

30 & 31 High Street Merthyr Tydfil- Flood Consequence Assessment

Version 1

July 2021

www.jbaconsulting.com

**Jols Holdings Ltd
30 & 31
High Street,
Merthyr Tydfil
CF47 8DP**

JBA Project Manager

Hannah Booth
Kings Chambers
7-8 High Street
NEWPORT
South Wales
UNITED KINGDOM
NP20 1FQ

Revision History

Revision Ref/Date	Amendments	Issued to
July 2021	Version 1	Jamie O'Leary

Contract

This report describes work commissioned by David Pittham, on behalf of Jamie O'Leary of Jols Holdings Ltd, by an email dated 21 June 2021. Hannah Booth of JBA Consulting carried out this work.

Prepared by Hannah Booth BSc

Flood Risk Analyst

Reviewed by George Baker BEng AIEMA CEnv IEng MCIWEM
C.WEM

Technical Director

Purpose

This document has been prepared for Jols Holdings Ltd. JBA Consulting accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

JBA Consulting has no liability regarding the use of this report except to Jols Holdings Ltd.

Copyright

© Jeremy Benn Associates Limited 2021.

Contents

1	Introduction	1
1.1	Terms of Reference	1
1.2	FCA Requirements	1
2	Site Description	2
2.1	Site summary	2
2.2	Site topography	3
2.3	Soils and geology	4
2.4	Watercourses and flood defences	4
2.5	Development proposal	5
3	Planning Policy and Flood Risk	6
3.1	Planning context	6
3.2	Vulnerability classification	6
3.3	Development Advice Map (DAM) classification	6
3.4	Local Development Plan	7
3.5	Justification test	8
4	Review of Existing Flood Risk Data	10
4.1	Review of existing flood risk data	10
4.2	Historical flooding	10
4.3	Flood Risk from Rivers	11
4.4	Flood Risk from the Sea	12
4.5	Flood Risk from Surface Water and Small Watercourses	12
4.6	Flood Risk from Groundwater	13
4.7	Flood Risk from Reservoirs	13
4.8	Flood Risk from Sewers	14
5	Detailed Fluvial Flood Risk Assessment	15
5.1	Hydraulic modelling availability	15
5.2	Model Results	15
5.2.1	1% AEP plus climate change event	15
5.2.2	0.1% AEP event	15
6	Assessment of Acceptability Criteria	17
6.1	Acceptability Assessment	17
7	Conclusions and Recommendations	19

List of Figures

Figure 2-1: Site Location	3
Figure 2-2: 1m LiDAR Topography	4
Figure 2-3 Watercourses near the site	5
Figure 3-1 Development Advice Map	7
Figure 4-1: NRW Historic Flooding records	11
Figure 4-2: Risk of flooding from rivers	12
Figure 4-3 Risk of Flooding from Surface Water and Small Watercourses	13
Figure 4-4 NRW Flood Map for the Risk of Flooding from Reservoirs	14
Figure 5-1: Predicted flood extents for the proposed scenario for Merthyr Tydfil Bus Station ⁸ for the 1% AEP plus climate change and 0.1% AEP events. The proposed re-development site is outlined in black. The red line boundary represents the new Merthyr Tydfil bus station and does not form part of this application.	16

List of Tables

Table 2-1: Site description	2
Table 3-1: Development categories as defined by TAN-15	6
Table 3-2: Justification test applied to the proposed site	9
Table 4-1: Summary of sources of flood risk at the proposed site	10
Table 6-1 Assessment of accessibility criteria	17

1 Introduction

1.1 Terms of Reference

JBA Consulting (JBA) were commissioned by Jols Holdings Ltd to prepare a Flood Consequence Assessment (FCA) for the re-development and extension at 30 & 31 High Street Merthyr Tydfil.

1.2 FCA Requirements

The FCA follows Welsh Government guidance on development and flood risk set out in Technical Advice Note 15: Development and Flood Risk (TAN-15). Where appropriate, the following aspects of flood risk are to be addressed in all planning applications over the development's expected lifetime in flood risk areas:

- The likely mechanisms of flooding
- The likely source of flooding
- The depths of flooding through the site
- The speed of inundation of the site
- The rate of rise of flood water through the site
- Velocities of floodwater across the site
- Overland flow routes
- The effect of flooding on access and egress and infrastructure, for example public sewer outfalls, combined sewer outflows, surface water sewers and effluent discharge pipes from wastewater treatment works
- The impacts of the development in terms of flood risk on neighbouring properties and elsewhere on the floodplain

2 Site Description

2.1 Site summary

The proposed development site is located in the centre of Merthyr Tydfil. The site comprises a pair of three-storey, terraced properties on the corner of High Street and Masonic Street, in the centre of Merthyr Tydfil, as shown in Figure 2-1. The building is bounded by Masonic Street to the north, terraced commercial properties to the east and south and High Street to the west. High Street is a semi-pedestrianised shopping street, whilst Masonic Street is a one-way street open to vehicular traffic.

The existing properties contain an inactive restaurant on the ground floor of 31 and sheltered residential accommodation on the ground floor of 30, and the first and second floors of 30-31. A stairwell providing access to the upper floors is present to the rear of the building.

Table 2-1 summarises the key characteristics of the site.

Table 2-1: Site description

Site Name	30 & 31 High Street
Site Area	115 m ²
Existing Land-use	Restaurant and sheltered residential accommodation
Purpose of Development	Mixed-use, four-storey development
OS NGR	SO 04950 05931
County	Merthyr Tydfil
Local Planning Authority	Merthyr Tydfil County Borough Council
Lead Local Flood Authority	Merthyr Tydfil Council Borough Council



Figure 2-1: Site Location

2.2 Site topography

Figure 2-2 shows the Natural Resources Wales (NRW) 1m LiDAR¹ data obtained from the Lle Geoportal. The site is relatively flat, with a gradual rise from the southwest corner towards the east of the site. The highest part of the site is in the south-east corner with a maximum ground level of 166.93mAOD, whilst the lowest ground level is in the southwest corner of the site at 166.61mAOD.

