnerable in both the existing and proposed development plans, and, from visual inspection on Google StreetView, the thresholds are estimated to be raised at least 0.3 m above adjacent ground levels on both the west and east sides of the Site. Therefore, as long as the additional proposed thresholds on the west of the Site are also installed at the existing Finished Floor Levels and mitigation measures are implemented, the risks of groundwater flooding are deemed to be Low.

The risks can be higher for buried infrastructure, although this assessment has been undertaken to assess the first and second floor levels. Groundwater could potentially impact adjacent ground levels, which could affect evacuation routes.

Guidance

Low Risk - There will be a remote possibility that incidence of groundwater flooding could lead to damage to property or harm to other sensitive receptors at, or near, this location.

Moderate Risk - There will be a significant possibility that incidence of groundwater flooding could lead to damage to property or harm to other sensitive receptors at, or near, this location.

Climate change predictions suggest an increase in the frequency and intensity of extremes in groundwater levels. Rainfall recharge patterns will vary regionally resulting in changes to average groundwater levels. A rise in peak river levels will lead to a response of increased groundwater levels in adjacent aquifers subject to the predicted climate change increases in peak river level for the local catchment.

The impact of climate change on groundwater levels beneath the Site is linked to the predicted risk in both peak river levels and the variation in rainfall recharge which is uncertain. Based on the available evidence the resulting increase to groundwater flood risk will be mitigated by the proposed measures.

Flooding from artificial sources

Artificial sources of flood risk include waterbodies or watercourses that have been amended by means of human intervention rather than natural processes. Examples include reservoirs (and associated water supply infrastructure), docks, sewers and canals. The flooding mechanism associated with flood risk from artificial sources is primarily related to breach or failure of structures (reservoir, lake, sewer, canal, flood storage areas, etc.)

Sewer flooding

Merthyr Tydfil Borough Council Flood Risk Management Plan (2013) does not confirm any historic incidences of sewer flooding have occurred within the Borough. More recent records could be obtained directly from the sewage utility provider, Dwr Cymru.

Guidance

Properties classified as “at risk” are those that have suffered, or are likely to suffer, internal flooding from public foul, combined or surface water sewers due to overloading of the sewerage system either once or twice in the ten year reference period. Records held by the sewage utility company provide information relating to reported incidents, the absence of any records does not mean that the Site is not at risk of flooding.

Culverts and bridges

The blockage of watercourses or structures by debris (that is, any material moved by a flowing stream including vegetation, sediment and man-made materials or refuse) reduces flow capacity and raises water levels, potentially increasing the risk of flooding. High water levels can cause saturation, seepage and percolation leading to failure of earth embankments or other structures. Debris accumulations can change flow patterns, leading to scour, sedimentation or structural failure.

Culverts and bridges have been identified within 500 m of the Site, as follows:

- A bridge over the River Taff is 460 m (Bethesda Road) and 400 m to the north west (Dixon Street), 290 m to the west (A4054) and 530 m to the south west (A4054).
- The Nant Morlais is culverted 120 m to the west and 140 m and 190 to the north east.

Culverts are normally covered channels or pipes that are used to continue a watercourse or drainage path under an artificial obstruction. Culverts range in size and capacity and require appropriate maintenance to function. Screens may be installed across openings to prevent entry and reduce the risk of blockage inside the culvert. However, they can cause of flooding when they are poorly maintained or trap large amounts of debris in times of high flow

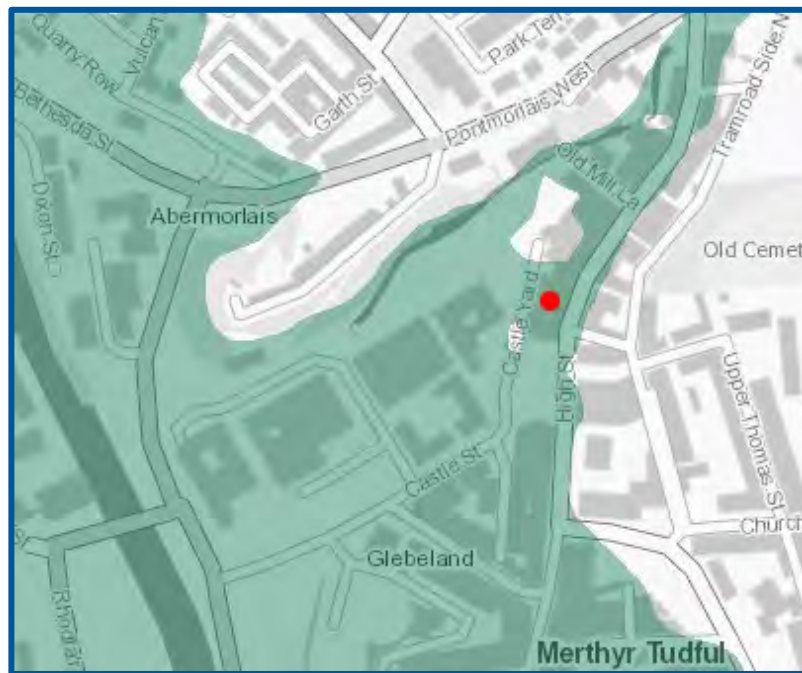
As the Site lies upstream of the some of the infrastructure identified, such as the culvert and bridge to the west and south of the Site, it could potentially be affected by flooding as a result of blockage. However, further assessment of local elevation data indicates the Site lies at a lower elevation than this infrastructure and is therefore unlikely to be at risk.

Reservoir flooding

According to the NRW's Risk of Flooding from Reservoir mapping the Site is at risk of flooding from reservoirs (Figure 9) (NRW, 2021).

The Site is most likely to be at risk of flooding from the Llwyn-on and Pontsticill Reservoirs, c. 6.2 km and c. 5.6 km north of the Site respectively.

Figure 9. NRW Risk of Reservoir Flooding (NRW, 2021)



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Guidance

The risk of reservoir flooding is related to the failure of a large reservoir (holding over 25,000 m³ of water) and is based on the worst-case scenario. Reservoir flooding is extremely unlikely to occur (EA, 2021).

Water supply infrastructure

Water supply infrastructure is comprised of a piped network to distribute water to private houses or industrial, commercial or institution establishments and other usage points. In urban areas, this represents a particular risk of flooding due to the large amount of water supply infrastructure, its condition and the density of buildings. The risks of flooding to properties from burst water mains cannot be readily assessed.

If more information regarding the condition and history of the water supply infrastructure within the vicinity of the Site is required, then it is advisable to contact the local water supplier (Dwr Cymru Welsh Water).

Canal failure

According to Ordnance Survey (OS) mapping, there are no canals within 500 m of the Site.

5. Flood risk from the development



Floodplain storage

The development is located within a fluvial Flood Zone, but does not involve an increase in building footprint. Floodplain storage would not be affected and compensatory flood storage is therefore not required.

Drainage and run-off

The development proposals are for a change of use and include the construction of an additional floor to the existing building, which will cause the alteration of external features. However, the building footprint will not increase and therefore there will not be any changes to existing permeable and impermeable areas. Therefore, an estimation of surface water runoff is not considered to be required.

Any changes to the existing drainage system will be undertaken in accordance with best practice and that care will be taken to ensure the new development does not overload/block any existing drainage or flow pathways to/from the Site. Based on the topography and low surface water flood risk in the vicinity interference with overland flow paths is considered unlikely.

It is recommended that a Sustainable Drainage Scheme is implemented at the Site to help attenuate surface runoff.

6. Suitability of the proposed development



The information below outlines the suitability of proposed development in relation to national and local planning policy.

National policy and guidance

The aims of the national planning policies TAN15 (2004) and PPW (2021) are achieved through application of the Justification Test and by assessing Flood Consequences. The key requirements of these are outlined below:

Guidance

Justification Test: New developments should be directed away from Zone C and towards suitable land in Zone A, otherwise Zone B, where river or coastal flooding will be less of an issue. In Zone C the tests outlined in sections 6 and 7 of TAN15 will be applied, recognizing, however, that highly vulnerable development and Emergency Services in Zone C2 should not be permitted. All other new development should only be permitted within Zones C1 and C2 if determined by the planning authority to be justified in that location.

Assessing Flood Consequences: If a development proposal in Zone C1, or in C2 and if it is defined as being of low vulnerability, it would meet the test outlines in section 6, however it should be noted that those developments would be more likely to flood and appropriate mitigation would need to be planned accordingly. This section applies to Zone C, and those parts of Zone B where flooding has been identified as a material consideration to allow for localised problems.

Assessing whether a development should proceed or not will depend upon whether the consequences of flooding of that development can be managed and reduced to a level which is acceptable for the nature/type of proposed development, including its effects on existing development.

Suitability of the proposed development, and whether a Justification Test is required, is based on the Development Advice Map Zone the Site is located in and the flood risk vulnerability classification of the development proposals.

As the area of the Site proposed for development is located within DAM Zone C2, and the proposed development is defined as Highly Vulnerable, according to Table 9 (Summary of Policy Requirements) in TAN 15 (2004) and included in Table 7 below developments are not generally in accordance, although in this instance the wider benefits to regeneration of the area and mitigation proposed are considered to outweigh the flooding risks.

Pre-application advice was requested from Merthyr Tydfil County Borough Council and was received on 4th November 2021 (Appendix D). The pre-application correspondence states:

"The building is located within a C2 Flood Risk Zone. Accordingly, Technical Advice Note (TAN) 15 (2004) is of particular relevance to the consideration of this proposal (until such a time when the

draft TAN 15 comes into force). As you may be aware, TAN 15 defines Flood Zone C2 as 'areas of the floodplain without significant flood defence infrastructure' where only 'less vulnerable development' should be considered subject to an application of the justification tests and that 'highly vulnerable development' should not be considered. As residential premises are defined as 'highly vulnerable development', a fundamental policy objection would be raised to the proposed roof extension as it would involve the development of new residential floor space in an area which is at risk from flooding.

The conversion of the existing building has the potential to form part of the wider regeneration of the town centre, which in turn can contribute to its vitality and viability. As such, the location of the four flats on the first floor of the building may be more acceptable, subject to a Flood Consequence Assessment (FCA) being submitted and adequately demonstrating that there would not be an unacceptable risk from flooding to people. The flood risk associated with the proposed development would need to be fully considered following consultation with Natural Resources Wales (NRW) during the planning application process."

Additionally, a planning application was submitted for the neighbouring property to the Site, which proposed a conversion of the first and second storey floors to residential flats and a ground floor retail unit; this development is therefore comparable to the proposed development at the Site. During its planning consultation, the neighbouring property did not receive objections in relation to flood risk from NRW during its consultation (Appendix E), which indicates the flood risk for the proposed development at this Site may be acceptable.

Table 4: Flood risk vulnerability and flood zone compatibility (taken from TAN15, 2004)

DAM Zone	Development Type	Planning Requirements	Acceptability Criteria	Development Advice
A	Emergency Services, highly vulnerable development, less vulnerable development, other	- Justification test not applicable - Refer to surface water requirements	No increase in flooding elsewhere	No constraints relating to river or coastal flooding, other than to avoid increasing risk elsewhere
B	Emergency services & Highly vulnerable development	- If site levels are greater than the flood levels used to define adjacent extreme flood outline there is no need to consider flood risk further - Refer to surface water requirements	- Acceptable consequences for nature of use - Occupiers aware of flood risk - Escape/Evacuation routes present - Effective flood warning provided - Flood emergency plans and procedures - Flood resistant design	Generally suitable for most forms of development. Assessments where required, are unlikely to identify consequences that cannot be overcome or managed to an acceptable level.

