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PRELIMINARY ECOLOGICAL APPRAISAL

PLOTS 2 AND 3, LAND AT MENAI AVENUE,

CROESERW.

ON BEHALF OF

TAI TARIAN LTD

January 2026

Ref: HE/20/2025/A – Issue 1

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All habitat and protected species surveys present a ‘snapshot’ of conditions existing and species present, or considered having potential to be present, at the time of survey. Many species are mobile and distributions can vary across time. Results and findings presented in this report should be considered with these factors in mind.

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SUMMARY

Hawkeswood Ecology was instructed to carry out a Preliminary Ecological Appraisal (PEA) on plots 2 and 3 as identified in plans on land off Menai Avenue, on the western boundary of Croeserw, in relation to their suitability for residential development. The plots are within the current built area of Croeserw and have previously been used for now demolished residential purposes.

The plots are generally unmanaged and dominated by rank grassland and scrub. Plot 2 is dominated by poor semi-improved grassland on a levelled area of damp ground which is within a designated Site of Importance for Nature Conservation. Plot 3 is a large area dominated by rank poor semi-improved neutral grassland with an area of rush dominated wet neutral grassland. Plot 2 shows potential for development of acid grassland with some typical acidic species occurring.

Given the late date of the PEA an in season walk over of the Site is recommended to properly assess the value of the habitats on Site. At this stage, further survey is also recommended for the presence of reptiles with habitats on Site appearing suitable for a number of reptile species including slow worm, adder and grass snake.

At this stage, it is considered there is not enough information to properly assess potential development impacts, however some initial recommendations are made to reduce any impacts that may occur. Following completion of the recommended surveys, the impacts and recommendations will be reviewed and updated as necessary for the scheme to provide a Net Benefit for Biodiversity in accordance with guidance from the Welsh Government. These issues are discussed more fully within the body of the report.

1 INTRODUCTION

- 1.1 Hawkeswood Ecology was instructed by Tai Tarian Ltd to carry out a Preliminary Ecological Appraisal (PEA) on two plots of land off Menai Avenue, Croeserw, Neath Port Talbot to assess their suitability for residential development. The plots lie around a Grid reference centred on SS 86483 95269.
- 1.2 The two plots are dominated by modified grassland and have varying amounts of woody scrub. The grassland type varied between poor semi-improved neutral to acid grassland mosaics. All are unmanaged and all occur on land that has been previously developed. Both plots supported housing developments which were demolished around 1985 (Plot 2) and 2010 (Plot 3). Neither plot appears to under any form of formal management.
- 1.3 The Site lies on the south western boundaries of Croeserw with the main A4063 Cymmer to Maesteg road bounding the west of Plot 3.
- 1.4 The objectives of the survey are:
 - To ascertain the habitats and species present within the Site;
 - To assess the ecological and nature conservation value of the Site;
 - To assess the potential ecological impacts of any proposed development;
 - To provide recommendations to mitigate the proposed works.
- 1.5 The PEA was carried out on 10th October 2024.

2 SURVEYOR EXPERIENCE

- 2.1 The surveyor and report author is Eric Hawkeswood. Eric has many years experience of broad habitat and detailed botanical and species surveying. He has extensive experience of protected species survey and holds Natural Resources Wales scientific and conservation licenses for bats and dormice. He has been a professional in the nature conservation field for thirty five years formerly working as Reserves Manager and Conservation Officer at Gwent Wildlife Trust and Woodland Manager for the Ruperra Conservation Trust. Eric has worked as an Ecological Consultant as joint proprietor of Hawkeswood Ecology since 2001.

3 METHODOLOGY AND CONSTRAINTS

Desktop Study

- 3.1 The South East Wales Biodiversity Records Centre (SEWBReC) was asked to provide records of protected species and habitats from a radius of 2 kilometres of the approximate Site centre. Records post 2000 were assessed, those of earlier dates were not considered unless of specific interest or of locally important species. Consideration is also given to local records within 500 metres of the Site and to species that are mobile, i.e. bats, and could be expected to be on Site given the Site conditions.