Given that the existing building occupies a large proportion of the site, and filtering algorithms are used to remove buildings from the terrain model, there remains uncertainty in the true site topography.

1 Lle Geoportal for Wales: <http://lle.gov.wales/catalogue/item/LidarCompositeDataset/?lang=en>

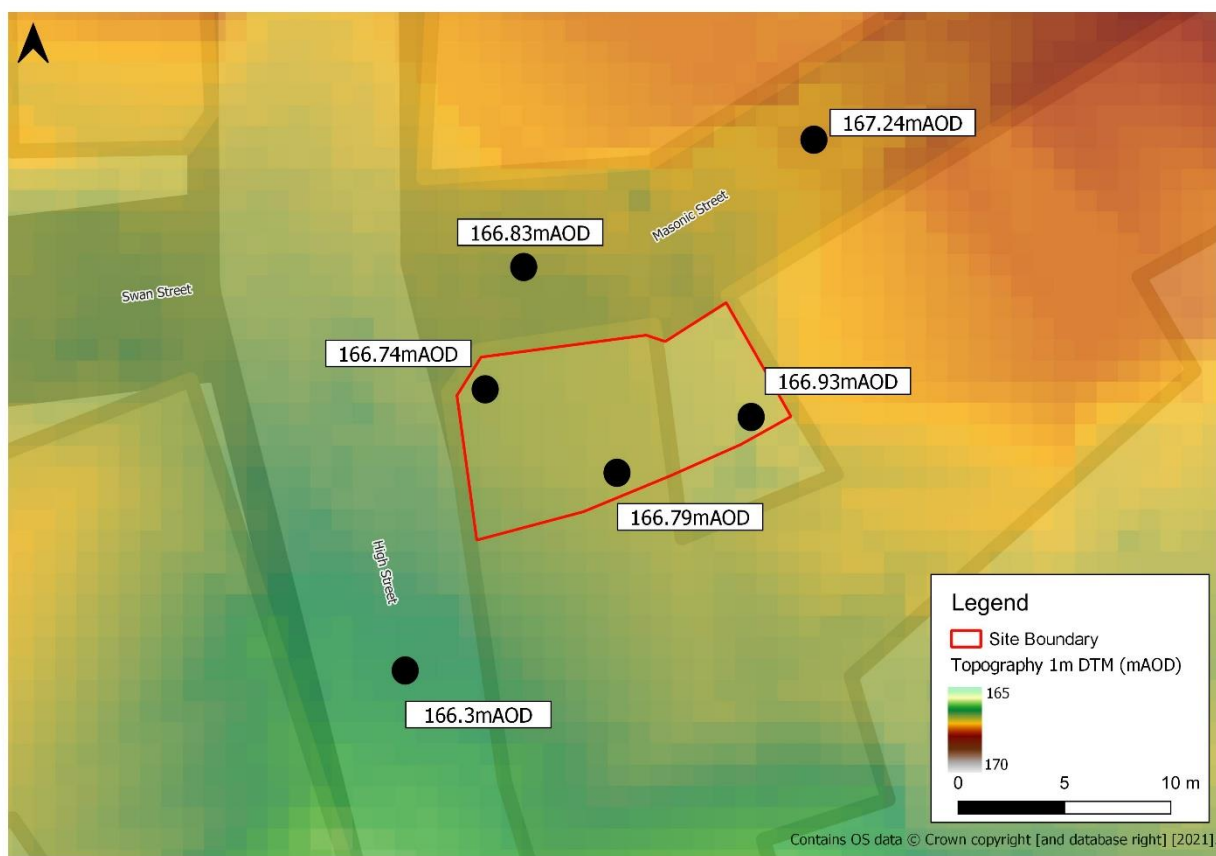


Figure 2-2: 1m LiDAR Topography

2.3 Soils and geology

The Cranfield University Soils Map² indicated that the site comprises acid loamy and clayey soils that are slowly permeable and seasonally wet. Soils are reported to drain to a stream network.

The British Geological Society Geology of Britain Viewer³ indicates that the site is underlain by the South Wales Lower Coal Measures Bedrock Formation, comprised of sandstone. No superficial deposits have been recorded at the site.

2.4 Watercourses and flood defences

As shown in Figure 2-3, the River Taff is an NRW designated main river and is located approximately 200m to the west of the site and flows in a southerly direction towards Cardiff. The Nant Morlais, a tributary of the River Taff, is located approximately 460m north of the site and is classed as an ordinary watercourse. No flood defences are present along these watercourses.

² Cranfield University Soils Map: <http://www.landis.org.uk/soilsmap/>

³ British Geological Society Geology of Britain Viewer: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

