



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

FAO: Chantalle Lamnea, Senior Planning Officer

Planning Ref: P2025/0646

Our Ref: TCY-JBAU-XX-XX-LT-Z-0001.docx

7 July 2026

Dear Ms Lamnea,

RE: P2025/0646 - Former Health Centre Hunter Street Briton Ferry - NRW Response (V2)

We write in response to Natural Resources Wales' (NRW) consultation comments on the above project, dated 15 May 2026. This letter has been prepared with input from Amity Planning (planning consultants) and Bear Consulting (designers).

We welcome NRW's acceptance of the assessment of flood levels carried out by JBA Consulting and the design's compliance with the flood frequency and tolerances in Figures 5 and 6 of TAN15.

NRW has, however, raised concerns about the flood void proposed beneath the building, specifically whether it would remain practical, effective and maintainable over the lifetime of the development. NRW has not disputed the hydraulic principle that a properly designed void can avoid floodwater displacement.

NRW's comments reflect a general concern about the long-term performance of flood voids, rather than an objection based on any published NRW or Welsh Government policy that precludes their use in principle. The key issue is whether appropriate design, access, maintenance obligations and safeguards can be secured.

NRW has concluded its consultee response by leaving it to the Local Planning Authority (LPA) to decide whether the void solution is acceptable and can be sufficiently managed and maintained.

This letter explains why the proposed flood void is an appropriate and practical means of avoiding floodwater displacement, why it improves the flood risk performance of the extant permission, and how NRW's residual concerns can be addressed through detailed design, access, inspection and maintenance controls secured by condition and/or an approved maintenance plan.

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NRW's remaining concerns

NRW has raised concerns about whether the void would be practical, effective and sustainable over the lifetime of the development. NRW is not supportive of this type of mitigation due to:

- the potential for the void area beneath the proposed building to become redundant over consecutive flood events due to siltation;
- limited ability to access the area beneath the building footprint to keep it open and free of such material; and
- the potential for obstruction of the void to affect its effectiveness.

If these concerns are not addressed, poor-functioning flood compensation could increase flood risk to third parties.

The key question for the LPA is therefore whether the submitted and conditioned design can provide adequate access, resilience to obstruction and a clear maintenance mechanism.

Description of design

The proposed building will be supported on piled foundations, with reinforced concrete ground beams and a suspended precast concrete ground floor. This will form an under-slab flood void beneath the building footprint, allowing floodwater to enter and temporarily occupy the space below the suspended slab rather than being displaced elsewhere.

The void will be formed between the proposed pile mat/formation level and the underside of the suspended ground floor construction. Based on the current structural design, the available vertical clearance will be approximately 905mm from the top of the pile mat to the underside of the suspended floor construction. The void will therefore function as a low-height crawl space/restricted access zone, rather than a normally occupied working area.

Floodwater entry, ventilation and cross-flow will be provided by horizontal 225mm diameter vent pipes with external grilles/covers, positioned at approximately 2m centres and set approximately 150mm above external ground level. Multiple openings around the building perimeter mean the void will not rely on a single inlet or outlet and will also provide cross-ventilation.

The external ends of the vent pipes will be fitted with suitable grilles, covers or security screens to reduce blockage by larger debris, discourage vermin ingress and prevent unauthorised access, while maintaining sufficient open area for ventilation and floodwater movement. These pipes are for floodwater movement and ventilation only; separate dedicated access points will be provided for inspection and maintenance.

Inspection and maintenance access will be provided through dedicated access points into the flood void. The primary arrangement will comprise larger lockable/demountable external grille openings within the perimeter elevations,

positioned so the void can be inspected and cleaned from multiple locations. Supplementary internal access hatches will be provided where required to ensure all parts of the void can be inspected and maintained.

The dedicated access points will be sized and located to allow controlled maintenance access, including the use of inspection, washdown and jetting equipment, subject to final coordination with the architectural, structural and M&E/drainage layouts. Due to the restricted height of the void, any physical entry will be treated as restricted access and may require confined space procedures. The final access strategy, safe system of work, ventilation requirements, rescue arrangements and any restrictions on entry will be reviewed and confirmed by the developer/end user in conjunction with the CDM/BSA Principal Designer and relevant dutyholders before occupation.

The void drainage arrangement will include low-level drainage connections to allow residual floodwater to drain from the void following a flood event. A perforated pipe network will be installed within the pile mat beneath the building footprint. This will collect residual floodwater from within the void/pile mat area and drain it externally to the proposed drainage field once flood levels have receded.

The perforated pipe network will be accessible via external manholes/inspection chambers outside the building perimeter, allowing inspection, rodding and jetting without relying on access from within the building footprint. Following a flood event, the void will be inspected and washed down, residual water will drain via the pipe network, and any deposited silt or debris will be removed by an appropriate maintenance contractor.

Nature of flood risk

The site lies within a natural depression. If flooding occurs, floodwater would gradually accumulate around Hunter Street, similar to water filling a bathtub. Flow velocities would therefore be very low, and the void is not required to act as a rapid conveyance route. Its function is to provide passive flood volume beneath the building so floodwater can be accommodated without being displaced onto neighbouring land. The distributed arrangement of openings provides resilience to localised blockage because performance does not depend on a single inlet or rapid inflow pathway.

The most significant source of flooding is from the sea. This is not a present-day risk and is expected to become more material over the longer term (>50 years) as sea levels rise due to climate change. NPTCBC has previously considered how this risk could be managed, including cutting off the tidal flood pathway beneath the M4 flyover. Although future investment in flood defences is not guaranteed, this context indicates that flood events are unlikely to be frequent. Even if some sediment deposition occurred, this would not automatically render the void ineffective.

