

Flood Consequences Assessment (FCA) For:
22 Victoria Gardens, Neath,
Neath Port Talbot
SA11 3AA

Prepared for:
Caredig Housing
Association

July 2024

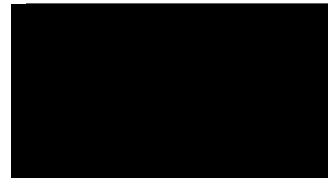
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Project	22 Victoria Gardens , Neath , Neath Port Talbot , SA11 3BH
Client	Caredig Housing Association
Vale Consultancy Ref:	19766

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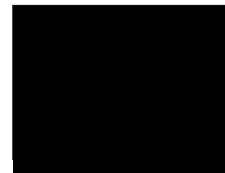
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01	19/07/2024	First Issue
02		
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Contents

1	INTRODUCTION	4
1.1	SITE LOCATION	4
1.2	EXISTING AND PROPOSED DEVELOPMENT	4
1.3	EXISTING TOPOGRAPHY	4
1.4	EXISTING GROUND CONDITIONS	5
1.5	EXISTING SITE DRAINAGE	5
1.6	PROPOSED DRAINAGE	5
2	PLANNING POLICY	6
2.1	NATIONAL POLICY	6
2.2	LOCAL PLANNING POLICY	7
3	SOURCES OF FLOODING AND PROBABILITY	7
3.1	HISTORICAL RECORDS OF FLOODING	7
3.2	FLOOD RISK FROM THE SEA (TIDAL) AND RIVERS (FLUVIAL)	7
3.3	SURFACE WATER AND SMALL WATERCOURSES (PLUVIAL)	10
3.4	SEWER FLOODING	11
3.5	GROUNDWATER FLOODING	11
3.6	ARTIFICIAL SOURCES OF FLOODING	12
3.7	JUSTIFICATION TEST	12
4	FLOOD RISK MITIGATION	12
4.1	FLOOD RISK MITIGATION	12
4.2	FLOOD RISK ELSEWHERE	12
5	CONCLUSIONS	13

Appendices

APPENDIX A: EXISTING SITE / LOCATION PLAN	14
APPENDIX B: PROPOSED DEVELOPMENT PLANS	15

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The information presented and conclusions drawn are based on statistical data and are for guidance purposes only. The study provides no guarantee against flooding of the study site or elsewhere, nor of the absolute accuracy of water levels, flow rates and associated probabilities.

Purpose of the report

Vale Consultancy has been instructed by *The Client* to prepare a Flood Consequences Assessment (FCA) report to accompany a planning application for the proposed change of use of an existing former Guest House to 5 no. flats , with associated works at 22 Victoria Gardens , Neath, Neath Port Talbot , SA11 3BH (“ The Site “)

From an examination of the Neath Port Talbot Planning Portal records, the application site / property has the following relevant planning history:

- P2005/0355 Change of use – from dwelling to guest house with manager’s accommodation , approved 30-June-05
- P2003/0823 Change of use from nursing home to dwelling , approved 31-July-03
- N1993/0468 Change of use: offices to nursing home (extension to home at 20 Victoria Gardens), approved 22-November-93
- N1991/0366 Change of use to nursing home , withdrawn 11-January-92

The assessment has been undertaken in accordance with the requirements of Technical Advice Note 15 (TAN 15) dated July 2004 and taking into account the revised (draft version) of TAN 15 (January 2023).

1 INTRODUCTION

1.1 Site Location

The site is located West of Eastland Road (B434) and West of Victoria Gardens at Ordnance Survey National Grid Reference SS 755 973. Refer to Figure 1, below, and Site Location Plan, Appendix A.

1.2 Existing and Proposed Development

The site was previously utilised as a guest house, with associated managers accommodation located on site

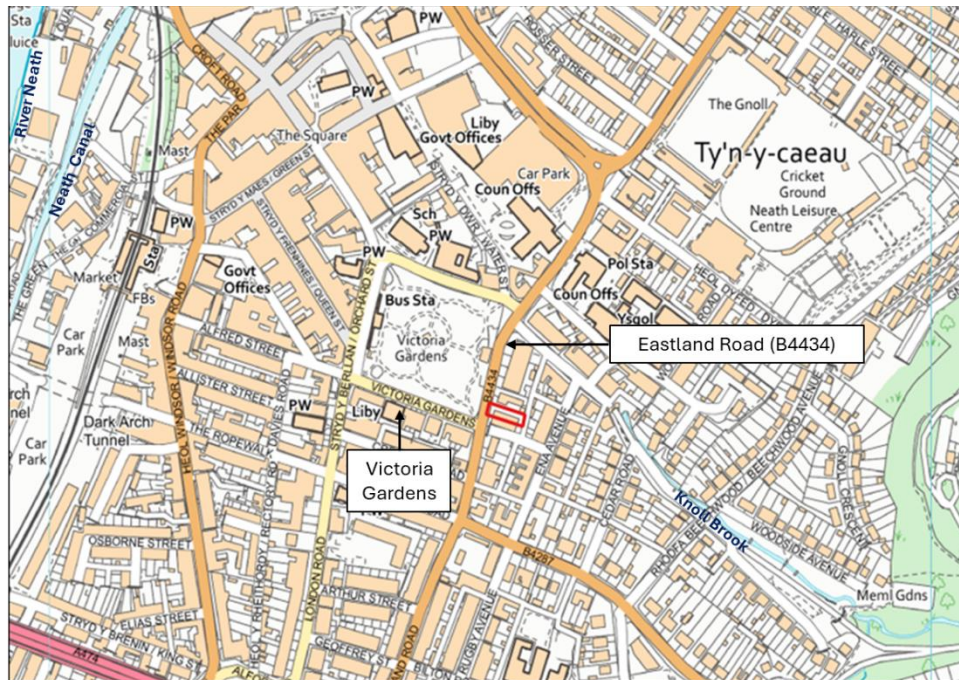


Figure 1 : Site Location

Refer to the Proposed Development Plans, Appendix B.

