

Vale Consultancy

CONSULTING CIVIL & STRUCTURAL ENGINEERS

FLOOD CONSEQUENCE ASSESSMENT (FCA)

22 Victoria Gardens, Neath,
Neath Port Talbot Council (NPTC),
SA11 3AA



Prepared for: Caredig Housing Association
Project Ref: 19766 – FCA – 03

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CONTENTS

1	INTRODUCTION	3
1.1	Purpose of Report.....	3
1.2	Planning History.....	3
1.3	Executive Summary	3
1.4	Consultation	4
2	SITE DETAILS AND PROPOSED DEVELOPMENT	5
2.2	Site Location	5
2.3	Existing & Proposed Development.....	5
2.4	Existing & Proposed Drainage	6
2.5	Topographic Levels.....	6
2.6	Existing Ground Conditions	6
3	PLANNING POLICY	7
3.2	National Planning Policy	7
3.3	Local Planning Policy.....	8
4	SOURCES OF FLOODING AND PROBABILITY.....	8
4.2	Historical Records of Flooding.....	8
4.3	Flood Risk from the Sea (Tidal / Coastal) and Rivers (Fluvial)	8
4.4	Surface Water & Small Watercourses (Pluvial)	11
4.5	Sewer Flooding	13
4.6	Groundwater Flooding	13
4.7	Artificial Sources of Flooding.....	13
4.8	Justification Test.....	14
5	FLOOD RISK MITIGATION MEASURES & RECOMENDATIONS	15
5.2	Flood Risk Mitigation	15
5.3	Safe Refuge and Flood Procedure	16
5.4	Finished Floor Level (FFL)	17
5.5	Flood Risk Elsewhere	17
6	CONCLUSIONS	18
	APPENDIX A: Site Location Plan, Existing Site Plans	19
	APPENDIX B: Proposed Site Plans.....	20
	APPENDIX C: 1m Resolution LiDAR DTM	21
	APPENDIX D: NRW Flood Maps, Correspondence and GIS Outputs	22



1 INTRODUCTION

1.1 Purpose of Report

Vale Consultancy has been instructed by *The Client* to prepare a Flood Consequences Assessment (FCA) report to accompany and support a planning application for the proposed development at 22 Victoria Gardens, Neath.

The proposals comprise internal reconfiguration and refurbishment of the existing property which will entail retaining (like-for-like) the existing 'Less Vulnerable' arrangement upon the ground floor, with residential ('Highly Vulnerable') occupying the upper floor (s).

The assessment has been undertaken in accordance with the requirements of Technical Advice Note 15 (TAN 15) dated 31st March 2025. This is the third iteration of the FCA and which represents the most up-to-date proposed plans which have had to change and have the design altered extensively, specifically; to appease and overcome concerns that Natural Resources Wales (NRW) and the Lead Local Flood Authority (LLFA) withhold in relation to flood risk.

1.2 Planning History

Review of the Neath Port Talbot Council (NPTC) Planning Portal records, the application site and property have the following relevant planning history:

- P2005/0355 Change of use – from dwelling to guest house with manager's accommodation – approved 30th June 2005;
- P2003/0823 Change of use from nursing home to dwelling – approved 31 July 03;
- N1993/0468 Change of use: offices to nursing home (extension at 20 Victoria Gardens) – approved 22 November 1993;
- N1991/0366 Change of use to nursing home, withdrawn 11 January 1992.

1.3 Executive Summary

It should be noted that the neighbouring and associated property (20 Victoria Gardens) which is also owned by Caredig Housing achieved successful planning permission for reconfiguration and refurbishment of the property to maximise its potential for residential; with proposals accepted and works completed comprising a 'change-of-use' of the ground floor from 'Less Vulnerable' to 'Highly Vulnerable'.

Despite the fact that the proposals next door was approved without any objections / concerns raised by NRW and / or the LLFA; especially when considering the apparent / perceived flood risk is identical as per the best possible and most up-to-date information and data available – NRW and the LLFA have objected to this site and associated proposals; demanding that hydraulic modelling of the Gnoll Brook (and catchment) be undertaken to achieve compliance with TAN15.

Whilst this was argued (to no avail) that this was superfluous in comparison to the proposals and not conducive with the scale and nature of proposals – these design alterations which have come at great expense to the developer and which were a '*Dernier recours*' option are deemed to be sufficient to appease any concerns that NRW / LLFA still maintain and withhold regarding the proposals, in regards to flood risk.



1.4 Consultation

Natural Resources Wales (NRW) and the Lead Local Flood Authority (LLFA) have been consulted (including pre-application advice) as part of the Planning Application and specifically, to inform this FCA. Any relevant correspondence, including consultee responses and advice; are included within **Appendix D**, for reference.

The following documents have been appraised to inform the FCA.

- South West Wales – Stage 1 Strategic Flood Consequence Assessment 2022 (JBA Consulting).
- Neath Port Talbot CBC Adopted Local Development Plan (2011-2026);
- Western Wales Flood Risk Management Plan (2013, NRW);
- NPTCBC Lead Local Flood Risk Management Strategy and Plan (2022);
- Welsh Government National Marine Plan (November 2019);
- Flood Consequences Assessments: Climate Change Allowances, Welsh Government, Sept 2021;
- Technical Advice Note 15: Development and Flood Risk, Welsh Government, 2004 and DAM;
- NRW Flood Map for Planning (FMfP);
- Technical Advice Note 15: Development and Flood Risk, Welsh Government, March 2025;
- Welsh Government Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems (2018);
- Welsh Government Sustainable Drainage (SuDS) Statutory Guidance (2019).

A virtual meeting between Vale Consultancy, the developer (Caredig) and NRW was held earlier this year. The aim and objective of the meeting was an attempt to find a more pragmatic solution (given the inconsistencies and contradictions between approaches to consultation to no. 20 Victoria Gardens (neighbouring property) and the one in question (22 Victoria Gardens) which are both at the same perceived risk (at least) as per NRW's Flood Map for Planning (FMfP).

This proved unfruitful in finding an agreeable solution for all stakeholders. Thus, the developer has decided to pursue the last resort option of amending the proposed plans so that there is no increase in vulnerability / change of use associated with the Ground Floor which will remain as 'Less Vulnerable' (LVD). All 'Highly Vulnerable' (HVD) aspects will be restricted to and located exclusively upon the upper floors which are well above any potential design flood levels (DFLs) from all sources, here.

Hopefully, and bearing this in mind, some pragmatism can prevail and the proposals can be progressed. This will avoid development stagnation and enable a currently disused property to be made good use of (rather than wasted economic space for want of a better phrase).

Neath Port Talbot Council has approved consultations on a new long-term flood risk management strategy. The early-stage plan was approved at a special cabinet meeting held by the authority this week, where members were given details of the scheme which aims to protect the county borough from flooding over the next 6-7 years.

The plan comes after what was described as an increase in "significant flood events" seen in the area over the last four years, with 300 properties in Neath Port Talbot having suffered from internal flooding since 2020 compared to 130 flooded properties between 2013 and 2020.

2 SITE DETAILS AND PROPOSED DEVELOPMENT

2.2 Site Location

The site is located east of Eastland Road (B434) and north east of Victoria Gardens, SA11 3BH at Ordnance Survey National Grid Reference SS 755 973 (275506E, 197313N). Refer to Figure 1, and Appendix A.

For the purposes of this report, the site is considered to be Brownfield or Previously Developed. This report specifically deals with NRWs comments mentioned above and which are included, in full within the appendices, for reference.

Refer to Figure 1, below, and Appendix A – Existing Site and Location Plan.

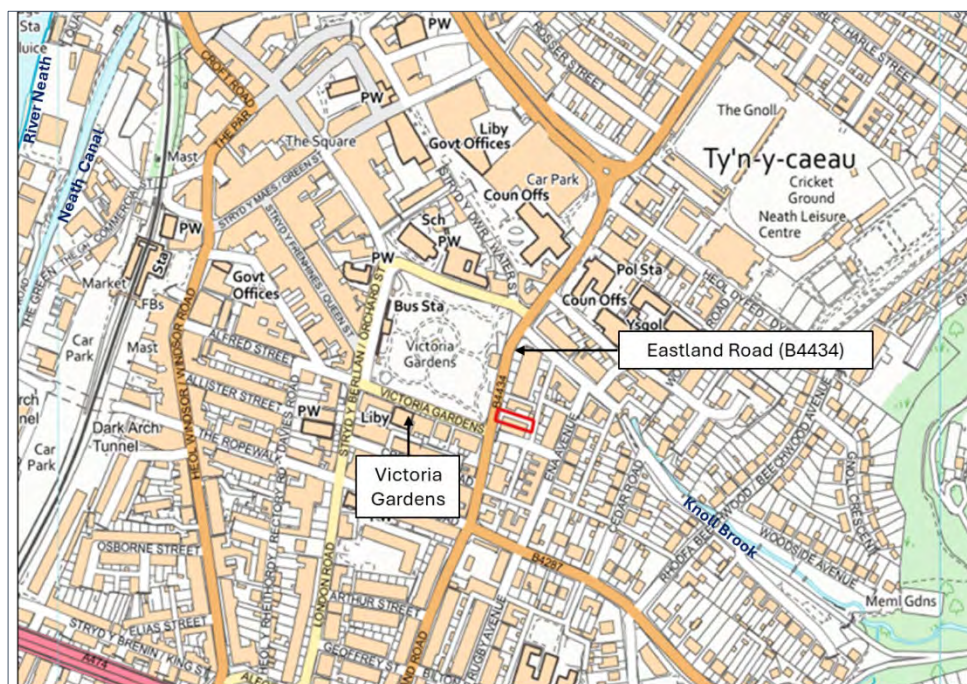


Figure 1 : Site Location

2.3 Existing & Proposed Development

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

The existing site comprises a disused and dilapidated property located amongst other neighbouring residential properties.

The developer has decided to pursue the last resort option of amending the proposed plans so that there is no increase in vulnerability / change of use associated with the Ground Floor which will remain / (change of use) to serve as 'Less Vulnerable' (LVD) space. All 'Highly Vulnerable' (HVD) aspects will be restricted to and located exclusively upon the upper floors which are well above any potential design flood levels (DFLs) from all sources, here.

Works are predominantly internal refurbishment and reconfiguration, with no associated intensification of use / increase in vulnerability classification. Having said this, the original purposes of the property are / were residential. In its current state, the site is essentially 'wasted' economic space for want of a better phrase. The neighbouring property has undergone a change of use to HVD (including Ground Floor).

Refer to Appendix B – Proposed Development Plans.

2.4 Existing & Proposed 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 cover. No operational development is to take place within 3 metres either side of the centreline of the sewer (easement). The proposed foul water and surface water drainage arrangements will be in accordance with national and regional legislation, policy and guidance.

2.5 Topographic Levels

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 – 13.80 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. An Ordnance Survey Benchmark Level of **13.57m AOD** is recorded at the site (west extent).

Refer to Figure 2, and Appendix C.

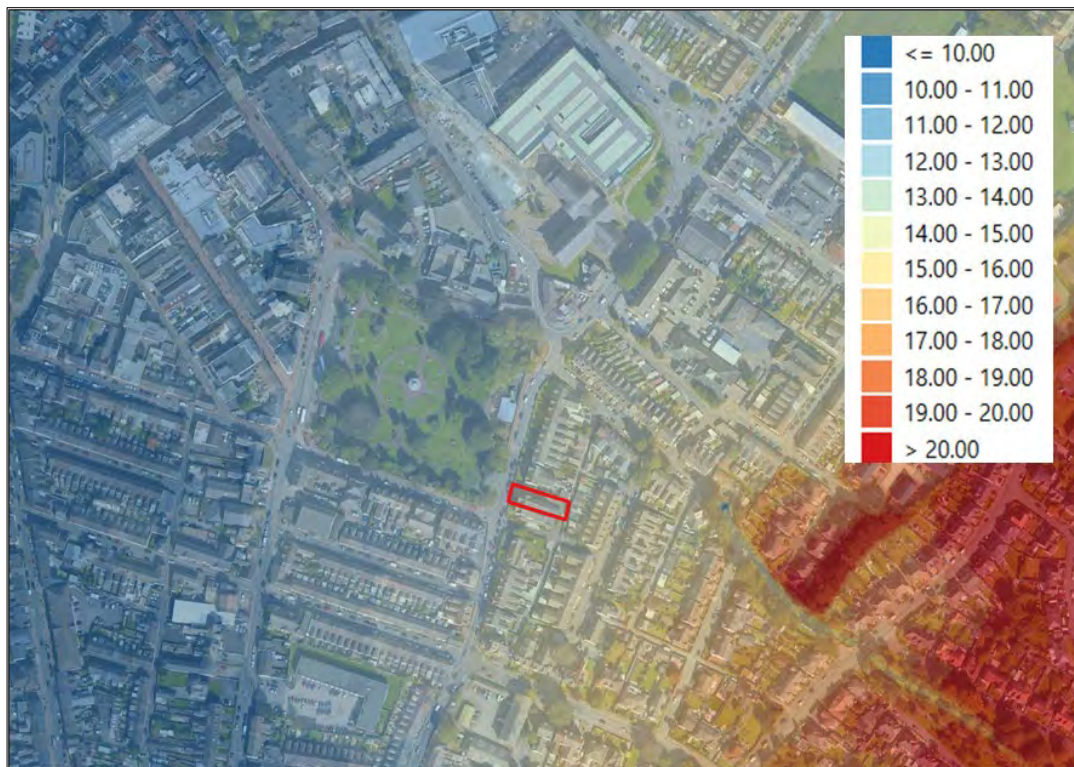


Figure 2 : LiDAR 1m Resolution Digital Terrain Model (DTM)

2.6 Existing Ground Conditions

According to Soilsapes 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 – 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.