			No increase in flooding elsewhere	It is unlikely, therefore, that these would result in a refusal of planning consent on the grounds of flooding.
	Less vulnerable development		- Occupiers aware of flood risk - No increase in flooding elsewhere	
	Other	Refer to surface water requirements	No increase in flooding elsewhere	
C1	Emergency services, highly vulnerable development, less vulnerable development	- Application of justification test including acceptability of consequences - Refer to surface water requirements	- Acceptable consequences for nature of use - Flood defences adequate - Agreement for construction and maintenance costs secured - Occupiers aware of flood risk - Escape/evacuation routes present - Effective flood warning provided - Flood emergency plans and procedures - Flood resistant design - No increase in flooding elsewhere	Plan allocations and applications for all development can only proceed subject to justification in accordance to section 6 of TAN 15 and acceptability of consequences in accordance to section 7 and Appendix 1 of TAN 15
	Other	- Application of acceptability of consequences (TAN 15 section 7 and Appendix 1) - Refer to surface water requirements	- Acceptable consequences for nature of use - Occupiers aware of flood risk - Desirable if effective flood warning and evacuation routes/procedure provided depending on nature of proposal - No increase in flooding elsewhere	Plan allocations and applications for development should only be made if considered acceptable in accordance with section 7 and Appendix 1 of TAN 15
C2	Emergency services, highly	The flooding consequences associated with Emergency Services and highly vulnerable developments are not considered to be acceptable.		

	vulnerable development	Plan allocations should not be made for such developments and planning applications not proposed		
	Less vulnerable development	• Application of justification test (section 6 of TAN 15), including acceptability of consequences (section 7 and Appendix 1 of TAN 15) • Refer to surface water requirements	• Acceptable consequences for nature of use • Flood defences adequate • Agreement for construction and maintenance costs secured • Occupiers aware of flood risk • Escape/evacuation routes present • Effective flood warning provided • Flood emergency plans and procedures	Plan allocations or applications for less vulnerable development can only proceed subject to justification in accordance with section 6 of TAN 15 and acceptability of consequences in accordance with section 7 and Appendix 1 of TAN 15
	Other	• Application of acceptability of consequences (section 7 and Appendix 1 of TAN 15) • Refer to surface water requirements	• Flood resistant design • No increase in flooding elsewhere • Acceptable consequences for nature of use • Occupiers aware of flood risk • Effective flood warning provided • No increase in flooding elsewhere	Plan allocations and applications for development should only be made if considered acceptable in accordance with section 7 and Appendix 1 of TAN 15.

TAN15 (2004) Change of Use section 11.20

In many cases planning permission will be required for development where flood risk is a material consideration. However, there may be instances where changes of use, permitted under the Town and Country Planning (Use Classes) Order 1987, as amended, could result in a change from a low vulnerability use to a high vulnerability use and therefore the consequences of flooding may be unacceptable in zone C. In such circumstances a flooding consequences assessment commensurate with the scale and nature of the proposal will be required.

TAN15 (2021)

TAN15 (2021) comes into effect on 1 June 2023.

TAN15 (2021) requires the use of Flood Zones. The planning requirements for developments within each Flood Zone is detailed in the table below.

As the area of the Site proposed for development is located within Flood Zone 3, and the proposed development is defined as Highly Vulnerable, according to Figure 3 in TAN 15 (2004), developments are not generally in accordance. However, in this instance it is understood that the wider benefits to regeneration of the area and mitigation proposed are considered to outweigh the flooding risks.

Table 5: Flood risk vulnerability and flood zone compatibility (taken from TAN15, 2021)

Flood Map for Planning Zone	Development Type	Development Advice	Planning Requirements	Acceptability Criteria
1	All	No constraints relating to flooding from rivers or the sea, other than to avoid increasing risk elsewhere.	Justification test not applicable. Flood resistant and resilient design in locally-defined areas of current or future flood risk. Refer to surface water requirements set out in section 8 and in the Development Plan.	No increase in flooding elsewhere.
TAN 15 Defended Zones	All	Plan allocations and applications for development can proceed subject to justification in accordance with section 10 and acceptability of consequences in accordance with section 11.	Application of justification test (section 10), and acceptability of consequences test (section 11). Refer to surface water requirements set out in section 8 and in the Development Plan.	- Acceptable consequences for type of use. - Agreement for construction and maintenance costs secured. - Occupiers aware of flood risk. - Escape/evacuation routes present. - Flood emergency plans and procedures. - Flood resistant and resilient design. - No increase in flooding elsewhere.

Rivers and Sea – Flood Zone 2	All	Plan allocations and applications for development can proceed subject to justification in accordance with section 10 and acceptability of consequences in accordance with section 11.	Application of justification test (section 10), and acceptability of consequences test (section 11). Refer to surface water requirements set out in section 8 and in the Development Plan.	• Acceptable consequences for type of use. • Agreement for construction and maintenance costs secured. • Occupiers aware of flood risk. • Escape/evacuation routes present. • Flood emergency plans and procedures. • Flood resistant and resilient design. • No increase in flooding elsewhere.
Rivers and Seas – Flood Zone 3	Highly vulnerable development	The flooding consequences associated with highly vulnerable development are not considered to be acceptable. Plan allocations must not be made for such development and planning applications not proposed. Flood Consequences Assessments (FCAs) should not be prepared as there is no requirement for Natural Resources Wales to provide advice.		
	Less vulnerable development Water Compatible Development (limited to those built elements of development that may be occupied by people).	Plan allocations or applications for less vulnerable development can only proceed subject to justification in accordance with section 10 and acceptability of the consequences in accordance with section 11.	Application of justification test (section 10), and acceptability of consequences test (section 11). Refer to surface water requirements set out in section 8 and in the Development Plan	• Acceptable consequences for type of use. • Agreement for construction and maintenance costs secured. • Occupiers aware of flood risk. • Escape/evacuation routes present. • Flood emergency plans and procedures. • Flood resistant and resilient design. • No increase in flooding elsewhere.

7. Resilience and mitigation



Based on the flood risk identified at the Site, the national and local policies and guidance and proposed development, the mitigation measures outlined within this section of the report are likely to help protect the development from flooding.

Sea (coastal/tidal) flood mitigation measures

As the Site is not identified as being at risk of flooding from the sea, mitigation measures are not required.

Rivers (fluvial) flood mitigation measures

Under both the TAN15 (2004) and TAN15 (2021) guidance, the proposals are not acceptable. However, it is understood that the wider benefits to regeneration of the area and mitigation proposed are considered to outweigh the flooding risks, and therefore the development may be considered acceptable by the local council. It is noted that the ground floor is classed as Less Vulnerable, with only the first and second floors classed as Highly Vulnerable, so any fluvial flooding would only affect the Less Vulnerable areas of the Site.

The following flood mitigation measures should be considered to reduce the present day and future flooding risks to future occupants at the Site.

Access to the east along the adjacent highway is at a Low risk of fluvial flooding. The maximum elevation of the highway adjacent to the east of the Site is c. 178.9 mAOD, which indicates that the maximum flood level would be c. 179.2 mAOD in this event.

Flood depths in the Low risk (1 % AEP event plus climate change proxy) scenario would be relatively shallow (up to 0.3 m), and would occur adjacent to the building. In order to provide freeboard for wave action (from passing vehicles), it is recommended that threshold levels are raised at the eastern entrance of the Site to 0.3 m above the flood level of c. 179.2 mAOD. As the current threshold levels for the ground floor to the east of the Site are estimated at approximately 179.2 mAOD, this would involve raising the threshold level by 0.3 m.

No fluvial flooding is expected along Castle Yard to the west of the Site, and therefore raising threshold levels at the rear of the Site is not proposed.

If it is not possible to raise threshold levels, a water exclusion strategy should be adopted. Potential strategies could include:

- The installation of passive flood door systems or flood barriers to protect thresholds;
- Air brick covers (manual or automatic closing); and
- Non-return flap valves on sewer outfalls.

Additionally, an evacuation plan should be designed and implemented at the Site.

- In a Low risk fluvial event, flood depths of up to 0.3 m are expected in the High Street on the east of the Site, and, according to the National Flood Hazard's Flood Risk from Rivers

Hazard map, the area of the highway adjacent to the Site has a hazard rating of 'Danger for Most'. This route should be avoided for evacuation purposes;

- Evacuation should be through the rear of the Site, along Castle Yard, where no flooding is expected and therefore the hazard rating is 'Low'. Both retail units and the residential accommodation have rear access and egress;
- Site management teams and occupants of the Site should be signed up to receive EA Flood Alerts and Flood Warnings; and
- A Flood Warning and Evacuation Plan (FWEP) should be produced for inclusion within the proposed development.

Surface water (pluvial) flood mitigation measures

According to the National Flood Hazard Flood Risk from Surface Water and Small Watercourses map, there is a High risk of flooding from surface water and small watercourses. Flood depths of up to 0.15 m are expected in the High risk event, and flood depths of up to 0.30 m are expected in the Low risk event.

However, the mitigation measures proposed for fluvial flooding would also mitigate against pluvial flooding, and therefore no separate mitigation measures are required.

Groundwater flood mitigation measures

GeoSmart's GW5 Groundwater Flood Risk Map indicates the groundwater flood risk at the Site is Moderate. However, the ground floor is classified as Less Vulnerable in both the existing and proposed development plans, and, from visual inspection on Google StreetView, the thresholds are estimated to be raised at least 0.3 m above adjacent ground levels on both the west and east sides of the Site.

The flood mitigation measures for fluvial risk are likely to be sufficient to reduce the groundwater flood risk at the development. However, specific groundwater measures that may also be considered for the Moderate risk identified include:

- Waterproof tanking of the ground floor;
- Interceptor drains;
- Automatic sump and pump to extract flood water; and
- Non-return flap valves on the proposed foul and surface water sewer lines.

Reservoir flood mitigation measures

According to NRW information, the Site is at risk of flooding from reservoirs.

There would be a relatively high rate and onset of flooding associated with a reservoir breach. Therefore, it is unlikely that safe access could be achieved unless a long warning period was provided. Therefore, occupants should get to the highest level of the building as possible and contact the emergency services.

Other flood risk mitigation measures

As the Site is not identified as at risk from other sources, mitigation measures are not required.

Residual flood risk mitigation measures

The risk to the Site has been assessed from all sources of flooding and appropriate mitigation and management measures proposed to keep the users of the development safe over its lifetime. There is however a residual risk of flooding associated with the potential for failure of mitigation measures if regular maintenance and upkeep isn't undertaken. If mitigation measures are not implemented or maintained, the risk to the development will remain as the baseline risk.

Further flood mitigation information

More information on flood resistance, resilience and water entry can be found here: http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf

www.knowyourfloodrisk.co.uk

Emergency evacuation - safe access / egress and safe refuge

Emergency evacuation to land outside of the floodplain should be provided if feasible. Where this is not possible, 'Highly Vulnerable' developments and, where possible, development in general, should have internal stair access to an area of safe refuge within the building to a level higher than the maximum likely water level. An area of safe refuge should be sufficient in size for all potential users and be reasonably accessible to the emergency services.

