

Development, Flooding and Coastal Erosion – Flood Consequences Justification Statement (TAN 15)

The proposed development at Aberavon Harlequins RFC (SA12 6UP) is located within an area identified as defended Zone 3 for both fluvial (river) and tidal (sea) flooding as shown on the Natural Resources Wales Flood Map for Planning. In accordance with Technical Advice Note 15 (TAN 15): Development, Flooding and Coastal Erosion, a proportionate Flood Consequences Assessment (FCA) has been considered in line with the scale, nature, and vulnerability classification of the proposed works.

Nature and Vulnerability of Development

The project comprises the installation of outdoor recreational infrastructure, including children's play equipment, safety surfacing, and a pétanque court. This form of development is classified as "less vulnerable" recreational use, as it does not involve habitable buildings, sleeping accommodation, or critical infrastructure. The development is open-air in nature, with no permanent enclosed structures that would place occupants at significant risk during flood events.

Justification for Location

The development is intrinsically linked to the existing Aberavon Harlequins RFC site and must be located within the club's grounds to serve its intended users. There are no reasonably available alternative locations outside the flood zone that would provide the same level of accessibility, supervision, and community benefit. The proposal therefore satisfies the locational justification requirement set out in TAN 15 for water-compatible or less vulnerable uses.

Flooding Mechanisms and Risk Consideration

Flood risk at this location arises from a combination of tidal and fluvial sources, although the designation of "defended" Zones 3 indicates that the area benefits from existing flood defence infrastructure. The proposed development does not increase impermeable built form significantly and will not displace floodwater or exacerbate flood risk elsewhere.

Design Response and Mitigation Measures

The scheme has been designed to be resilient and compatible with flood risk, incorporating the following measures:

- Use of permeable and free-draining surfacing systems, including GrassLok, bonded rubber mulch, and the layered limestone construction of the pétanque court, allowing water infiltration and reducing surface runoff.
- No enclosed buildings or critical services, ensuring that the site can safely flood without causing structural damage or risk to life.
- Installation of durable, water-resistant materials that can withstand periodic inundation with minimal long-term impact.

- Groundworks designed to avoid significant level changes or obstruction to flood flows.

Climate Change Consideration

The design approach reflects the need to accommodate future climate change impacts, including increased rainfall intensity and potential sea level rise. By utilising permeable surfaces, robust materials, and avoiding reliance on vulnerable structures, the scheme remains adaptable and resilient over its lifetime.

Consequences of Flooding

In the event of a flood, the consequences are considered low in severity, limited primarily to temporary disruption of use rather than risk to life or significant property damage. The absence of buildings and the use of robust, replaceable surfacing materials ensure rapid recovery and minimal long-term impact.

Conclusion

The proposed development is considered appropriate within a defended Zone 3 location when assessed against TAN 15 requirements. Its recreational, open-air nature, combined with a flood-resilient design and absence of vulnerable structures, ensures that flood risk is appropriately managed. The significant community benefits delivered by the project outweigh the limited and manageable risks associated with flooding, and the proposal aligns with national policy objectives for sustainable, community-focused development.