3 PLANNING POLICY

3.2 National Planning 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.



3.3 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 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.

4 SOURCES OF FLOODING AND PROBABILITY

4.2 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. However, in a request for information to Neath Port Talbot County Borough Council (Received 3rd September 2024 – Refer to Appendix D) indicates flooding event dates associated with Victoria Gardens have been recorded in 29th September 2019, 30th September 2019, 25th August 2020 and 4th September 2022. No historic flood extents have yet been fully investigated. However, in their consultation response, Neath Port Talbot Council have stated;

‘As a result of the above (recent historical flood records) mentioned flooding events, flooding and drainage investigations highlighted that the surface water flooding observed in and around Gnoll Avenue, Victoria Gardens and the surrounding areas of Neath is in response to the flood waters entering Gnoll Brook.

The Gnoll Brook flows in parallel to Gnoll Avenue. Following the flood events listed in the above, it appeared that during periods of prolonged heavy rainfall, large volumes of flood water flowing along Gnoll Brook spilled out of its channel, resulting in large volumes of flood water to flow down Gnoll Avenue and into the surrounding area of Neath’.

It should be noted that the site is not located within a Critical Drainage Area (CDA); neither an Internal Drainage Board (IDB) District.

4.3 Flood Risk from the Sea (Tidal / Coastal) 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.

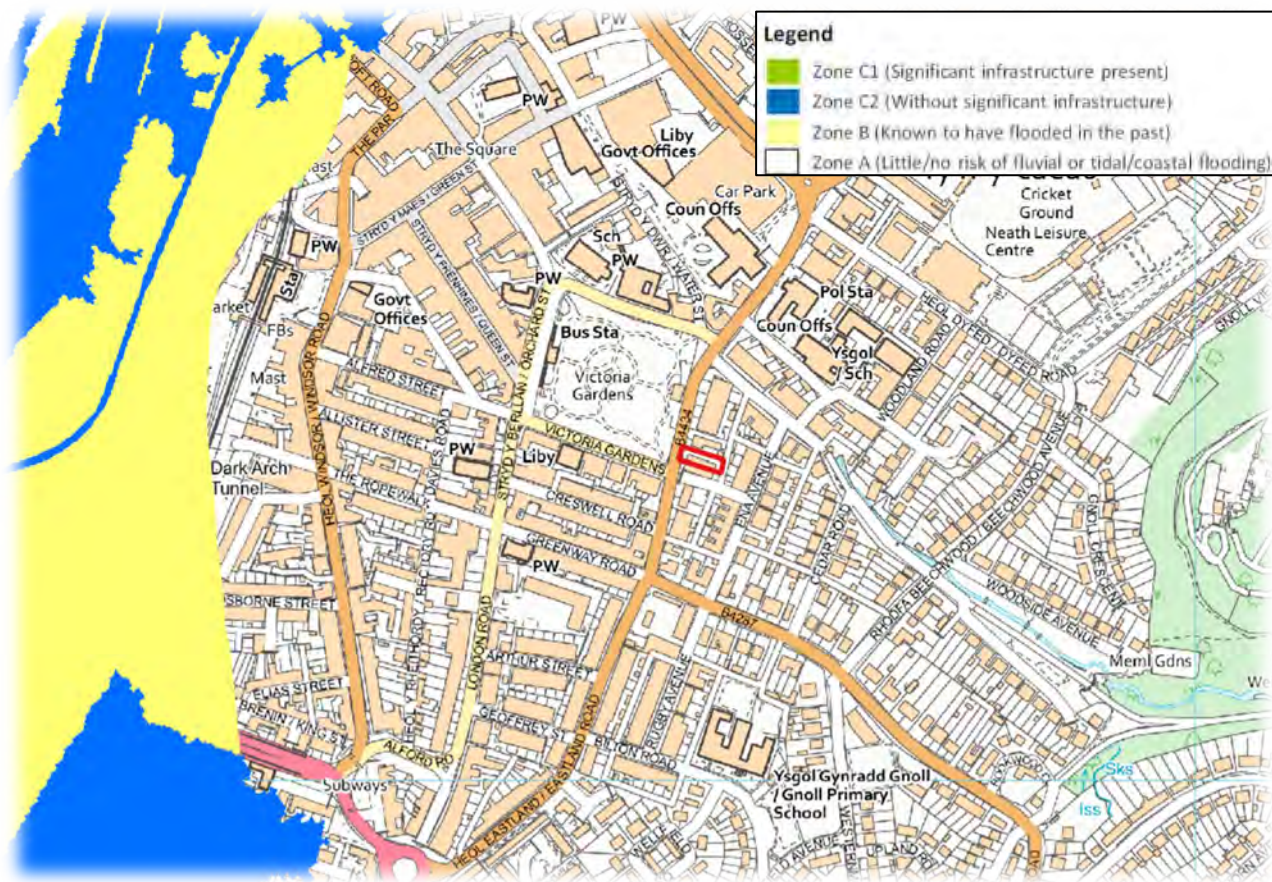


Figure 3: NRW Development Advice Map

The NRW Flood Map for Planning – Rivers and Sea indicates the site to be located in Flood Zone 3 (Rivers). This is caused by the extent of flooding from the Groll Brook which is classed as an Ordinary Watercourse by NRW. Refer to Figure 4.

There are three identified ordinary watercourses that flow downstream from the River catchment area above / upstream of the Groll Country Park. Namely; the Groll Brook, Groll Park Brook and Llantwit Brook. The watercourses flow downstream to three critical intakes at Groll Avenue, Ivy Avenue and Llantwit Road, all of which are NPTCBC highway and drainage assets. Sometimes, flooding can be caused by the lack of surface water drainage infrastructure maintenance and / or the exceedance of their designed capacity.

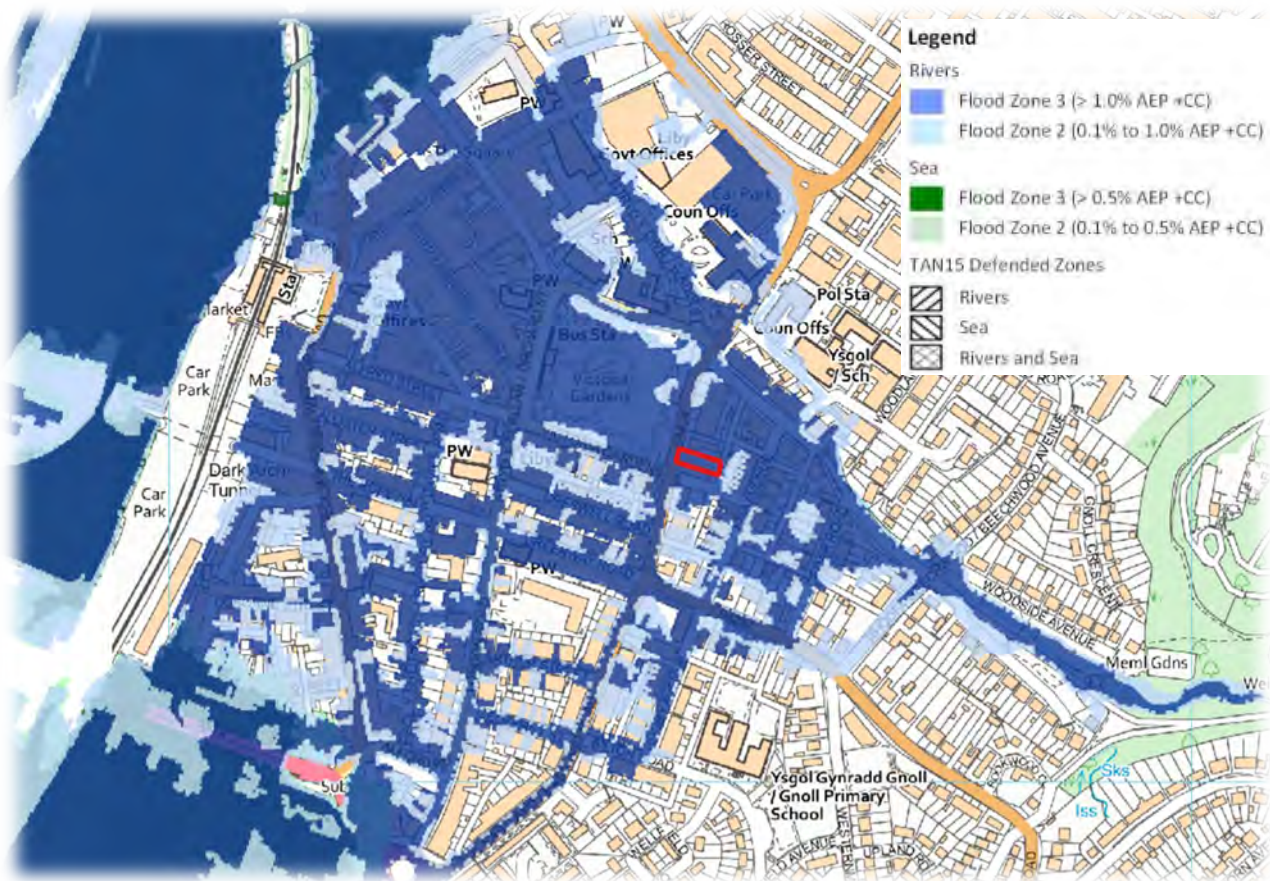


Figure 4: Flood Map for Planning – Rivers and Sea

The flood zones are defined as follows and include the potential 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

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”.

In a request to receive fluvial data for the Groll Brook in the 1 in 100, 1 in 100 + CC, 1 in 1000 and 1 in 1000 + CC events (Received 3rd September 2024), Neath Port Talbot County Borough Council responded in stating that they hold no hydraulic flood modelling of the Groll Brook and or any other watercourses in the vicinity of the site that fall into the remit of this council. We have model data from Natural Resources Wales for the River Neath. However, NRW have advised that the peak flood levels from the River Neath have no bearing on the site.



The NRW flood map for planning uses a combination of generalised national scale modelling and detailed local models where they exist. In the case of the proposed redevelopment, the site is not covered by detailed fluvial flood modelling, and to undertake such modelling of the Gnoll Brook would be a disproportionate exercise. Therefore, to inform our Flood Consequences Assessment, the flood depths and Velocities from the National Flood Hazard Mapping will be used to generate estimated flood levels for the proposed development.

National Flood Hazard Mapping fluvial depths and velocities will be extracted and added to the available LiDAR data in order to produce a predicted flood level (m AOD) for high, medium and low risk scenarios for the present day and climate change scenarios. The modelling of the National Flood Hazard Mapping is based on the same 2m resolution LiDAR ground model and therefore this approach should produce values identical to NRW's unpublished Flood Map for Planning water levels grids.

It is recognised that this approach of taking water levels from the national scale modelling is significantly less reliable than detailed local flood risk modelling, however the flood hazard maps (+ climate change) were released on 16th December 2024 and therefore will use the most up-to-date methods to produce broad scale modelling which has significantly improved over the years. The National Flood Hazard Maps - Present day were last updated 2020 but still provide a very up-to-date assessment without the requirement to model and provide a good indicative start point.