Preliminary Ecological Appraisal

3.2 The Preliminary Ecological Appraisal (PEA) was carried out in line with the guidance issued by The Chartered Institute for Ecology and Environmental Management (2013) and consisted of a walk-over survey of the proposed Site considering features within and adjacent to it. Habitats were categorised according to the Phase 1 Habitat Survey guidelines (JNCC, 2010) and annotated onto a map (Figure 1). Plant assemblages were described using the DAFOR scale of cover abundance (Appendix 1) and each habitat was recorded using Target notes (Appendix 2); a species list of plants identified during survey is given in Appendix 3 and photographs are given in Appendix 4.

3.3 In addition, the Site was assessed for its potential to support protected species.

Constraints

3.4 The Appraisal was taken late in the survey calendar and as such some plant species may not have been visible. Recommendations are made within this report in relation to this constraint.

4 DESKTOP STUDY FINDINGS

Species

4.1 SEWBRc reported a total of 951 priority and protected species records from the 2 kilometre search area. The majority of records relate to the built areas of Cwmafan, Baglan and the Afan corridor. Otherwise the records are scattered over the search area with a number of road casualty records of badger and otter reported from the M4.

4.2 Protected and priority species reported that are relevant to the Site are listed below:

<i>Species</i>	<i>Legislation</i>	<i>Distance of nearest record (approx.)metres</i>
<i>Herpetofauna</i>		
Adder	WCA5, S7, Bern,	1k+
Common frog	HDir, WCA5, Bern	200
Common lizard	WCA5, S7, Bern	200
Common toad	WCA5, S7, Bern	300
Grass snake	WCA5, S7, Bern	500
Palmate newt	WCA5, Bern	700
Slow worm	WCA5, S7, Bern	700
<i>Birds</i>		
Barn owl	WCA1.1, WCA9, Bern, CITES, LI(VC43),	700
Bullfinch	S7, WBR(RSPB), UKBAm(RSPB)	200
Cuckoo	S7, WBR(RSPB), UKBR(RSPB)	200
Curlew	BDir22, S7, WBR(RSPB), LI(VC43), UKBR(RSPB)	1k+
Dunnock	S7, Bern, UKBAm(RSPB)	200

Preliminary Ecological Appraisal, Two Plots of Land at Menai Avenue, Croeserw.
Hawkeswood Ecology – February 2026

Fieldfare	BDir22, WCA1.1, WBAm(RSPB), UKBR(RSPB)	100
Grasshopper warbler	S7, WBR(RSPB), UKBR(RSPB)	200
Hen harrier	BDir1, WCA1.1, S7, CITES, WBR(RSPB), LI(VC43)	1k+
House sparrow	S7, WBAm(RSPB), UKBR(RSPB)	200
Kestrel	S7, Bern, CITES, WBR(RSPB), LI(VC43), UKBAm(RSPB)	200
Linnet	S7, Bern, WBR(RSPB), UKBR(RSPB)	200
Merlin	BDir1, WCA1.1, Bern, CITES, WBR(RSPB), LI(VC43), UKBR(RSPB)	700
Peregrine falcon	BDir1, WCA1.1, Bern, CITES, LI(VC43)	200
Red kite	BDir1, WCA1.1, WCA9, CITES, WBAm(RSPB)	200
Redpoll	S7, WBAm(RSPB), UKBR(RSPB)	200
Redwing	BDir22, WCA1.1, WBAm(RSPB), UKBR(RSPB)	Within 1k square
Reed bunting	S7, Bern, WBAm(RSPB), UKBAm(RSPB)	200
Skylark	BDir22, S7, WBAm(RSPB), UKBR(RSPB)	950
Song thrush	BDir22, S7, Bern, WBAm(RSPB), UKBR(RSPB)	Within 1k square
Spotted flycatcher	S7, Bern, WBR(RSPB), UKBR(RSPB)	600
Starling	BDir22, S7, Bern, WBR(RSPB), UKBR(RSPB)	Within 1k square
Tree pipit	S7, Bern, WBAm(RSPB), UKBR(RSPB)	1k+
Yellowhammer	S7, Bern, WBR(RSPB), UKBR(RSPB)	780
<i>Mammals</i>		
Brown hare	S7	1.2K
Common pipistrelle	EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP	300
Hedgehog	S7, Bern	150
Red deer	NRW, Bern	150
Soprano pipistrelle	EPS, HDir, WCA5, S7, Bern, RDB2 (UK), LBAP	300
<i>Plants</i>		
Bluebell	WCA8	800
<i>Lepidoptera</i>		
Small heath	S7, RDB1 (UK)	200
Dingy skipper	S7, RDB1 (UK) - LI(SEWBRcC)	550