The proposals are for 5 flats across the ground floor, first floor and the second floor of 22 Victoria Gardens. Flat 1 will consist of a 2 bedroom / 4 person flat (86 m²), Flat 2 will consist of a 1 bedroom / 2 Person Flat (60m²), Flat 3 will consist of a 1 bedroom / 2 Person Flat (57 m²), Flat 4 will consist of a 1 bedroom / 2 Person Flat (49.2 m²) and Flat 5 will consist of a 1 bedroom / 2 Person Flat (38.2 m² – 50.2 m²). All flats will have associated dining and living room spaces and WC. Access and Egress will continue to be provided by Eastland Road (B4434) and Victoria Gardens.

TAN15 classifies residential development as Highly Vulnerable to flood risk.

1.3 Existing Topography

In the absence of topographical survey data; topographic levels to metres Above Ordnance Datum (m AOD) have been derived from a 1m resolution NRW composite 'Light Detecting and Ranging (LiDAR) Digital Terrain Model (DTM).

A review of LiDAR data indicates a level of **13.40 – 13.60 m AOD** at the site.

A level of **13.46m AOD** has been recorded on the proposed site plans to be the internal FFL for the dwelling.

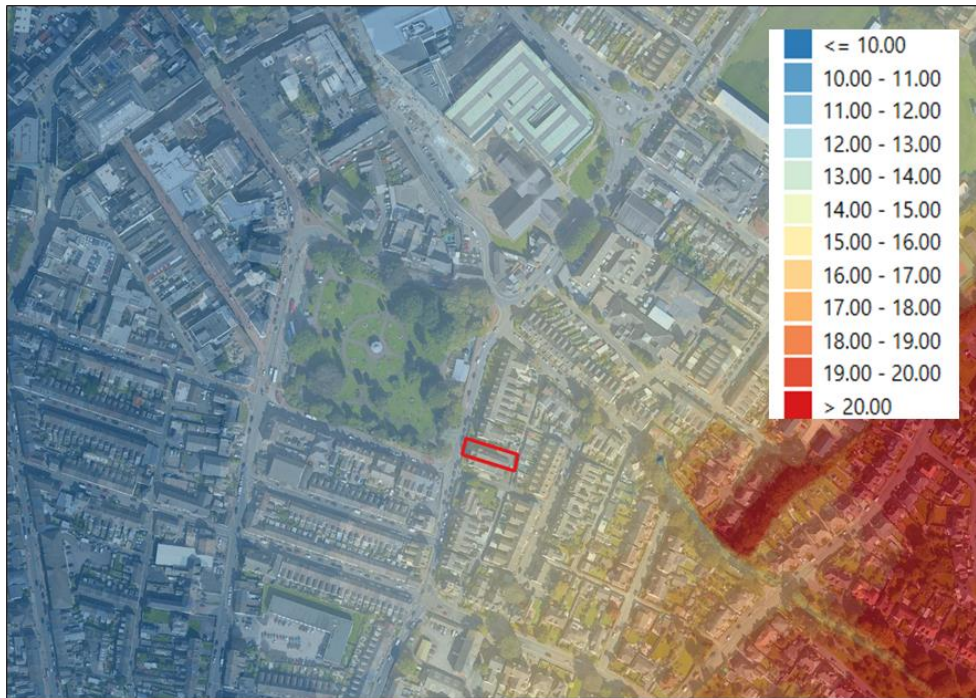


Figure 2: LiDAR Map

1.4 Existing Ground Conditions

According to Soilscape's soils dataset produced by the Cranfield Soil and AgriFood Institute, soil conditions at the site and within the surrounding area are described as slowly permeable, seasonally wet, acid loamy and clayey soils.

British Geological Mapping of surface geology indicates the underlying bedrock formation comprises Swansea Member – Mudstone, siltstone and sandstone overlain by Glaciofluvial Sheet Deposits, Devensian – Sand and gravel.

According to the British Geological Survey and Natural Resources Wales aquifer designation dataset the superficial and bedrock deposits are classified as a Secondary A aquifer. The site is not shown to be located in a designated groundwater source protection zone.

1.5 Existing Site Drainage

Public sewer records have not been obtained from DCWW at this stage. Online internet mapping tools indicate that the site and site access/egress (Victoria Road and Eastland Road) are served by formal surface and foul water drainage infrastructure due to the presence of rainwater downpipes (RWPs), gullies and manhole covers. No operational development is to take place within 3 metres either side of the centreline of the sewer (easement).

1.6 Proposed Drainage

The proposed foul water and surface water drainage arrangements will be in accordance with national and regional legislation, policy and guidance.

2 PLANNING POLICY

2.1 National Policy

Future Wales – The National Plan 2040 sets out the national framework for Wales with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate – resilience , developing strong ecosystems and improving the health and well-being of our communities.

Policy 8 – Flooding states that “flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. The Welsh Government will work with Flood Risk Management Authorities and developers to plan and invest in new and improved infrastructure, promoting nature-based solutions as a priority.

Planning Policy Wales (PPW) sets out the government’s planning policies for Wales and how these are expected to be applied. TAN15 provides technical guidance which supplements the policy within PPW and seeks to ensure that flood risk is taken into account at all stages in the planning process and is appropriately addressed.