The flood levels have been compared to the existing (informed) FFL of the ground floor of 13.46 m AOD in order to assess the potential for internal flooding. This has been summarised in Table 1.

Table 1: Potential Flood Depths for the proposed redevelopment

Flood Risk AEP event	Max Flood Level (m AOD)	Finished Floor Level (mAOD)	Flood Depth (mm)	Flood Velocity (m/s)
1 in 30 year	No Flooding	13.46	No flooding	No Flooding
1 in 30 year + CC	13.28	13.46	Flood Free	Flood Free
1 in 100	13.29	13.46	Flood Free	Flood Free
1 in 100 + CC	13.34	13.46	Flood Free	Flood Free
1 in 1000	13.40	13.46	Flood Free	Flood Free
1 in 1000 + CC	13.44	13.46	Flood Free	Flood Free

4.4 Surface Water & 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).

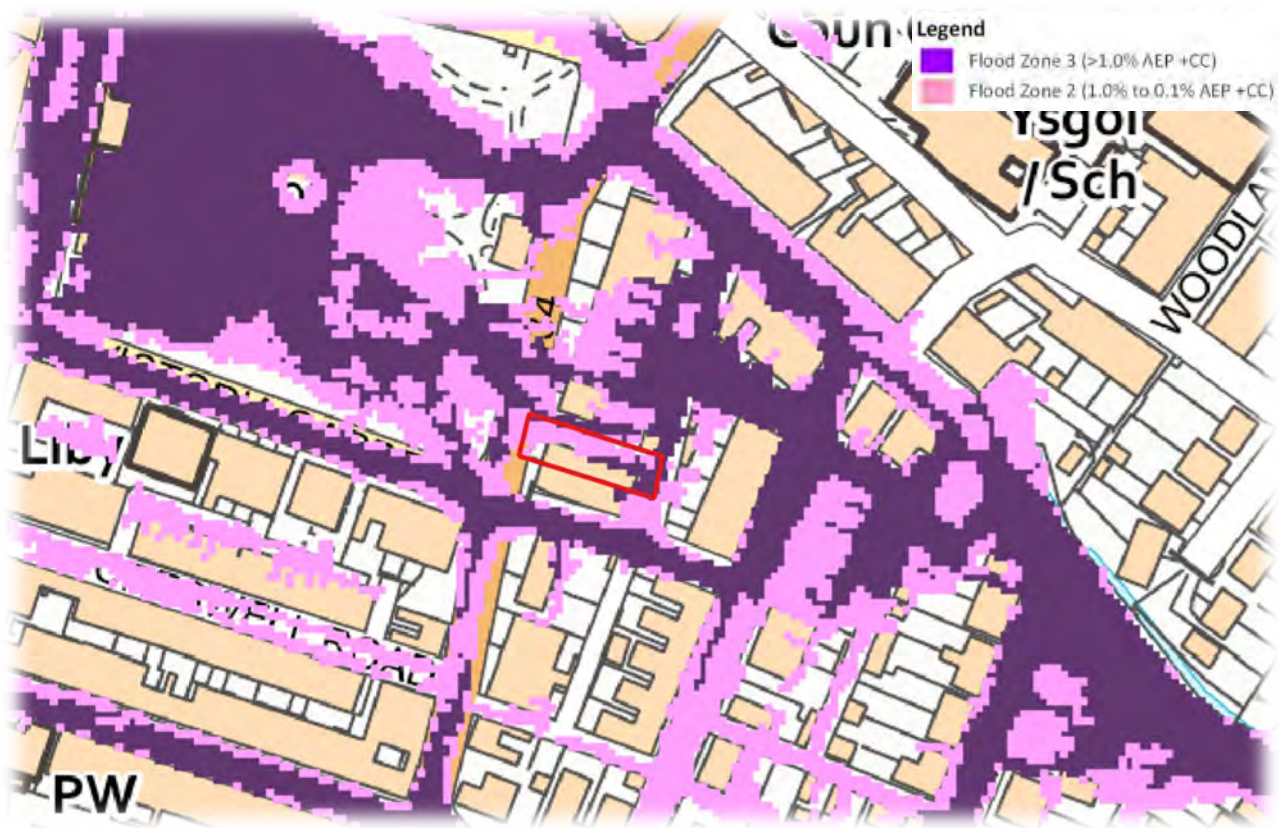


Figure 5: Flood Map for Planning – Surface Water and Small Watercourses

NRW mapping indicates that during a high frequency / low severity event (1 in 30 AEP event), maximum potential depths are recorded in the region of 0.00 – 0.36m, with a mean estimated depth of 0.15m. Associated velocities during this event could potentially be in the region of 0.00 – 1.2 m/s, with a mean estimated velocity of 0.54 m/s. During a medium frequency / medium severity event (1 in 30 to 1 in 100 AEP event), maximum estimated potential depths are recorded in the region of 0.00 – 0.12 m, with an estimated mean estimated depth of 0.12 m. Associated velocities during this event could potentially be in the region of 0.00 – 0.23 m/s, with a mean estimated velocity of 0.19 m/s.

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

As a result of the aforementioned historic flooding events, flooding and drainage investigations by Neath Port Talbot County Borough Council highlighted that the surface water flooding observed in and around Gnoll Avenue, Victoria Gardens and the surrounding areas of Neath is in response to the flood waters entering Gnoll Brook. The Gnoll Brook flows in parallel to Gnoll Avenue.

Following the historical flood events, it appeared that during periods of prolonged heavy rainfall, volumes of flood water flowing along Gnoll Brook spilled out of its channel, resulting in large volumes of flood water to flow down Gnoll Avenue and into the surrounding area of Neath following areas of low topography.

As previously mentioned, there are three critical intakes of fluvial and pluvial sources at Gnoll Avenue, Ivy Avenue and Llantwit Road, all of which are NPTCBC highway and drainage assets. These will ensure assist surface water management and flows during extreme events and should be thoroughly maintained so that the infrastructure is functioning to maximum or near to maximum capacity / efficiency.

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



4.5 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**.

4.6 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**.

4.7 Artificial Sources of Flooding

Neath Canal is located approximately 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. Furthermore, there are no records or incidents of the canal flooding here. 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. For instance, 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**.



4.8 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. Owing to its location within Zone A on the DAM, the site and proposals do not require a justification test. Furthermore, TAN15 states;

6.1 Much urban development in Wales has taken place alongside rivers and in the coastal plain. It is therefore inevitable, despite the overall aim to avoid flood risk areas, that some existing development will be vulnerable to flooding and fall within Zone C. Some flexibility is necessary to enable the risks of flooding to be addressed whilst recognising the negative economic and social consequences if policy were to preclude investment in existing urban areas, and the benefits of reusing previously developed land. Further development in such areas, whilst possibly benefiting from some protection, will not be free from risk and could in some cases exacerbate the consequences of a flood event for existing development and therefore a balanced judgement is required;

7.2 Whether a development should proceed or not will depend upon whether the consequences of flooding of that development can be managed down to a level which is acceptable for the nature / type of development being proposed, including its effects on existing development. It would certainly not be sensible for people to live in areas subject to flooding where timely flood warnings cannot be provided and where safe access / egress cannot be achieved;

11.9 Applications for minor extensions or alterations should not raise significant issues unless they are likely to have a direct and adverse effect on a watercourse or its flood defences, would impede access to flood defence and management facilities or where the cumulative impact of such developments could have a significant effect on flood storage capacity or flood flows. In such cases there will be no requirement to justify the location of development but if such minor works are likely to have an adverse effect then the full consequences of a development will need to be appreciated and assessment undertaken commensurate with the scale and nature of development.

In its current state, the site is dilapidated and in need of renovation, notwithstanding the fact that it is disused and unoccupied, as existing. There is very little scope for alternative development at the site, and it makes sense to maximise the sites potential and return it to its former, and original intended use; residential. Furthermore, the proposals will contribute to provision of affordable housing in alignment with the aims and objectives of the LDP.

As is outlined in Section 5 of this report; the proposals actually present an opportunity to make the existing site and property more resilient and resistant to the potential impacts of climate change and flood risk.

Although a sequential approach is not ideally or generally sought; and as already raised by Vale during correspondence with NRW (Refer to Appendix D) – there are similar residential planning applications within the vicinity that have not required or undergone NRW consultation in regards to flood risk. And yet saying that; owing to their location – they are at similar / potentially greater flood risk from the Gnoll Brook than this site. Their planning applications have not been supported by an FCA. This highlights inconsistencies within the planning process, particularly regarding flood risk and implementation of TAN15.

The development is consistent with the land use and image of the area – more so than the existing. The proposals will vastly improve the aesthetic value of the site which is in dire need of renovation / redevelopment. The revised version of the new TAN which is currently being consulted upon also gives more weight to regeneration projects in the flood zone, in response to concerns that it would otherwise ‘sterilise’ development in large areas of some of Wales’ most populated areas. Wider UK Government Policy is currently in a position to provide and advocate housing (residential) development to meet growing demands.



5 FLOOD RISK MITIGATION MEASURES & RECOMENDATIONS

5.2 Flood Risk Mitigation

The risk of flooding to the proposed development from all sources is assessed to be **Low / Medium / Residual**. The predominant source of flood risk to the site and proposed development (and which is consistent with the surrounding local area) is from the Gnoll Brook. The potential associated and perceived consequences are deemed acceptable and manageable across the lifetime expectancy of the development.

Taking a precautionary approach and as an additional factor of safety, mitigation measures should be incorporated into the proposed development to reduce and minimise the potential consequences of flooding and climate change to the site and proposals. Any risks as identified and analysed in this report will remain **Residual** following adoption and implementation of the measures outlined in this section.

External alterations such as commercial flood guards (barriers) are available and could and should be fitted to doorways. They can be applied and removed as and when by site users / residents and can provide a protection and freeboard to inundation waters of up to 0.6m and will prevent the ingress of waters to properties thus minimising and avoiding internal damage. Other products which would protect the dwellings from inundation and which should be considered; include flood fences, flood doors and air bricks. Additional *internal* alterations that should be introduced where practically possible to the development include:

- Raised electronic control units and sockets;
- Install smart air bricks or air brick covers;
- Provide low level flood guards on all access points;
- Use plastic and stainless-steel fixtures and fittings and avoid wooden alternatives;
- Use solid flooring (tiled, resin, concrete) at lower ground level, where possible;
- Ensure that with the time afforded by advance warning, evacuation of property via safe egress and removal of valuables from the building can be implemented;
- Clearance of the existing surface water drainage system to improve drainage of the site and follow necessary maintenance procedures (to new and existing surface water drainage) to ensure that the system functions to optimum capacity.

All construction methods to be inherently flood resilient as and where possible. Refer to the BS 85500: 2015, Flood resistant and resilient construction. Guide to improving the flood performance of buildings (November 2015).

If a hydraulic model for the Gnoll Brook becomes available (in particular an NRW published); this FCA and any Flood Evacuation Management Plans (FEMPs) should be updated accordingly.

The existing site is bounded by stone masonry and brick walls measuring approximately between 0.5m and 1m in height which would prevent any inundation waters from entering the site. Refer to the Google Streetview Extract, **Appendix A**.

The Brynau and Preswylfa Natural Flood Management Scheme was completed within the upper reaches of the Gnoll Brook Catchment, situated on Woodland Trust Land at Brynau, Cimla, Neath in 2022. The aim of the NFM Scheme is to reduce flood risks to the two Gnoll catchment areas, Gnoll Brook and Gnoll Park Brook. Natural flood management features will now be built within the newly planted woodland of Brynau, restoring an ancient woodland site at the Gnoll Country Park, and directly protecting more than 200 nearby properties. The scheme will be situated amongst the Woodland Trust's newly planted trees, alongside construction works that include the uncovering of a stone-lined underground drain to bring water to the surface. Natural flood management features such as 'leaky barriers' will also be installed across the drain's channel to help intercept and slow the flow of water. Two pond features could also be included in the plans to temporarily store water in times of heavy rainfall.



Flood Alerts cover the site, however **Flood Warnings** do not. Flood Warnings do cover some areas in the surrounding wider area. Site owners should register to receive flood alerts and where possible (or in the future, should they become available), Flood Warnings. Flood Warnings Direct is a free service that provides prior warnings of a fluvial flood event. Areas at risk of flooding from rivers (fluvial) and the sea (tidal) are warned, which relies on direct measurements of rainfall, river levels, tide levels, in-house predictive models, rainfall data and information from the Met Office. This service operates 24 hours / day 365 days a year. If flooding is forecast, warnings are issued using a set of easily recognisable codes.