Small pearl bordered fritillary	S7, RDB1 (UK) LI(SEWBRcC), LI(VC43),	650
Marsh fritillary	HDir, WCA5, S7, Bern, RDB1 (UK) - VU, LI(SEWBRcC)	700
Wall	S7, RDB1 (UK)	700
Small square spot	S7	200
White ermine	S7	200
Buff ermine	S7	200
Shoulder striped wainscot	S7	200
Broom moth	S7	200

- 4.3 Four hundred and ninety four Species of Conservation Concern records were reported of which all but fifteen were of birds. Of these many were species that could be expected to be seen on or near the Site including willow warbler, goldfinch, greenfinch, green woodpecker, wheatear, swallow, swift, snipe, woodcock, meadow pipit and whitethroat.
- 4.4 Other records include three flowering plants of which sea buckthorn at 600 metres distance is the closest; nine invertebrate species are recorded of which the Orange-footed Furrow Bee at approximately 450 metres is the closest and three moss records all of which are in excess of 1.5 kilometres from the Site.
- 4.5 SEWBRcC provided 513 records of Locally Important Species of which birds, flowering and lower plants and invertebrates were the most frequent. Many of the species recorded are related to the open hillsides in the area but some could occur closer to the Site. Generally the small and disturbed nature of the plots may select against the presence of many species.
- 4.6 Invasive non-native species recorded from the 1 kilometre square the Site sits in are Japanese knotweed, Himalayan balsam, garden lupin, Himalayan cotoneaster, buddleia and variegated yellow archangel.

Designated Sites

- 4.7 No statutory sites are reported within the 2 kilometre search area. A number of Sites of Importance for Nature Conservation (SINC) are reported. Plot 2 lies within Parc Croeserw SINC which is cited for a mosaic of habitats including lowland heath, lowland meadow and purple moor-grass and rush pasture. Approximately 445 metres to the east lies Nant Y Wern SINC which is cited for Lowland meadows, Lowland dry acid grassland and Purple moor-grass and rush pasture.
- 4.8 Just over 200 metres distant are ancient semi-natural woodland SINC, part of a cross county NPT SINC designation and the Site also lies within the county wide NPT watercourses SINC designation.

Habitats

- 4.9 The Site is not characterised on the Natural Resources Wales (NRW) habitat map. Locally reported habitats include broad-leaved woodland (including an area of semi-natural ancient woodland

approximately 200 metres to the north), semi-improved acid grassland and semi-improved neutral grassland.

- 4.10 SEWBRc data is confidential and cannot be released into the public domain without prior permission in writing from SEWBRc. Hawkeswood Ecology holds the data on the client's behalf for one year (in accordance with conditions) in case of further query. All queries should quote reference 0245-701.

5 FIELD SURVEY FINDINGS

- 5.1 The plots were surveyed in October 2024, past the best season for surveying grassland, limiting habitat classification and meaning some species may not have been visible at the time of survey. A general description of each plot is made below and any significant features identified. See Figure 1, Phase 1 map; Detailed Target Notes can be found in Appendix 2 and photographs in Appendix 4.

