



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Ein cyf/Our ref: CAS-164572-P7N2
Eich cyf/Your ref: P/21/0225

Rivers House,
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15/09/2021

Annwyl Syr/Madam / Dear Sir/Madam,

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

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

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales about the above, which we received on 26/08/2021.

We continue to 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 flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

Our previous response (our ref: CAS-157378-J9X8) stated that the Flood Risk Assessment Wales (FRAW) map is not suitable for planning purposes. However in the response letter dated the 27/08/2021 (ref: 1867w0004) it is stated:

'Based on the FRAW map, the 1 in 100-year flood outline (medium risk area) broadly accords to a level of approximately 162.20mAOD, according to topographical survey information (included in appendix B of the original FCS document). The 1 in 1000-year flood outline (low risk area) reaches approximately 163.70mAOD.'

We would advise that it is not acceptable to use the FRAW maps to broadly provide a flood level of 162.20m AOD. The Development Advice Maps (DAM) remain the official flood risk

map for development planning purposes at this time. In addition, a flood level must come from an appropriate model, that can be obtained from NRW. However, if we have no such information then one must be provided by the applicant through their own detailed model. We therefore continue to have concerns with this application as submitted.

We therefore are unable to fully assess the proposals line with TAN 15. The FCA should be undertaken in line with the technical requirements as outlined in A1.17 of TAN15

If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would object to this application.

Please inform us, in accordance with paragraph 11.7 of TAN15, if you are minded to grant permission for the application contrary to our advice.

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.

We also previously provided comments on other areas of interest. These are included again below for your convenience.

Land Contamination

We consider that the controlled waters at this site are not of the highest environmental sensitivity, therefore we will not be providing detailed site-specific advice or comments with regards to land contamination issues for this site.

It is recommended that the requirements of Planning Policy Wales and the [Land Contamination Risk Management \(LCRM\)](#) guidance should be followed.

These comments are based on our assumption that **gross contamination** is not present at this location. If, during development, gross contamination is found to be present at the site please re-consult us.

European Protected Species

We note that the bat report submitted in support of the above application (Tyler Grange Group Ltd., date: 16th June 2021, ref: 13892_R01b_LT_MM.) We have no comments to make on the application as submitted.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

Advice for the Developer

Works Near a Watercourse

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

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

Yn gywir / Yours faithfully

Charlotte Morgan

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