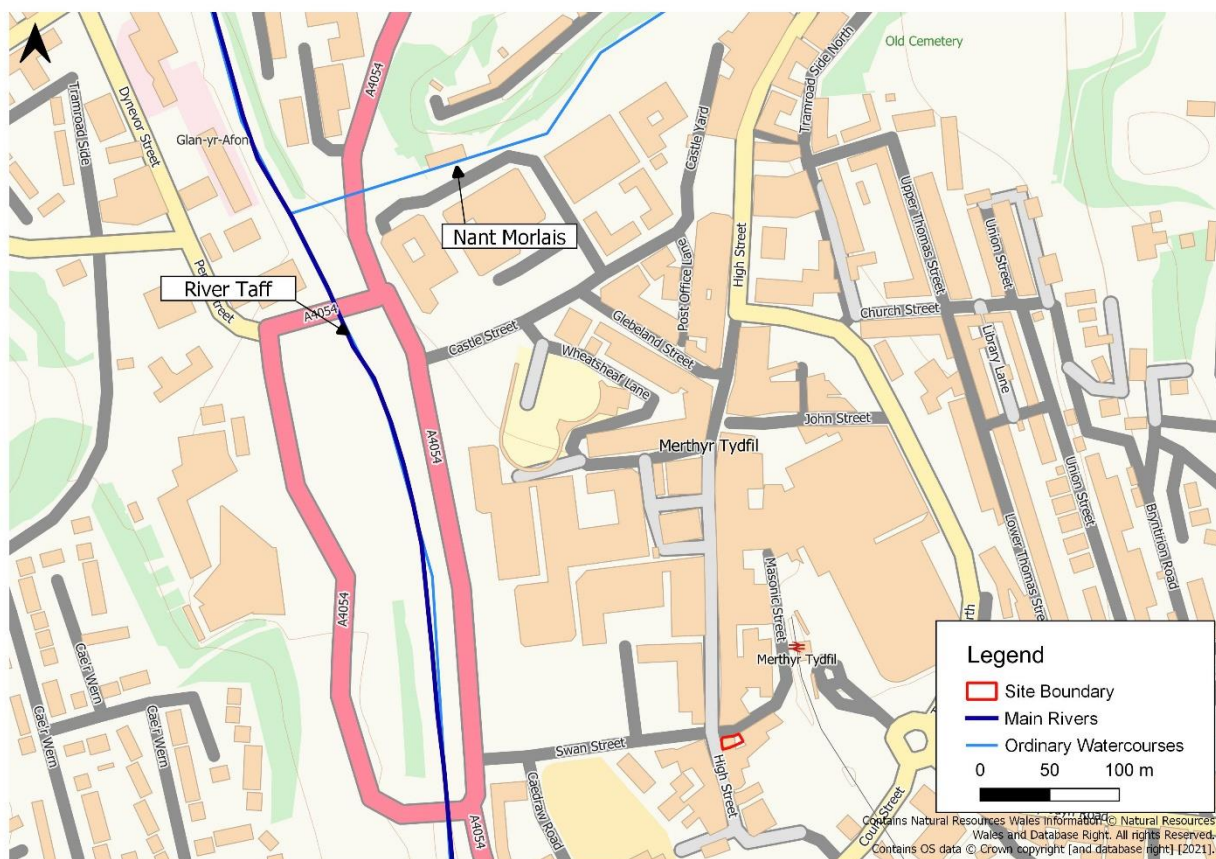


Figure 2-3 Watercourses near the site

2.5 Development proposal

The client is seeking planning permission for a change of use and a minor extension to the existing building.

The development proposal includes changing the existing building from a former restaurant and sheltered accommodation to a boutique hotel on the first and second floors and an area for 'food and drink uses' on the ground floor. The development proposal also includes external works to the buildings comprising a rear roof extension, a 4-storey rear infill extension to provide a stairwell, and a roof terrace above the existing single-storey rear extension.

3 Planning Policy and Flood Risk

3.1 Planning context

TAN-15 was introduced in 2004 by the Welsh Assembly Government. It provides technical guidance related to development planning and flood risk using a sequential characterisation of risk based on the Welsh Government's Development Advice Map (DAM). Its initial requirement is to identify the flood zones and vulnerability classification relevant to the proposed development, based on an assessment of current and future conditions.

3.2 Vulnerability classification

TAN-15 assigns one of the three flood risk vulnerability classifications to development, as shown in Table 3-1. The proposed development consists of a mix of residential and commercial units. Residential development is classed as highly vulnerable development, whilst commercial units are classed as less vulnerable development. TAN-15 indicates that the highest vulnerability class should be applied to a proposed development. As a result, the proposed development is classed as 'highly vulnerable development'.

As the site is presently partially occupied by residential and commercial development, there shall be **no change in vulnerability classification** resulting from the proposed re-development of the site.

Table 3-1: Development categories as defined by TAN-15

Development category	Types
Emergency services	Hospitals, ambulance stations, fire stations, police stations, coastguard stations, command centres, emergency depots and buildings used to provide emergency shelter in time of flood.
Highly vulnerable development	All residential premises (including hotel and caravan parks), public buildings (e.g. schools, libraries, leisure centres), especially vulnerable industrial development (e.g. power stations, chemical plants, incinerators), and waste disposal sites.
Less vulnerable development	General industrial, employment, commercial and retail development, transport and utilities infrastructure, car parks, mineral extraction sites and associated processing facilities, excluding waste disposal sites.

3.3 Development Advice Map (DAM) classification

Figure 3-1 presents the DAM zones for the proposed development. The DAM is used to trigger different planning actions based on a precautionary assessment of flood risk.

The proposed development site is located in Zone C2 of the DAM. Zone C2 is described as areas of the floodplain without significant flood defence infrastructure. This zone is used to indicate that only less vulnerable development should be considered subject to the application of the Justification Test, including the acceptability of flood consequences. Highly vulnerable development is not typically considered acceptable in Zone C2. However, TAN-15 does not provide guidance as to whether re-development or change of use can be considered within Zone C2.