The general approach of TAN15 is to set out a precautionary framework to guide planning decisions at high risk of flooding by:

- Directing new development away from high risk areas
- Where development has to be considered in high risk areas (Zone C) only those developments which can be justified should be located in these areas

In accordance with paragraph 6 of TAN15 , development will only be justified if it can be demonstrated that:

- 1) Its location in Zone C is necessary for local authority regeneration
- 2) Its location in Zone C contributes to key employment objectives

And,

- i) It meets the aims of PPW and meets the definition of previously developed land (PPW Figure 2.1; and,
- ii) The potential consequences of a flooding event for a particular type of development have been considered , and in terms of the criteria contained in sections 5 and 7 and Appendix 1 found to be acceptable

A revised version of TAN15 and updated Flood Map for Planning are due to be published in the near future (albeit the timing is yet to be confirmed by Welsh Government). The Flood Map for Planning currently holds no formal weight as it is not yet national policy, but Welsh Government advise this is the best available information.

National Policy requires that planning applications for new development proposals should incorporate sustainable drainage systems (SuDS) to appropriate operational standards and with maintenance arrangements in place unless there is clear evidence that this would be inappropriate.

Statutory standards for sustainable drainage were published by Welsh Government in October 2018 in relation to the design, construction, operation and maintenance of sustainable drainage systems serving new developments of more than one house or where the construction is equal to or greater than 100mm².

2.2 Local Planning Policy

The Neath Port Talbot County Borough Council Local Development Plan (LDP) was adopted in January 2016 and now forms the development plan that will form the basis of decisions on land use for planning.

We have also have consulted the Neath Port Talbot County Borough Council Strategic Consequences Assessment (Stage 1 & 2) (September 2014) and The Neath Port Talbot County Borough Council Local Flood Risk Management Strategy (June 2013).

The relevant specific policies relating to flood risk, drainage and climate change have been reviewed and considered as part of this FCA.

3 SOURCES OF FLOODING AND PROBABILITY

3.1 Historical Records of Flooding

The Flood Map for Planning – Recorded Flood Extents and associated database indicates that no historic flooding has occurred at or within the immediate vicinity of the site.

3.2 Flood Risk from the Sea (Tidal) and Rivers (Fluvial)

Figure 1 of TAN15 defines three development advice zones:

- Zone A: Considered to be at little or no risk of fluvial / coastal flooding
- Zone B: Areas known to have been flooded in the past evidenced by sedimentary deposits
- Zone C: Based on Natural Resources Wales flood outline, equal to or greater than 0.1% (river, tidal or coastal). Zone C is subdivided into two zones:
 - 1) Zone C1: Areas of the floodplain which are developed and served by significant infrastructure
 - 2) Zone C2: Areas of the floodplain without significant defence infrastructure.

The Development Advice zones are shown on the Development Advice Map and are defined by the predicted extent of the 1 in 1,000 (rivers and sea) AEP event (zone C) and the British Geological Survey drift data (Zone B). The zones do not take into account the possible impact of climate change.

The Development Advice Map indicates the site to be located within **Zone A. Refer to Figure 3.**

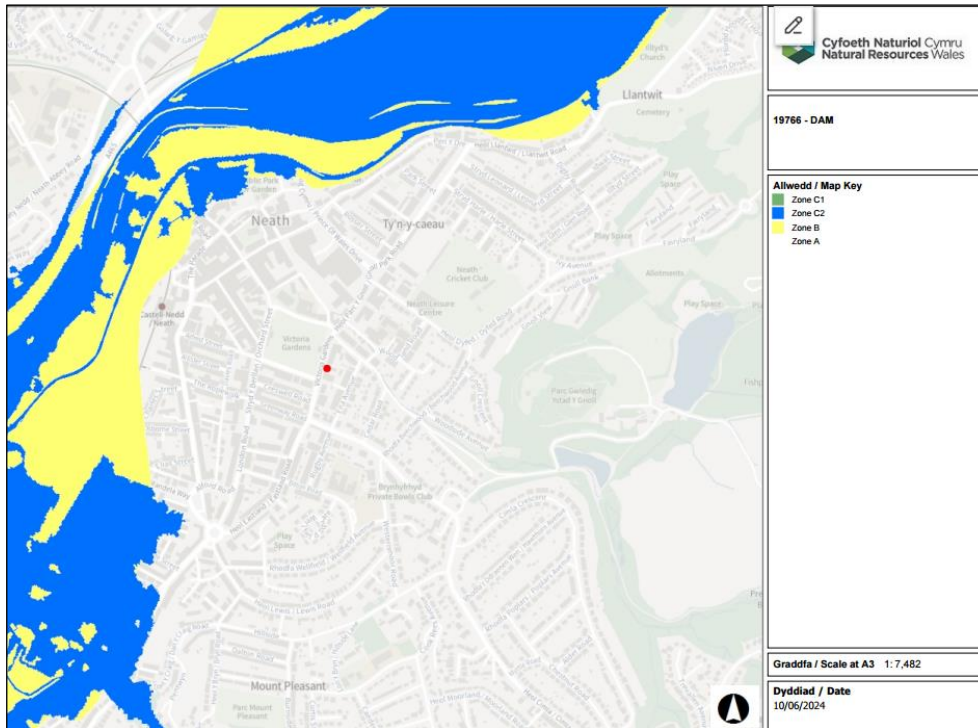


Figure 3: NRW Development Advice Map

The NRW Flood Map for Planning – Rivers and Sea indicates the site to be located in Flood Zone 3 (Rivers) and Flood Zone 1 (Sea). Refer to Figure 4.