Plot 2

- 5.2 Plot 2 is a large area of levelled land with a north facing bank and footpath at the southwestern boundary and another north facing bank towards its northern boundary. It is dominated by grassland with frequently occurring scrub and is damp without any obvious standing water, the site is unmanaged. Previously this area supported flats which were demolished around 1985.
- 5.3 The majority of the Site is dominated by poor semi-improved grassland (TN1). Yorkshire fog, creeping bent and cocksfoot are abundant with frequently occurring false oat-grass and common bent. Purple moor-grass occurs occasionally. Other species noted included ribwort plantain, common field speedwell, bird's-foot trefoil, spiked sedge, silverweed and ragwort. Common heather is locally abundant near along with male fern and hard fern. The presence of common heather and purple-moor grass indicated acidic edaphic conditions at least in parts of the Site.
- 5.4 Scrub species present included holly, garden privet, dogwood and hawthorn. Invasive non-native species noted were *Crocsmia* and a cotoneaster species. The presence of reed canary-grass indicated the damp nature of the ground.
- 5.5 At TN2 is a bank with a easterly aspect which supports common heather, purple-moor grass, tormentil and gorse, evidencing the acidic nature of parts of the Site. *Crocsmia* and rosebay willowherb were also present with some goat willow scrub.

Plot 3

- 5.6 Plot 3 is the largest of the three plots, bonded to the north by the A4063 and to the south by Menai Avenue it has housing to the east and west. It consists of a largely flat piece of ground which formerly supported housing, demolished around 2010 -2012. It is rank and dominated by largely neutral grassland and heavily disturbed with a wet area in the centre which may hold standing water occasionally.

- 5.7 The dominant habitat is rank neutral grassland (TN3) best described as poor semi-improved, which is dominated by red fescue and cocksfoot, false oat-grass is also locally frequent and soft rush locally abundant. Other species noted were locally abundant creeping buttercup, locally frequent red clover and ribwort plantain and occasionally occurring field mouse-ear, dandelion, common field speedwell, field horsetail and hogweed. *Crocospia* is present along the Menai Avenue road verge as are a garden geranium species.
- 5.8 At TN 4 is a large area of species poor wet neutral grassland which is dominated by soft rush; creeping buttercup, yellow flag and field horsetail are locally abundant. This area is species poor and bare ground is frequent.
- 5.9 At TN5 is an area of scrub to the rear of existing housing which is dominated by goat willow and garden privet with a field layer of bramble. Great willowherb and hogweed are locally frequent here. TN6 is similar in composition to TN3 but has been planted in part with rowan, the planted trees failing, species also noted here included bird's-foot trefoil and silverweed.

Summary

- 5.10 Both plots show extensive signs of previous disturbance. Plot 3 in particular appears to be impacted by disturbance from neighbours with garden escapes present, bonfires and general dumping of rubbish. In Plot 2, some species present, such as common heather and purple moor-grass, also indicate the acidic nature of the soils locally. Neither of the plots can be identified as Sites of Importance for Nature Conservation (SINC) based on the survey data gained, however it is noted that Plot 2 does form part of the larger Parc Croeserw SINC.

Fauna

- 5.11 Faunal species observed during the survey were limited to a small number of bird species, house sparrow, jackdaw, robin, blackbird and starlings on or near the Site and an overflying red kite.
- 5.12 Bats are likely to use the plots for foraging but opportunities for roosting are very limited with no obvious roost features noted amongst the trees present. No evidence of badgers was noted from the Site and there was no suitable habitat for dormouse, water vole, otter or great crested newts.
- 5.13 Common bird species are likely to utilise the scrub for breeding and are likely to forage across the Site. It is considered unlikely that ground nesting species could occur do to the disturbance suffered across all three plots.
- 5.14 The plots have potential for reptiles, particularly slow worm but possibly also common lizard and grass snake. This potential will need further investigation.

