



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-134963-J5Z9
Eich cyf/Your ref: P/20/0188

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09/02/2021

Annwyl Syr/Madam / Dear Sir/Madam,

BWRIAD / PROPOSAL: Construction of 4 storage units

LLEOLIAD / LOCATION: The Willows Abercanaid Industrial Estate, Abercanaid

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 14 January 2021.

We continue to have significant concerns with the proposed development as submitted. We recommend you should only grant planning permission if the following requirements are met. Otherwise, we would object to this planning application.

Requirement 1- Land Potentially affected by Contamination – Details of site remediation

Requirement 2 – Flood Risk Management - A revised Flood Consequences Assessment (FCA) is required to demonstrate the risks and consequences of flooding can be managed to an acceptable level in accordance with TAN15.

Further details are provided below.

Requirement 1- Land Potentially affected by Contamination

Our advice on this matter remains as set out in our letter of 12 November 2020, reference CAS-128505-J8D5 as follows:

The site is located in a sensitive area, adjacent to the river Taff.

We note that this proposed development site is part of a larger application site, dealt with under reference P/12/0314, which contained a former gas works and gas storage compound. Within documents submitted in support of P/12/0314 we note that this site appears to be identified as “Area C limited product removal” with underground storage

tanks, other underground structures and a CWG (carburetted water gas) plant. We are aware that some remediation has occurred within the wider site, but it is unclear what remediation occurred (if any) at this site. Therefore, to establish if there remains any risk of contamination which could affect the water environment, we require that details of the remediation of this site (remediation within the redline boundary) to be submitted in support of this application.

We also note it is proposed to dispose of surface water to soakaway. We advise against the use of soakaways if the ground is contaminated. If contamination is suspected an alternative method of drainage should be investigated.

Requirement 2- Flood risk Management

The planning application proposes less vulnerable development (storage units). Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and the 1% (1 in 100 year) and 0.1% (1 in 1000 year) annual probability fluvial flood outlines of the River Taff.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of an FCA that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the revised Flood Consequences Assessment CA undertaken by WHS, dated December 2020, reference WHS1800. Our advice is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an appropriate level in line with TAN15 as follows:

A1.12 Criteria

Flood Risk Elsewhere

The previous FCA, which did not propose any ground raising, showed an increase in flooding off site of up to 35mm during the 0.1% (1 in 1000 year) flood event.

The revised FCA states that site levels will be raised to 158.35m AOD. The existing and proposed site level plans submitted, show that the majority of the site will be raised in order to achieve a uniform site level of 158.35mAOD. The plan of the existing site levels shows that all but one spot-level is below the proposed ground level of 158.35m AOD.

Raising the site may reduce floodplain storage outside of the site and result in an increase in flooding elsewhere. However, the FCA states *"The depth changes for the 1000yr event show a **small decrease** in depths of up to 6mm to the west of the site boundary along the access road- this is likely a result of slightly increased storage within the western portion of the site, as a result of the levelling. Detriment to flood depths is mainly restricted to within the site boundary and are a result of the ground levelling, wherein the areas experiencing*

an increase in depths relative to the baseline, are a result of the ground level having been lowered, to create a uniform level of 158.35mAOD.”

“Figure 4-3 Ground level changes to achieve uniform 158.35mAOD level” in the FCA indicates lowering of the ground level. However, the existing site levels in this area, as per the submitted plan, are already lower than 158.35mAOD i.e. between 158.22 and 158.26mAOD at this point.

Therefore, we request the FCA confirms the existing ground levels in comparison to the proposed i.e. which part of the site are to be raised and lowered; and clarifies any subsequent decreases/increases in flooding elsewhere as a result.

A1.14 Criteria

Based on the raised site level of 158.35m AOD and the proposed units set at 158.64m AOD, the proposed development is predicted to be flood free in the 1% (1 in 100 year) plus climate change allowance (25%) flood event based on the flood level of 158.34m AOD, therefore in line with A1.14 of TAN15.

Additional comments on flood risk management

Based on the predicted 0.1% (1 in 1000 year) flood level of 158.49m AOD and the proposed site level of 158.35m AOD the site is predicted to flood to a depth of 140mm during this event. However, this is within the indicative tolerable conditions (i.e.<600mm) set out at A1.15 of TAN15. The proposed units are predicted to be flood free during this event.

The velocity during the 0.1% (1 in 1000 year) flood event is stated as 0.26m/s, which is within the indicative tolerable conditions set out in A1.14 of TAN15. This figure is modelled using the existing ground level rather than the proposed of 158.35m AOD.

Section 4.6 of the FCA, shows that access and egress routes are subject to flood depths of 80mm and 300mm for the 1% (1 in 100 year) plus CCA and the 0.1% (1 in 1000 year) events.

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

Section 4.5 of the FCA proposes an emergency flood plan and advises that occupiers register for Flood Warnings.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood 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.

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

Mrs Claire McCorkindale

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