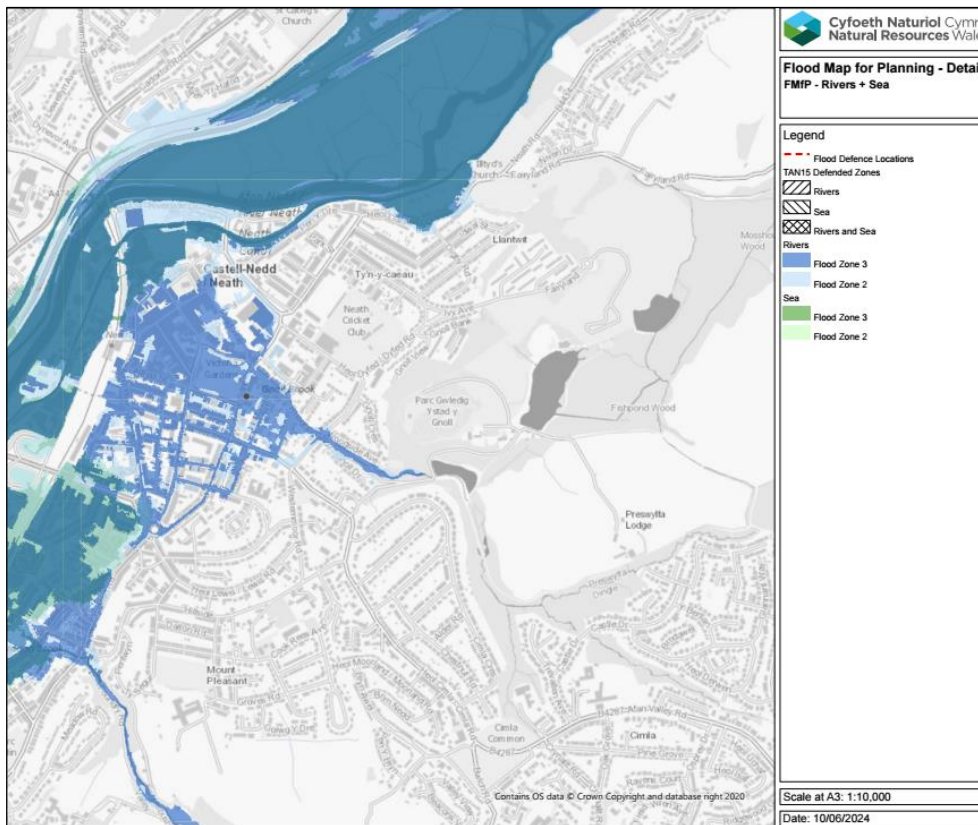


Figure 4: Flood Map for Planning – Rivers and Sea

The flood zones are defined as follows and include the effects of climate change:

- Flood Zone 1 (Rivers and Sea): Less than 1 in 1,000 chance of flooding from rivers and the sea in a given year
- Flood Zone 2 (Rivers): Areas with a 1 in 1,000 to 1 in 100 chance of flooding from rivers in a given year
- Flood Zone 3 (Rivers): Areas with more than a 1 in 100 chance of flooding from rivers in a given year
- Flood Zone 2 (Sea): Areas with a 1 in 1,000 to 1 in 200 chance of flooding from sea in a given year
- Flood Zone 3 (Sea): Areas with more than a 1 in 200 chance of flooding from the sea in a given year
- TAN15 Defended Zones: Areas that benefit from Risk Management Authority flood defences with a present day 1 in 100 and 1 in 200 AEP standard of protection for rivers and the sea respectively.

TAN15 requires an allowance for climate change to be made. Using the allowance set out in Welsh Government Guidance and a development lifetime of 100 years (PPG – Flood Risk and Coastal Change para. 006), this allowance has been calculated as 1.12m (70th percentile; 70P) and 1.52m (95th percentile; 95P).

The Welsh Government climate change guidance is based on UK Climate Projections (UKCP18) data and states “as a minimum, development proposals should be assessed against the relevant regional 70th percentile to inform design levels. An assessment should also be made against the 95th percentile to inform mitigation measures, access / egress routes and emergency evacuation plans”.

Peak still tidal levels have also been provided by Natural Resources Wales from the Neath_V5_V1.1_2023 flood model and are provided in Table 1.

Table 1: Peak Still Tidal Levels

AEP Event	Peak Still Tidal Level (m AOD)	
	Tidal Flood Boundary Conditions for the UK , 2018	Neath_V5_V1.1_2023
1 in 200	2017 – 6.37 m AOD	2023 – 6.76 m AOD
1 in 1000	2017 – 6.67 m AOD	2023 – 6.91 m AOD
1 in 200 plus climate change – 70P	2124 – 7.49 m AOD	-
1 in 200 plus climate change – 95P	2124 – 7.89 m AOD	2123 – 7.46 m AOD
1 in 1000 plus climate change – 70P	2124 – 7.79 m AOD	-
1 in 1000 plus climate change – 95P	2124 – 8.19 m AOD	2123 – 7.74 m AOD

Given the distance between the peak still tidal level and the site location (450 – 500 m AOD), as well as the > 5.5 m freeboard between the site and the peak tidal levels (Tidal Flood Boundary Conditions for the UK and the Neath_V5_V1.1_2023) (8.19 m → 13.63 m AOD), it can be concluded that the site will be at low risk of flooding from the River Neath (Tidal) in up to a 1 in 1000 + CC event.

The site is not served by any fluvial flood defences.

An ISIS – TufLOW Model of the River Neath (Fluvial) has been undertaken by JBA as commissioned by Natural Resources Wales as part of the Neath – Phase 2 Modelling Report (March 2017). This assesses the risk of flooding from the River Neath for the present day 1 in 100, 1 in 1000 and CC events. As mentioned in section 4 of the Neath – Phase 2 Modelling Report (March 2017), a series of model runs were undertaken using only the 20% climate change allowance (data was built on the basis of the data supplied by Storm Geomatics between February and April 2015). As a result, they do not take into account the new climate change allowance for Western Wales of 30%. Given that the modelled information provided by the NRW (Our Ref: ATI-26938a -: 19766 – 22 Victoria Gardens, Neath NRW Data Request, received 6th June 2024, the information provided to us is therefore “outdated” but should be used as best available information in support of a Flood Consequence Assessment for this site.

