

SO/348-02/7639ER

27th February 2026

Life Property Group Ltd
65 Station Road
Port Talbot
SA13 1NW



For the attention of: Mr David Darkin

RESPONSE TO PRELIMINARY ECOLOGICAL APPRAISAL REQUEST – 48 STATION ROAD, PORT TALBOT

Dear Mr Darkin,

I am writing with regard to the proposed development at 48 Station Road, Port Talbot, consisting of the redevelopment of a former bank to 13 affordable accommodation units and an office (Reference: **P2026/0067**).

Background

ExCAL Limited were previously commissioned to undertake a Preliminary Roost Assessment (PRA) for bats at the property, with an initial survey being undertaken on 29th September 2023.

No development has occurred at the property since the original PRA was undertaken in 2023.

The developer however now wishes to continue with the proposals and given that the original PRA was undertaken approximately 2 years prior to this stage, the recommendation was made that the building should be subjected to an updated PRA to ensure that the characterisation of the building and its potential to support roosting bats had not changed since 2023.

An updated PRA was subsequently undertaken on 29th August 2025, the results of which remain consistent with those recorded in 2023.

Planning Responses

Further to the above, Neath Port Talbot's planning department have issued an 'Invalid Notice' relating to the submission, and one of the concerns raised relates to a lack of a Preliminary Ecological Appraisal (PEA) having been submitted as part of the proposals.

The following response was received from Neath Port Talbot on February 25th 2026: -

Biodiversity Survey – *Although the PRA may not reference a PEA. A PEA / extended Phase 1 habitat survey will still be required. Although a survey has been undertaken for Bats, this does not consider other habitats and species as an extended Phase 1 habitat survey of the site would. Please refer to point 2 of the invalid notice.*

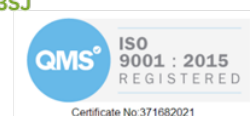
Further to the above, the below response was also received on February 26th 2026: -

You will note the objectives of Chapter 6 of PPW 12.

In addition, The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions. A PEA should be used to identify the 'baseline' and inform the GIS which must demonstrate that the step-wise approach has been applied (DECCA framework). As a site-walkover survey has not been undertaken (except in relation to bats) it suggests that the GIS may have been based on assumptions and therefore, may not accord with PPW12.

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Company Registration Number 3199872 ExCAL Limited is a member of the Hendre Holdings Group



Our Ecologist also provides the following observation: "The proposals have the bat boxes on the wrong elevation, they need to be exposed to the sun for part of the day so should be on south, south-east or south-west elevations As this involves new building all boxes should ideally be integrated into the fabric of the building in the form of a bird/bat brick."

Recent appeals also show that inspectors are giving considerable weight to biodiversity, GI/bio-enhancements and the quality of GIS's.

Site Baseline Data and Conditions

Although a formal PEA has not been undertaken at the site, the PRA seeks to identify both potential roosting features within building present on site, along with the potential for surrounding habitats to support foraging, commuting and roosting bats.

Subsequently, some level of assessment of the baseline ecology present at the site was made during the PRAs undertaken in both 2023 and 2025.

The majority of the site's footprint is taken up by the existing buildings present on site. A small area of hardstanding is present at the east (rear) of the property, adjacent to which a caged staircase permits access to the flat roof of the building in this location.

Vegetation was extremely limited on site. Limited opportunistic growth was noted within some cracked areas of hardstanding, (where ruderal species including common dandelion (*Taraxacum officinale*) was identified), whilst limited growth of ivy (*Hedera helix*) and a small stand of buddleia (*Buddleja davidii*) was noted in the vicinity of the aforementioned access cage.

The habitats identified during the PRA were assessed to be of low ecological value, although the buddleia and ivy were assessed to offer some foraging opportunity for adult stage invertebrates.

The recommendation is however made that biodiversity at the site is considered as part of the development proposals, with Net Benefit for Biodiversity (NBB) being an integral objective in line with Chapter 6 of PPW.

This could be achieved by installing bird or bat boxes, and by including the provision of wildflower planting within planters or similar at the site for invertebrates, to improve the site's potential to support these species.

Conclusion

Based upon the observations and baseline information gathered at the site during both PRAs, we would be of the opinion that a PEA would not provide significant additional information required to support the application or Green Infrastructure Statement (GIS) which will also be required as part of this process.

We would recommend instead that the information gained during the PRAs should be used to support the application submission *in lieu* of a PEA, however Neath Port Talbot's planning department or ecologists may have a difference of opinion on the above.

I trust the above is acceptable, however if you would like to discuss any aspect of the above in further detail, then please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Steve Owen".

Steve Owen
Environmental Consultant