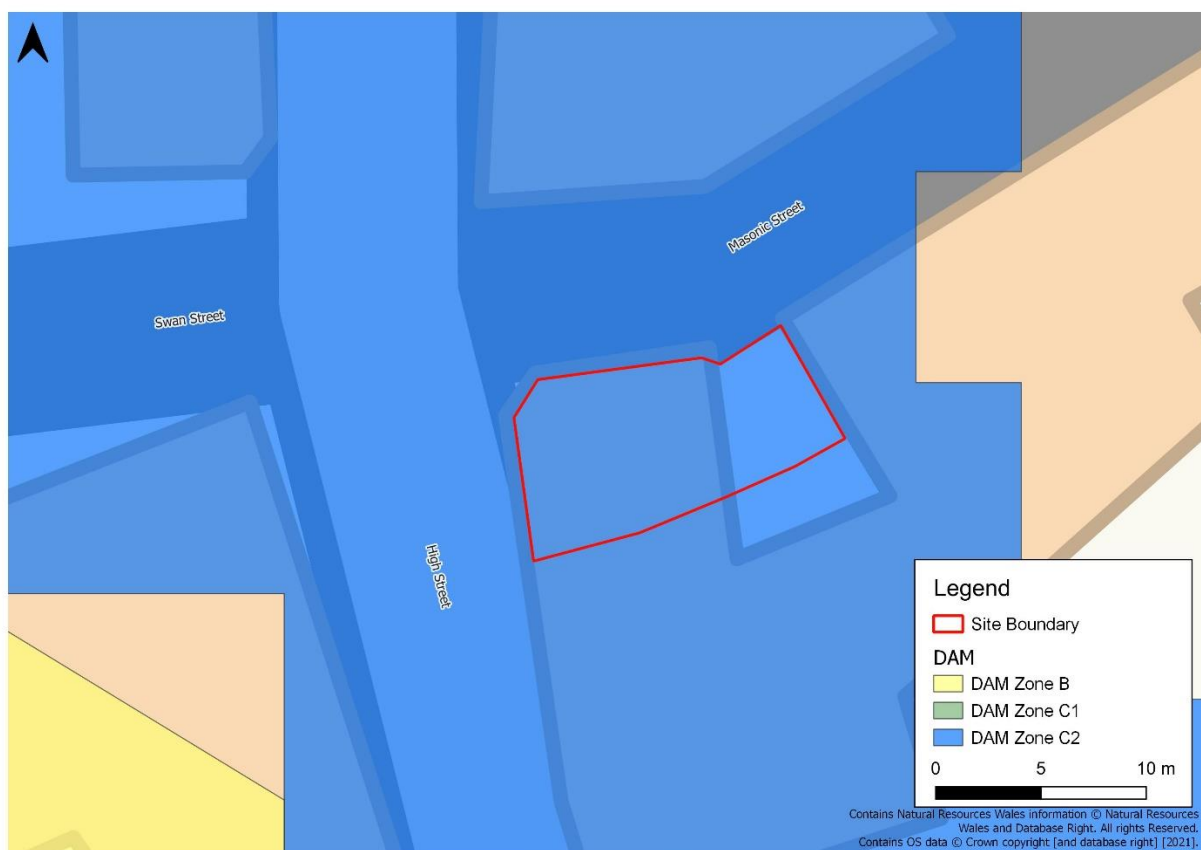


Figure 3-1 Development Advice Map

3.4 Local Development Plan

The Local Development Plan (LDP) is a land-use document where the Council sets out its land use development over a 15-year period. The current LDP, entitled 'Replacement Local Development Plan (2016-2031)',⁴ was adopted by the Merthyr Tydfil County Borough Council (MTCBC) in January 2020.

The proposed development site lies within the town centre boundary of Merthyr Tydfil but outside of the primary shopping area. The development proposals for the site supports several Local Development Plan policies. These policies are indicated below:

⁴ Merthyr Tyfil County Borough Council (2020) Replacement Local Development Plan (2016-2031). Retrieved from: <https://www.merthyr.gov.uk/resident/planning-and-building-control/planning-policy/>

- **Policy EcW5: Town and Local Centre Development**

Development enhancing the vitality and viability of the Town and Local Centres will be supported. Within the Town Centre Primary Shopping Area (PSA) the change of use of the ground floor from A1 to another 'A class' use will be permitted where. . .

- *Within the PSA and local centres, the change of use of the ground floor to 'non-A' use classes will only be permitted where: -*
 1. *It is demonstrated through active and appropriate marketing that the existing use is no*
 2. *longer economically viable; and,*
 3. *The proposal would not result in an over-concentration of non-A1 uses that would be detrimental to the vitality, attractiveness and viability of the local centre; and,*
 4. *The proposal would not result in the creation of a dead window frontage; and,*
 5. *The proposal would not have an unacceptable effect on the amenity and viability of neighbouring uses, having regard to the 'agent of change principle'.*

- **Policy EcW7: Tourism, Leisure and Recreation Development**

- *Tourism, leisure and recreation development within settlement boundaries is generally supported, particularly where they aid the revitalisation and regeneration of the Town and Local Centres.*

- **Policy SW11: Sustainable Design and Placemaking**

- *Policy SW11 identifies general design and placemaking requirements, including requiring new developments to:*
 1. *be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density;*
 2. *integrate effectively with adjacent spaces, the public realm and historic environment to enhance the general street scene and create good quality townscape;*
 3. *not result in an unacceptable impact on local amenity, loss of light or privacy, or visual impact, and incorporate a good standard of landscape design;*
 5. *allow access for the widest range of people possible, and demonstrate that any traffic movements will not have an unacceptable impact on local amenity or highway safety and satisfy the Council's parking standards;*

The proposed development site lies within the town centre boundary of Merthyr Tydfil where LDP policies EcW5 (Town and Local Centre Development) provide policy support for ground floor 'A' uses (including restaurants) and complimentary uses which improve the vitality and viability of the centre (including hotels). The proposed development would also align with LDP Policy EcW7 (Tourism) and remove an existing in-active (non-retail) ground-floor frontage to 30 High Street. Therefore, it is concluded that, in land-use planning terms, the principle of development would fully accord with relevant planning policy.

3.5 Justification test

TAN-15 states that "new development" will be justified if it can be demonstrated that:

- Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement;*
 - or*
 - Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region;*
- and*

- iii. *It concurs with the aims of Planning Policy Wales and meets the definition of previously developed land;*
- and,
- iv. *The potential consequences of a flooding event for the particular type of development have been considered and found to be acceptable.*

TAN15 does not specifically explain how the justification test should be applied to a change of use application, particularly where there will be no increase in the vulnerability of the development. Notwithstanding this point, the proposed re-development has been assessed against the requirements of the Justification Test, with the results summarised in Table 3-2. All the criteria have been satisfied with regards to the proposed development.

