

JBA Project Code	2025s0904
Contract	Neath Abbey Road Neath Modelling
Client	Alpha Building Group Ltd
Day, Date and Time	2 July 2026
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Subject	Response to Consultee Comments

1 Response to Consultee Comments

Following submission of the Flood Consequences Assessment (FCA) and hydraulic modelling in relation to planning application reference P2026/0202, Natural Resources Wales (NRW) and the Lead Local Flood Authority (LLFA) have provided consultee comments. This technical note provides a response to the comments and concerns raised.

1.1 Natural Resources Wales Consultee Response

NRW provided consultee comments in an email dated 19 June 2026. The comments are as follows:

“Our Hydrology Team have reviewed the hydrology submitted. Their conclusion is that it is not acceptable for current use.

They note they have received little information regarding the source of the hydrology and their assumption is that this has been extracted from a general model from some years ago. We advise there have been significant changes in methodology, software, and datasets in the last few years, and the hydrology should be done with the latest versions. They provide the following observations.

Comparing the flows at the inflow points (assumed to be flow calculation locations):

- *Neath: NRW's calculation of QMED is lower than provided. Our flows are then higher up to the 0.5% AEP (max. deviation 6%), and lower for the longer return periods (13% difference at 0.1% AEP).*
- *Dulais: NRW's calculation of QMED is higher than the flows provided, but all other flows are lower than those provided. Provided flows are 27% higher than ours at 0.1% AEP.*
- *Clydach: NRW's flows are all lower than those provided, with differences ranging from 7% at QMED to 51% at 0.1% AEP.*
- *Crythan: NRW's calculation of QMED is higher than provided, but for higher return periods the provided flows are higher, with a maximum difference of 44% at 0.1% AEP.*

Please can this be addressed as NRW will be unable to complete the review of the model until the hydrology is agreed and the new values remodelled.”

1.1.1 JBA Response to NRW

Thank you for your consultation response in relation to the hydrology used in the hydraulic modelling. It is disappointing that the hydrology has been reviewed without consideration of the hydraulic modelling and FCA to provide wider context and the resulting delays in the review process this will cause. A response to the hydrology comments is provided below.

The revised NRW calculations indicate an overall reduction in the flows used in the model, which would likely result in lower fluvial flood levels for the 0.1% AEP plus climate change event. The River Neath and River Dulais have by far the largest catchment areas of 260km² and 48km², respectively, for which the NRW calculations indicate a 13% and 27% reduction in flows compared to those modelled for the 0.1% AEP event. Whilst the NRW calculations show higher flows for the Clydach and the Cyrthan in the 0.1% AEP event, the catchment areas are significantly smaller, at approximately 1km² and 4.2km². The Cythan is also located 500m downstream of the site on the opposite side of the River Neath. These smaller watercourses are therefore unlikely to influence flood risk at the site. Consequently, the use of the previous hydrology provides a proportionate and robustly precautionary approach to the assessment of flood risk from rivers.

Furthermore, referring to Table 5-1 of the FCA, this shows that the tidal risk to the site is more significant than the fluvial risk. The tidal 0.1% AEP event plus climate change flood level, which has been used to inform the proposed flood mitigation, is 0.22m higher than the equivalent fluvial event. This means that any changes resulting from changes to the fluvial risk are unlikely to impact the proposed flood mitigation strategy or conclusions of the FCA.

The hydrology from the River Neath 2015 study was utilised for the hydraulic modelling, as we considered it appropriate for the nature and scale of development, precautionary, and of lesser importance to the tidal risk component.

1.2 Lead Local Flood Authority Consultee Response

The LLFA provided consultee comments in an email dated 10 June 2026. The comments are as follows:

- *“Could the FCA quantify the net change in floodplain storage arising from the proposed ground level changes, to demonstrate that any displacement of floodwater is negligible and confined within the site boundary. “*

1.2.1 JBA Response to LLFA

Figure 4-1 of the FCA shows that the site is not at significant risk from surface water and small watercourses, and no ground level changes are proposed within the flood extent for the 0.1% AEP event plus climate change from these sources.

The impact of the proposed ground level changes on tidal and fluvial risk has been assessed in the FCA and is in the process of being reviewed by NRW. The hydraulic modelling in the FCA demonstrates that displacement of tidal and fluvial floodwater in the 0.1% AEP event plus climate change is negligible and changes in flood depths are confined to the site boundary (refer to Figures 5-8 and 5-9 of the FCA).

2 Conclusion

We trust that the above responses address the comments received from NRW and the LLFA, however we would be happy to discuss any points further. We look forward to receiving comments from NRW in relation to the hydraulic modelling and FCA.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Nick Yeo', written in a cursive style.

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For and on behalf of Jeremy Benn Associates Limited