There is therefore limited basis for concluding that the void would quickly become redundant over consecutive floods due to siltation, particularly where inspection and maintenance arrangements are secured.

Maintenance Arrangements

The flood void will be included within the site maintenance regime and will be the responsibility of the end user or appointed management company. It will be inspected routinely and after flood events to confirm that it remains clear, unobstructed and able to function as intended.

Routine inspections will check that external grilles/covers/security screens, vent openings and dedicated access points remain secure, open and unobstructed. They will also confirm that the void is not affected by silt, debris, vegetation, stored materials or any other material that could reduce flood volume or restrict floodwater movement.

After a flood event, the void will be inspected as soon as reasonably practicable once floodwater has receded and it is safe to do so. Deposited silt, debris or other material will be removed by a suitable maintenance contractor. Controlled washdown/jet washing will be used where required, with residual water draining via the perforated pipe network. Bulk silt and debris will be removed before or during washdown to limit sediment entering the pipe network.

The perforated pipe network will also be maintained. External manholes/inspection chambers outside the building perimeter will allow the pipework to be inspected, rodded and jetted as required. These chambers will be checked routinely and after flood events to confirm that the pipework remains free-flowing and able to drain residual floodwater from the void/pile mat area to the proposed drainage field.

Where blockage, siltation or damage is identified, the affected part of the void drainage system will be cleaned, rodded or jetted as necessary. Any removed silt or debris will be disposed of appropriately.

Due to the restricted height of the void, any physical entry will be treated as restricted access and may require confined space procedures. Access will only be undertaken by competent persons in accordance with a suitable safe system of work, including appropriate ventilation, lighting, PPE, rescue arrangements and any other measures identified by the end user, appointed management company and CDM/BSA Principal Designer.

A detailed Flood Void Inspection and Maintenance Plan will be prepared prior to occupation and retained by the end user or appointed management company. The plan will set out inspection frequency, post-flood procedures, cleaning methodology, access arrangements, responsibilities, record keeping, and procedures for checking and clearing the vent pipes, perforated pipe network and associated external chambers.

The maintenance plan will also recognise that the flood void forms part of the wider post-flood recovery process. Following a flood event, external hardstanding, landscaped areas, access routes, drainage features and other affected areas of the site will also be inspected and cleaned before the site is returned to normal operation.

Summary

The Section 73 proposals should be given significant weight in flood risk terms because they represent clear betterment against the extant planning permission. If the application is not approved, the applicant retains the ability to implement the previously approved, larger care home scheme. The relevant planning judgment is therefore whether the amended scheme would materially improve the flood risk position when assessed against that lawful fallback, rather than against an idealised flood-risk-free alternative.

The amended scheme does so in several respects. It reduces the number of bedrooms from 40 to 24, reducing the number of future residents potentially exposed during an extreme flood event. It also reduces the scale and intensity of development, including servicing requirements, foul flows and operational use. The submitted FCA and Outline Drainage Strategy explain that the amended scheme adopts a passive flood-compatible strategy, with finished floor levels set at 6.280mAOD and a void beneath the building to accommodate floodwater rather than displace it onto neighbouring land.

There is also precedent for this type of approach being accepted in Wales. By way of context, a student accommodation scheme in Swansea was approved under planning application 2021/0867/FUL with flood void/undercroft flood storage forming part of the flood risk mitigation strategy. Although each application must be determined on its own facts, it demonstrates that the use of void space beneath a building has previously been accepted by a Welsh LPA where the design was supported by an appropriate flood risk assessment and where residual matters could be addressed through the planning process.

This is materially more favourable than the extant permission. The extant scheme was granted before the current TAN15 Flood Map for Planning position applied to the site in the same way and was not supported by the same detailed consideration of floodwater displacement, compensatory storage, surface water attenuation or long-term flood-compatible design. Without the amended proposals, the larger extant scheme could be delivered without the safeguards now proposed. That is important given NRW's principal concern that the proposals could displace floodwater and increase flood risk elsewhere.

The proposed void directly addresses that concern. It would be formed beneath a suspended ground floor supported by piled foundations, with floodwater entry, ventilation and cross-flow provided by multiple 225mm diameter vent pipes around the building perimeter. These would be fitted with suitable grilles, covers or security screens, with larger lockable/demountable access points and any

necessary internal hatches provided so that the void can be inspected and cleaned from more than one location. A perforated pipe network within the pile mat, accessible via external manholes/inspection chambers, would allow residual water to drain and enable inspection, rodding and jetting without relying solely on access from within the building footprint.

In planning balance terms, the amended Section 73 scheme should attract significant positive weight. It would deliver a smaller and less intensive development, reduce the number of vulnerable occupants potentially exposed during an extreme flood event, incorporate raised finished floor levels and safe refuge, and provide a SuDS-based drainage strategy with attenuation and restricted discharge. Most importantly, it includes a passive flood void designed to avoid floodwater displacement.

For these reasons, we respectfully request that the Local Planning Authority gives significant positive weight to the amended Section 73 proposals. NRW has accepted the flood level assessment and has not disputed the hydraulic principle of the flood void. The remaining issues relate to detailed design, inspection, access and maintenance. These can be secured through planning conditions and an approved Flood Void Inspection and Maintenance Plan, including routine and post-flood inspections, clearing of grilles, vent pipes and access points, removal of silt and debris, washdown where required, and inspection, rodding or jetting of the perforated pipe network and associated external chambers.

Yours sincerely,

For and on behalf of Jeremy Benn Associates Limited

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

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