6 RELEVANT LEGISLATION AND POLICIES

Birds

- 6.1 Part I of the Wildlife and Countryside Act 1981 (as amended) makes it an offence (with certain limited exceptions and in the absence of a licence) intentionally to kill, injure or take any wild bird, or intentionally to damage, take or destroy its nest whilst being built or in use, or to take or destroy its eggs. Consequently, even common birds such as blackbirds or robins, and their nests and eggs

are protected in this way. Any works involving removal or other management of trees or shrubs must be undertaken outside the breeding bird season (March- August).

- 6.2 Further, section 1(5) of Part 1 of the W&C Act states any person intentionally disturbing any wild bird included in Schedule 1 whilst it is building a nest or is in or near a nest containing eggs or young or disturbs the young of such a bird is committing an offence and liable to a special penalty.
- 6.3 The Conservation of Habitats and Species Regulations 2017 (as amended) has strengthened the protection of wild birds and their habitats. The Regulations now serve “To help preserve, maintain and re-establish habitats for wild birds.”
- 6.4 Under the amended Regulations, Local Planning Authorities (as well as national statutory conservation bodies such as Natural Resources Wales) are required to protect and create bird habitat.

European Protected Species (Bats)

- 6.5 All UK bats are protected under the Wildlife and Countryside Act 1981. Schedule 5 of this act makes it illegal to intentionally kill, injure or take these animals. It is also an offence to intentionally damage or destroy their place of rest. In 2007 the offences of killing, injuring or taking species under Section 9(1), 9(2) and 9(4)a of European Protected Species listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) were removed to avoid duplication with their protection under Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (The Habitats Directive) as amended. The regulations remove the defence of inadvertent or accidental damage to roosts and make the offence ‘absolute’.
- 6.6 They are also protected under Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (The Habitats Directive) as amended which requires the United Kingdom government to provide European Protected Species with strict protection.
- 6.7 The Habitats Directive is transcribed into England and Wales Law by The Conservation of Habitats and Species Regulations 2017, this legislation consolidates amendments made to the earlier 2010 act. This legislation states in Part 3, Protection of Species, paragraph 43(1) that a person who:
 - (a) deliberately captures, injures or kills any wild animal of a European Protected Species,
 - (b) deliberately disturbs wild animals of any such species,
 - (c) deliberately takes or destroys the eggs of such an animal, or
 - (d) damages or destroys a breeding site or resting place of such an animal,is committing an offence.
- 6.8 Further, with regard to disturbance of EPS, Paragraph 43(2) that disturbance is an act which is likely to:
 - (a) to impair their ability—
 - (i) to survive, to breed or reproduce, or to rear or nurture their young, or
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or

(b) to affect significantly the local distribution or abundance of the species to which they belong.

- 6.9 In the case of a development involving the loss or modification of a habitat which may affect an EPS the above legislation must be considered and it may be necessary to apply to Natural Resources Wales for a European Protected Species Derogation Licence EPSL.
- 6.10 The introduction of the Conservation of Habitats and Species Regulations 2017, has removed the defence of killing or injuring a protected species during a lawful operation, thus even in an instance where planning permission is granted, the presence of EPS must be considered and mitigated for prior to commencement of works. Under the above regulations, a derogation licence can only be given if three tests are satisfied:
- The action proposed is in the interest of preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance to the environment;
 - That there is not a satisfactory alternative;
 - That the action proposed will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.
- 6.11 Failure to satisfy the regulations and obtain an EPSL where required is likely to result in prosecution and can lead to severe fines of up to £5000 per animal and possible imprisonment.
- 6.12 Eight species of bat are listed in section 7 of the Environment Wales Act (2106). Section 7 of the Act provides a list of living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in Wales. This is a list of species considered at threat within Wales and in need of conservation management to maintain and enhance population numbers.
- 6.13 A duty is placed on the Local Authority by the Welsh Assembly Government to maintain and enhance populations of species listed in Section 7.