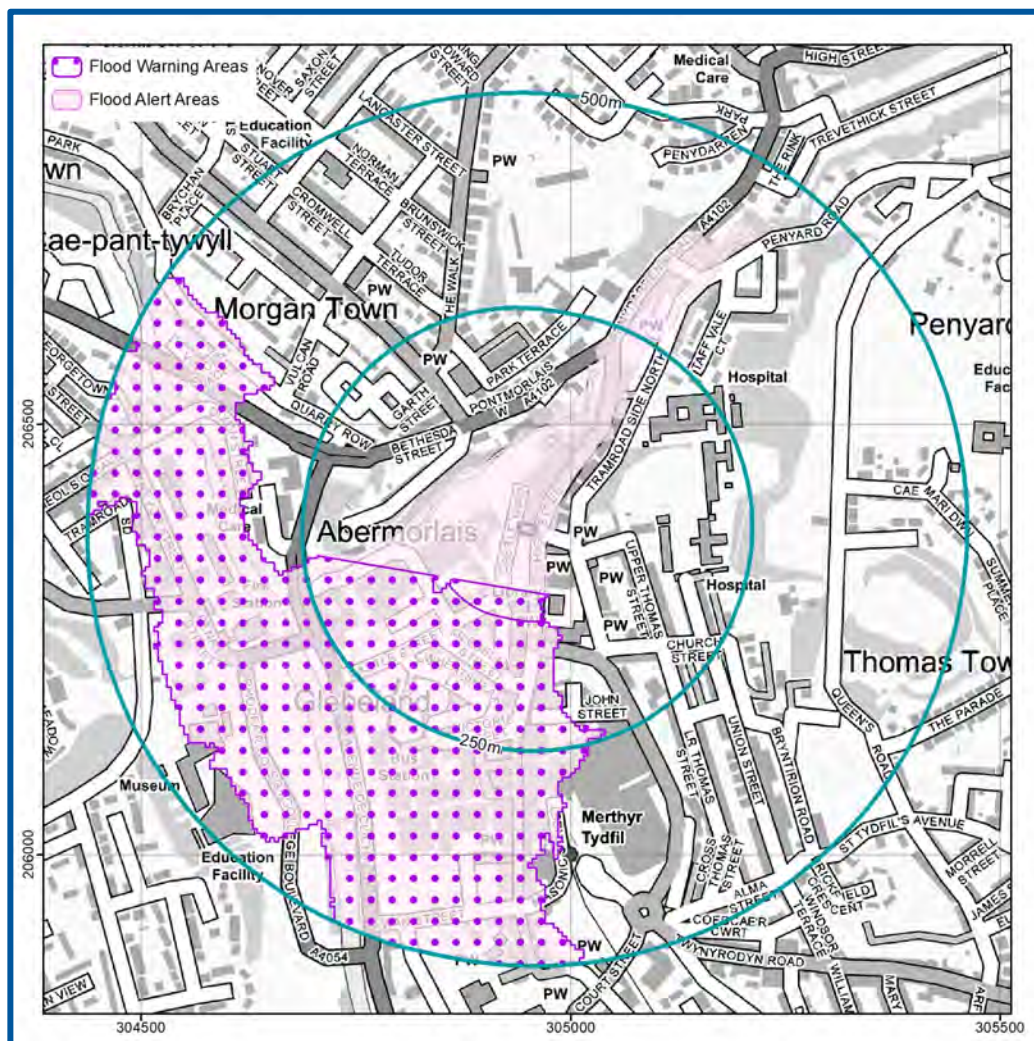
Emergency evacuation from the development and the Site should only be undertaken in strict accordance with any evacuation plans produced for the Site, with an understanding of the flood risks at the Site including available mitigation, the vulnerability of occupants and preferred evacuation routes.

Flood warnings

The NRW operates a flood warning service in all areas at risk of flooding; this is available on their website: <https://www.gov.uk/check-flood-risk>. The Site is located within an NRW Flood Alerts and Warning coverage area so is able to receive alerts and warnings (Figure 10). All warnings are also available through the NRW's 24 hour Floodline Service 0345 988 1188.

The NRW aims to issue Flood Warnings 2 hours in advance of a flood event. Flood Warnings can provide adequate time to enable protection of property and evacuation from a Site, reducing risk to life and property.

Figure 10. NRW Flood Warning Coverage for the local area (NRW, 2021).



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Emergency evacuation

Where possible, a safe access and egress route with a 'Very Low' hazard rating from areas within the floodplain to an area wholly outside the 1 in 100 year flood event including an allowance for climate change should be demonstrated.

Based on the NRW's Flood Zone Map the closest dry evacuation area within Flood Zone 1 is along Castle Yard (adjacent to the west of the Site) which has the lowest hazard rating. It is advised that evacuation from the premises would be the preferred option in a flood event if safe to do so. It is recommended that residents prepare to evacuate as soon as an NRW Flood Warning is issued in order to completely avoid flood waters.

On-Site refuge

Evacuation should be the primary action in preference; however, safe refuge could be sought at first and second floor level in a worst-case scenario as the residential areas of the development are situated on the first and second floor.

Other relevant information

A Flood Warning and Evacuation Plan (FWEP) is recommended, and Site Management teams and occupants will be signed up to receive NRW's Flood Alerts and Warnings.

Registration to the Natural Resource Wales flood warning scheme can be done by following this link: <https://www.gov.uk/sign-up-for-flood-warnings>.

It is recommended that main communication lines required for contacting the emergency services, electricity sockets/meters, water supply and first aid stations and supplies are not compromised by flood waters. Where possible these should all be raised above the extreme flood level.

8. Summary



Site analysis

Source of Flood Risk	Baseline	After Mitigation
River (fluvial) flooding	Low to Very Low ¹	Very Low
Sea (coastal/tidal) flooding	Very Low	N/A
Surface water (pluvial) and small watercourses flooding	Low to Very Low	Very Low
Groundwater flooding	Moderate	Low
Other flood risk factors present	No	N/A
Is any other further work recommended?	Yes	Yes

N/A = mitigation not required

¹ Model data was requested for the Site but was not provided within the time frame of this report. The National Hazard and Flood Risk Assessment Wales (FRAW) maps (2020) have been used to assess flood risk to the Site. The Site is at a Low to Very Low risk with a Low risk adjacent in the highway to the east.

9. References and glossary



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Glossary

General terms

BGS	British Geological Survey
EA	Environment Agency
GeoSmart groundwater flood risk model	GeoSmart's national groundwater flood risk model takes advantage of all the available data and provides a preliminary indication of groundwater flood risk on a 50m grid covering England and Wales. The model indicates the risk of the water table coming within 1 m of the ground surface for an indicative 1 in 100 year return period scenario.
Dry-Island	An area considered at low risk of flooding (e.g. In a Flood Zone 1) that is entirely surrounded by areas at higher risk of flooding (e.g. Flood Zone 2 and 3)
Flood resilience	Flood resilience or wet-proofing accepts that water will enter the building, but through careful design will minimise damage and allow the re-occupancy of the building quickly. Mitigation measures that reduce the damage to a property caused by flooding can include water entry strategies, raising electrical sockets off the floor, hard flooring.
Flood resistance	Flood resistance, or dry-proofing, stops water entering a building. Mitigation measures that prevent or reduce the likelihood of water entering a property can include raising flood levels or installation of sandbags.
Flood Zone 1	This zone has less than a 0.1% annual probability of river flooding
Flood Zone 2	This zone has between 0.1 and 1% annual probability of river flooding and between 0.1% and 0.5 % annual probability sea flooding
Flood Zone 3	This zone has more than a 1% annual probability of river flooding and 0.5% annual probability of sea flooding
Functional Flood Plain	An area of land where water has to flow or be stored in times of flood.
Hydrologic model	A computer model that simulates surface run-off or fluvial flow. The typical accuracy of hydrologic models such as this is $\pm 0.25\text{m}$ for estimating flood levels at particular locations.
OS	Ordnance Survey
Residual Flood Risk	The flood risk remaining after taking mitigating actions.
SFCA	Strategic Flood Consequence Assessment. This is a brief flood risk assessment provided by the local council

SuDS

A Sustainable drainage system (SuDS) is designed to replicate, as closely as possible, the natural drainage from the Site (before development) to ensure that the flood risk downstream of the Site does not increase as a result of the land being developed. SuDS also significantly improve the quality of water leaving the Site and can also improve the amenity and biodiversity that a Site has to offer. There are a range of SuDS options available to provide effective surface water management that intercept and store excess run-off. Sites over 1 Ha will usually require a sustainable drainage assessment if planning permission is required. The current proposal is that from April 2014 for more than a single dwelling the drainage system will require approval from the SuDS Approval Board (SABs).

Aquifer Types

Principal aquifer

These are layers of rock or drift deposits that have high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale.

Secondary A aquifer

Permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.

Secondary B aquifer

Predominantly lower permeability layers which may store and yield limited amounts of groundwater due to localised features such as fissures, thin permeable horizons and weathering.

Secondary undifferentiated

Has been assigned in cases where it has not been possible to attribute either category A or B to a rock type due to the variable characteristics of the rock type.

Unproductive Strata

These are rock layers or drift deposits with low permeability that has negligible significance for water supply or river base flow.

Data Sources

Aerial Photography	Contains Ordnance Survey data © Crown copyright and database right 2021 BlueSky copyright and database rights 2021
Bedrock & Superficial Geology	Contains British Geological Survey materials © NERC 2021 Ordnance Survey data © Crown copyright and database right 2021
Flood Risk (Flood Zone/RoFRS/Historic Flooding/Pluvial/Surface Water)	Natural Resource Wales copyright and database rights 2021

Features/Reservoir/ Flood Alert & Warning)	Ordnance Survey data © Crown copyright and database right 2021
Flood Risk (Groundwater)	GeoSmart, BGS & OS GW5 (v2.4) Map (GeoSmart, 2021) Contains British Geological Survey materials © NERC 2021 Ordnance Survey data © Crown copyright and database right 2021
Location Plan	Contains Ordnance Survey data © Crown copyright and database right 2021
Topographic Data	OS LiDAR/EA Contains Ordnance Survey data © Crown copyright and database right 2021 Natural Resource Wales copyright and database rights 2021

10. Appendices



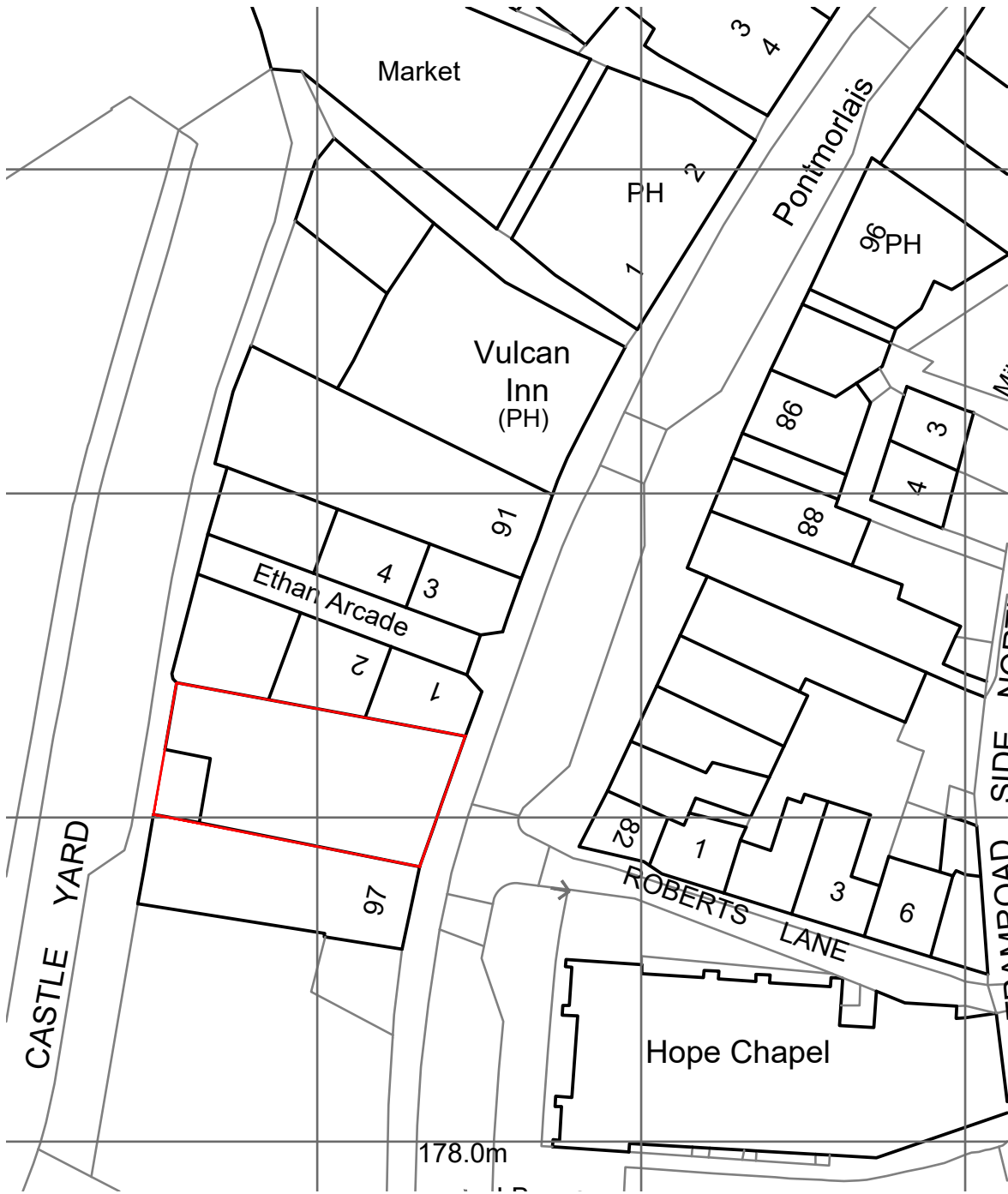
Appendix A



Site plans



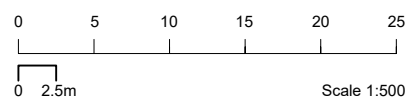
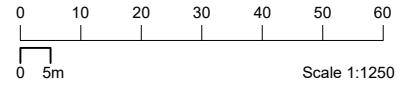
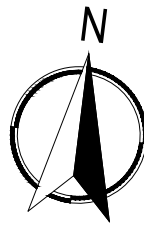
1 LOCATION PLAN
Scale: 1:1250



