



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

For the attention of Rhodri Griffiths, Planning Officer

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

29 May 2026

Dear Rhodri,

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

Following our recent meeting on 30th April 2026, we write to provide you with an update as to progress on the position of flood risk and policy position for the above application.

As a summary of information submitted to date on this site, JBA prepared an FCA reference PCH-JBA-XX-XX-RP-X-0001-S3-P01-Neath_RAFA_Club_FCA. Comments were received by NRW in November 2025 and responded to by JBA in a letter referenced RKT-JBAU-XX-XX-LT-Z-0001, submitted directly to the Local Planning Authority.

Subsequent comments on flood risk were received by both the Lead Local Flood Authority (LLFA), noting no objection on flood risk grounds, and NRW, who stated that *'the letter provides no additional technical information regarding flood risk, we have no further comments to make and leave it to the local authority to make the determination. The previous response therefore remains relevant'*.

Our understanding is that the following aspects are the main concerns in relation to suitability of the redevelopment proposals in relation to flood risk, and remain as such following the submission of the additional information as noted above:

- A. "The application site is shown to be at wholly within Flood Map for Planning Flood Zones 2 and 3."
- B. "It does not satisfy figure 5 of TAN15 (March 2025)."
- C. "As the proposal includes ground floor sleeping arrangements, it contravenes section 10.23 of TAN15 (March 2025)."

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

- 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."
- 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."

We further address the comments below, along with addressing additional points raised within the meeting dated 30th April 2026.

Flood Map for Planning Classification

The statement from NRW that the application site is shown to be wholly within Flood Map for Planning Flood Zones 2 and 3 is inaccurate.

The proposed development site is partially within Flood Zones 2 and 3 of the Flood Map for Planning for Rivers, though we continue to acknowledge that building is located in Flood Zone 3.

At this stage, we wish to re-emphasise the point that the building is in Flood Zone 3 solely as a result of undocumented GIS processing NRW apply to the broadscale modelling (i.e. the National Flood Hazard Map), which artificially extends flood outlines across the entire building footprint when there is adjacent flooding. Therefore, this does not provide an accurate assessment of the risk of flooding to the building but instead applies a precautionary approach which identifies further assessment is required.

Such an approach is easily identifiable in instances such as these where the adjacent car park, which forms part of the red line boundary of the site, is located within Flood Zone 1 of the FMfP, despite being 600mm lower than the existing building. LiDAR data provides a ground level of 10.53 to 10.89 mAOD to the length of the highway adjacent to the site, and a minimum level of 10.96mAOD to the car park. The threshold level of the property is approximately 600mm above the car park level. Utilising the lowest ground level of the car park, a precautionary threshold level is therefore 11.56 mAOD.

Use of the National Flood Hazard Mapping

The FCA has used the National Flood Hazard Mapping data, which has shown that the site is predicted to be flood free in the 1% AEP plus

climate change event, and predominantly flood free in the 0.1% AEP plus climate change event, with the exception of extremely shallow flooding with depths of 10-30mm predicted to a small extent to the north of the car park, adjacent to The Ropewalk. Corresponding flood levels derived from the NFHM are 10.90 mAOD and 10.99 mAOD in the 1% AEP and 0.1% AEP events, respectively, both with an allowance for climate change.

As mentioned above, the FMfP in this location is informed by the National Flood Hazard Mapping. Therefore, there is no separation between NRW's National Flood Hazard Mapping and the FMfP; as they are based on the same hydraulic modelling. NRW continues to raise concerns with the use of the NFHM, suggesting that it does not have any formal standing, and that the Flood Map for Planning is the official understanding of flood risk.

This is illogical for NRW to disregard the more detailed information contained within the National Flood Hazard Mapping as it provides the best available information and informs the FMfP. JBA 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.

To address NRW's concerns, an alternative approach to estimating the flood level utilising the FMfP has been undertaken. This approach inspects the ground level along the flood extent, utilising the FMfP Flood Zone 2 and 3 layers. Where the depth of flooding becomes zero, and the extent of flooding stops, the water level and the ground level will be approximately the same. The nearest and clearest edge of Flood Zone 3 is found 6 m directly to the north-east of the proposed building. Along the edge of the flood extent at this location, the ground level/flood level was found to be 10.89 mAOD. As expected, this closely correlates with the flood level estimated from the NFHM depth grid (10.9 mAOD), providing confidence to the predicted flood levels and depths determined in this assessment. When undertaking the same assessment for areas of Flood Zone 2, the nearest and clearest edge of the zone is found 5m east of the building, within the car park. The ground/flood level is 10.99 – 11 mAOD, again corresponding with the flood level derived for the 0.1% AEP plus climate change event using the NFHM.