Reptiles

- 6.14 All common reptiles are protected under the Wildlife and Countryside Act 1981 (as amended) schedule 5, from deliberate injury or killing (Section 9(1)) and sale (Section 9(5)).
- 6.15 A Welsh Government licence is not required to handle or disturb slow worms but there must be proper consideration of the presence of these animals on site and mitigating measures implemented to minimise any impacts on them.
- 6.16 All British reptiles are listed under section 7 of the Environment Wales Act (2106). Section 7 of the Act provides a list of living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. A duty is placed on the Local Authority by the Welsh Assembly Government to maintain and enhance populations of species listed in Section 7.

Amphibians

- 6.17 All amphibians are protected from sale under the Wildlife and Countryside Act 1981 (as amended).

Invasive species

- 6.18 Any species that are listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) must not be impacted from any development in such a manner that the spread of them is encouraged. Crocosmia has been identified from the Site and measures should be in place to prevent its spread during any development.

Environment (Wales) Act 2016

- 6.19 The Welsh Government has made a commitment to reversing the decline in biodiversity in Wales and increasing the resilience of its ecosystems. This is in part fulfilled by the Environment (Wales) Act 2016 which introduces a new biodiversity duty, which highlights biodiversity as an essential component of ecosystem resilience.
- 6.20 Section 6 of the Act places a duty on public authorities to ‘seek to maintain and enhance biodiversity’ and ‘promote the resilience of ecosystems’ in the exercise of their functions. Section 7 places a duty on Welsh Ministers to identify lists of living organisms and types of habitat (priority habitats and species) in Wales that are of key significance to sustain and improve biodiversity in relation to Wales. Local Authorities have a duty to consider this list when considering planning applications, applying the principles of sustainable management of natural resources. The Section 7 list is a revised list of the Section 42 list in the Natural Environment and Rural Communities Act, 2006.

Well Being of Future Generations (Wales) Act 2015

- 6.21 The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.
- 6.22 The Act includes a number of key principals and resilience of ecosystems forms a core principle, it aims for ‘*A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).*’

Securing Biodiversity Enhancements

- 6.23 The Chief Planning Officer sent a letter to LPAs (dated 23rd October 2019) following discrepancies over the implementation of LPA duty under the environment (Wales) Act 2016. This letter provides clarification on the Welsh Governments approach to Paragraph 6.4.5 of PPW 11. The purpose of the letter was to ‘*clarify that in light of the legislation and Welsh Government policy outlined above, where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission.*’ Biodiversity maintenance and enhancement and Ecosystem Resilience will need therefore to be considered in any future planning application.
- 6.24 Planning Policy Wales (PPW) 12 has recently been released and has strengthened the green infrastructure segments. In respect of the Chief Planning Officers letter (6.32 above) and a consultation process Paragraph 6.4.5 in PPW 12 now requires a net benefit for biodiversity in any development and reads:
Planning authorities must seek to maintain and enhance biodiversity in the exercise of their

*functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A **net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before**, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.*

- 6.25 *Within this is incorporated the use of DECCA – Diversity, Extent Condition, Connectivity and Adaptability of ecosystems, factors used to measure Ecosystem Resilience. These Policies and other policies in Chapter 6 of PPW 11 relate to the requirements of the Section 6 Duty of the Environment (Wales) Act 2016.*

Neath Port Talbot (NPT) Council Policies

- 6.26 Strategic Policies SP14 and SP15 are relevant to development in the NPT countryside and coastal areas. Of particular importance is policy EN7 in SP15. This policy aims to control unrestricted developments that affect the ability of the countryside to cope sustainably. The introduction to Policy EN7 is given below:

Policy EN 7 Important Natural Features:

Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where: 1. Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or 2. The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.