2 SITE PLAN
Scale: 1:500

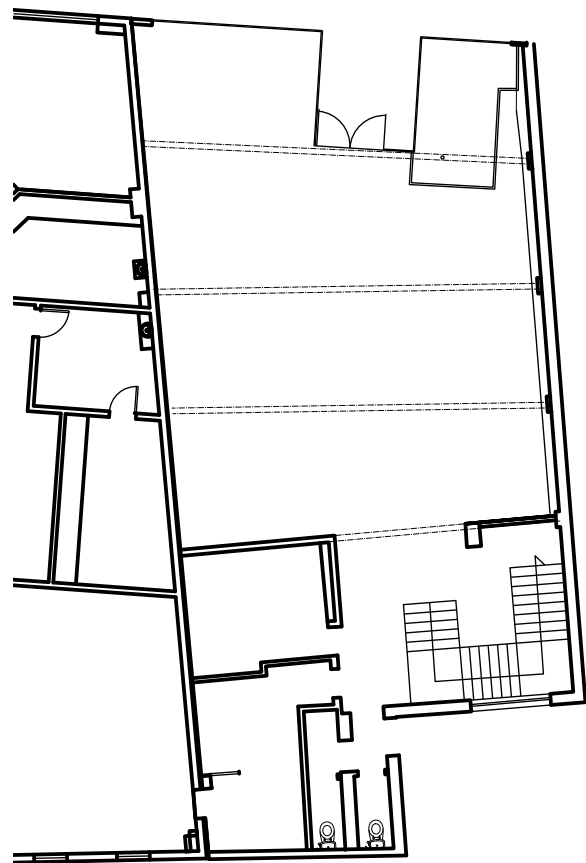
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Rev. P1	Issued for pre-planning	OCT 2021

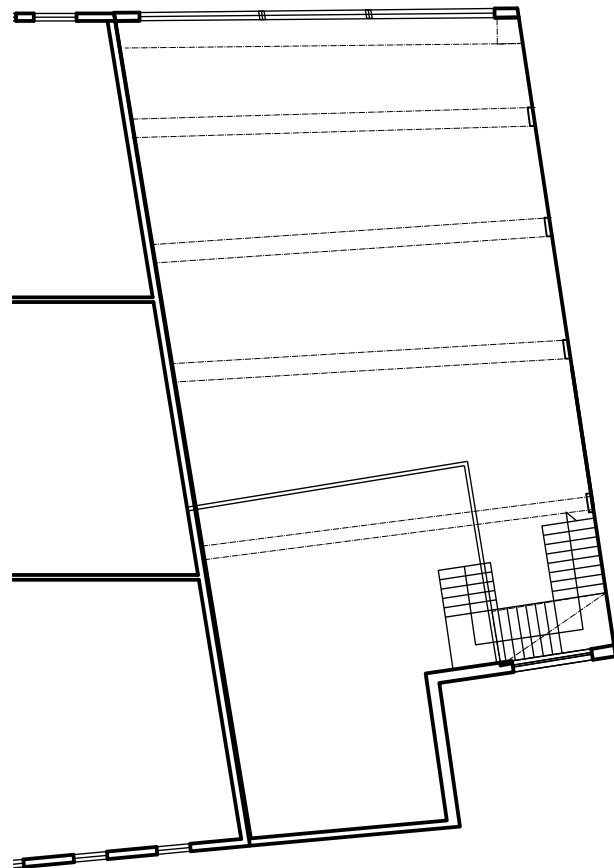


PRE-PLANNING

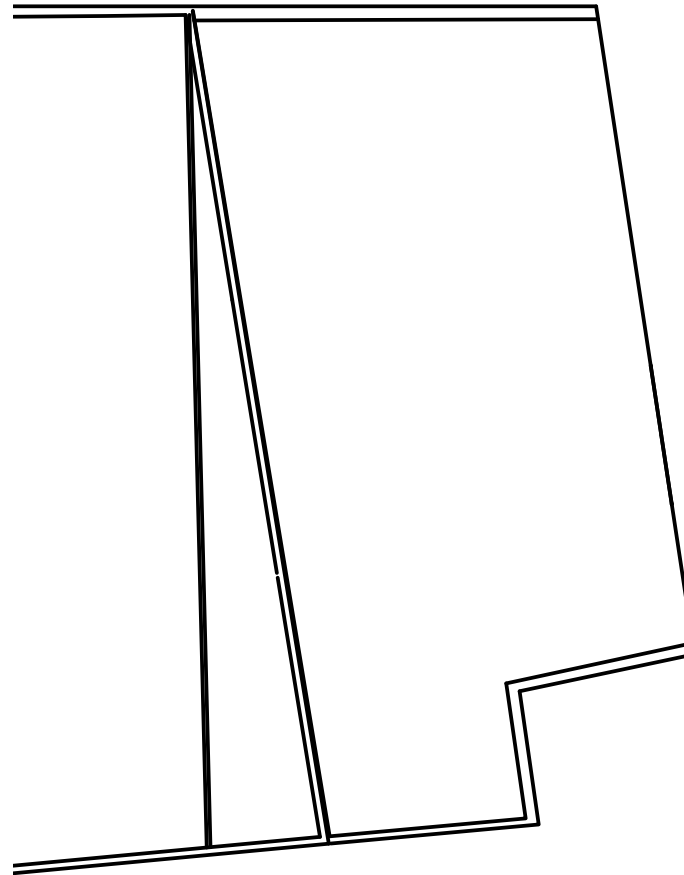
PROJECT:	MANETTES , 95-96 HIGH STREET, MERTHYR TYDFIL
CLIENT:	MF INVESTMENTS LTD
DRAWING:	LOCATION AND SITE PLAN
DATE:	DECEMBER 2020
DWG. NO:	9435-101
SCALE:	1:1250 @ A3 & 1:500
REVISION:	P1



1 EXISTING GROUND FLOOR PLAN
Scale: 1:200



2 EXISTING FIRST FLOOR PLAN
Scale: 1:200

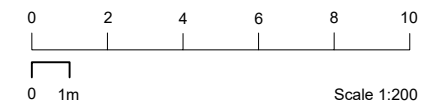
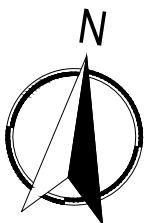


2 EXISTING ROOF PLAN
Scale: 1:200

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PROJECT: MANETTES
95-96 HIGH STREET, MERTHYR TYDFIL, CF47 8UP
CLIENT: MF INVESTMENTS LTD
DRAWING: EXISTING PLANS

DATE: JUNE 2021 SCALE: 1:200 @ A3
DWG. NO: 9435-105 REVISION: P1

CHARTERED ARCHITECTS
ADDRESS: 94 TENNYSON ROAD, LONDON. NW67SB. TEL 07775903564

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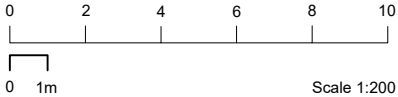
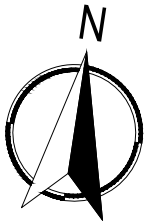
REVISION:	DESCRIPTION:	DATE:
Rev. P1	PRE PLANNING	OCT 2021

SCHEDULE OF AREAS:

GROUND FLOOR:
RETAIL/A3 UNIT 83M2 (893FT2)
RETAIL/A3 UNIT 89M2 (957FT2)

