

Ein cyf/Our ref: CAS-302079-D6C9
Eich cyf/Your ref: P2025/0646

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

Dyddiad/Date: 15 May 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Section 73 application (variation of condition) to amend the approved development for (i) a reduction in the number of bedrooms at the care home from 40 to 24; (ii) a reduction to the footprint of the building; (iii) changes to the roof form and elevations/materials and (iv) a revised landscaping, planting and boundary treatment scheme with the variation of planning condition 2 (approved plans), 6 (hard landscaping and planting scheme), 8 (demolition and construction method statement), 9 (obscure glazing) and 12 (enclosures) of planning permission p2023/0767 granted 23.08.2024.

Lleoliad/Location: Former Briton Ferry health centre, Hunter Street, Briton Ferry, Neath Port Talbot, SA11 2SF

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 April 2026.

We 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

We note the original planning application for a residential care home received permission under planning reference P2017/0662 in August 2024. We had no objection to raise in our response letter to that application, dated 26 July 2017 (our reference: CAS-36167-Z6F4) and note the application site at the time was situated within Zone B of the Development Advice Map (DAM) contained in Technical Advice Note (TAN)15 (2004) (now superseded).

As previously advised in our response letter dated 24 March 2026 (our reference: CAS-302079-D6C9), we note this application is to vary the conditions listed above due to design changes, including the reduction in the number of bedrooms at the care home and a reduction in the building's footprint. The application is for a highly vulnerable development (residential care home), and we previously highlighted that under the Flood Map for Planning, which has replaced the DAM, the application site is identified to be at risk of

flooding and entirely within Flood Zone 3 (Sea). Following our previous advice, we note we have been reconsulted on the application as it is now supported with a 'Flood Consequences Assessment & Outline Drainage Strategy' (hereon known as the FCA) by Bear Consulting, dated March 2026.

We refer you to Section 10 of TAN 15 (March 2025) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the FCA in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

The 'Flood Risk Statement' undertaken by JBA, dated December 2025 (contained within Appendix F of the FCA) has identified that based on existing ground levels, the site could experience maximum flood depths of 1.88m in the 0.5% plus climate change (+cc) event and 2.6m in the 0.1%+cc event.

Due to these flood depths, the proposal does not meet the tolerances of Figures 5 and 6 of TAN15. To mitigate these flood depths, it is proposed that the finished floor levels (FFLs) will be set to 6.280m above ordnance datum (AOD) therefore the building internally will be flood free in the 0.5%+cc event. In the 0.1%+cc event, the building would flood to a depth of 600mm. Both would meet the requirements of Figures 5 and 6 respectively.

The FCA proposes to mitigate the potential of increased flood risk elsewhere because of the new building's footprint by incorporating a void beneath the building. Whilst in theory this void may mitigate the potential of increased flood risk elsewhere, we raise concerns over whether the void would be practical, efficient, and sustainable for the lifetime of the development. We advise that this type of mitigation is not one that NRW are supportive of due to the high potential that the void area beneath the proposed building would become redundant very quickly over consecutive floods due to siltation and the lack of ability to achieve access beneath the building footprint to keep this area open and free of such material. If this void cannot be maintained to be clear of sediment/flood debris etc., and left unobstructed, this form of mitigation is unlikely to be reliable and result in increased flood risk to third parties.

In summary, the FFLs are proposed to be set at a level that would show compliance with Figures 5 and 6 of TAN15, and the FCA proposes compliance of Section 11.4 with the inclusion of a void underneath the building that we would not be in support of. We advise it is a decision for your authority as to whether this is acceptable and can be sufficiently managed and maintained.

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,

Hannah Roberts

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.