7 DISCUSSION AND IMPACT ASSESSMENT

Habitats

- 7.1 The two plots are dominated by poor semi-improved grassland with some scattered scrub. Plot 2 is a previously levelled area which is dominated by grasses but again shows development of species typical of acidic soils such as purple moor-grass. All plots have been previously developed and support recovering vegetation typical of disturbed Sites along with some species typical of edaphic conditions prevailing in the local area.
- 7.2 Plot 3 is dominated by disturbed rank poor semi improved neutral grassland (but see recommendations). A small area of species poor wet neutral grassland lies within this area at TN4, this is dominated by soft rush and creeping buttercup, further survey for properly assessing the habitat is necessary to value this and other habitats within all of the plots of land.
- 7.3 The plots are unmanaged and show disturbance to a greater or lesser extent. In Plot 3 this extends to the use of the Site for bonfires and general rubbish tipping is also evident. It is noted that Plot 2 lies within the Parc Croeserw SINC which is cited for lowland heath, lowland meadow and purple moor-grass and rush habitats, none of which were clearly dominant in this plot.
- 7.4 In relation to use by protected species, it is probable that bats would forage over the areas, however there is no significant potential for roosting bats in either plot; many of the trees are young and there were no obvious Potential Roost Features (PRFs) noted. Birds are also likely to use the plots for foraging and also likely to breed in the scattered scrub. The use of the Site by ground nesting birds is unlikely; all of the plots are heavily disturbed and this, plus the small size of the plots, will preclude their use for breeding purposes.
- 7.5 All of the plots show potential for use by reptiles, particularly slow worm, common lizard and grass snake.

Characterisation of Impact

- 7.6 At this stage, Hawkwood Ecology are not aware of any development proposals for the Site. In addition, it is considered that the Site would need to be resurveyed at an appropriate time of year to properly assess the value of habitats on Site, reptile presence absence survey is also necessary to assess if reptile species are present on the plots.

Ecosystem Resilience

- 7.7 Under the Environment (Wales) Act 2016 and Well Being of Future Generations Act 2015 require Local Planning Authorities (LPA's) and other public bodies must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. Assessment of the Ecosystem Resilience is therefore an integral part of the LPA's duty and they will need to consider the impacts of the proposed development upon the resilience of the adjacent wooded areas in this context. LPAs are directed to consider the resilience of ecosystems early in the planning process to aid assessment of the impacts of any proposed development upon biodiversity. In addition, a letter from the Chief Planning Officer clarified planning requirements in relation to biodiversity impacts (see Section 8, Relevant Legislation and Policies paragraphs 8.17-8.19) points out the responsibility of the LPA to maintain and enhance biodiversity and to provide 'a net benefit for biodiversity'.

- 7.8 The premise for Ecosystem Resilience is laid out in Section 4 of The State of Natural Resources Report, a 2018 document produced by Natural Resources Wales (NRW) on behalf of the Welsh Government. It lays out a framework for assessing ecosystem resilience. However, despite the duty placed on LPA's, there is no currently agreed format for this assessment.
- 7.9 Section 4 names five attributes that NRW consider 'building blocks' of ecosystem resilience, these are:
- Diversity
 - Extent
 - Condition
 - Connectivity
 - Adaptability
- 7.10 At this stage, with no development proposals available and further survey required it is not possible to properly undertake a review of the impacts on ecosystem resilience. This will be considered following the completion of all recommended Site surveys and the ensuing prediction of development impacts. Below is a brief comment against each heading.
- 7.11 Diversity – At this point, the diversity of each of the Plots cannot be properly determined. There appears to be some botanical diversity to all of the plots with possibly plot 2 showing the most varied flora.
- 7.12 Extent - the total area of the three plots is approximately 0.63 hectares, the largest plot is 0.33 hectares.
- 7.13 Condition – neither of the plots are under any form of management currently. Plot 3 in particular suffers from disturbance and is the contains a large bonfire site.
- 7.14 Connectivity – whilst none of the plots offer direct connectivity they do allow transport of animals from the estate to open countryside or into Parc Croeserw.
- 7.15 Adaptability - NRW comments that:
'Adaptability differs from the other attributes because it is part of the definition of resilience rather than an attribute that supports it. However, its inclusion in the Environment (Wales) Act is important because it emphasizes one of the most important features of resilience: dynamism and the ability to adapt to change' and that *'Adaptability cannot yet be quantified in an equivalent way to the other attributes and so we have not used it in the assessment of resilience in this State of Natural Resources Review'*. As such this cannot be considered in this report.

