



Neath Port Talbot County Borough Council
The Quays
Briton Ferry
SA11 2GG

For the attention of Rhodri Griffiths, Planning Officer

Our Ref: RKT-JBAU-XX-XX-LT-Z-0001

5 December 2025

Dear Sirs,

P2025/0581 - 16 London Road, Neath, Neath Port Talbot

Thank you for passing on to us the comments received from Natural Resources Wales (NRW) in respect to the above planning application. As the flood risk consultants on this application, we would like to respond to the concerns raised by NRW in their letter. Please therefore find set out below the NRW comments and our corresponding responses:

- A. *"The application site is shown to be at wholly within Flood Map for Planning Flood Zones 2 and 3."*

This is inaccurate; the site is partially within Flood Zones 2 and 3, although we acknowledge the entire building is in Flood Zone 3.

The building is in Flood Zone 3 solely as a result of undocumented GIS processing NRW apply to the National Flood Hazard Mapping, which artificially extends flood outlines across the entire building footprint when there is adjacent flooding.

- B. *"It does not satisfy figure 5 of TAN15 (March 2025)."*

There is no explanation provided to support this statement. Our assessment of why the site is predicted to be flood-free, in full compliance with TAN15 Figure 5, is set out at length in Section 5 of the FCA, more specifically, Page 21.

Furthermore, as referred to in the FCA, paragraph 11.8 of TAN15 states in relation to Figure 5 *"The thresholds may be applied with more flexibility for redevelopment, changes of use, conversions and extensions, where the ability to substantially redesign a development is limited. In those circumstances the thresholds are a guide. If they cannot reasonably be met, the planning authority should seek the views of the relevant risk management authorities*

Kings Chambers
8 High Street
NEWPORT
NP20 1FQ

+44 (0)1633 413 514
info@jbaconsulting.com

www.jbaconsulting.com
Follow us:

Registered Office
1 Broughton Park
Old Lane North
Broughton
SKIPTON
North Yorkshire
BD23 3FD
United Kingdom

Jeremy Benn Associates Limited
Registered in England 3246693

JBA Group Ltd is certified to:
ISO 9001:2015
ISO 14001:2015
ISO 27001:2022
ISO 45001:2018



JBA Consulting is part
of the JBA Group

on the resilience measures proposed to help it reach a decision.”

NRW have not acknowledged this in their response or commented on resilience measures.

- C. *“Furthermore, as the proposal includes ground floor sleeping arrangements, it contravenes section 10.23 of TAN15 (March 2025).”*

We accept that the proposals do not comply with an aspect of TAN15 10.23. However, we believe that the LPA should give significant weight to the assessment of flood risk contained within the FCA, which concludes that the property is not at risk of flooding. As explained under point A, the building is in Flood Zone 3 only as a result of post-processing of NRW flood modelling; and not because the modelling predicted internal flooding. We suggest that the LPA should adopt a risk-based approach to their decision-making, as set out in Sections 8.1 and 8.3 of the TAN.

- D. *“The FCA has looked to utilise NRW’s National Flood Hazard Mapping to assess the fluvial flood risk to the site. This data set has no formal standing when considering planning applications and the Flood Map for Planning (FMfP) data is the official understanding of flood risk.”*

For this location, there is no separation between NRW’s National Flood Hazard Mapping and the FMfP; they are based on the same hydraulic modelling. Therefore, it is illogical for NRW to disregard the more detailed information contained within the National Flood Hazard Mapping as it provides the best available information. We accept that the National Flood Hazard Mapping is generalised modelling that needs to be used with care. However, we have gone to some lengths to review the suitability and appropriateness of the modelling and confirm that it is based on precautionary assumptions of the performance of the Neath Interceptor.

- E. *“Should the consultants intend to challenge the current understanding of flood risk to demonstrate compliance with TAN15, then a formal review/amendment of FMfP would be required in the form of a flood map challenge until such information is submitted then our advice to the LPA must be that the current application does not meet the requirements of TAN15.”*

In accordance with TAN15 10.24, we feel that we have ‘undertaken a flood consequences assessment proportionate to the nature and scale of the proposal’, adopting a risk-based precautionary approach. To suggest new flood modelling of Neath town centre

and a subsequent Flood Map Challenge is required is disproportionate to the risks assessed.

We hope that you find our responses useful in arriving at your decision.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'George Baker', written in a cursive style.

George Baker BEng, FCIWEM, C.WEM, CEnv, IEng, AIEMA

For and on behalf of Jeremy Benn Associates Limited

Associate Director

george.baker@jbaconsulting.com