The current Environment Agency Guidance on climate change allowances (May 2022) advises that for *Highly Vulnerable* development in Flood Zone 3, the central allowance should be used to assess flood risk for the lifetime of development with the upper allowance used to inform mitigation, access / egress and emergency evacuation. The central allowance for the West Wales Management Catchment is +30% (2080s). The peak still fluvial levels for the fluvial node closest to the site are provided in Table 2.

Table 2 : Peak Still Fluvial Levels

AEP Event	Peak Still Fluvial Levels (m AOD)
	NCAN2349M4.2 (Neath_V5_V1.0_2015)
Q100	2017 – 6.46 m AOD
Q100 + 20% CC	2017 – 6.69 m AOD
Q1000	2017 – 7.04 m AOD

Given the extent between the peak still fluvial levels and the site location (450 - 500 m), and the > 6.5 m freeboard between the site and the peak fluvial extents (Tidal Flood Boundary Conditions for the UK and the Neath_V5_V1.1_2023) (7.04 m → 13.63 m AOD), it can be concluded that the site will be at low risk of flooding from the River Neath (Fluvial) in up to a 1 in 1000.

3.3 Surface Water and Small Watercourses (Pluvial)

Surface water (Pluvial) flooding occurs when rainwater does not drain away through the normal drainage system or soak into the ground. It is usually associated with high intensity rainfall events but can also occur with lower intensity rainfall or melting snow where the ground is saturated, frozen or developed, resulting in overland flow and ponding in depressions in topography. Surface water flooding can occur anywhere without warning. However, flow paths can be determined by consideration of contours and relative levels. The flood risk from surface water and small watercourses map has therefore been utilised to assess the risk of flooding.

The Flood Map for Planning – Surface Water and Small Watercourses accounts for climate change and indicates that the site is located within Flood Zone 1, with areas to the south of the building and on the access within Flood Zone 2 / 3 (Figure 5).

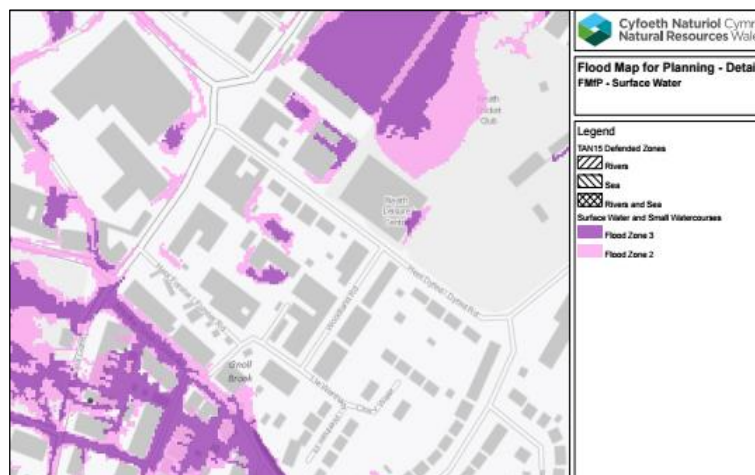


Figure 5: Flood Map for Planning – Surface Water and Small Watercourses

The mapping indicates that during a high frequency / low severity event (1 in 30 AEP event), depths are expected to be in the region of 0.00 – 0.36 m, with a mean depth of 0.15m.

Velocities during this event are estimated to be in the region of 0.00 – 1.2 m/s, with a mean velocity of 0.54 m/s. During a medium frequency / medium severity event (1 in 30 to 1 in 100 AEP event), depths range in the region of 0.00 – 0.12 m, with a mean depth of 0.12 m. Velocities during this event are in the region of 0.00 – 0.23 m/s , with a mean velocity of 0.19 m/s .

During a low frequency / high severity event (1 in 1000 AEP event), flooding from surface water does not occur.

It can be concluded that the risk of sewer flooding to the site is **Low**.

3.4 Sewer Flooding

Flooding from sewers can occur when a sewer is overwhelmed by heavy rainfall, becomes blocked, is damaged, or is of inadequate capacity. This can occur if there is a blockage in the network causing water to back up behind it or if the sheer volume of water draining into the system is too great to be handled. Sewer flooding tends to occur sporadically in both location and time. As such, any inundation flows emitting from / breaching the local sewer network would be confined to the highways around the development before either re-entering the water cycle via evapotranspiration, flow away from the site following the natural fall in topography, be absorbed by local surface water drainage as and where the capacity of the system is recovered.

There are no known records of notable flooding from sewers at the site or in the near vicinity.

There are no distinct flow routes in the area which would direct any potential flooding arising from the local sewer network towards the site.

It can be concluded that the risk of sewer flooding to the site is **Low**.

3.5 Groundwater Flooding

Groundwater flooding occurs when water levels underneath the ground rise above normal levels. Prolonged heavy rainfall soaks into the ground and can cause the ground to become saturated. This results in rising groundwater levels which leads to flooding above ground.

The Neath Port Talbot County Borough Council Flood Risk Management Strategy states that;

“Groundwater flooding occurs as a result of water rising up from underlying aquifers or from water flowing from abnormal springs. This tends to occur after long periods of sustained high rainfall and the areas most at risk are often low-lying where the water table is more likely to be at shallow depth. Groundwater flooding is known to occur in areas underlain by major aquifers, although increasingly it is also being associated with more localised floodplain sand and gravels. Historically there are no specific areas of groundwater flooding recorded in the Neath Port Talbot area.”

There are no known records of groundwater flooding incidents at or near to the site.

The majority of the proposed development site will remain as existing hardstanding.

It can be concluded that the risk of groundwater flooding is **Low**.