Table 3-2: Justification test applied to the proposed site

TAN 15 Justification Criteria	Comments	Achievable?
Its location is necessary to assist a local authority regeneration initiative or strategy, or contribute to key employment objectives necessary to sustain an existing settlement or region	The proposed development will deliver Merthyr Tydfil's Local Development Plan policies EcW5, EcW7, and SW11 of the Replacement Local Development Plan (2016-2031).	✓
The site meets the definition of previously developed land (i.e. it is not a Greenfield site) and concurs with the aims of Planning Policy Wales (i.e. the presumption in favour of sustainable development)	There is an existing building on site, currently comprised of two units. The site has already been developed and therefore meets the definition of previously developed land.	✓
A Flood Consequence Assessment has been produced to demonstrate that the potential consequences of a flood event up to the extreme flood event (1 in 1000 chance of occurring in any year) have been considered and meet the [Acceptability Criteria] ... in order to be considered acceptable	Sections 4 and 5 describe the flood risk assessment at the site, using a combination of existing NRW mapping and hydraulic modelling carried out by Capita at Merthyr Tydfil Bus Station FCA.	✓

4 Review of Existing Flood Risk Data

This section assesses the risk to the proposed development from all sources of flooding, the risk of increased flooding to others, and how flood risks can be managed. As a Level 1 FCA, the flood risk assessment is based solely on a desk-based analysis of existing flood risk data.

4.1 Review of existing flood risk data

A review of the existing flood risk data relating to the site has been undertaken. The main sources of risk have been published by Natural Resources Wales (NRW) and within MTCBC Flood Risk documents. Table 4-1 below summarises these findings.

Table 4-1: Summary of sources of flood risk at the proposed site

Source of Flooding	Onsite Presence	Description
Flood Risk from Rivers	✓	The site is at low flood risk from rivers.
Flood Risk from the Sea	✗	The site is not at risk of flooding from the sea.
Flood Risk from Surface Water and Small Watercourses	✗	The site is at very low risk of surface water flooding.
Flood Risk from Groundwater	✗	The site is at very low risk of flooding from groundwater.
Flood risk from Reservoirs	✓	The site is at low risk of flooding from reservoir failure.
Flood risk from Sewers	✗	The site is at low risk of sewer flooding.

4.2 Historical flooding

NRW's map of recorded flood extents (see Figure 4-1) does not show any evidence of historic flooding on the site.

No further historic flooding records were identified at the site in the MTCBC Local Flood Risk Management Strategy⁵, Preliminary Flood Risk Assessment Report⁶ or the Flood Risk Management Plan⁷.

5 Merthyr Tyfil County Borough Council (2013) Local Flood Risk Management Strategy. Retrieved from: <https://www.merthyr.gov.uk/media/1472/mtcbc-local-flood-risk-management-strategy-lfrms.pdf>

6 Merthyr Tyfil County Borough Council (2011) Preliminary Flood Risk Assessment. Retrieved from: <https://www.merthyr.gov.uk/media/1470/mtcbc-preliminary-flood-risk-assessment-report-pfra.pdf>

7 Merthyr Tyfil County Borough Council (2015) MTCBC Flood Risk Management Plan. Retrieved from: <https://www.merthyr.gov.uk/media/1810/mtcbc-frmp.pdf>



Figure 4-1: NRW Historic Flooding records

4.3 Flood Risk from Rivers

NRW's Flood Risk Assessment Wales (FRAW) map for Flood Risk from Rivers shows that the proposed development site is at low risk of fluvial flooding from the River Taff. This means that the site has between a 1 in 1000 (0.1%) and 1 in 100 (1%) year chance of flooding during a flood event, as shown in Figure 4-2.

Given the DAM C2 designation of the site and to confirm the risk of flooding posed by the River Taff, further assessment using detailed flood modelling data is discussed in Section 5.