The FFL of the proposed building is estimated to be 11.56 mAOD and is therefore higher than these predicted flood levels, resulting in the building being flood free. This adds further weight to the stance that the proposed building is only in Flood Zone 3 as a result of the post processing

methods used, and not as a result of the predicted flooding to the site and site levels.

In addition, this analysis demonstrates that the proposals meet the requirements of Figure 5 on TAN-15 in its entirety, with the proposed redevelopment site predicted to be flood free in the 1% AEP plus climate change event.

Availability of Alternative Datasets and Potential for Flood Map Challenge

As discussed in the meeting of 30th April 2026, recent detailed modelling of the Gnoll Brook has been undertaken by JBA to inform an outline business case addressing flood risk to the wider Neath area from the Gnoll Brook, on behalf of the LLFA.

We had anticipated that this detailed model could be used in support of the redevelopment proposals at this location, with this model demonstrating that the proposed development site is flood free in all design events.

We have requested permission to use this model to support an updated FCA. However, the LLFA have advised that this would not be possible at this time due to the need for the model to be formally and wholly reviewed by NRW, with the need for it to inform a formal Flood Map Challenge in order to amend the Flood Map at this location.

As recognised by the LLFA in their response to our request to utilise the model, the Flood Map Challenge (FMC) process is robust can therefore take some time to complete. Consequently, until that process has been undertaken the FMfP and associated mapping products remain an appropriate basis for flood risk assessment and planning decisions.

Considering the length of time associated with the FMC process and its associated costs to undertake the associated work, against the scale and nature of the proposals and flood risk at the site, it is not considered a viable option in terms of progressing with the planning submission for the site. With certain, the time taken to ascertain the outcome of the FMC would exceed the tolerable timeframe applied by the LPA to determine the application.

Policy Position and Planning Balance

Given the additional information provided above, the stance offered by NRW and the LLFA on the application, it is considered that determination of the application by the LPA relies on consideration of planning balance on the need for the proposals, the scale and nature of flood risk and policy position.

At this stage, we consider it worth reiterating that the building on the redevelopment site is located within Flood Zone 3 solely as a consequence of the post-processing of the broadscale modelling underpinning the FMfP. Robust flood risk assessment continues to demonstrate that the likelihood of flooding to the building itself is negligible.

It is understood that the strict phrasing of the requirements for redevelopment in Flood Zone 3, stated in Section 10.23 of TAN15, is the key policy wording which results in concerns by the LPA for the proposals.

TAN-15 advises that residential development should not occur at ground floor level in Flood Zones 2 and 3. However, without a pragmatic framework for applying this aspect of TAN-15, there is a risk that decision-making runs contrary to the risk-based framework of TAN-15 and the placemaking and sustainable development aims and objectives of Planning Policy Wales. Further clarity to this stance has been provided by the TAN-15 FAQs published by Welsh Government in March 2026, which highlights that whilst the intent of national policy is clear, it cannot address every conceivable circumstance.

In this instance, it is considered that strict adherence to this requirement would run contrary to the LDPs placemaking objectives, including policy SP7 and SC1.

As noted above and in the FCA, the site is not shown to be at risk of flooding, and the building is predicted to be flood free. Therefore, the concerns with the site should not be as a result of the risk of flooding, but the ridged application of policy. It therefore seems counterproductive to restrict redevelopment within a town centre where a site has been shown to meet the aims of TAN-15 and is not predicted to flood.

It may be beneficial for the LPA to be aware that JBA have been involved in the preparation of a number of Strategic Flood Consequences Assessments for authorities around Wales. The preparation of such documents have resulted in policy discussions with the authorities where key to a successful LDP is the inclusion of appropriate local policy wording to ensure that there is a small degree of flexibility afforded to redevelopment proposals which propose ground floor residential uses and the requirements of Figures 5 and 6 of TAN-15 have been demonstrated to be achieved.

In light of the above, in our professional opinion, refusal on flood risk grounds would not be supported by the available evidence. We hope that

you find the additional detail provided above useful in arriving at your decision.

Yours sincerely,

For and on behalf of Jeremy Benn Associates Limited

A handwritten signature in black ink, appearing to read 'F. Tomalin', is displayed within a light gray rectangular box.

Faye Tomalin BSc (Hons) MSc C.WEM MCIWEM

Principal Flood Risk Analyst

faye.tomalin@jbaconsulting.com