Appropriate documentation should be displayed to inform any users of the site of the potential risk. Documentation will be displayed at an appropriate position in the building. The documentation will indicate the risk of flooding and contain information on how prior warnings will be sent to the building. Further information on the documentation will comprise of the Floodline Warnings Direct telephone number, emergency services numbers and exit plans and egress directions from the hall, as identified in the evacuation procedure for the site.

The site owner should undertake a Flood Evacuation Management Plan (FEMP) for implementation during an extreme event. This should be done in conjunction with the appropriate professional bodies including and in particular the NPTCC Emergency Planning Department. The FEMP should be a written document which outlines the course of action to all occupants and site users during a flood event / on receipt of a Flood Alert. The evacuation procedure should address (but not limited to) the following topics:

- A list of important contacts, building services, suppliers and evacuation contacts for officers and users;
- A description or plan showing locations of key property, protective materials and service shut off points;
- Basic strategies for protecting property and assisting recovery;
- Checklist of procedures that can be quickly accessed by users during a flood;
- Safe exit-plan (building and site);
- Safe exit route to higher ground outside the flood risk area (building and site), kept and displayed on site.

In many senses and as outlined below; the proposals actually present a great opportunity to make the site as a whole lot more resilient to climate change, global warming and flooding, commensurate with the LDPs definition of *sustainable development*.

5.3 Safe Refuge and Flood Procedure

In the unlikely event that the site floods the competent warning authority is NRW and a lead time of several hours in advance of flooding is typically provided, excluding potential breaches of defences. When a flood is expected NPTCBC and the local emergency services will be responsible for public care and safety.

In the event of the site flooding before site users have an opportunity to evacuate the occupants should seek refuge on the upper floors as and where possible until flood waters have receded and it is safe to evacuate the site.

This provides an area of safe refuge; well above any potential DFLs (from all sources) over the lifetime expectancy of the proposed development (100-years), including appropriate CCAs.

Evacuation should only be proceeded with if it is safe to do so.

Refer to Appendix D – Evacuation Route Plan.



5.4 Finished Floor Level (FFL)

The FFL of the existing property to be retained (13.46m AOD). There is no need for any raising of existing levels to appease flood risk. Furthermore, this could cause propensity for inundation displacement / loss of flood storage.

Taking typical UK ceiling heights into account – the first floor will have an FFL of at least **15.6 m AOD** which is well above any potential DFLs from all sources of flooding over the lifetime expectancy of the proposed development.

5.5 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. No re-profiling is proposed. No third-party land / infrastructure would be affected by the proposals (i.e. the proposals would not exacerbate flood risk elsewhere, neither would there be any loss of flood storage.

All surface water flows to be managed on-site and in line with national and regional policy guidance and legislation. This can often lead to a betterment over the existing arrangements.



6 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 flats, with associated works at 22 Victoria Gardens, Neath.

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).

It can be concluded that the Gnoll Brook presents the predominant flood risk to the site albeit **Medium / Low**, and but **Residual** following implementation and adoption of mitigation measures and recommendations as per Section 5 of this report.

All HVD aspects (including any / all habitable rooms) located on first floor and above which is deemed to be at **Very Low** Risk of flooding from all sources.

Since the recent historic flood events in the local area; the area benefits from a flood alleviation scheme. The site and existing property were originally built for residential occupancy.

The site and proposals would pass the *Justification Test* even though it is not strictly subject to it owing to its location in Zone A on the DAM.

All other potential sources of flooding have been considered and are concluded to pose a **Low / No / Residual** flood risk to the site.

The FCA is at least commensurate with the scale and nature of the proposals and has been undertaken by suitably qualified personnel.



APPENDIX A:
Site Location Plan, Existing Site Plans



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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

SCALE: 1:500@A4

DATE: Jan 24

SWANSEA

70 Walter Road

Swansea, SA1 4QA



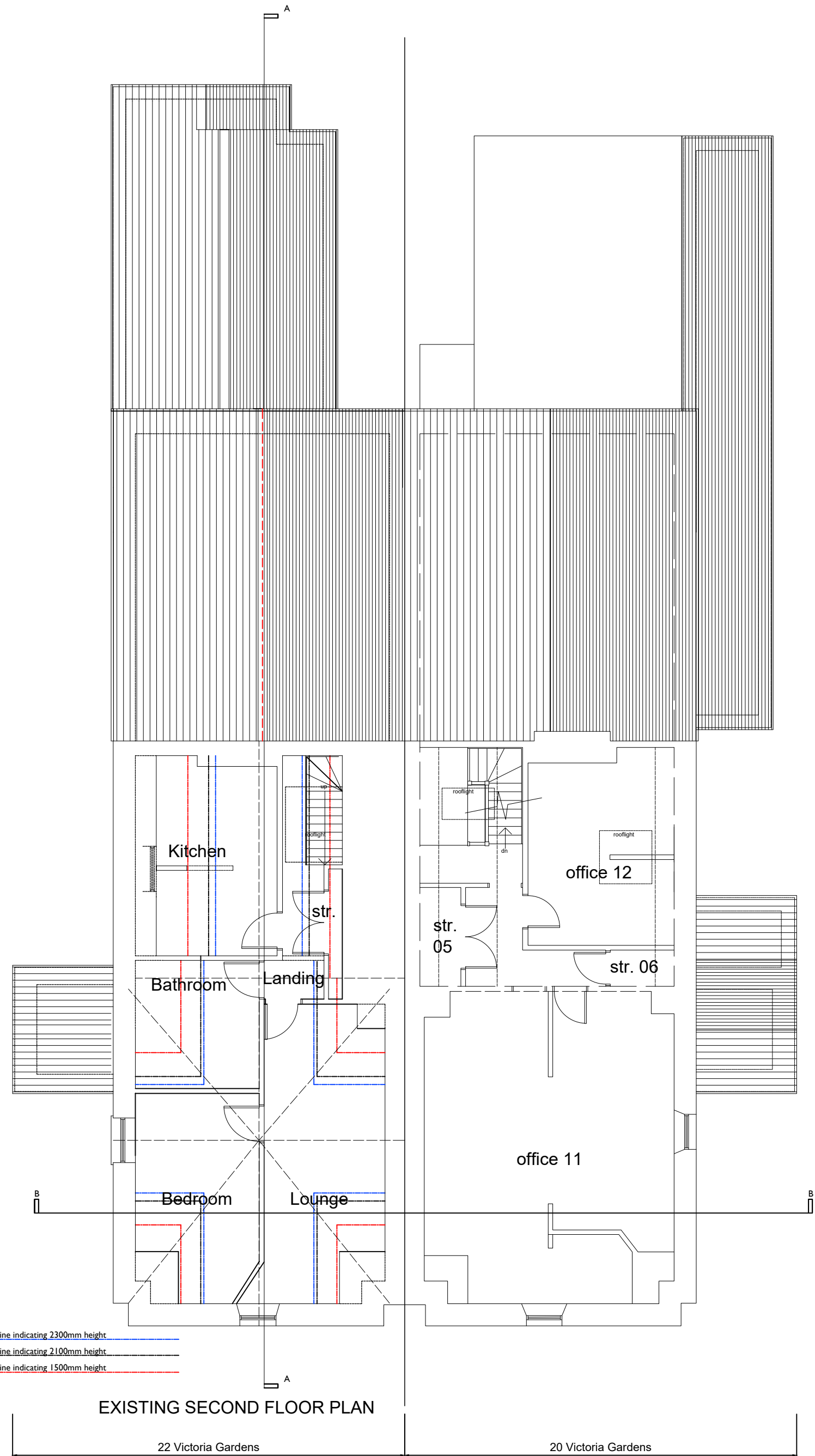
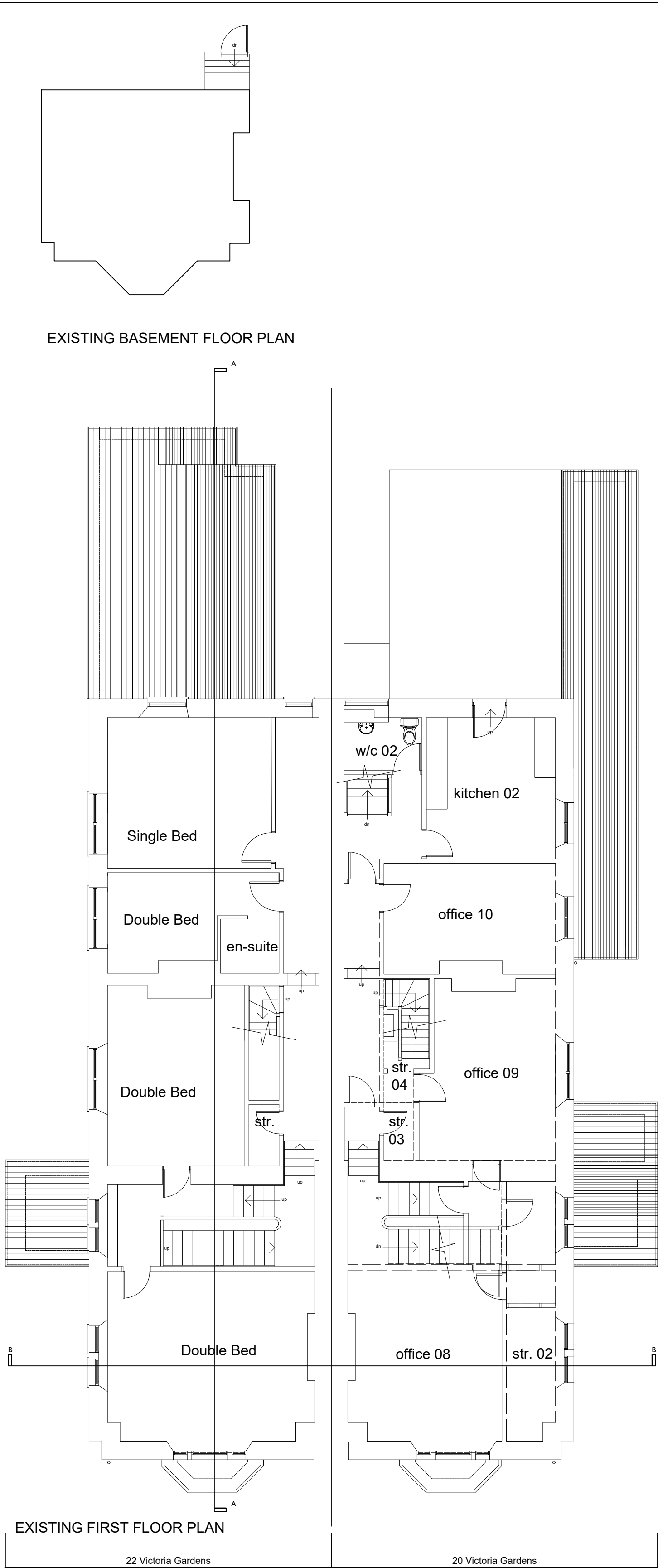
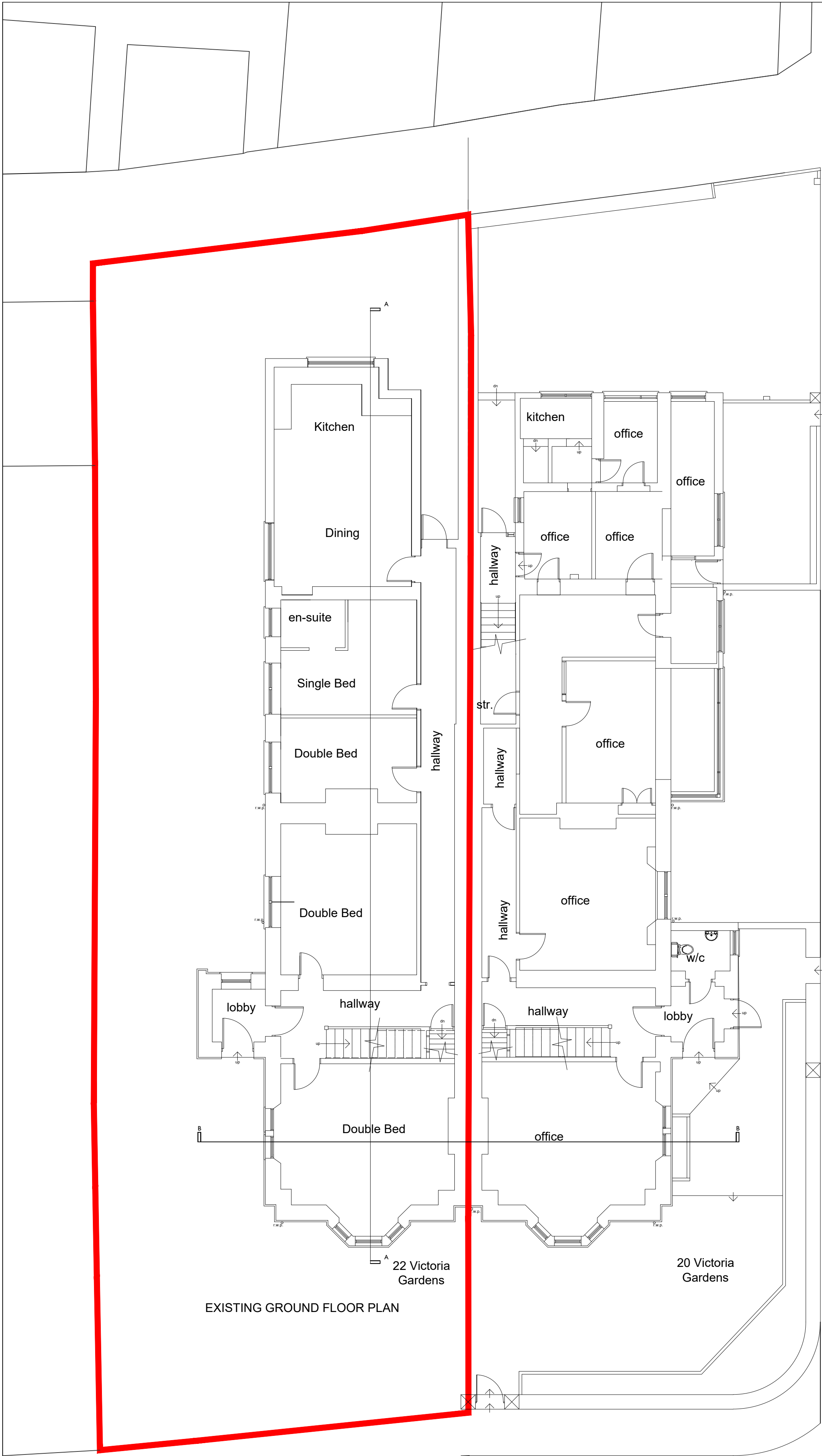
LONDON