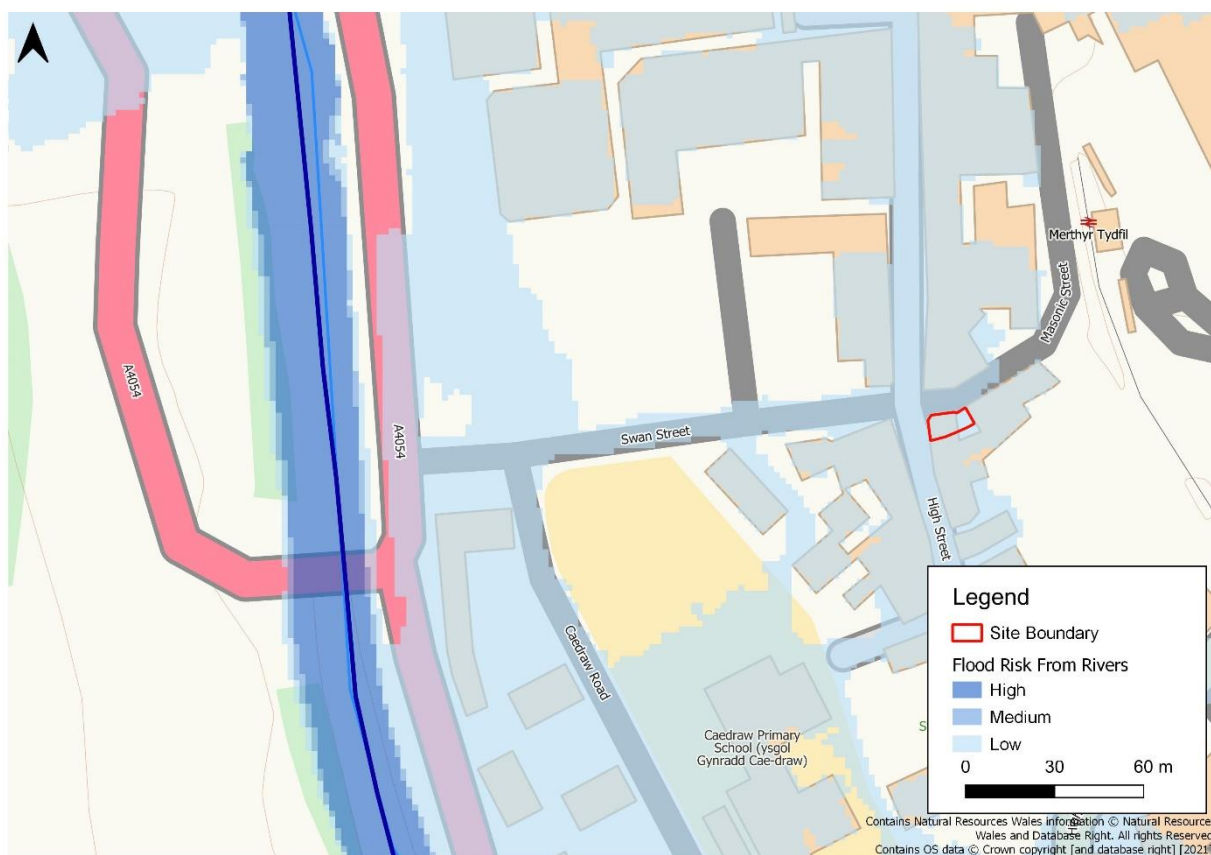


Figure 4-2: Risk of flooding from rivers

4.4 Flood Risk from the Sea

The NRW FRAW Flood Risk from the Sea map shows that the site is not at risk of tidal flooding.

4.5 Flood Risk from Surface Water and Small Watercourses

NRW's FRAW Surface Water and Small Watercourse map indicates that the site is at **very low** risk of surface water flooding, as shown in Figure 4-3. However, there is a significant flow path down the High Street from north to south. This flow path does not affect the site and is confined to the carriageway. The flow path occurs during the high risk (greater than 1 in 30 (3.3%)) to low risk (between 1 in 1000 (0.1%) and 1 in 100 (1%)) scenarios which is located by the site's western boundary.

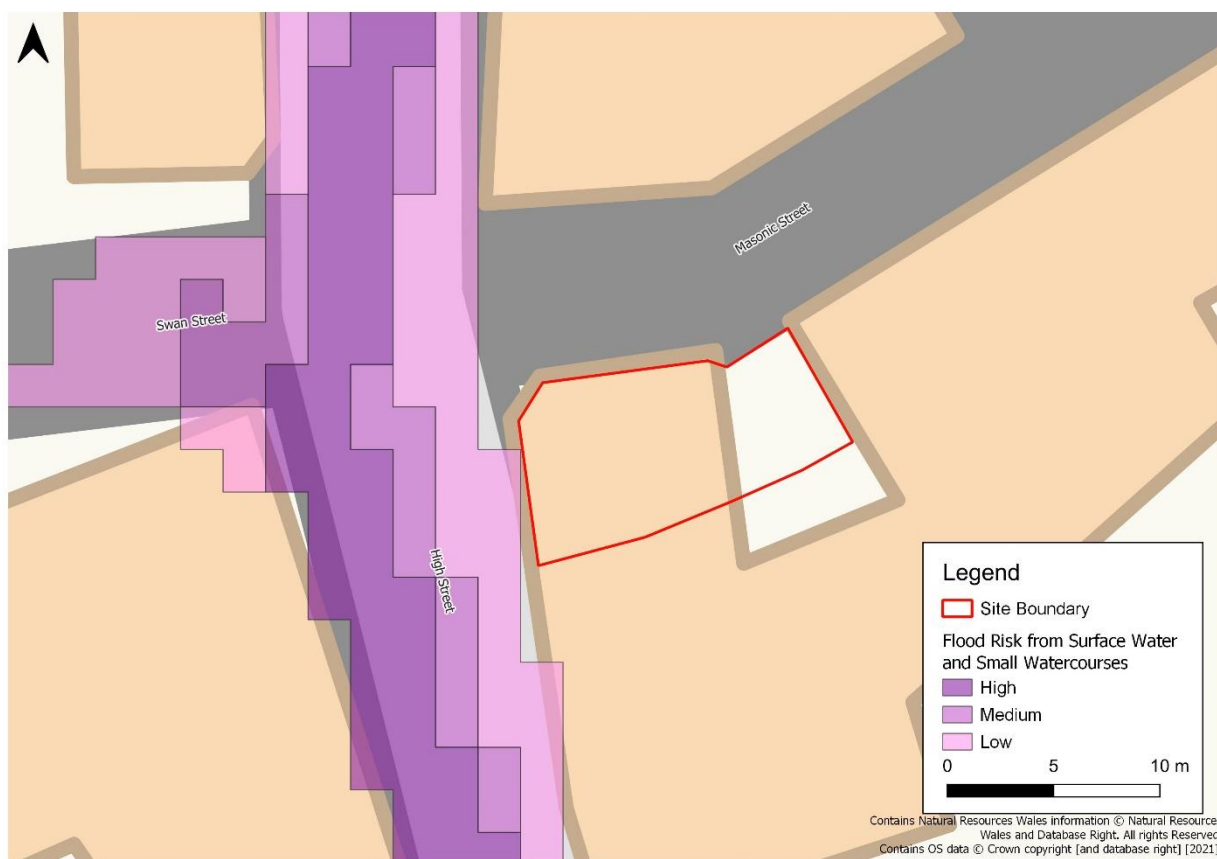


Figure 4-3 Risk of Flooding from Surface Water and Small Watercourses

4.6 Flood Risk from Groundwater

Groundwater flooding is caused by unusually high groundwater levels. It occurs as excess water emerges at the ground surface or within manmade structures such as basements. Groundwater flooding tends to be more persistent than surface water flooding, in some cases lasting for weeks or months and can result in damage to property. The risk of groundwater flooding depends on the nature of the geological strata underlying the site and the local topography.