FIRST FLOOR:
4 NO. STUDIO FLATS 39M2
ACCESS STAIRCASE

SECOND FLOOR:
2 NO. STUDIO FLATS 39 +43M2
1 NO. 1 BED FLAT OF 47M2
ACCESS STAIRCASE

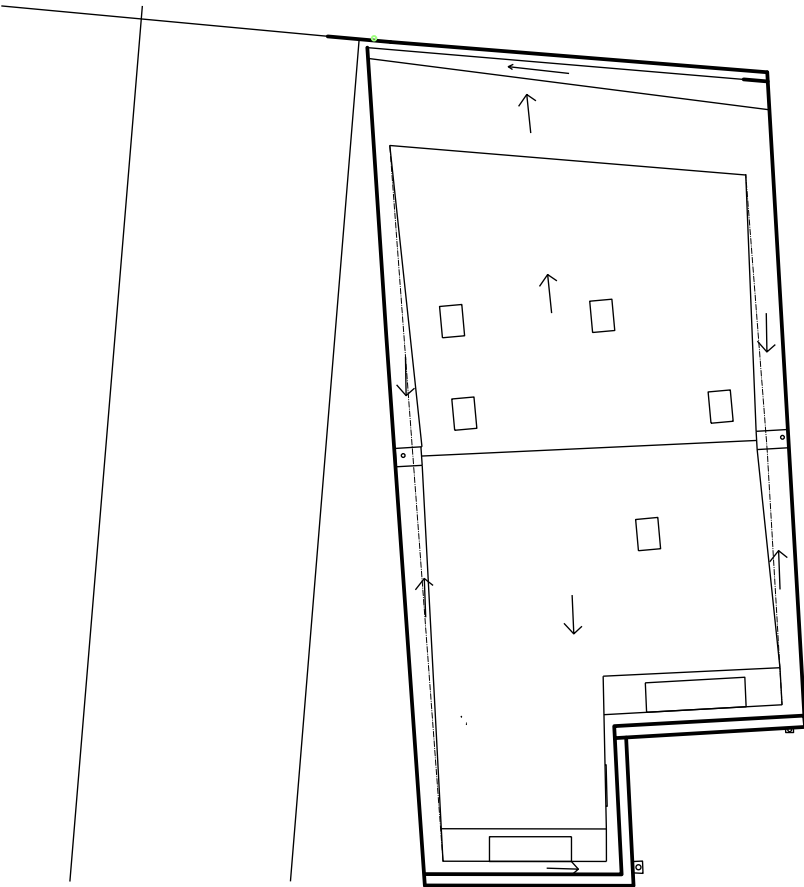


PRE-PLANNING

PROJECT: MANETTES
95-96 HIGH STREET, MERTHYR TYDFIL, CF47 8UP
CLIENT: MF INVESTMENTS LTD
DRAWING: PROPOSED PLANS

DATE: JUNE 2021 SCALE: 1:200 @ A3
DWG. NO: 9435-103 REVISION: P1

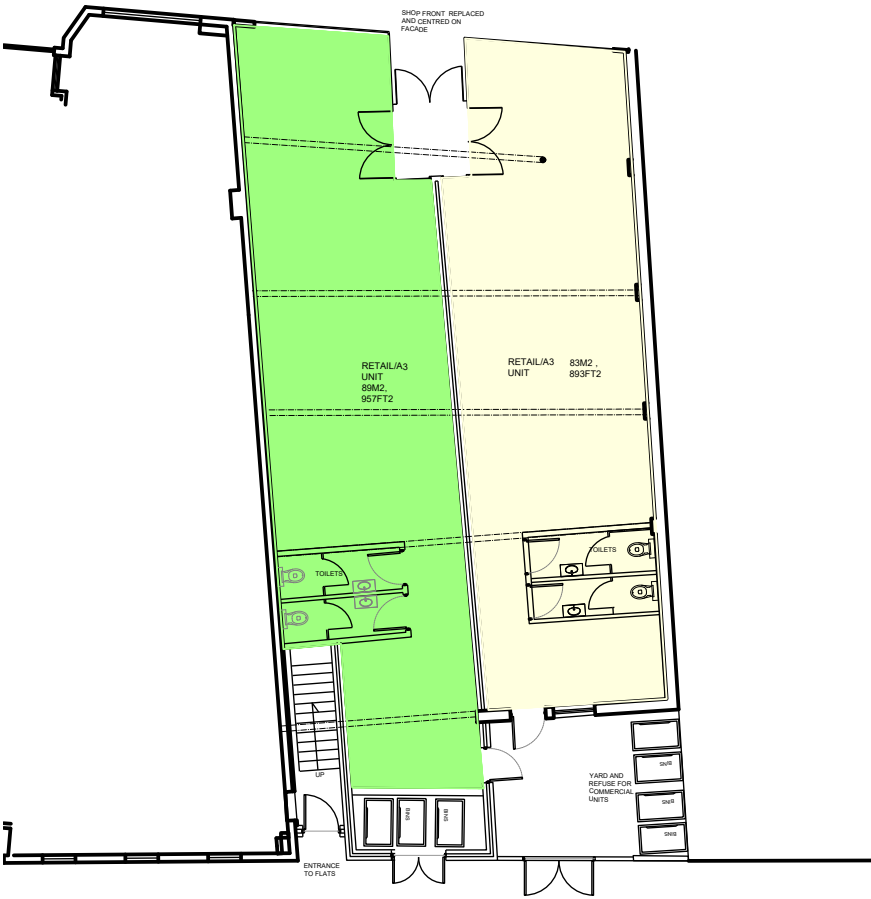
CHARTERED ARCHITECTS
ADDRESS: 94 TENNYSON ROAD, LONDON. NW67SB. TEL 07775903564



4 ROOF PLAN
Scale: 1:200



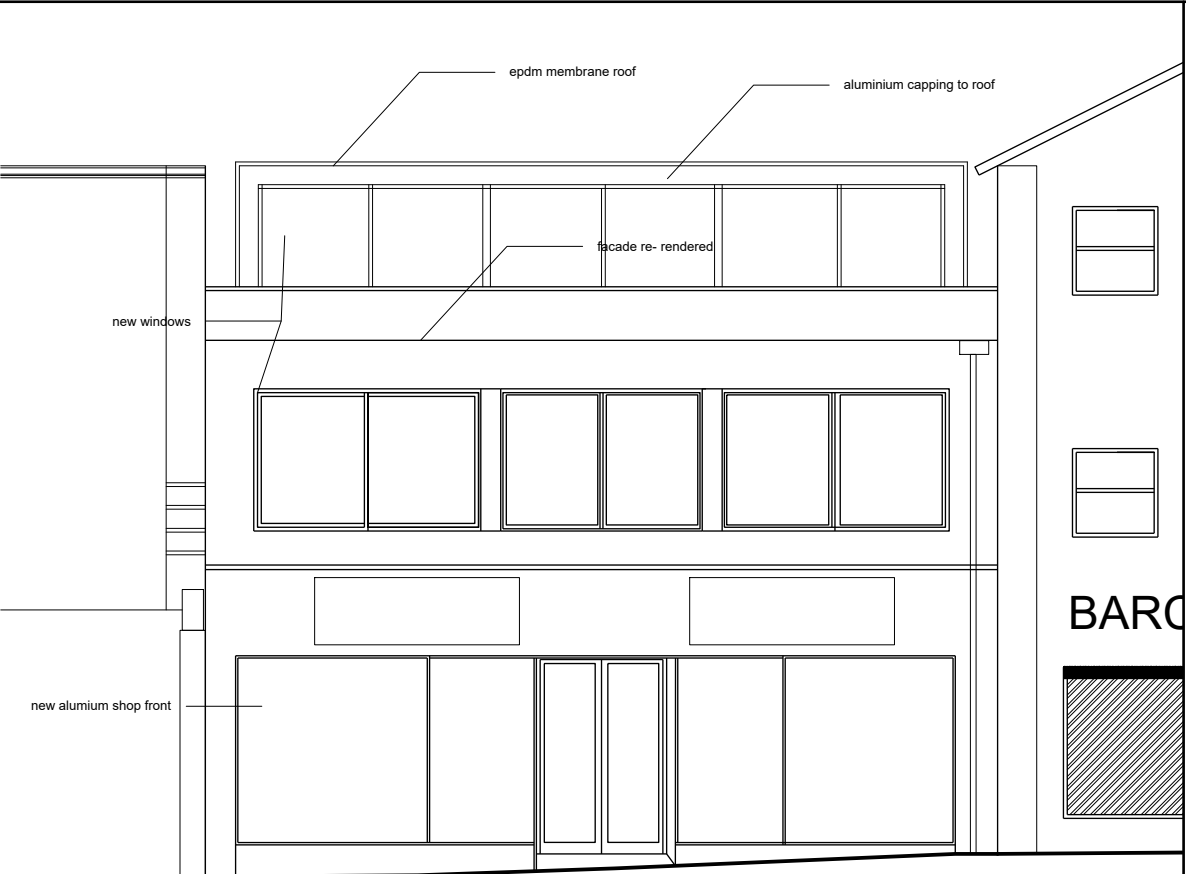
3 SECOND FLOOR PLAN
Scale: 1:200



1 GROUND FLOOR PLAN
Scale: 1:200



2 FIRST FLOOR PLAN
Scale: 1:200



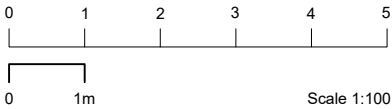
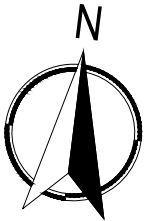
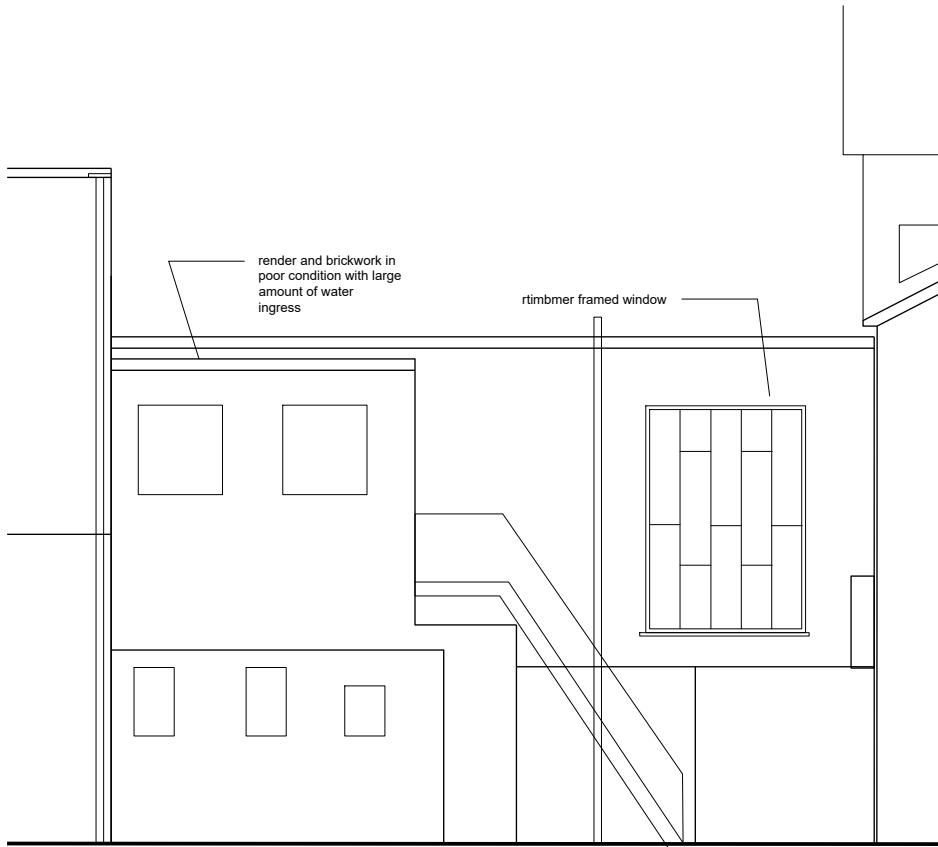
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1 EXISTING FRONT ELEVATION
Scale: 1:100