3.6 Artificial Sources of Flooding

Neath Canal is located 550 m west of the site. Canals are regularly inspected by the Canal and River Trust. Therefore, the likelihood from flooding from the Canal is expected to be low/minimal.

The NRW ‘Risk of Flooding from Reservoirs’ map shows that the site is not at risk of flooding from reservoirs. Moreover, the risk of flooding from reservoirs is extremely unlikely to happen.

All large reservoirs must be inspected and supervised by a reservoir panel engineer, as the enforcement agency the NRW ensure that reservoirs are inspected regularly, and essential safety / maintenance work is carried out.

Therefore, it can be concluded that the probability of flooding from artificial sources is **Low**.

3.7 Justification Test

The proposals will help to sustain the existing development and the site meets the definition of “previously developed land”. Part i and iii of the justification test are therefore considered to have been addressed.

This report addresses part iv of the justification test.

4 FLOOD RISK MITIGATION

4.1 Flood Risk Mitigation

The risk of flooding to the proposed development from all sources is assessed to be low. As such no specific flood risk mitigation measures are proposed. The scheme is a conversion of an existing building and a small services riser extension, rather than a dwelling and therefore no ground regrading works are required .

4.2 Flood Risk Elsewhere

In accordance with A1.2 of TAN15 developers must ensure there will be no loss of flood flow or flood storage capacity for floods up to the severity of the 1 in 1,000 AEP event. Whilst not specified by TAN15, Natural Resources Wales generally recommends that this should be the case over the lifetime of the development (i.e should take into account climate change) and should consider breach and blockage scenarios where necessary.

The site is not at risk of flooding in up to a 1 in 1000 AEP tidal and fluvial event including an allowance for climate change. As such the proposals would not be expected to impact flood risk elsewhere and no compensatory storage would need to be provided on site.

5 CONCLUSIONS

Vale Consultancy has been instructed by *The Client* to prepare a Flood Consequences Assessment (FCA) report to accompany a planning application for the proposed change of use of an existing former Guest House to 5 no. flats, with associated works at 22 Victoria Gardens , Neath, Neath Port Talbot , SA11 3BH (" The Site ")

From an examination of the Neath Port Talbot Planning Portal records, the application site / property has the following relevant planning history:

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- N1993/0468 Change of use: offices to nursing home (extension to home at 20 Victoria Gardens), approved 22-November-93
- N1991/0366 Change of use to nursing home , withdrawn 11-January-92

The Flood Map for Planning – Recorded Flood Extents and associated database indicates that no historic flooding has occurred at or within the immediate vicinity of the site.

The Development Advice Map indicates the site to be located within Zone A. The Flood Map for Planning – Rivers and Sea indicates the site to be located in Flood Zone 3 (Rivers) and Flood Zone 1 (Sea).

Given the distance between the peak still fluvial and tidal level extent and the site location (450 - 500 m) , as well as the > 5.0 - 6.5 m freeboard between the site and the peak fluvial and fluvial levels, It can be concluded that the site will be at low risk of flooding from the River Neath in up to a 1 in 1000 AEP event.

The site is at low risk from surface water and groundwater flooding .

APPENDIX A: Existing Site / Location Plan



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Note: All dimensions to be checked on site and not to be scaled from drawing.

AMENDMENTS:	
Revision	Date

BUCKMASTERBATCUP
Architects Ltd.

CLIENT:
Caredig H.A.