MTCBC Local Flood Risk Management Strategy⁵, Preliminary Flood Risk Assessment Report⁶ and the Flood Risk Management Plan⁷ states that groundwater is 'not a major problem in MTCBC'. It can therefore be concluded that the risk of groundwater flooding at the site is **very low**.

4.7 Flood Risk from Reservoirs

NRW flood risk mapping indicates a risk of flooding at the site due to five different reservoir failures: New Pond Dowlais, the Beacons, the Cantref, the Pontsticill and the Llwyn-On. The extent covers the whole site, as shown below in Figure 4-4.

Each of these reservoirs are >40km away from the proposed development site, meaning that timely warnings can be provided in the event of a failure. The heavily regulated nature of reservoir management means that the likelihood of a reservoir failure, and subsequent flooding, is considered very low. The low probability of such an event and the significant distance from the source to the proposed site means that the site's overall risk should be considered **low**.



Figure 4-4 NRW Flood Map for the Risk of Flooding from Reservoirs

4.8 Flood Risk from Sewers

The MTCBC Local Flood Risk Management Strategy⁵, Preliminary Flood Risk Assessment⁶ Report and the Flood Risk Management Plan⁷ show no evidence of historic sewer flooding on the site. It can therefore be concluded that the risk of sewer flooding at the site is **low**.

5 Detailed Fluvial Flood Risk Assessment

5.1 Hydraulic modelling availability

A data request was submitted to NRW and the Merthyr Tydfil County Borough Council (MTCBC) for the most up to date flood risk information for the proposed development site. Both NRW and MTCBC confirmed that they did not hold a detailed hydraulic model that covered the proposed development. However, NRW indicated that a detailed model was constructed as part of the Merthyr Bus Station Flood Consequence Assessment in 2016⁸.

A hydraulic model was developed to inform the Merthyr Bus Station FCA. The model is a 1D-2D ESTRY-TUFLOW model of the River Taff and Nant Morlais developed in 2016. The hydrological inflows into the model were calculated in 2016. Given that the Merthyr Bus Station development received planning permission, it can be concluded that the model was deemed acceptable by NRW for representing flood risk in the area.

Given the nature of the proposed re-development of the site, the level of flood risk and the detailed nature of flood modelling data, we conclude that the existing Capita model data outputs, as presented in this FCA, are suitable to inform this assessment.

5.2 Model Results

Model results presented in this section are for the 'Proposed' scenario presented in the Merthyr Bus Station FCA. This scenario includes a representation of the Merthyr Bus Station, which is due for completion in Spring 2021.

5.2.1 1% AEP plus climate change event

In the 1% AEP plus climate change event, the site is predicted to remain flood free, as shown in Figure 5-1. This meets the requirement of section A1.14 of TAN15, which requires the development site to remain flood free in the fluvial 1% AEP event plus climate change.

5.2.2 0.1% AEP event

In the 0.1% AEP event, the site remains flood free, as shown in Figure 5-1. This satisfies the requirement of section A1.15 of TAN15, which requires flood depths on-site to be no greater than 0.60m in a 0.1% AEP event.

⁸ Capita (2016), Merthyr Bus Station Flood Consequence Assessment. Retrieved from <https://www.merthyr.gov.uk/media/4445/sd38-merthyr-tydfil-proposed-new-bus-station-flood-consequence-assessment-may-2016.pdf>