2 PROPOSED FRONT ELEVATION
Scale: 1:100

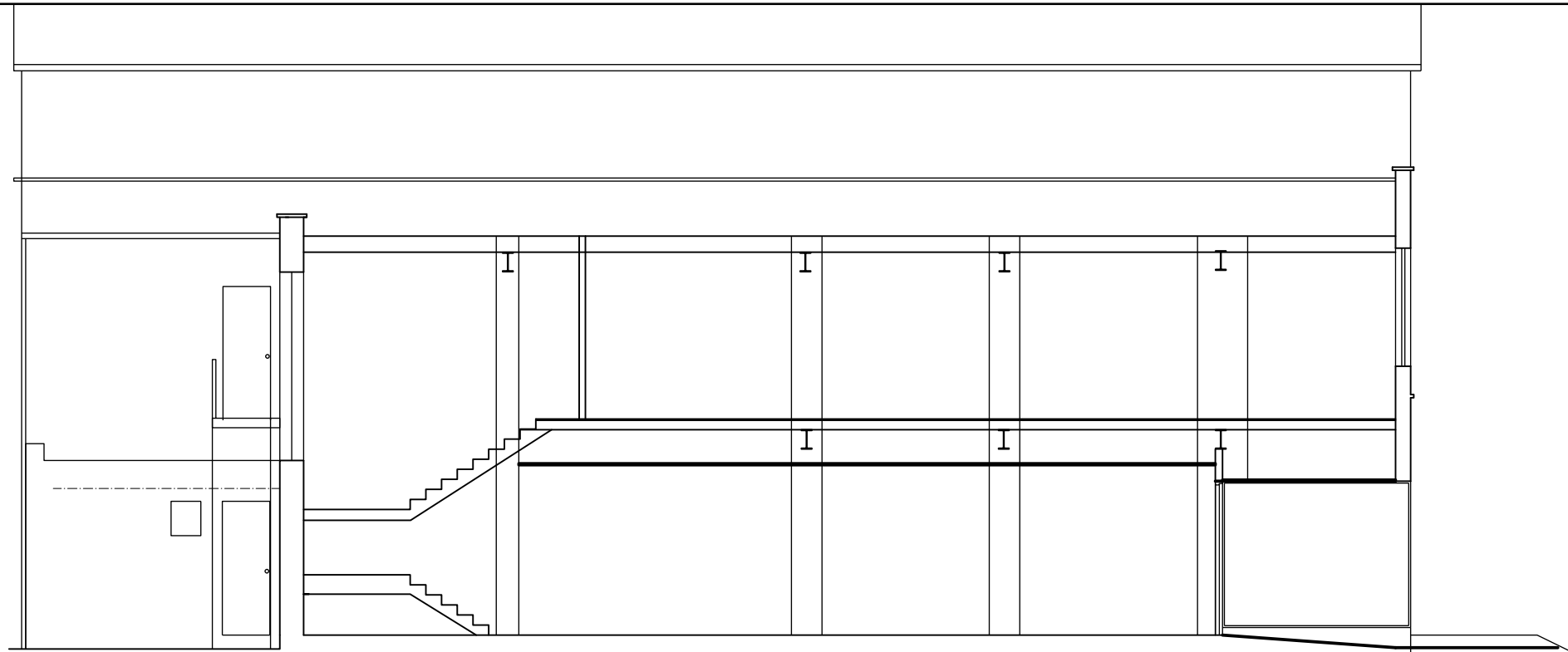


PRE-PLANNING

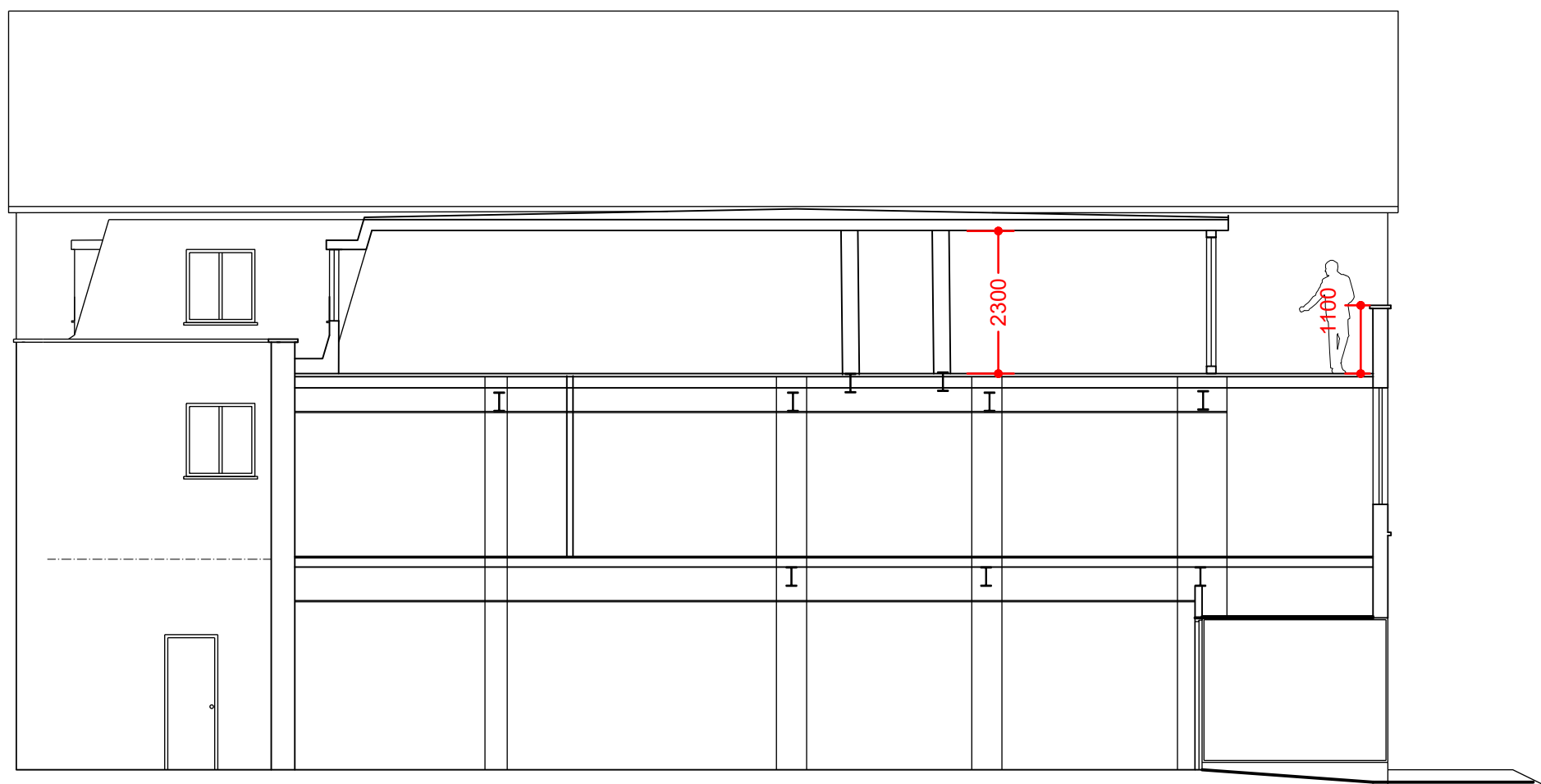
3 EXISTING REAR ELEVATION
Scale: 1:100

4 PROPOSED REAR ELEVATION
Scale: 1:100

PROJECT: MANETTES
95-96 HIGH STREET, MERTHYR TYDFIL, CF47 8UP
CLIENT: MF INVESTMENTS LTD
DRAWING: EXISTING AND PROPOSED ELEVATIONS
DATE: NOV 2020 SCALE: 1:100 @ A3
DWG. NO: 9435-102 REVISION: P1
CHARTERED ARCHITECTS
ADDRESS: 94 TENNYSON ROAD, LONDON.NW67SB. TEL 07775903564



1 EXISTING SECTION A-A
Scale: 1:100

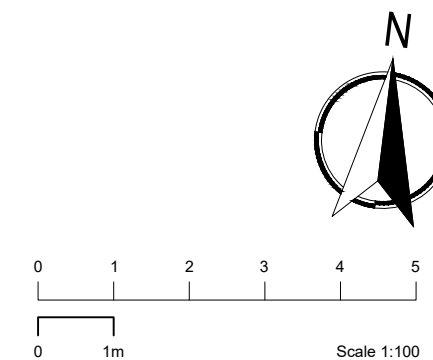


2 PROPOSED SECTION A-A
Scale: 1:100

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REVISION:	DESCRIPTION:	DATE:
Rev. P1	PRE-APP	OCT 2021



PRE-PLANNING

PROJECT: MANETTES
95-96 HIGH STREET, MERTHYR TYDFIL, CF47 8UP
CLIENT: MF INVESTMENTS LTD
DRAWING: EXISTING AND PROPOSED SECTIONS
DATE: NOV 2020 SCALE: 1:200 @ A3
DWG. NO: 9435-104 REVISION: P1
CHARTERED ARCHITECTS
ADDRESS: 94 TENNYSON ROAD, LONDON. NW67SB. TEL 07775903564

Appendix B



NRW data

From: [Annabel Ellera](#)
To: "Watkins, Craig"
Subject: RE: T121332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]
Date: 22 November 2021 08:20:10
Attachments: [image017.png](#)
[image018.jpg](#)
[image019.png](#)
[image021.jpg](#)
[image022.gif](#)
[image023.png](#)
[image024.jpg](#)
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[image030.jpg](#)
[image031.png](#)
[image032.png](#)
[image033.png](#)
[image034.png](#)
[image035.jpg](#)
[image036.png](#)
[image037.jpg](#)
[image038.jpg](#)

Hi Craig,

I was wondering if you've been able to find a way of sending the bus station FCA? The FCA that I'm working on needs to be issued very soon for a planning deadline, so it would be great to get this as soon as possible.

Thanks!

Annabel



[Register for FREE CPD](#)

Annabel Ellera
Consultant

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d. +44 (0)1743 295 278
e. annabellellera@geosmartinfo.co.uk
@geosmartinfo
www.geosmartinfo.co.uk

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Please consider the environment before printing this email.

From: Annabel Ellera
Sent: 18 November 2021 17:06
To: 'Watkins, Craig' <Craig.Watkins@merthyr.gov.uk>
Subject: RE: T121332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

Hi Craig,

Thanks for getting back to me! It would be great to receive a copy of the bus station FCA if you have a way of sending it.

Kind regards,

Annabel



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Annabel Ellera
Consultant

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d. +44 (0)1743 295 278
e. annabellellera@geosmartinfo.co.uk
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From: Watkins, Craig <Craig.Watkins@merthyr.gov.uk>
Sent: 18 November 2021 13:57

To: Annabel Ellera <AnnabelEllera@geosmartinfo.co.uk>

Subject: RE: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

Hi Annabel,

Apologies for the delay in getting back you. I have been able to find a copy of the bus station FCA however the file is too large to email. I shall be in our offices tomorrow so hopefully I shall be able to find a solution.

With regards to your second point, I wouldn't know the answer to that one. I'd suggest contacting the case officer in Development Control who should be able to assist.

Regards

Craig

From: Annabel Ellera <<mailto:AnnabelEllera@geosmartinfo.co.uk>>

Sent: 12 November 2021 11:04

To: Watkins, Craig

Cc: Planning

Subject: RE: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

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Hi,

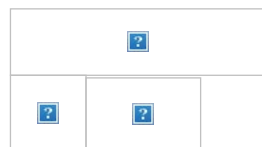
I'd like to follow up on the below email chain.

I am currently writing a FCA for the neighbouring property to this Site (95-96 High Street) and also require the modelled data. In your previous email you mentioned the data would be included in the FCA for planning ref P/16/0048 – however, I am unable to download this off the Site. Is there any way you could send me this FCA, or another one which might also contain the modelled data?

If there is no access to the modelled data (as seems to be the case from the emails for 92-94 High Street), would it be acceptable from a planning policy perspective to use the National Flood Hazard and Flood Risk Assessment Wales maps for the FCA for our Site?

Thanks for your help!

Kind regards,
Annabel



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Annabel Ellera
Consultant

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Please consider the environment before printing this email.

From: Alexandra Pickles

Sent: 21 June 2021 16:32

To: 'Craig.Watkins@merthyr.gov.uk' <Craig.Watkins@merthyr.gov.uk>

Cc: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>; Michael Piotrowski <MikePiotrowski@geosmartinfo.co.uk>; Martin Lucass <MartinLucass@geosmartinfo.co.uk>

Subject: RE: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

Good Afternoon,

I am following up on the below email on Rebecca's behalf.

I am unable to download the referenced FCA and am receiving an error message. Are you able to send this directly at all? Would Merthyr Tydfil County Borough Council accept the use of the data/maps within the FCA for our Site?

It would also be appreciated if you could forward on contact information for Capita, if possible, so we may request the raw data.

Thank you.

Kind Regards,

  Register for FREE CPD	Alexandra Pickles Consultant t. +44 (0)1743 298 100 e. alexandrapickles@geosmartinfo.co.uk @geosmartinfo www.geosmartinfo.co.uk GeoSmart is registered with the Property Codes Compliance Board as a subscriber to the Search Code.
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From: Watkins, Craig <Craig.Watkins@merthyr.gov.uk>
Sent: 15 June 2021 11:33
To: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>
Cc: Cross, David <David.Cross@merthyr.gov.uk>
Subject: RE: T121332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

Good Morning Rebecca,

I don't believe that we in Planning have access to the raw data from the modelling that was carried out by Capita in 2015. The FCA that was published at this time (in support of the proposals for a new bus station) is publically available, and can be found under the application reference number P/16/0048 using the following search page:

<https://publicaccess.merthyr.gov.uk/online-applications/>

If you need anything further, please let me know.

regards

Craig

From: Rebecca Davies [<mailto:rebeccadavies@geosmartinfo.co.uk>]
Sent: 15 June 2021 10:09
To: Cross, David; Watkins, Craig
Subject: RE: T121332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

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Afternoon David/Craig,

I wanted to chase up again to see if there had been any progress with this?

Kind Regards

Becky

  Register for FREE CPD	Becky Davies Consultant and Business Development Manager dd. +44 (0)1743 298 093 t. +44 (0)1743 298 100 m. 07590 775011 e. rebeccadavies@geosmartinfo.co.uk @geosmartinfo www.geosmartinfo.co.uk
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From: Cross, David <David.Cross@merthyr.gov.uk>
Sent: 09 June 2021 16:34
To: Watkins, Craig <Craig.Watkins@merthyr.gov.uk>
Cc: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>
Subject: FW: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [NOT PROTECTIVELY MARKED]

Classification: NOT PROTECTIVELY MARKED

Hi Craig,

With reference to the email below and our brief chat yesterday about the flood modelling in the town centre, are we able to share any information we might have?

If you could let Rebecca know what we have or can share that would be great.

Thanks

David Cross

Prif Swyddog Cynllunio / Principal Planning Officer
BSc (Cynllunio), Ma (Dylunio Trefol), MRTPI / BSc (Planning), Ma (Urban Design), MRTPI
Ffôn / Tel: 07761330341
E-bost / Email: david.cross@merthyr.gov.uk

Cyngor Bwrdeistref Sirol Merthyr Tudful / Merthyr Tydfil County Borough Council
Uned 5, Parc Fusness Triongl / Unit 5, Triangle Business Park
Pentrebach, Merthyr Tudful / Pentrebach, Merthyr Tydfil
CF48 4TQ

From: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>
Sent: 09 June 2021 16:28
To: Cross, David <David.Cross@merthyr.gov.uk>
Subject: FW: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP

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Afternoon David,

Following our conversation yesterday. Please see email trail where we are trying to obtain the modelled data required to complete the FCA for the above site as part of a merthyr planning requirement.

Kind Regards
Becky

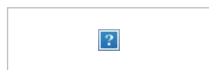
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Becky Davies
Consultant and Business Development Manager

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m. 07590 775011
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From: Rebecca Davies
Sent: 19 May 2021 15:20

To: huw.williams@merthyr.gov.uk

Cc: Alexandra Pickles <AlexandraPickles@geosmartinfo.co.uk>; Martin Lucass <MartinLucass@geosmartinfo.co.uk>

Subject: RE: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP [Filing cancelled]

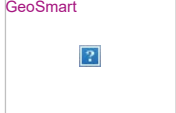
Afternoon Huw,

I wanted to get in touch to see what progress has been made regarding this?