One Kingdom Street

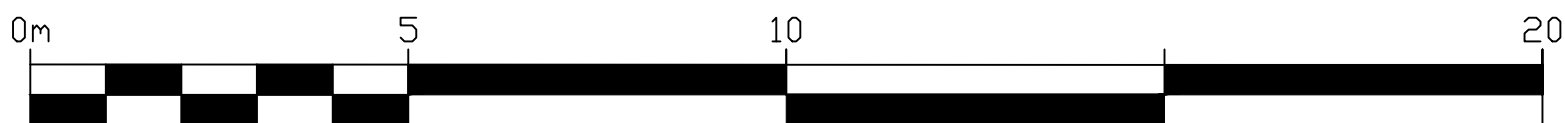
Paddington Central

London, W2 6BD

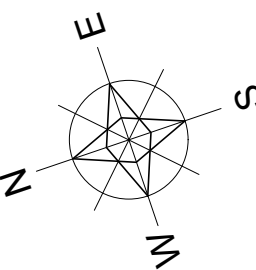
BBA 940/01



DRAWINGS ISSUED SUBJECT TO FUTURE MEASURED SURVEY



SCALE: 1:100



This Drawing is Copyright. ©

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

AMENDMENTS:
Revision Date

BUCKMASTERBATCUP
Architects Ltd.

CLIENT:
CAREDIG Housing Association

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

DRAWING TITLE:
Existing Plans

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

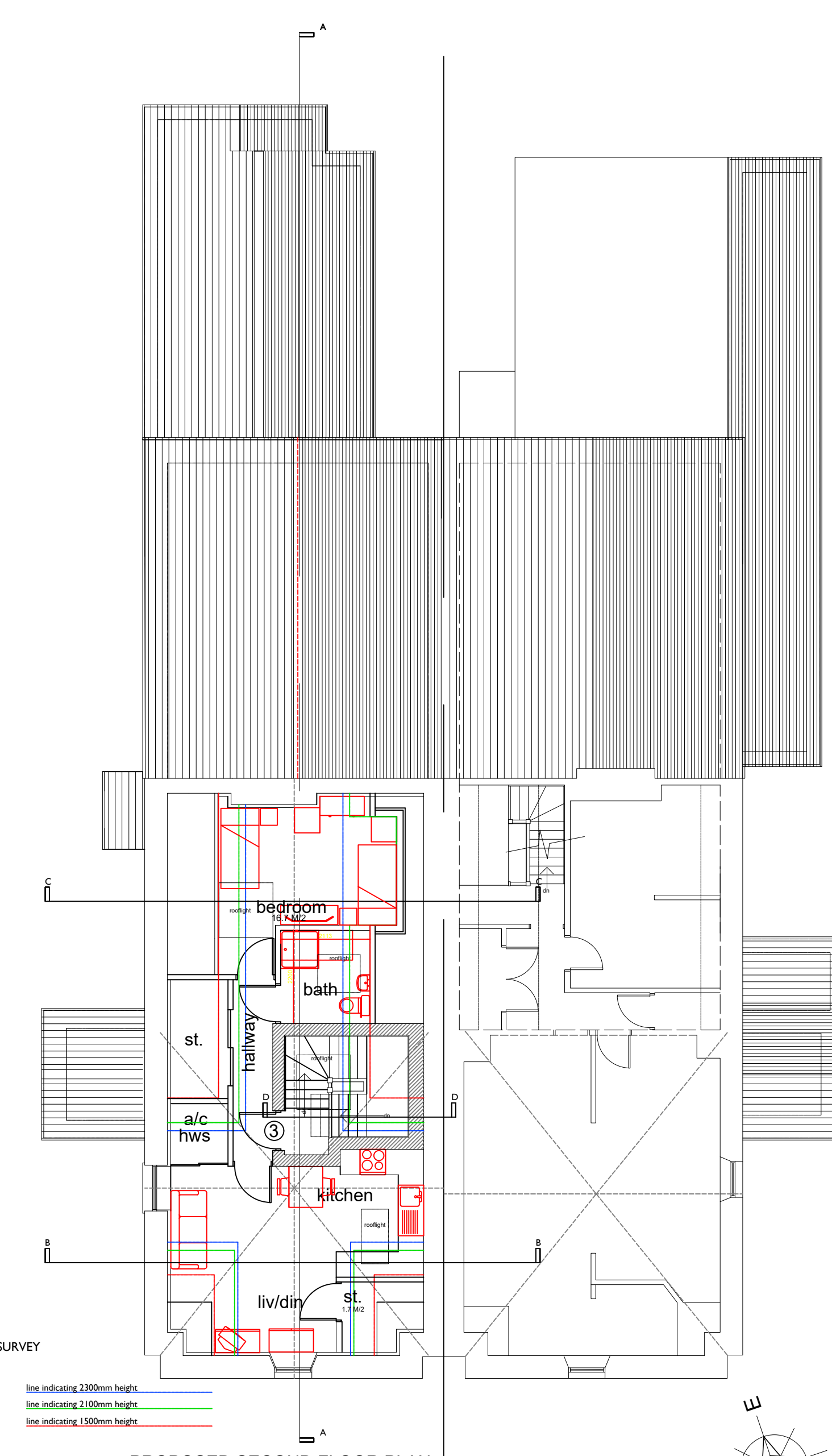
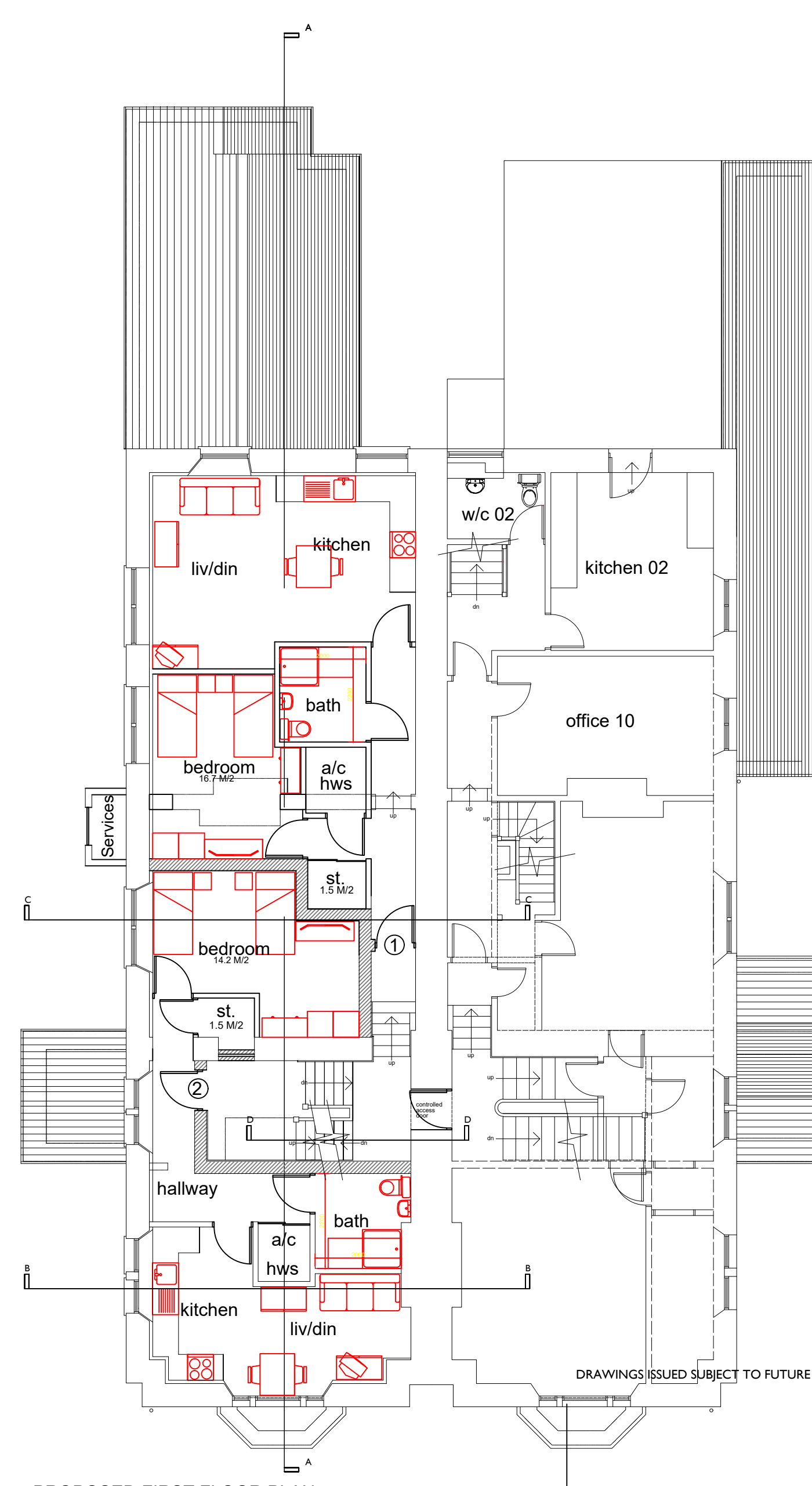
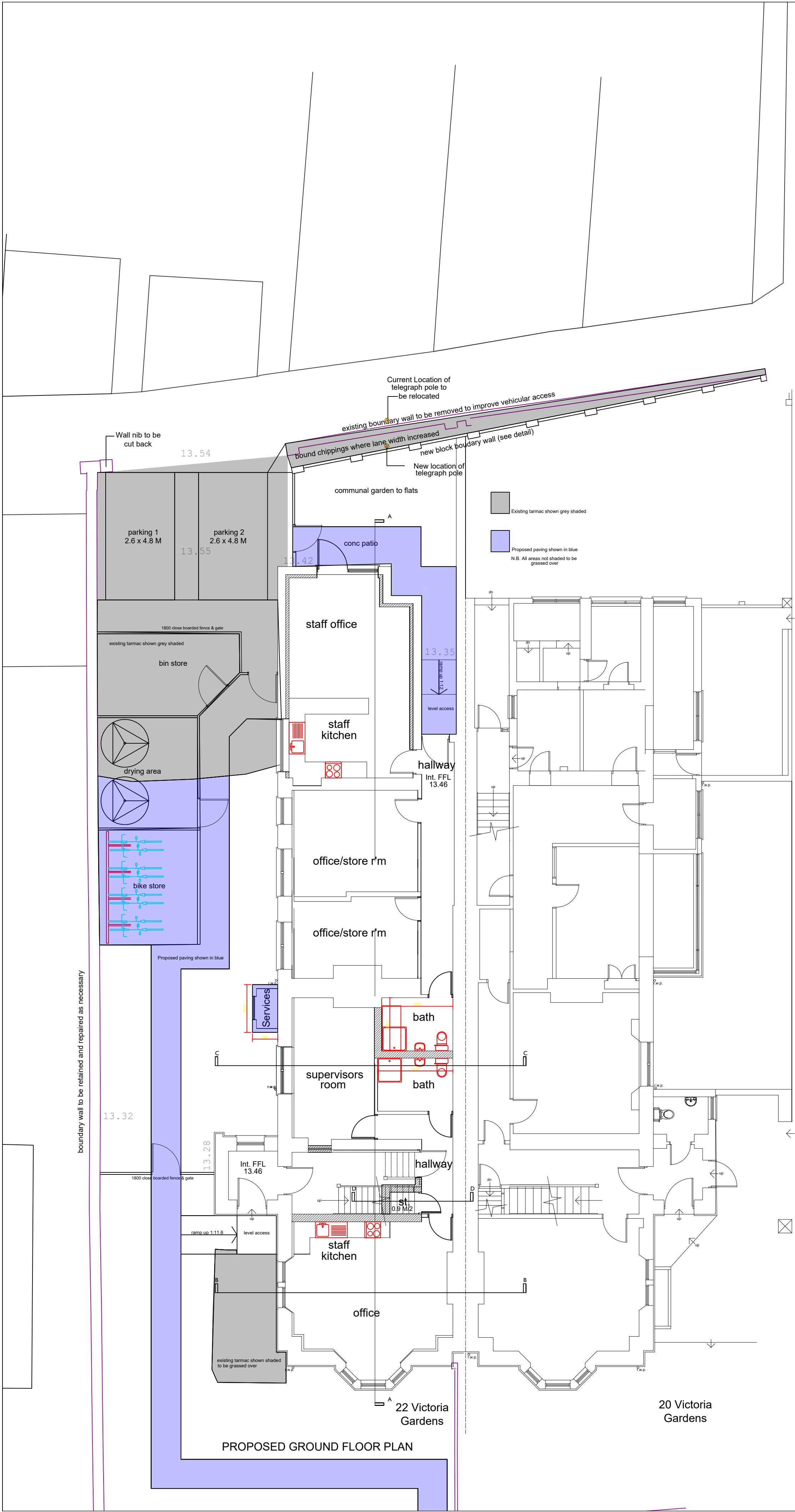
SWANSEA LONDON
70 Water Road One Kingdom Street
Swansea, SA1 4QA Paddington Central
London, W2 6BD

BBA 940.P.02





APPENDIX B:
Proposed Site Plans



KEY	
Ground Floor - Office for staff	146 M/2
FLAT 1 - 1 b/2p Flat	57 M/2
FLAT 2 - 1 b/2p Flat	49.2 M/2
FLAT 3 - 1 b/2p Flat	50.2 M/2
	38.2 M/2

This Drawing is Copyright. ©	
Note: All dimensions to be checked on site and not to be scaled from drawing.	
AMENDMENTS:	
Revision	Date
B. Service duct added to 1st and 2nd floors, existing dormer to be removed	15.07.24
D.	07.11.24
E.	18.06.25

BUCKMASTERBATCUP
Architects Ltd.

CLIENT:
CAREDIG Housing Association

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

DRAWING TITLE:
Proposed Site Plan & Floor Plans

SCALE: 1:100 @ A1

DATE: Feb. 2024

SWANSEA
70 Walter Road
Swansea, SA1 4QA

LONDON
One Kingdom Street
Paddington Central
London, W2 6BD

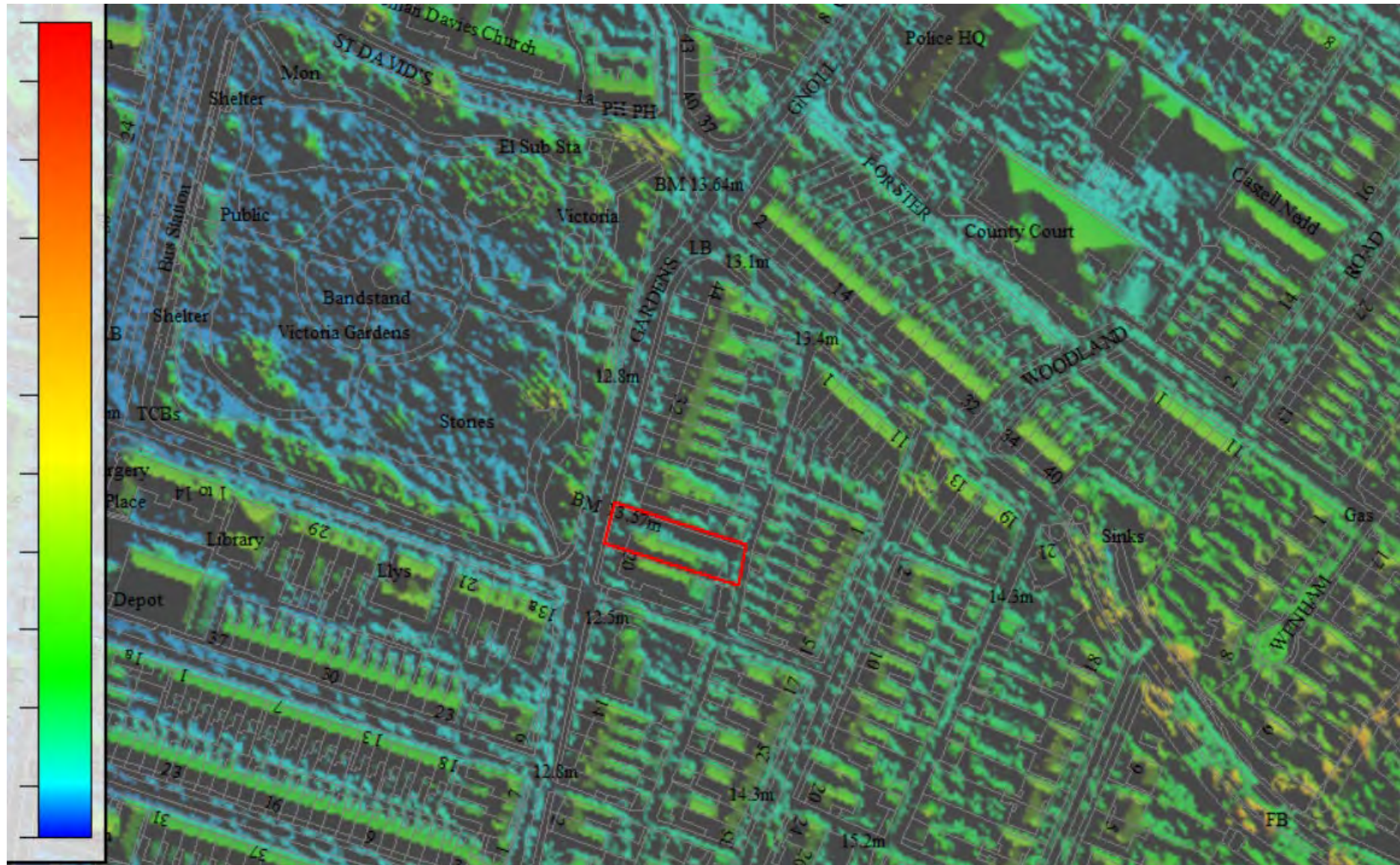
BBA 940.P.03E



APPENDIX C:
1m Resolution LiDAR DTM



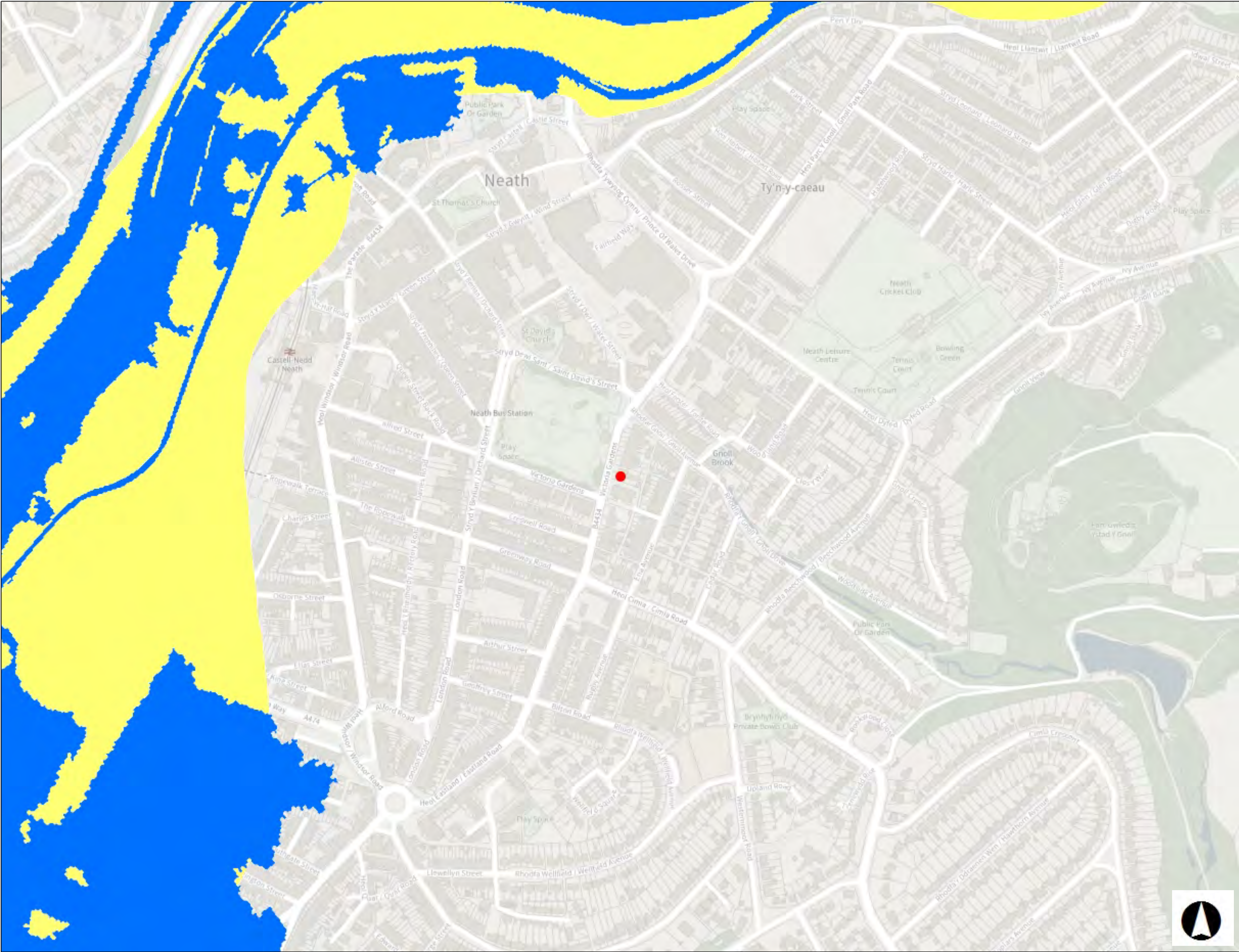
19766 – 22 Victoria Gardens



DSM / OS Overlay



APPENDIX D:
NRW Flood Maps, Correspondence and GIS Outputs



Development Advice Map

Allwedd / Map Key

- Zone C1
- Zone C2
- Zone B
- Zone A

Graddfa / Scale at A3 1: 4,901

Dyddiad / Date
21/05/2024



Flood Map for Planning - Detail
FMfP - Rivers and Sea

Legend

TAN15 Defended Zones

-  Rivers
-  Sea
-  Rivers and Sea

Rivers

-  Flood Zone 3
-  Flood Zone 2

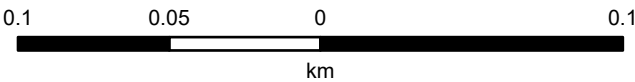
Sea

-  Flood Zone 3
-  Flood Zone 2

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Scale at A3: 1:2,500

Date: 21/05/2024



Disclaimer
<https://naturalresources.wales/flooding/disclaimer-for-our-flood-and-coastal-erosion-risk-maps/?lang=en>

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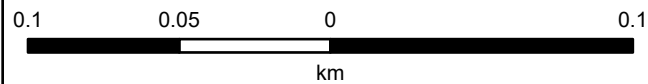
Flood Map for Planning - Detail
FMfP - SW and Small Watercourses

- Legend**
- Surface Water and Small Watercourses
-  Flood Zone 3
 -  Flood Zone 2

Contains OS data © Crown Copyright and database right 2020

Scale at A3: 1:2,500

Date: 21/05/2024

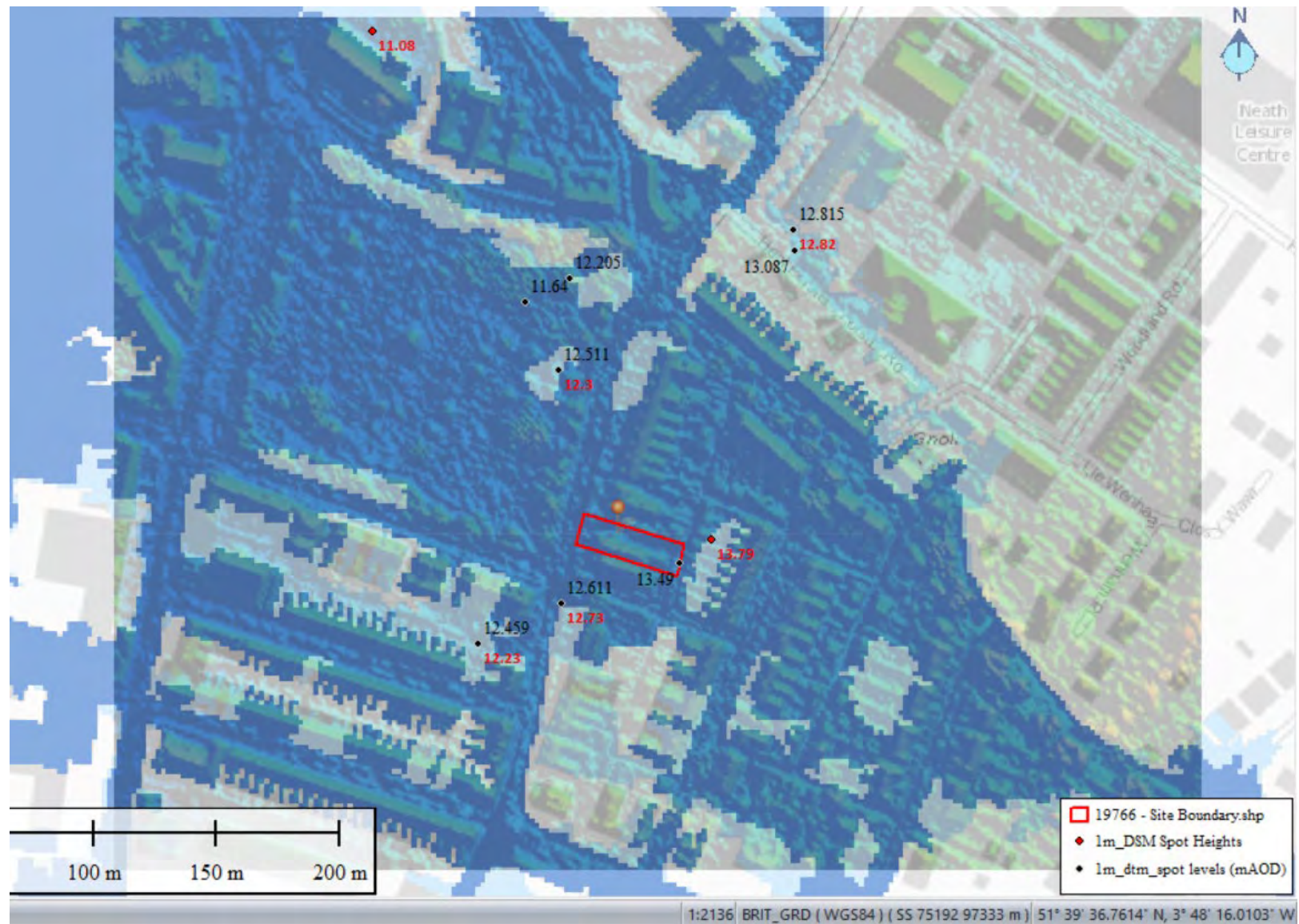


British National Grid

Disclaimer
<https://naturalresources.wales/flooding/disclaimer-for-our-flood-and-coastal-erosion-risk-maps/?lang=en>

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19766 – 22 Victoria Gardens

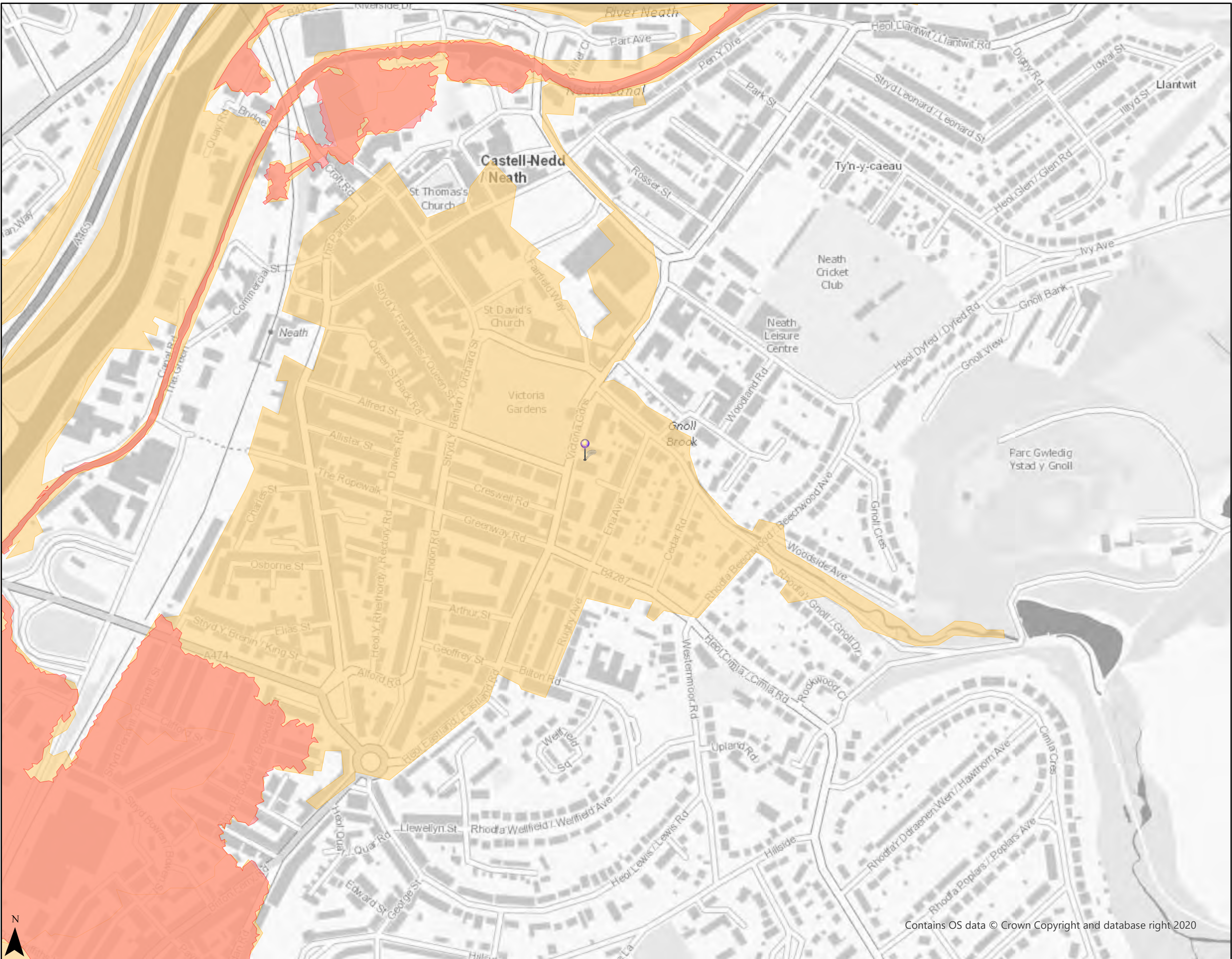


FMfP Fluvial Flood Zone Extents Associated with the Gnoll Brook overlain with 1m resolution DSM Extract including spot levels (DSM and DTM)

Flood Warning and Alert Areas
19766

Legend

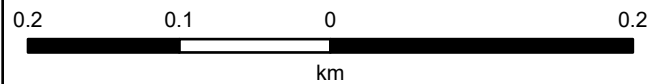
- Flood Warning Areas
- Flood Alert Areas



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Scale at A3: 1:5,000

Date: 07/10/2024



Disclaimer

<https://naturalresources.wales/flooding/disclaimer-for-our-flood-and-coastal-erosion-risk-maps/?lang=en>

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19766 – Victoria Gardens, Neath



Flood Evacuation Route

Natural Resources Wales

“We 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

The application site is within Zone A of the Development Advice Map (DAM) contained in TAN15 (2004). However, our Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and within Flood Zone 3 (Rivers). As confirmed in the letter from Welsh Government dated 15 December 2021, the FMfP represents better and more up-to date information on areas at flood risk than the DAM.

We have reviewed the flood consequence assessment (FCA) referenced 19766, prepared by Vale Consultancy and advise that the FCA fails to demonstrate that the risks of flooding can be managed to an acceptable level for the reasons explained below.

As noted above the site lies within Zone 3 of the FMfP however, the FCA has not assessed the mapped flood risk to the site from the Gnoll Brook. The FCA makes reference to the peak flood levels from the River Neath yet this has no bearing on the site. As no assessment has been made of the flood risk from the Gnoll Brook we are unable to fully assess the application to determine if the requirements of TAN 15 can be satisfied.

We acknowledge that there is no change in vulnerability as a result of the proposed change of use. However, there will be self-contained flats on the ground floor with no mention of a communal space that could be used for a ‘safe refuge’. We therefore advise that either:

- an updated FCA is submitted in support of the application which demonstrates that the development complies with TAN15, or,*
- an amended layout is submitted showing that no self-contained units will be wholly on the ground floor, or,*
- an amended layout is submitted showing the provision of an upstairs communal area that occupants could use in the event of a flood.*

The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15 (2004). The FCA should be proportionate to the development proposed. You may also refer to our website, which contains technical advice and recommendations.

Please note that if an updated FCA fails to demonstrate compliance with A1.14 or the layout is not amended we may object to the application as submitted.



Cyngor Castell-nedd Port Talbot
Neath Port Talbot Council

Dyddiad/ Date	3 rd September 2024
Rhif Ffôn/ Direct Line	
Ebost/ Email	
Cyswllt/ Contact	Miss. R. Bailey
Eich cyf / Your ref	
Ein cyf/ Our ref	RB/CB1411/P966526

Liam Davies

Dear Mr. Davies

22 Victoria Gardens , Neath , SA11 3BH

I refer to your correspondence dated 22nd August, 2024 regarding the above.

Please find my response to your requests below:

Any information and data regarding the Gnoll Beck in the 1 in 100 , 1 in 100 + CC, 1 in 1000 and 1 in 1000 + CC event as well as any other watercourses which may impact the site – In addition to this any raw data or mapped outputs would be beneficial

We do not hold any recent hydraulic flood modelling data in association with Victoria Gardens.

Any information regarding ground conditions at the site (Soil Conditions , bedrock formation and superficial deposit formation + Borehole data)

We do not hold any ground investigation data for the above named address.

Any historic flooding events that have occurred at or within the immediate vicinity of the site not shown on Natural Resources Wales Flood Maps

Below are the flooding event dates associated with Victoria Gardens we have on record:

- 29/09/2019
- 30/09/2019
- 25/08/2020
- 04/09/2022

Yr Amgylchedd ac Adfywio

Mike Roberts, Pennaeth Gofal Strydoedd

Y Ceiau, Ffordd Brunel, Parc Ynni Baglan, Castell-Nedd, SA11 2GG
Ffôn 01639 686868 Ffacs 01639 686100

Environment & Regeneration

Mike Roberts, Head of Streetcare

The Quays, Brunel Way, Baglan Energy Park, Neath, SA11 2GG
Phone 01639 686868 Fax 01639 686100

www.npt.gov.uk

Croesewir gohebiaeth yn y Gymraeg a byddwn yn ymdrin â gohebiaeth Gymraeg a Saesneg i'r un safonau ac amserlenni.

We welcome correspondence in Welsh and will deal with Welsh and English correspondence to the same standards and timescales.

Information regarding surface water flooding and sewer flooding at or within the vicinity of the site

As a result of the above mentioned flooding events, flooding and drainage investigations highlighted that the surface water flooding observed in and around Gnoll Avenue, Victoria Gardens and the surrounding areas of Neath is in response to the flood waters entering Gnoll Brook.

The Gnoll Brook flows in parallel to Gnoll Avenue. Following the flood events listed in the above question, it appeared that during periods of prolonged heavy rainfall, large volumes of flood water flowing along Gnoll Brook spilled out of its channel, resulting in large volumes of flood water to flow down Gnoll Avenue and into the surrounding area of Neath.

Information regarding groundwater / groundwater vulnerability at or within the vicinity of the site

There are no known flooding instances within the area in association with groundwater and groundwater vulnerability.

Any formal / informal defences located at or within the immediate vicinity of the site

There is three identified ordinary watercourses that flow downstream from the catchment area above the Gnoll Country Park, named the Gnoll Brook, Gnoll Park Brook and Llantwit Brook. The watercourses flows downstream to three critical intakes at the Gnoll Avenue, Ivy Avenue and Llantwit Road, all of which are NPTCBC highway and drainage assets.

Information on any artificial sources of flooding which may impact the site

N/A

Any flood alleviation schemes that have been undertaken/ proposed at or within the River Catchment

The Brynau and Preswylfa Natural Flood Management Scheme was completed within the upper reaches of the Gnoll Brook Catchment, situated on Woodland Trust Land at Brynau, Cimla, Neath in 2022. The aim of the NFM Scheme is to reduce flood risks to the two Gnoll catchment areas, Gnoll Brook and Gnoll Park Brook.

Any other information which will help to assist with a Flood Consequences Assessment at this site

If you require any further information on the above responses then please contact the above named officer.

Yours sincerely

Stephen Owen
Highways & Drainage Services Manager

From: [SW Planning](#)
To: [Richard Peskett](#)
Cc: [Daisy Tomkins](#)
Subject: RE: 19766 - 22 Victoria Gardens, Neath (P2024/0426) - Consultation Responses NRW:01205921
Date: 03 September 2024 10:59:46
Attachments: [image012.png](#)
[image020.png](#)
[image016.png](#)
[image021.png](#)
[image013.png](#)
[image018.png](#)
[image011.png](#)
[image017.png](#)
[image014.png](#)
[image019.png](#)
[image015.png](#)

Good morning,

Thank you for your email the content of which is noted. Our detailed comments regarding the proposed development including the need to either update the submitted flood consequence assessment or amend the application layout are provided within our response dated 23/07/2024 (our reference: CAS-261015-D9L1).

We note your query regarding the conversion of other properties within the vicinity of the site however, from our records it does not appear that we were consulted on these applications. We can therefore not provide any clarification on why these applications were approved and advise that you contact the Local Planning Authority directly regarding this matter.

Kind regards

Kirsty Murphy
Cynghorydd | Advisor
Cynllunio Datblygu | Development Planning
Hi/Hithau / She/Her

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

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



Rhybudd: Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

Caution: This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Good afternoon,

My name is Richard Peskett, and I work alongside my colleague Liam Davies on behalf of Vale Consultancy, who produced the Flood Consequences Assessment (FCA) for this project. I am reaching out regarding the above consultation response sent on behalf of 22 Victoria Gardens, Neath (P2024/0426), as we have several questions that we feel need to be addressed directly as a matter of urgency.

Firstly, we have recently undertaken a search of the planning applications in the Victoria Gardens area and would like to raise a few queries. The application for 10 Victoria Gardens (Ref: P2022/0604) was granted approval on September 1st, 2022, with a change of use from a dwelling occupied by 6 people to a dwelling occupied by 7 people. However, no Flood Consequences Assessment was required for this application, despite the property being located in Flood Zone A and Flood Zone 3, which is the same as the classification for 22 Victoria Gardens. We would like to understand why a Flood Consequences Assessment was not required for this site, given the increase in occupancy and the flood risk associated with the location.

Furthermore, the application for 20 Victoria Gardens (Ref: P2021/1178) was approved for a change of use from commercial premises (Class B1) to 6 one-bedroom residential apartments (Class 3). This change of use represents a shift from a less vulnerable development to a highly vulnerable development, with two bedrooms located within Flood Zone 3 on the Ground Floor, which is at an extremely high risk of flooding according to the Flood Map for Planning (FMfP). Given that Natural Resources Wales (NRW) are requiring an FCA for 22 Victoria Gardens, we would like to understand how the application for 20 Victoria Gardens was justified and approved without the requirement for an FCA, despite the significant increase in HVD at the location.

Additionally, we have identified three other planning applications (Refs: 2018/0522, P2018/0225, and P2017/1138) that were approved in the same general area without the requirement for an FCA, even though they were located in similar flood risk zones. This apparent lack of consistency in the decision-making process regarding the need for flood consequences assessments is concerning, and we would like to understand the reasoning behind these decisions.

Although we do not often seek a sequential approach to FCAs, this consultation response is somewhat baffling when compared to the other planning applications mentioned. And it is only fair in light of this that NRW can provide sufficient reasoning.

Apologies if I have missed anyone in terms of cc'd in.

Please don't hesitate to call us.

We look forward to your response.

Thanks in advance.

Kind Regards

Rich Peskett BSc (Hons), MSc
*Flood Risk and Drainage
Engineer*



Working
From:

North Wales Office



07468325889



Vale Consultancy
CONSULTING CIVIL & STRUCTURAL ENGINEERS

HEAD OFFICE

29 Bocam Park
Old Field Road
Bridgend
CF35 5LJ

CARDIFF OFFICE

Suite 2, Churchgate
Court
3 Church Road
Cardiff
CF14 2DX

**NORTH WALES
OFFICE**

15 A Clwyd St
Ruthin
Denbighshire
LL15 1HF

**BRISTOL & SOUTH
WEST OFFICE**

Suite 4, 12 Whiteladies
Rd
Clifton
Bristol
BS8 1PD



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From: [Daisy Tomkins](#)
To: [Richard Peskett](#)
Cc: [REDACTED]
Subject: RE: 19766 - 22 Victoria Gardens, Neath (P2024/0426) - Consultation Responses
Date: 05 September 2024 15:59:18
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Good afternoon,

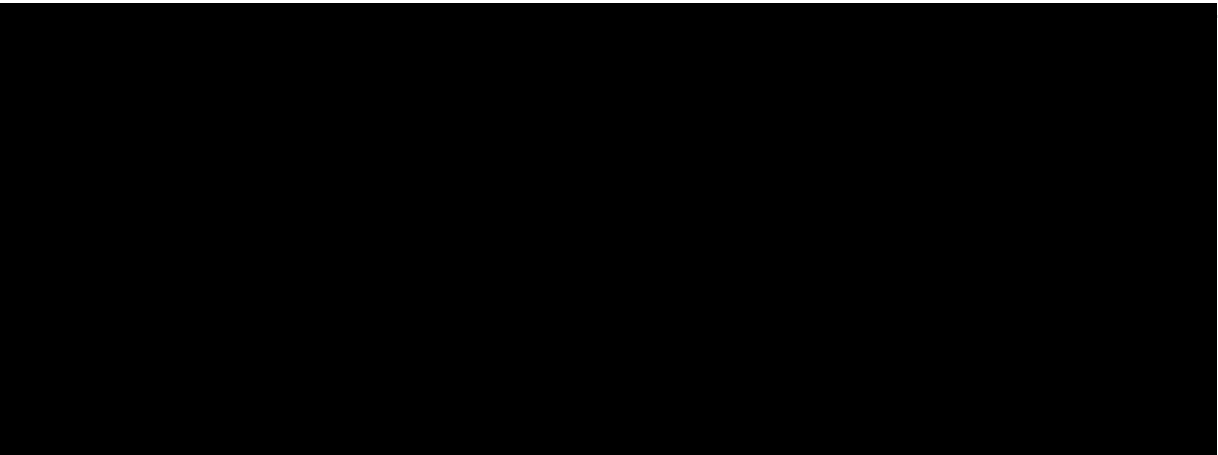
Thank you for your email and apologies for the delayed response. I note that Kirsty Murphy from Natural Resources Wales recently responded to your email advising that their records show that they were not consulted on the applications you referenced, and they subsequently advised you to contact the Local Planning Authority directly regarding this matter.

Having reviewed the applications you have queried, as I was not the case officer dealing with the applications, I cannot say for certain the reason behind Natural Resources Wales not being consulted in those instances. However, I would assume that this may have been a result of Welsh Government advising in November 2021 that they were suspending the coming into force of the new TAN 15 and Flood Map for Planning until 1st June 2023, and that the existing TAN 15, published in 2004, and the Development Advice Map would continue in the meantime as the framework for assessing flood risk.

Since then, Welsh Government have advised that FMfP may be regarded as a material consideration. Natural Resources Wales have subsequently advised that in order to ensure that their advice to Local Planning Authority's is based on the best available flood risk information they hold, they will be considering both the DAM and the FMfP as part of the consultation process and providing comments accordingly. As the FMfP has been established as a material consideration of the planning process, I thought it was necessary to consult Natural Resources Wales in this instance.

I hope this clarifies matters. However, if you have any further queries please contact me.

Kind regards,
Daisy



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Good afternoon,

My name is Richard Peskett, and I work alongside my colleague Liam Davies on behalf of Vale Consultancy, who produced the Flood Consequences Assessment (FCA) for this project. I am reaching out regarding the above consultation response sent on behalf of 22 Victoria Gardens, Neath (P2024/0426), as we have several questions that we feel need to be addressed directly as a matter of urgency.

Firstly, we have recently undertaken a search of the planning applications in the Victoria Gardens area and would like to raise a few queries. The application for 10 Victoria Gardens (Ref: P2022/0604) was granted approval on September 1st, 2022, with a change of use from a dwelling occupied by 6 people to a dwelling occupied by 7 people. However, no Flood Consequences Assessment was required for this application, despite the property being located in Flood Zone A and Flood Zone 3, which is the same as the classification for 22 Victoria Gardens. We would like to understand why a Flood Consequences Assessment was not required for this site, given the increase in occupancy and the flood risk associated with the location.

Furthermore, the application for 20 Victoria Gardens (Ref: P2021/1178) was approved for a change of use from commercial premises (Class B1) to 6 one-bedroom residential apartments (Class 3). This change of use represents a shift from a less vulnerable development to a highly vulnerable development, with two bedrooms located within Flood Zone 3 on the Ground Floor, which is at an extremely high risk of flooding according to the Flood Map for Planning (FMfP). Given that Natural Resources Wales (NRW) are requiring an FCA for 22 Victoria Gardens, we would like to understand how the application for 20 Victoria Gardens was justified and approved without the requirement for an FCA, despite the significant increase in HVD at the location.

Additionally, we have identified three other planning applications (Refs: 2018/0522, P2018/0225, and P2017/1138) that were approved in the same general area without the requirement for an FCA, even though they were located in similar flood risk zones. This apparent lack of consistency in the decision-making process regarding the need for flood consequences assessments is concerning, and we would like to understand the reasoning behind these decisions.

Although we do not often seek a sequential approach to FCAs, this consultation response is somewhat baffling when compared to the other planning applications mentioned. And it is only fair in light of this that NRW can provide sufficient reasoning.

Apologies if I have missed anyone in terms of cc'd in.

Please don't hesitate to call us.

We look forward to your response.

Thanks in advance.

Kind Regards

Rich Peskett BSc (Hons), MSc

*Flood Risk and Drainage
Engineer*



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