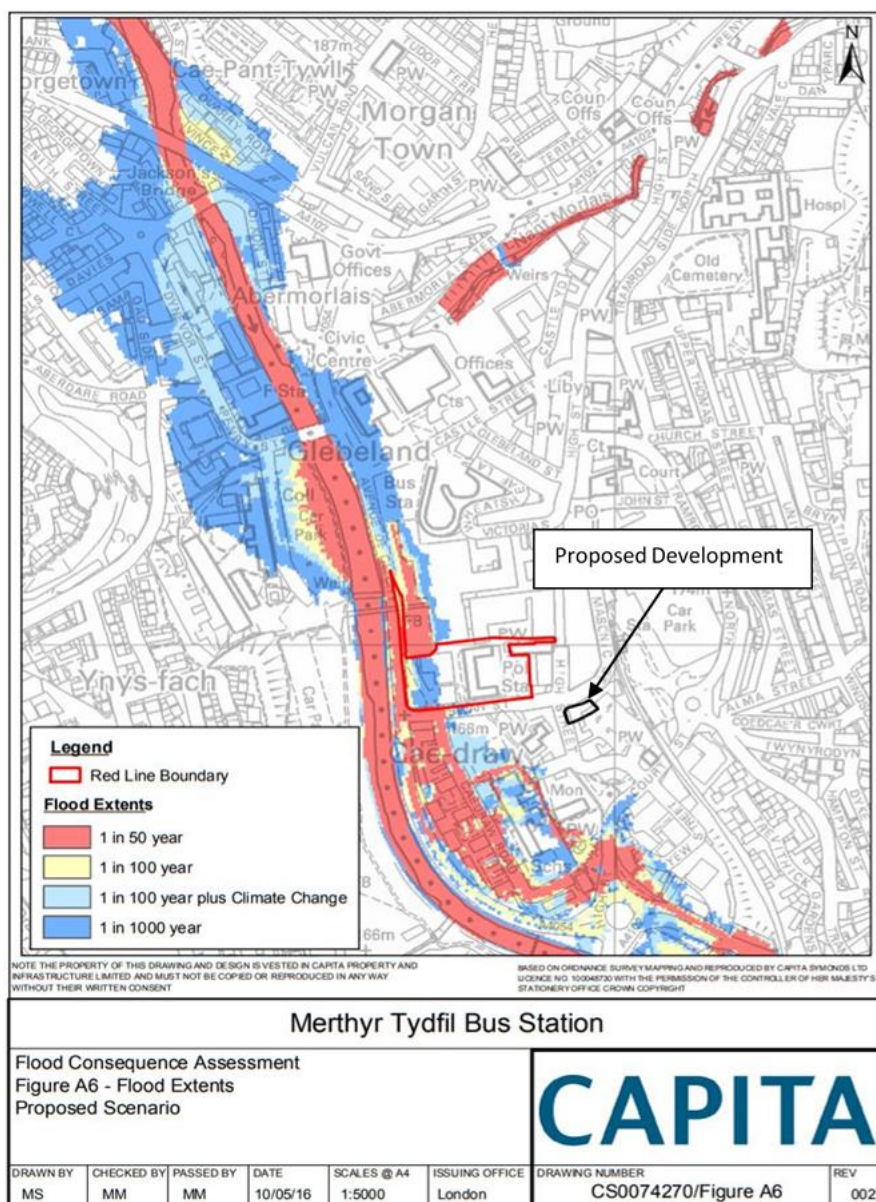


Figure 5-1: Predicted flood extents for the proposed scenario for Merthyr Tydfil Bus Station⁸ for the 1% AEP plus climate change and 0.1% AEP events. The proposed re-development site is outlined in black. The red line boundary represents the new Merthyr Tydfil bus station and does not form part of this application.

6 Assessment of Acceptability Criteria

6.1 Acceptability Assessment

Table 6-1 assesses the proposed development against the acceptability requirements of TAN15.

Table 6-1 Assessment of accessibility criteria

TAN-15 Acceptability Criteria	Comments	Satisfied
<i>Developer is required to demonstrate that the site is designed to be flood free for the lifetime [Ref: TAN-15 A1.5] of development for a 1 in 100 (1%) chance (fluvial) flood event including an allowance for climate change in accordance with TAN-15 table A1.14.</i>	During the 1% AEP plus climate change event the proposed development is predicted to remain flood free.	✓
<i>In respect of the residual risk to the development it should be designed so that in an extreme (1 in 1000) event there would be less than 600mm of water on access road and within the property, the velocity of any water flowing across the development would be less than 0.4/second.</i>	During the 0.1% AEP event the proposed development is predicted to remain flood free.	✓
<i>No flooding elsewhere.</i>	The proposed development is predicted to be flood free during all design events. As a result, there will be no increase to flood risk elsewhere as a result of the development.	✓
<i>Flood defenses must be shown by the developer to be structurally adequate particularly under extreme overtopping conditions (i.e. that flood with a 1 in 1000 chance of occurring in any given year).</i>	The proposed site does not rely upon any formal flood defences in the area	✓
<i>Effective flood warnings are provided at the site.</i>	The site is located within the NRW 'River Taff' flood alert area and the 'River Taff at Merthyr Tydfil' flood warning area.	✓
<i>The developer must ensure that future occupiers of the flooding risks and consequences.</i>	The building occupants may wish to sign up to the NRW Flood Warning Service to provide warning in the event of an extreme flood event.	✓

<i>Escape/evacuation routes are shown by the developer to be operational under all conditions.</i>	A safe access and egress route is available up to and including the 0.1% AEP event.	✓
<i>The development is designed by the developer to allow the occupier the facility for rapid movement of goods/possessions to areas away from flood waters.</i>	The proposed development site is predicted to be flood free during all design events.	✓
<i>Development is designed to minimise structural damage during a flooding event and is flood proofed to enable it to be returned to its prime use quickly in the aftermath of the flood.</i>	The proposed development site is predicted to be flood free during all design events.	✓

7 Conclusions and Recommendations

- JBA Consulting (JBA) were commissioned by Jols Holdings Ltd to prepare a Flood Consequence Assessment (FCA) to support the proposed re-development of an existing commercial unit on Merthyr Tydfil High Street.
- The development proposals are for a mixed-use, four-storey development. On the ground floor, the building will be used for food and drink. A hotel will be situated on the upper levels, and a roof terrace will be located above the existing single-storey rear extension. The building will also be extended to provide a stairwell.
- The proposed development site is located in Zone C2 as designated by the Welsh Government's Development Advice Maps (DAM). Zone C2 is defined as areas of the floodplain without significant flood defence infrastructure. If a site falls partially in Zone C, it is a matter for the planning authority to judge whether to apply the Justification Test. Development in Zone C can only be permitted where they can be justified based on the justification and acceptability test outlined in TAN15.
- The proposed development meets the first three parts of the Justification Test as it will meet Merthyr Tydfil County Borough Council's Policy Objectives EcW5, EcW7 and SW11 of the Replacement Local Development Plan (2016-2031). Additionally, the site is previously developed land.
- The proposed development site is at low risk of fluvial flooding and reservoir flooding. The site is at very low risk of groundwater, surface water and sewer flooding.
- Existing flood risk mapping based on hydraulic modelling carried out by Capita for the Merthyr Tydfil Bus Station FCA in 2016 was used to assess the risk of fluvial flooding. This shows that the proposed development site is predicted to be flood free in the 1% AEP plus climate change event and the 0.1% AEP event.
- In all flood events up to and including the 0.1% AEP event, safe access and egress can be provided from the development site.
- It is concluded that on the grounds of flood risk, the proposed development at 30 & 31 High Street meets the principles and requirements set out in TAN-15 and the aims of Planning Policy Wales.

Offices at

Coleshill
Doncaster
Dublin
Edinburgh
Exeter
Haywards Heath
Isle of Man
Limerick
Newcastle upon Tyne
Newport
Peterborough
Saltaire
Skipton
Tadcaster
Thirsk
Wallingford
Warrington

Registered Office
1 Broughton Park
Old Lane North
Broughton
SKIPTON
North Yorkshire
BD23 3FD
United Kingdom

+44(0)1756 799919
info@jbaconsulting.com
www.jbaconsulting.com
Follow us:  

Jeremy Benn Associates Limited

Registered in England 3246693

JBA Group Ltd is certified to:
ISO 9001:2015
ISO 14001:2015
ISO 27001:2013
ISO 45001:2018