Thanks again for looking into this for me.

Kind Regards

Becky



Becky Davies
Consultant and Business Development Manager

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From: Rebecca Davies

Sent: 14 May 2021 16:25

To: huw.williams@merthyr.gov.uk

Cc: Alexandra Pickles <AlexandraPickles@geosmartinfo.co.uk>; Martin Lucass <MartinLucass@geosmartinfo.co.uk>

Subject: RE: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP

Afternoon Huw,

Thank you for taking my call just now. I have felt like I have been going round the houses these past few weeks so I am glad you might be able to help search for the flood model data.

You can see from the email trail that the data was requested on 16th April and the NRW responded on 20th April saying they didn't hold the intellectual property rights to this data and to contact Merthyr. I have called a few times but then been told someone would call me back. This is obviously causing a big delay on our clients planning application.

In summary, it would be much appreciated if you could have a look into finding the flood modelled data and any further required data for flood consequence assessment which has been requested by Judith Jones – Chief Planning Officer.

I have cc'd in my colleague who will be responsible for writing this report so they are fully aware of the situation.

Once again, thank you for your help.

Kind Regards

Becky



Becky Davies
Consultant and Business Development Manager

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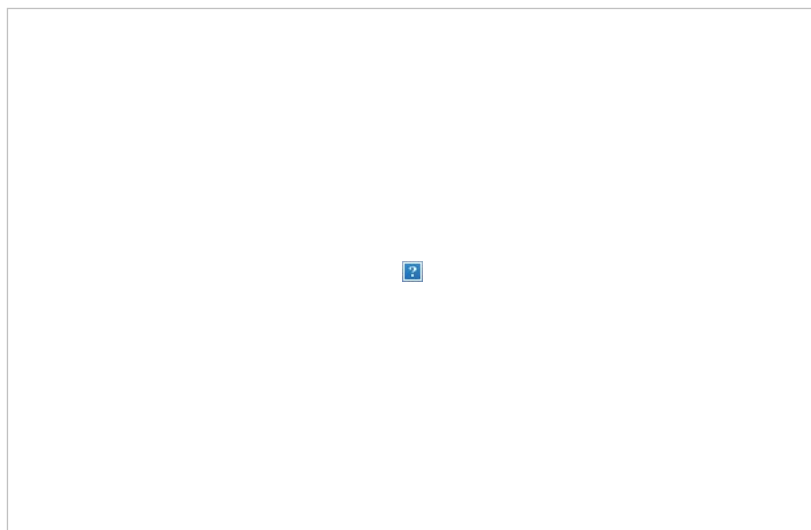
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From: Data Distribution <datadistribution@cyfoethnaturiolcymru.gov.uk>
Sent: 20 April 2021 11:58
To: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>
Subject: TI21332a P5&6, FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP

Dear Ms Davies,

Further to your recent email concerning the above, please note that the modelling in this area was carried out by Capita for Merthyr Council in 2015. Therefore, as we do not own the Intellectual Property Rights for this model, you would need to approach Merthyr Council/Capita.

Apologies we could not have been of any more assistance to you on this occasion.



From: Rebecca Davies <rebeccadavies@geosmartinfo.co.uk>
Sent: 16 April 2021 11:21
To: Data Distribution <datadistribution@cyfoethnaturiolcymru.gov.uk>
Cc: Data <data@geosmartinfo.co.uk>
Subject: 74542 FloodSmart Plus 92-94 High Street, Merthyr Tydfil, CF47 8UP

Good Afternoon

Please can I request the Basic Model Information (flood levels, flows and maps). I have submit a request for Pre-Application advice on the online form. for Please attached the area on the attached plan for the proposed developments at 92-94 High Street, Merthyr Tydfil, CF47 8UP .

Grid Ref: SO 05015 06447 Eastings 305015 , Nothings 206447

Kind regards,

Becky

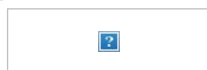
GeoSmart



Register for FREE CPD

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Consultant and Business Development Manager

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Darllenwch ein [hysbysiadau preifatrwydd](#) i ddarganfod mwy am sut rydym yn defnyddio eich gwybodaeth bersonol.

Cyngor Bwrdeistref Sirol Merthyr Tudful

Canolfan Dinesig
Stryd Y Castell
Merthyr Tudful
CF47 8AN

Teleffon: 01685 725000

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Merthyr Tydfil County Borough Council

Civic Centre
Castle Street
Merthyr Tydfil
CF47 8AN

Telephone: 01685 725000



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Cyngor Bwrdeistref Sirol Merthyr Tudful

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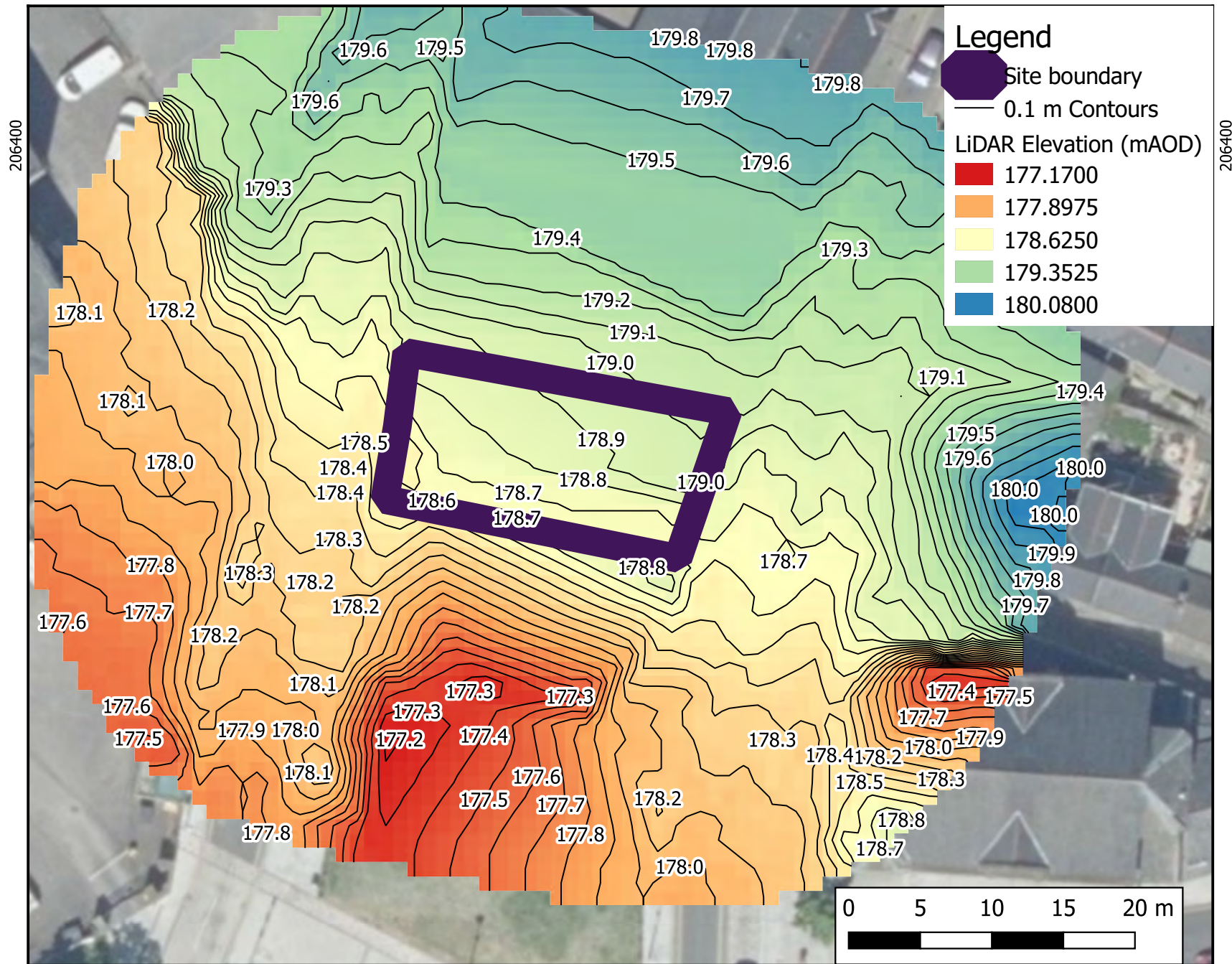
Telephone: 01685 725000



<http://www.merthyr.gov.uk>



Natural Resource Wales LiDAR ground elevation data



Appendix D



Pre-application Correspondence



Ms L Forsyth
XL Property Ventures LTD
Belvoir Lodge
Upper Oldfield Park
BA2 3JX

Dyddiad/Date: 03.11.2021

Ein Cyf./Our ref.: PA/21/0059
Eich Cyf./Your ref.:

Gofynnwch am/Please ask for: Caroline Pulley
Llinell Uniongyrchol/Direct Line: 01685 726200
e-bost/e-mail: Caroline.pulley@merthyr.gov.uk

Dear Miss Forsyth,

RE: PROPOSED CHANGE OF USE OF UPPER FLOORS TO PROVIDE 7 RESIDENTIAL FLATS WITH ASSOCIATED ROOF WORKS AND SUBVISION OF AN EXISTING RETAIL PREMISE INTO TWO A3 UNITS.

I refer to your enquiry registered by the authority on the 14th October 2021 concerning the above and your request for pre-application advice.

Having considered the nature of the submission I can respond as follows.

Relevant Planning History

There is no recent planning history relating to the property.

Relevant Policies and Guidance

Planning Policy Wales (PPW), Edition 11 (February 2021) sets out the Welsh Governments national policy framework and is supported by a series of Technical Advice Notes (TAN) that address specific issues, including:

- TAN 5 – Nature Conservation and Planning
- TAN 12 – Design
- TAN 15 – Development and Flood Risk
- TAN 18 – Transport
- TAN 24 – The Historic Environment

You may also be aware that a new Draft TAN 15 (Development, flooding and coastal erosion) is due to come into force in Wales on 1st December 2021. The new TAN 15 and Flood Map will replace the 2004

Merthyr Tudful
... lle i fod yn falch ohono

Merthyr Tydfil
... a place to be proud of

version and any planning application submitted after 1st December 2021 will need to have regard to the policies and guidance set out in the new TAN. However, at this stage the emerging TAN has no weight.

The Merthyr Tydfil County Borough Council Replacement Local Development Plan (LDP) 2016-2031 sets out the local policies, of which the following would be relevant to the determination of this scheme:

Policy SW4 – Settlement Boundaries
Policy SW9 – Planning Obligations
Policy SW11 – Sustainable design and Placemaking
Policy CW1 – Historic Environment
Policy EcW3 – Retail Hierarchy – Supporting Retailing Provision
Policy EcW5 – Town and Local Centre Development
Policy EnW1 – Nature Conservation and Ecosystem Resilience
Policy EnW2 – Internationally and Nationally Protected Sites and Species
Policy EnW3 – Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species
Policy EnW4 – Environmental Protection

The LDP, including the full detail of these policies, can be found on the Merthyr Tydfil County Borough Council Website at:

<https://www.merthyr.gov.uk/resident/planning-and-building-control/planning-policy/>

The following supplementary planning guidance (SPG) would also be material considerations:

- SPG3 – Shopfront Design
- SPG4 – Sustainable Design
- SPG5 – Nature and Development

Summary of the acceptability of the proposal

Based on the submitted plans, it is understood that the proposal entails the subdivision and extension of the existing building to provide 7 self-contained flats and two retail units falling within use class C3. The proposal would also entail a number of external works to the building. These works include the provision of a new shop front, the re-rendering of the principal elevation and the installation of new windows and doors to the front and rear building. The proposal also includes a roof extension to provide an additional floor of residential accommodation.

As the site falls within a defined flood risk area, the Town Centre Conservation Area and retail boundary, the main planning considerations for this proposal would be:

- The acceptability of the proposed development within a C2 flood risk zone.
- The impact of the proposal on the character and appearance of the conservation area.
- Highway safety and car parking considerations;
- The impact of the proposal on the amenity of surrounding residents; and
- Ecology

These matters are discussed below.

