

NRW's Advice provided to George Baker (15.01.2020)

Dear George,

The information we require is outlined within our response to Planning Application P/17/0144, dated 20th June 2019 (Planning Authorities website), this includes the figures showing detriment in the blockage scenarios.

The 95% blockage factor is considered the design event for the site, as noted in our previous response; 'the Nant Canaid culvert has not been fully surveyed beneath the site due to obstacles. Therefore, assumptions have been included in the model regarding the capacity of the culvert. Given the presence of broken ground within the culvert and the historical risk of blockage at the inlet, as highlighted within the Section 4.1 of the (Hafren Water) FCA we believe it is appropriate to add a 95% blockage factor when considering the flood events referred to above (i.e. 1% +CCA +blockage and 0.1% +blockage flood events).'

The modelling undertaken by Thomas Mackay for the FCA by Hafren Water (May 2019) indicated areas to the northwest and south of the site are predicted to experience increased flood depths (>5mm) during a 1% +CCA +blockage and a 0.1% + blockage flood event as a result of the development. This does not meet the requirements of A1.12 of TAN15 which states there should be no flooding elsewhere.

It was not established in the Hafren Water FCA and Thomas Mackay Flood Modelling Study what was causing the change in flood depths to the northwest of the site, as the proposed site ground levels appear to be broadly similar to the existing site levels, therefore it would be expected the swale would reduce the risk of overland flows to the south. Clarification is needed i.e. what is causing the detriment outside the site boundaries and confirmation of the maximum changes in depth, the number of properties affected and whether there is any increase in hazard outside of the site.

We accept that the comparison for the baseline and proposed 1% and 0.1% scenarios (without blockage) has been included by JBA and shows betterment elsewhere, however the JBA FCA (November 2019) does not clarify the above request and needs to include a comparison of the 1%+CC and 0.1% flood events including 95% blockage for the existing and proposed scenarios to confirm if risk is still increased for 3rd parties and the change in depth/hazard and number of properties affected in line with our modelling guidance;

<https://cdn.naturalresources.wales/media/690050/gn-028-modelling-for-flood-consequence-assessments.pdf?mode=pad&rnd=132209712340000000>.

Detriment to 3rd parties needs to be resolved and without this information our concerns regarding compliance with A1.12 in TAN15 remain.

Kind Regards
Alice Jewer

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Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay