

The Neath Port Talbot West Planning Department,  
The Quays,  
Brunel Way,  
Baglan Energy Park,  
Neath SA11 2GG  
Attn: Mr Rhodri Griffiths  
Ref: P2025/0158

04-07-2025

Dear Sirs,

I, as applicant, confirm that I am aware that the Natural Resources Wales technical comments regarding flood risk in respect of this application and that the Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 Rivers, which, as I understand it, refers to risks in the next 100 years?? But I also want to refer to NRW's "Flood and Coastal Erosion Risk Maps", which still this morning is showing that 80 Windsor Rd. is a Low-Risk!!

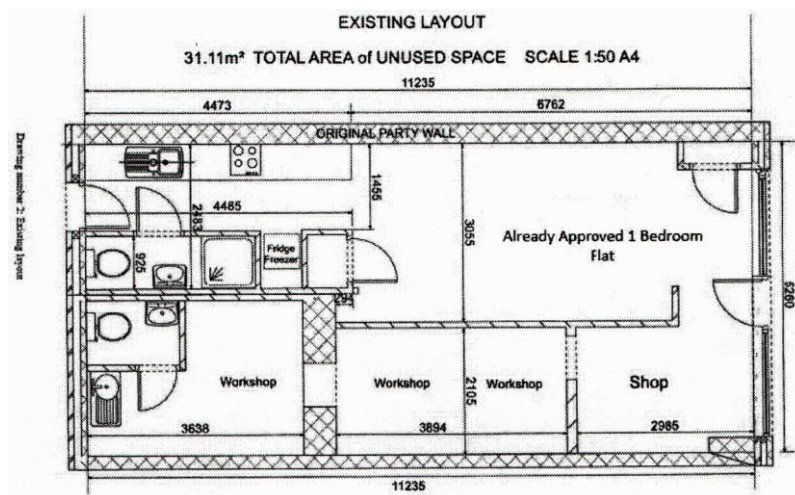
With the announcement of the latest TAN 15, Neil Hemington, Chief Planner, stated that The Planning Directorate of the Welsh Government, recognised the impacts on the processing of planning applications. He went on to say that there would be a transitional period for the implementation of TAN 15 and that after this time the NRW maps, other than "Flood Map for Planning" would be taken down. I have today signed up to NRW's flood warnings and was then referred to their "Flood and Coastal Erosion Risk Maps", which stated that 80 Windsor Rd., is in a Low-Risk Zone.

When I submitted this Planning Application on the 11<sup>th</sup> of March 2025, I quite naturally expected that it would be validated within 24 to 48 hours, bearing in mind that this application had already been the subject of an extensive 6-month Pre-Application, and therefore was already well known by the Planning Dept. and no mention was ever made with regards to an imminent change in flood risk policy.

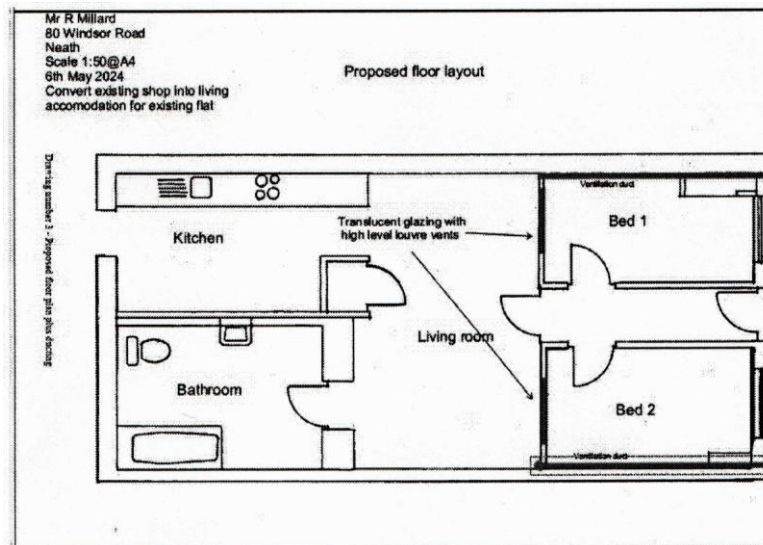
If it had been validated in March, then we wouldn't be having this discussion now. Unfortunately, we were advised to amend our application title to refer to the whole ground floor to be converted into a 2-bedroom flat, which I think was misleading to the NRW, as they were presumably not aware of the existence of a fully approved flat already taking up 2/3rds of the ground floor. Notwithstanding this, the transitional guidance in respect of the new TAN 15 states: Planning applications which were submitted and registered before the publication of the new TAN will continue to be assessed against the previous version.

With the above in mind, this planning application was registered as a new application by the LPA on 11.03.2025 well before the release of the new TAN which was published on 31.03.25. As such, it is my view that in respect of flood risk this current application should be assessed against the old TAN. Under the old TAN, the remainder of the shop was granted planning permission in 2023, indicating that unacceptable flood risk was not an overriding issue. Given the proximity of the two application sites, the same principle should therefore apply to this current application.

The small retail area remaining, which is a slither of a shop, measuring approx. 6ft in width, is being occupied by a business that has been haemorrhaging tens of thousands of pounds, per year, for the last few years and will be shut down permanently, when this application has been dealt with. Rather than leaving this 6ft wide shop, to lie dormant and unused, we considered that converting it into a second bedroom for the adjacent flat, by redesigning the total floor area, as shown in the drawings below, would be a sensible use of the space.



NB When the dividing wall is built in the existing layout scenario, it's thickness to reduce sound and fire risks would be considerably greater than shown, reducing the width of the shop area to just over 6ft.



NB The proposed alterations to the front elevation have predominately been agreed in the currently approved 1-bedroom flat. The main difference would be a single centre door and a slightly smaller window to the front of bedroom 2.

The approved and proposed floor plans above, indicate that in terms of flood risk, there is little difference between the two schemes with the proposed scheme adding just one bedroom and a small amount of additional floor space.

I am more than prepared to install floodproofing measures as part of the development. I will, for example, incorporate flood resistance/resilience measures into the design and construction of the development. These could include implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above any possible flood level.

I hereby confirm that I am aware, understand and accept any risk and consequences of flooding that may occur on the above land and property and in relation to the development subject of this planning application.

Also, a flooding evacuation plan will be fully implemented and made available to all occupiers of the approved development. The flood evacuation plan shall be relayed to all occupiers of the approved flat, prior to their first occupation and will be implemented for the life of the development.

In addition to the above, I will also ensure future occupiers will sign up to the free Natural Resources Wales flood warning service, as I have done so already, thereby receiving flood warnings / alerts. This should therefore give occupiers of the above property, time to prepare for flooding.

I will also refer to the Natural Resources Wales website for further advice and guidance available. I will refer to additional guidance including the leaflet "Prepare your Property for flooding".

I will also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties'.

As this is not a complete residential application and is only one additional bedroom to complement the adjacent 1-bedroom flat, I would ask you to view it in the light that the existing flat would also be upgraded to provide superior flood protection, if this existing shop area were to be integrated as requested in the full planning application.

Yours truly

A handwritten signature in black ink, appearing to read 'Ray Millard', with a horizontal line underneath.

Ray Millard

80a Windsor Rd,

Neath,

Neath Port Talbot

SA11 1NR