Principle of the proposed development, including the change of use.

The proposed site is located within the settlement limits as defined by Policy SW4 of the LDP where the majority of new development is generally encouraged. Whilst the town centre largely comprises commercial uses at ground floor level, there are a number of properties that provide residential uses on

the upper floors, which contributes to the vitality of the area with the provision of mixed uses. In this respect, the principle of converting the upper floor of the existing building to provide residential accommodation would be acceptable under Policy SW4 and would not be out of character with the wider area.

Notwithstanding this, the loss of an A1 use at ground floor and the introduction of two adjoining A3 uses in its place could have a harmful impact on the viability of the Town Centre, by reducing the retail diversity and availability of properties supporting an A1 use in this location. Additionally, while the exact use of the A3 units has not been specified, it is important to highlight that uses that generally tend to operate only in the evening, erode the vitality of, and detract from the retail character of an area. This is a particular concern when taking into account the context of the immediate area, which is surrounded by a large number of units, which as a result of their use (largely takeaways and late night establishments) are closed during normal (day time) trading hours and are secured with roller shutters which present inactive and undesirable frontages. Such uses also have an adverse impact on the appearance and amenities of the area and also, its daytime vibrancy and vitality. Furthermore, the increasing number of units with later opening hours in a relatively small area is slowly eroding the historic character of this part of the town centre. All these factors are essential elements that make up the overall character and appearance of the conservation area. Therefore, at this stage and without knowing the exact type of use(s) that are being proposed for the ground floor and their proposed opening times, there is concern that the vitality and retail character and appearance of the area may be harmed, contrary to Policies CW1, EcW3 and EcW5 of the LDP.

The acceptability of the proposal within a C2 Flood Risk Zone

The building is located within a C2 Flood Risk Zone. Accordingly, Technical Advice Note (TAN) 15 (2004) is of particular relevance to the consideration of this proposal (until such a time when the draft TAN 15 comes into force). As you may be aware, TAN 15 defines Flood Zone C2 as 'areas of the floodplain without significant flood defence infrastructure' where only 'less vulnerable development' should be considered subject to an application of the justification tests and that 'highly vulnerable development' should not be considered. As residential premises are defined as 'highly vulnerable development', a fundamental policy objection would be raised to the proposed roof extension as it would involve the development of new residential floor space in an area which is at risk from flooding.

The conversion of the existing building has the potential to form part of the wider regeneration of the town centre, which in turn can contribute to its vitality and viability. As such, the location of the four flats on the first floor of the building may be more acceptable, subject to a Flood Consequence Assessment (FCA) being submitted and adequately demonstrating that there would not be an unacceptable risk from flooding to people. The flood risk associated with the proposed development would need to be fully considered following consultation with Natural Resources Wales (NRW) during the planning application process.

Impact of the scheme on the character and appearance of the area

Notwithstanding the fundamental issues highlighted above in relation to flood risk and the vitality and character and appearance of the area, it is considered that the refurbishment of the existing building including the re-rendering of the front elevation would help to improve the visual appearance of the building, subject to some minor alterations and further details being provided.

The submitted plans illustrate a new aluminium shop front being provided to the principal elevation of the building. The general design, proportions and scale of the shop front are considered acceptable. However,

section details will need to be provided, along with details of any new roller shutter door that may be proposed. Being located within the Town Centre Conservation Area, and also within a Townscape Heritage Initiative Area, the proposed shop front will also need to be of a high quality design. The materials proposed for the replacement windows and doors for the building should also be of a high quality. In this respect, it is noted that on the submitted plans the first floor window in the principal elevation has been separated. It is considered that this window should be retained as a continuous opening as existing. Details of the proposed windows and proposed materials will need to be provided as part of the planning application. The proposed roof extension, although unacceptable from a flood risk perspective, would be set back from the principal elevation and subject to details of the proposed finishes being submitted for consideration, would not significantly impact on the character and appearance of the conservation area. The alterations proposed to the rear of the building are also deemed acceptable.

With regard to the proposed A3 units, it is unclear whether the proposed uses would require an external flue to disperse of odours. If the proposal does involve the siting of a flue, consideration would need to be given to impact of this part of the proposal on the character and appearance of the building and the surrounding area and on the amenities of neighbouring properties.

Impact on neighbouring properties/residents.

Policy SW11 of the LDP, amongst other things, considers the potential impact on the amenities of neighbouring properties. In terms of the impact on residential amenity (i.e. noise and disturbance and overlooking from existing windows) it is not considered that the proposed development would give rise to impacts that would be significantly different to the existing use. The property is located within a defined retail area whereby a level of activity is expected during the day and the late evening. Whilst it is acknowledged that the change of use of the upper floors to residential flats may result in an intensification of the building, it would not result in an adverse impact upon the levels of amenity currently enjoyed by neighbouring occupiers. The property is located within an area that has a varied character and it is not considered that the change of use of the first and second floors to residential would be unduly harmful in this context. Notwithstanding this, the building is located in close proximity to a number of noisy uses which have the potential to cause noise disturbance to the future occupiers of the flats. As such, acoustic insulation may be required. It is also reiterated that the exact uses proposed for the ground floor of the application building is unknown. Due consideration will need to be given to the impact of the uses intended for the ground floor on future occupiers of the flats and those that may live within the vicinity of the building.

Highway Safety

In terms of highway safety, the Council's Head of Engineering has not raised any objection to the proposal noting that the property is located within a sustainable location, in close proximity to public car parks and the central bus and railway station. It is also noted that there are traffic regulation orders in place within this part of the town centre, which would prevent indiscriminate on-street parking in these locations. As such, the proposal to change the use of the building to a mixed retail/residential use does not raise any adverse highway safety issues.

Ecology

I have attached the comments from the Councils Ecologist which are hopefully self-explanatory.

Other considerations

The Community Infrastructure Levy (CIL) was introduced in Merthyr Tydfil County Borough Council on the 2nd June 2014. The application is for development of a kind that may be liable for a charge under the CIL Regulations 2010 as amended. The application lies within the Merthyr Tydfil Charging Zone, where there is a liability of £25 / sqm for residential development.

You should also note that surface water drainage for new developments also have to comply with new legislation relating to sustainable drainage. This may require you to submit a separate SAB (Sustainable Drainage Approval Body) application to the SuDs approval body. For more information on this application, please contact Huw Williams (07568 100588).

Required Information

Should you decide to submit a planning application based on this pre-application enquiry, please note that the following information would be required:

- A fully completed application form and relevant ownership certificates (this can be found on the Council's web site www.merthyr.gov.uk)
- A site location plan (scale of 1:1250) which clearly identifies the application site (outlined in red) within the surrounding area and includes a north arrow.
- Detailed drawings (to a suitable scale) illustrating the development in context, including existing and proposed elevations, floor plans and where appropriate section details through the building, shopfront and windows.
- Any supporting assessments/survey information i.e. Ecological Assessments, Flood Consequence Assessment and Noise Assessment (you may wish to seek the advice of the Council's Environmental Health Department on this to determine if a noise assessment is required to support a planning application)
- The appropriate planning fee (£460 per flat)

It is also recommended to applicants that detailed information is submitted at the application stage to ensure that, in the event of planning permission being granted, that 'pre-commencement' conditions (which require approval of details prior to work starting on site) can be minimised. You are therefore encouraged to ensure that your initial submission incorporates as much information as possible (for example materials, details of obscure glazing), and address all matters raised in the advice given above.

I trust the above information is of assistance. However, I must note the advice given in this response represents an informal opinion, provided in accordance with the Council's Planning Pre-Application Service. In particular, it is emphasised that while this pre-application advice will be carefully considered in reaching a decision or recommendation on an application, the final decision on any application that you may make can only be taken after we have consulted local people, statutory consultees and any other interested party. It does not therefore prejudice any decision which the Local Planning Authority may make should an application be submitted.

Yours sincerely,



 **MISS J JONES**
PRIF SWYDDOG CYNLLUNIO A GWASANAETHAU CYMDOGAETH/ CHIEF OFFICER PLANNING & NEIGHBOURHOOD SERVICES

Appendix E



Natural Resource Wales Comment

Rivers House,
St Mellons Business Park,
St Mellons,
Cardiff,
CF3 0EY

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

ebost/email:
southeastplanning@cyfoethnaturiolcymru.gov.uk

25/08/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: CONVERSION OF 1ST AND 2ND FLOOR TO 6 NO. STUDIO FLATS AND 6 NO. HOLIDAY LETS.

LLEOLIAD / LOCATION: ETHAN ARCADE, 92 – 94 HIGH STREET, MERTHYR TYDFIL, CF47 8UP.

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 12 August 2021.

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 bats, a European Protected Species. If this information is not provided, we would object to this planning application. Further details are provided below.

European Protected Species

We have reviewed the 'Preliminary Roost Assessment Survey', prepared by Arbtech Consultants, issue 2, dated 09/06/2021 submitted in support of the above application. The report identifies secondary evidence to indicate the development site has been used as a bat roost and that the building should be subject to a full suite of bat emergence and re-entrance surveys.

We therefore advise that further surveys are undertaken as recommended in the report, and in accordance with 'Bat Surveys; Good Practice Guidelines 3rd Edition', published by the Bat Conservation Trust 2016. We further advise the results of the surveys are submitted to the Local Planning Authority prior to the determination of the application, along with full mitigation proposals, where appropriate.

Flood Risk

The planning application proposes highly vulnerable development (housing). Our Flood Risk map confirms the application site lies entirely within Zone C2 of the Development Advice Map (DAM) contained in TAN15.

We refer you to Section 6 of TAN15 and the Chief Planning Officer [letter](#) for Welsh Government, dated 9 January 2014, which affirms that **highly vulnerable development should not be permitted in Zone C2** (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 do not apply to highly vulnerable development in Zone C2.

Notwithstanding this policy position we have reviewed the FCA submitted in support of the above application prepared by GeoSmart Information, reference 74542R2, dated 2021-08-03.

Whilst the proposal will result in highly vulnerable development being introduced into an area of flood risk, this will be elevated above the flood risk, and there is no change in vulnerability use at ground floor level. Therefore, we have no objection to the application as submitted, in relation to flood risk.

Further Advice

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15. We cannot advise you 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 flooding 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.

Advice for Applicant

We recommend you consider the future insurability of this development now. Although we have no involvement in this matter, we would advise you to review the Association of British Insurers published paper, '[Climate Adaptation: Guidance on Insurance Issues for New Developments](#)', to help you ensure any properties are as flood proof as possible and insurable.

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

Paige Minahan

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

Disclaimer

This report has been prepared by GeoSmart in its professional capacity as soil, groundwater, flood risk and drainage specialists, with reasonable skill, care and diligence within the agreed scope and terms of contract and taking account of the manpower and resources devoted to it by agreement with its client and is provided by GeoSmart solely for the internal use of its client.

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Tel: 01743 298 100

Email: info@geosmartinfo.co.uk

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Please note that all queries or complaints regarding your search should be directed to your search provider in the first instance, not to TPOs or to the PCCB.

TPOs contact details:

The Property Ombudsman scheme

Milford House

43-55 Milford Street

Salisbury

Wiltshire SP1 2BP

Tel: 01722 333306

Fax: 01722 332296

Email: admin@tpos.co.uk

You can get more information about the PCCB from www.propertycodes.org.uk.

Please ask your search provider if you would like a copy of the search code.

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- Normally deal with it fully and provide a final response, in writing, within 20 working days of receipt.
- Keep you informed by letter, telephone or e-mail, as you prefer, if we need more time.
- Provide a final response, in writing, at the latest within 40 working days of receipt.
- Liaise, at your request, with anyone acting formally on your behalf.

If you are not satisfied with our final response, or if we exceed the response timescales, you may refer the complaint to The Property Ombudsman scheme (TPOs): Tel: 01722 333306, E-mail: admin@tpos.co.uk.

We will co-operate fully with the Ombudsman during an investigation and comply with his final decision. Complaints should be sent to:

Alan White

Operations Manager

GeoSmart Information Limited

Suite 9-11, 1st Floor,

Old Bank Buildings,

Bellstone, Shrewsbury, SY1 1HU

Tel: 01743 298 100

alanwhite@geosmartinfo.co.uk

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