PROJECT TITLE:
**22 Victoria Gardens,
Neath**

DRAWING TITLE:
Location Plan

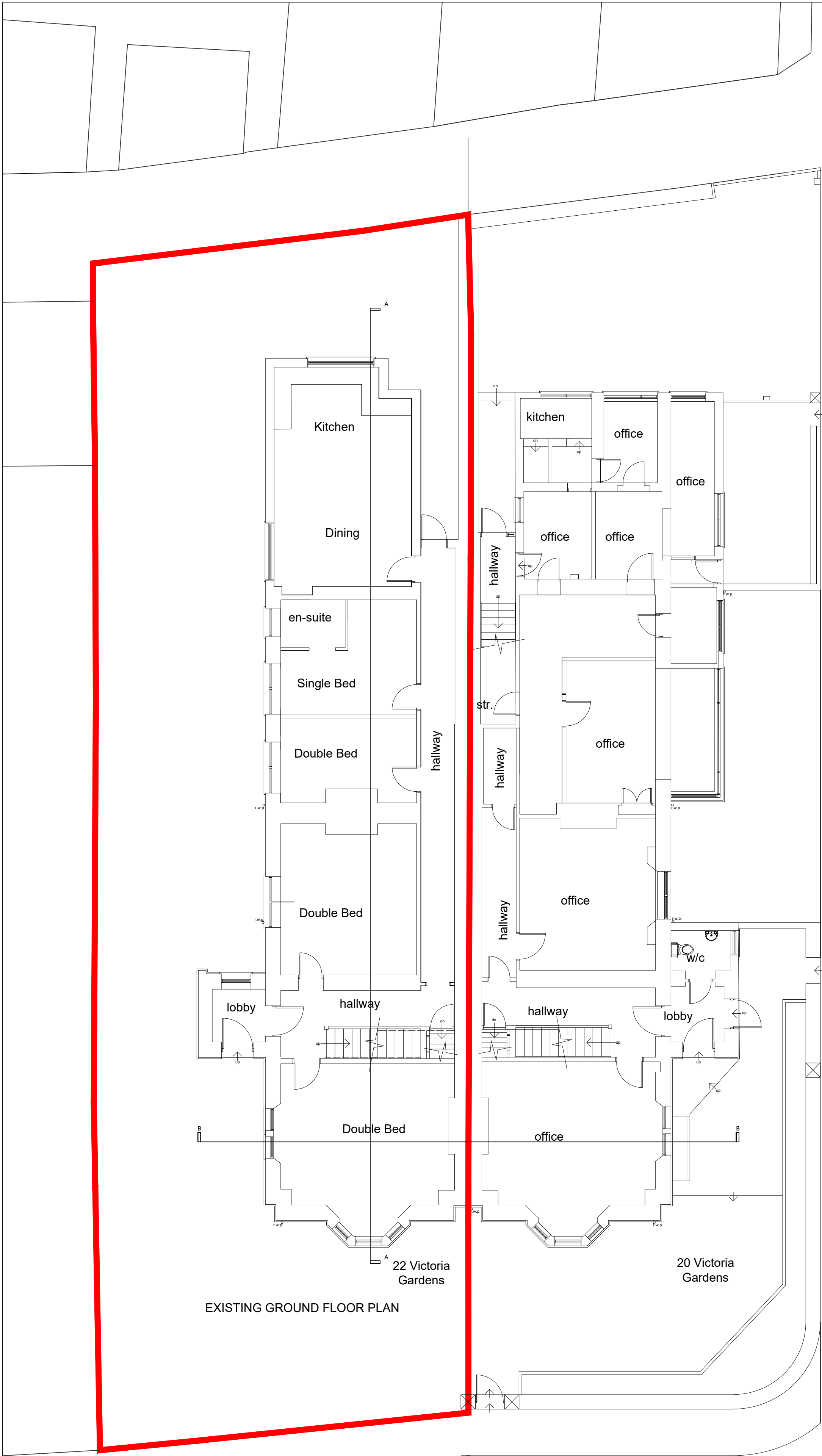
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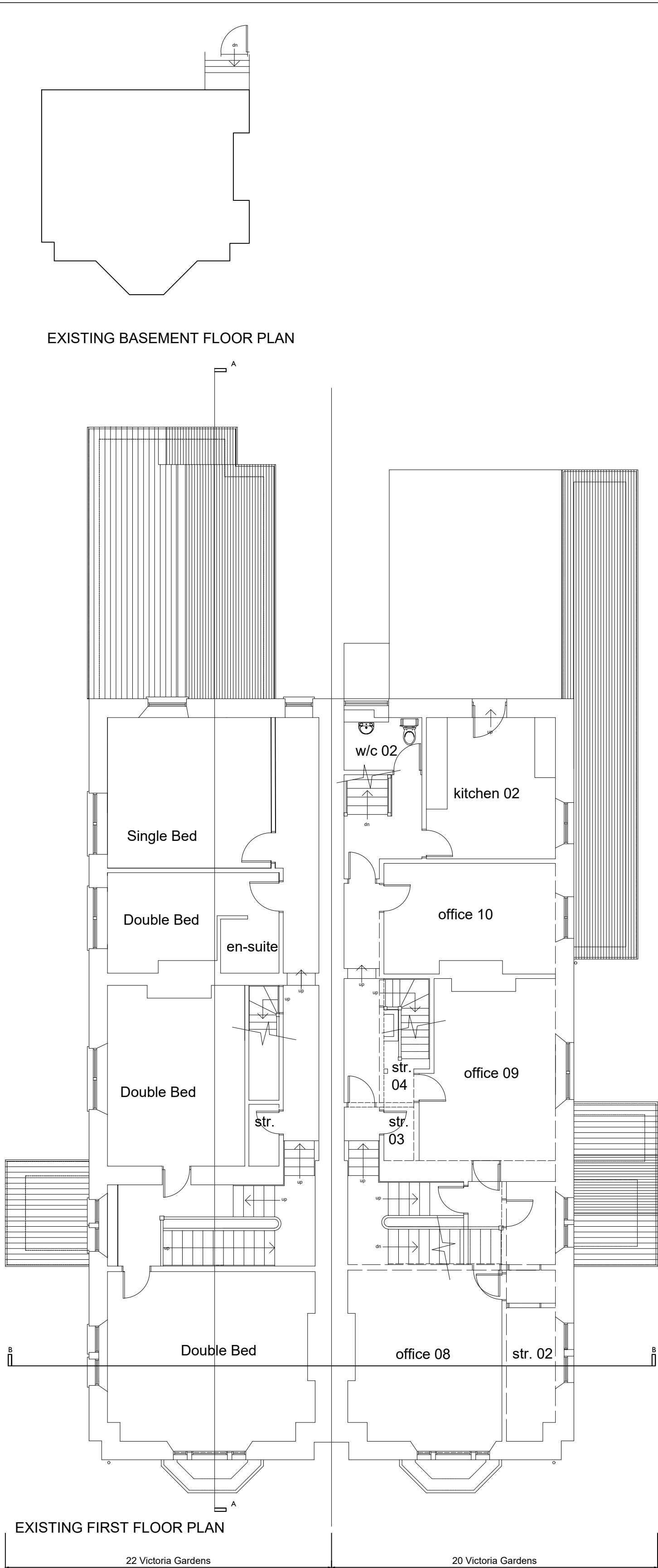
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Paddington Central
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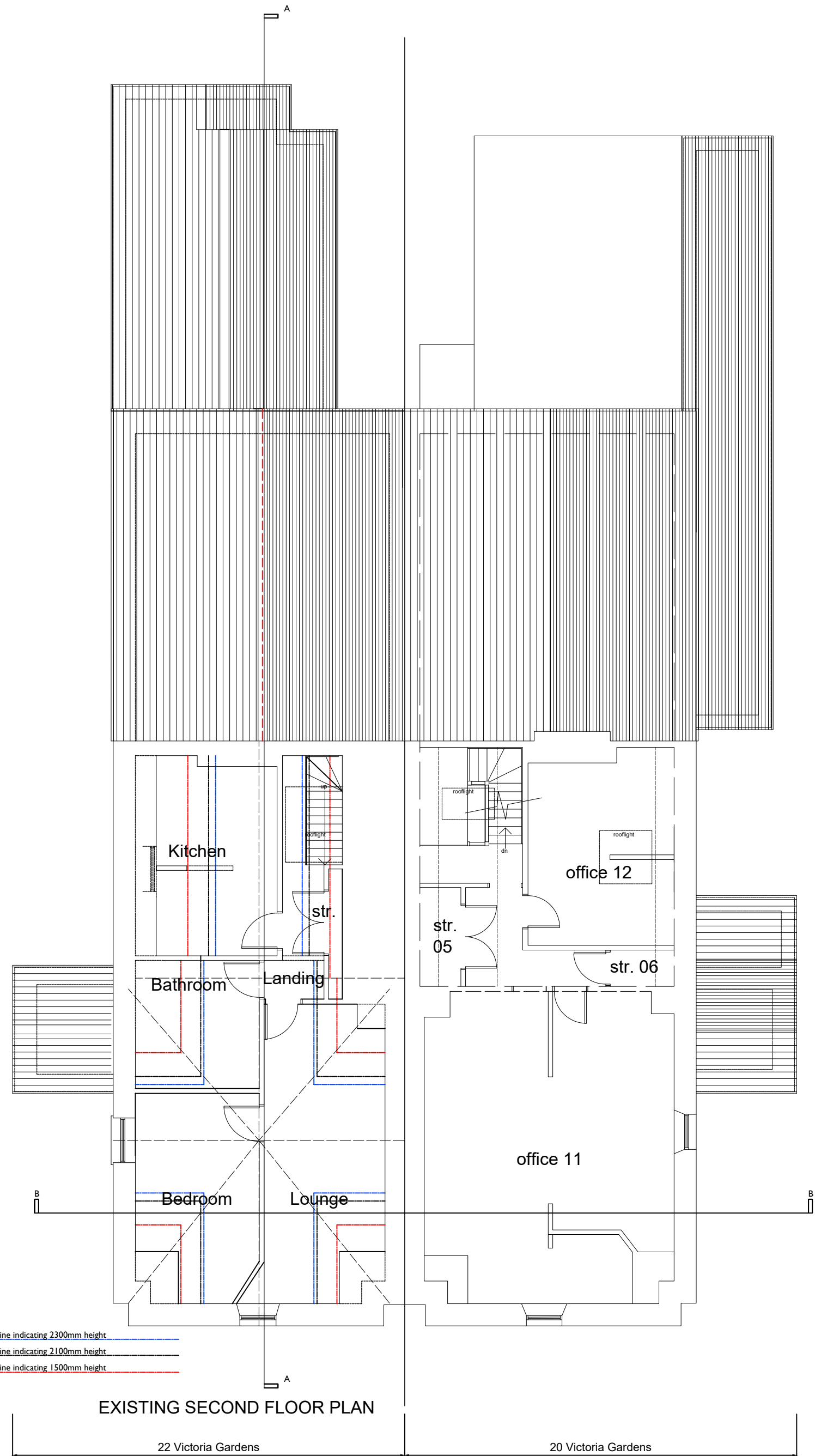




