

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

Our Ref: CAS- 307759-W4V7
Your Ref: P2026/0067

Dyddiad/Date: 20 May 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Proposed redevelopment of former bank to 13 affordable accommodation units and office (A2)

Lleoliad/Location: 48 Station Road, Port Talbot, SA13 1LJ

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 05 May 2026.

We have/continue to have **concerns** with the application as submitted. To overcome these concerns, further consideration is required regarding **flood risk**. Further details are provided below.

Flood risk

The planning application proposes a highly vulnerable development, the redevelopment of a former bank to 13 affordable accommodation units, with ground floor residential development proposed. The application site is located within Flood Map for Planning Flood Zones 2 and 3 (Rivers) it is also within a TAN15 Defended Zone; however, the standard of protection is only the 1% Annual Event Probability (AEP) fluvial without the allowance of climate change. The site is not considered to be at tidal flood risk.

We have reviewed the Flood Consequence Assessment (FCA) (Document Ref. 2511 Rev. 3, dated February 2026) submitted by phg Consulting Engineers.

The FCA looks to use Natural Resources Wales hydraulic models for Port Talbot however, there has been no review to ensure that the hydrology within these models is still accurate.

The FCA states that the finished floor levels of the existing building are estimated to be 9.55m above ordnance datum (AOD) which shows a marginal level of free board compared to the 1% plus climate change AEP (fluvial) which is stated to be 9.455m AOD.

In the 0.1% plus climate change AEP (fluvial) the flood level is stated to be 10.143m AOD to which the FCA states the flood level within the building is up to 0.593m which is within

the tolerable condition relating to the depth of flooding as per Figure 6 of TAN15 (March 2025) and is shown in the FCA's Table 1.

The maximum velocities of flood waters within the application boundary exceeds 1.2m/sec during the 0.1% plus climate change AEP which is significantly above the tolerable conditions within Figure 6 of TAN15 (March 2025) which is 0.15m/sec for highly vulnerable development (residential) as shown in the FCA's Table 2.

As a form of mitigation for the occupants of ground floor the FCA proposes "easy access to the first floor to be provided for safe refuge in an event of extreme flood", the suitability of this mitigation will be of consideration for the local planning authority as the proposed plans only show a communal hallway which is questionable as to whether this is can be considered safe refuge as there are no amenities for the ground floor residents in such an event.

Whilst the FCA has demonstrated that the proposed can comply with the criteria of Figure 6 of TAN15 (March 2025) in relation to flood depths the predicted velocities exceed tolerable conditions. Furthermore, we would highlight section 10.23 of TAN15 (March 2025) which states "Any redevelopment proposal must be consistent with the acceptability considerations in section 11. In addition, proposals which include residential development must ensure that such uses do **not** occur at ground floor level."

In summary the proposal looks to bring new residential development (including ground floor use) into an area considered to be at fluvial flood risk. Whilst the finished floor levels quoted show the ground floor to be theoretically flood free in the 1% plus climate change AEP (Figure 5) and within the tolerance of Figure 6 for flood depth in the 0.1% plus climate change AEP, the predicted flood velocities exceed the tolerable conditions. It is therefore considered the proposed redevelopment does not meet the requirements of TAN15.

Protected Species

We have reviewed the Preliminary Roost Assessment for Bats (report no. 348-02-01.R2, Dated September 2025, By ExCAL) submitted in support of the application. We note the conclusion of the report that the building possesses negligible/low potential to support roosting bats. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with the LPA's internal ecologist.

Other matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Harriet Power

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.