EXISTING GROUND FLOOR PLAN

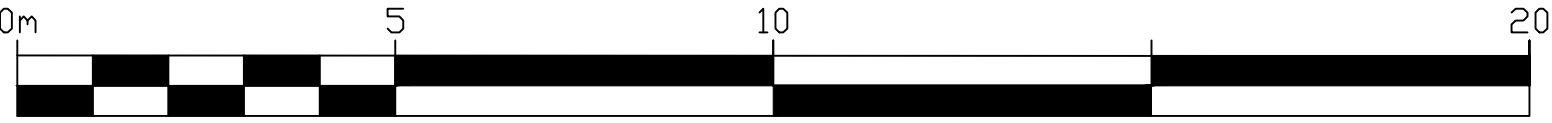


EXISTING FIRST FLOOR PLAN

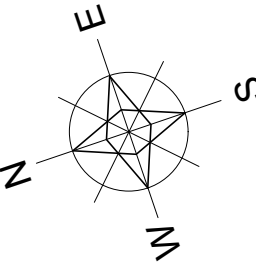


EXISTING SECOND FLOOR PLAN

DRAWINGS ISSUED SUBJECT TO FUTURE MEASURED SURVEY



SCALE: 1:100



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AMENDMENTS:
Revision Date

BUCKMASTERBATCUP
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CLIENT:
CAREDIG Housing Association

PROJECT TITLE:
**22 Victoria Gardens, Neath,
SA11 3AA**

DRAWING TITLE:
Existing Plans

SCALE: 1:100 @ A1 DATE: Feb. 2024

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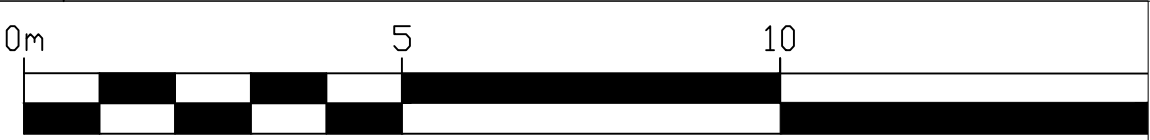
APPENDIX B: Proposed Development Plans



Exis South Elevation



Prop South Elevation



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AMENDMENTS:	
Revision	Date
A. extg dormer to be removed	15.07.24

BUCKMASTERBATCUP
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CLIENT:
CAREDIG Housing Association
PROJECT TITLE:
**22 Victoria Gardens, Neath,
SA11 3AA**

DRAWING TITLE:
Existing / Proposed Elevations Sheet I
SCALE:1:100 @ A3 | DATE:May, 2024

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