8 RECOMMENDATIONS

- 8.1 The following further surveys are recommended for this Site:
- An in-season walk over survey of the Sites to assess habitat value at an appropriate time of year;
 - Reptile presence – absence surveys on both plots;
- 8.2 Initial recommendations are made below, these will be reviewed and revised as appropriate following completion of the recommended surveys.
- 8.3 Any works on scrub and trees should be undertaken outside the accepted bird breeding season of March to August. There is no licence for the destruction of active bird nests and nest translocations invariably fail, in addition nest searches are often unsuccessful and miss nesting birds. Development timing is a key consideration should such works prove necessary. Checks should also be made prior to works undertaken outside the breeding season if the weather is fine as climate warming is leading to an extended breeding season.
- 8.4 Should any trees be removed as part of a proposed development at least an initial ground level inspection for the presence of Potential Roost Features (PRFs) for roosting bats should be carried out beforehand.
- 8.5 An area will be identified during the construction phase where chemicals and building materials can be safely stored and bonded to prevent contamination of the adjacent habitats. Measures to prevent and deal with any pollution incidents will be clearly outlined in a Construction Environmental Management Plan (CEMP) as will measures to be undertaken to protect the adjacent notified habitats.
- 8.6 An Ecological Clerk of Works (ECW) will be employed for the lifetime of the project to oversee sensitive works (i.e. tree works). In addition, an onsite senior staff member will be tasked with ongoing supervision of the CEMP.
- 8.7 Tree root protection zones (RPZ) will be outlined for retained trees as and if required, they will comply with BS 5837:2012 – Trees in relation to design, demolition and construction.
- 8.8 Any landscaping plan should introduce native species reflecting those present in the local area (all native species should be of local provenance). Woody plantings in particular should reflect those present in local hedgerows and woodlands. Typical species would include hazel, hawthorn, blackthorn, dog rose and holly. Other species that might be considered for their potential to support invertebrates or fruits include guelder rose, dogwood, crab apple and elder.
- 8.9 If gardens are closed board fenced hedgehog passes must be constructed into the fence bases as closed fencing can isolate areas of garden, particularly impacting on hedgehog travel. Boards will be cut out to give a minimum 15x15cm gap at the bottom, or more preferably be fitted to leave a minimum 15cm gap at ground level for the length of the fence.

- 8.10 Integral bat and bird boxes should be used in the new construction and bird boxes. In particular swift and house sparrow boxes should be used on a number of houses throughout the development.
- 8.11 Artificial lighting and spill into the surrounding habitats may present a significant impact upon nocturnal wildlife using the Site, in particular bats. If artificial lighting is to be utilised a predicted illuminance contour map (lux plots) should be produced and a methodology for reducing light spill into the neighbouring habitats to less than 1 lux if possible (i.e. by use of baffles). If this lux level cannot be achieved, further measures must be investigated to reduce light spill impacts.
- 8.12 Illuminance surveys should be undertaken by an appropriately qualified engineer and accord with the survey guidance presented in the Bat Conservation Trust guidance note 08/18 of 2023. The use of 'bat friendly' lighting (wavelengths above 550 nano metres) should be used for any street or footpath lighting employed.
- 8.13 Recommendations will be reviewed and updated as necessary following completion of the recommended further surveys.

9 CONCLUSIONS

- 9.1 Further survey for habitat and reptiles is required to allow a proper assessment of potential impacts of any development on the three plots.
- 9.2 The plots were assessed for ecological value at Croeserw, the plots all showed differing ecological characteristics with scrub, neutral grassland and grassland showing developing acidic characteristics.
- 9.3 All of the habitats are developing on land that has been previously disturbed and ongoing disturbance is significant, particularly in Plot 3.
- 9.4 Whilst Plot 2 lies within Parc Croeserw Site of Importance for Nature Conservation (SINC) at the current time it does not meet the criteria for designation as a stand-alone are. However, this needs to be measured against the impact of its potential loss to the value and sustainability of the whole SINC.

10 BIBLIOGRAPHY

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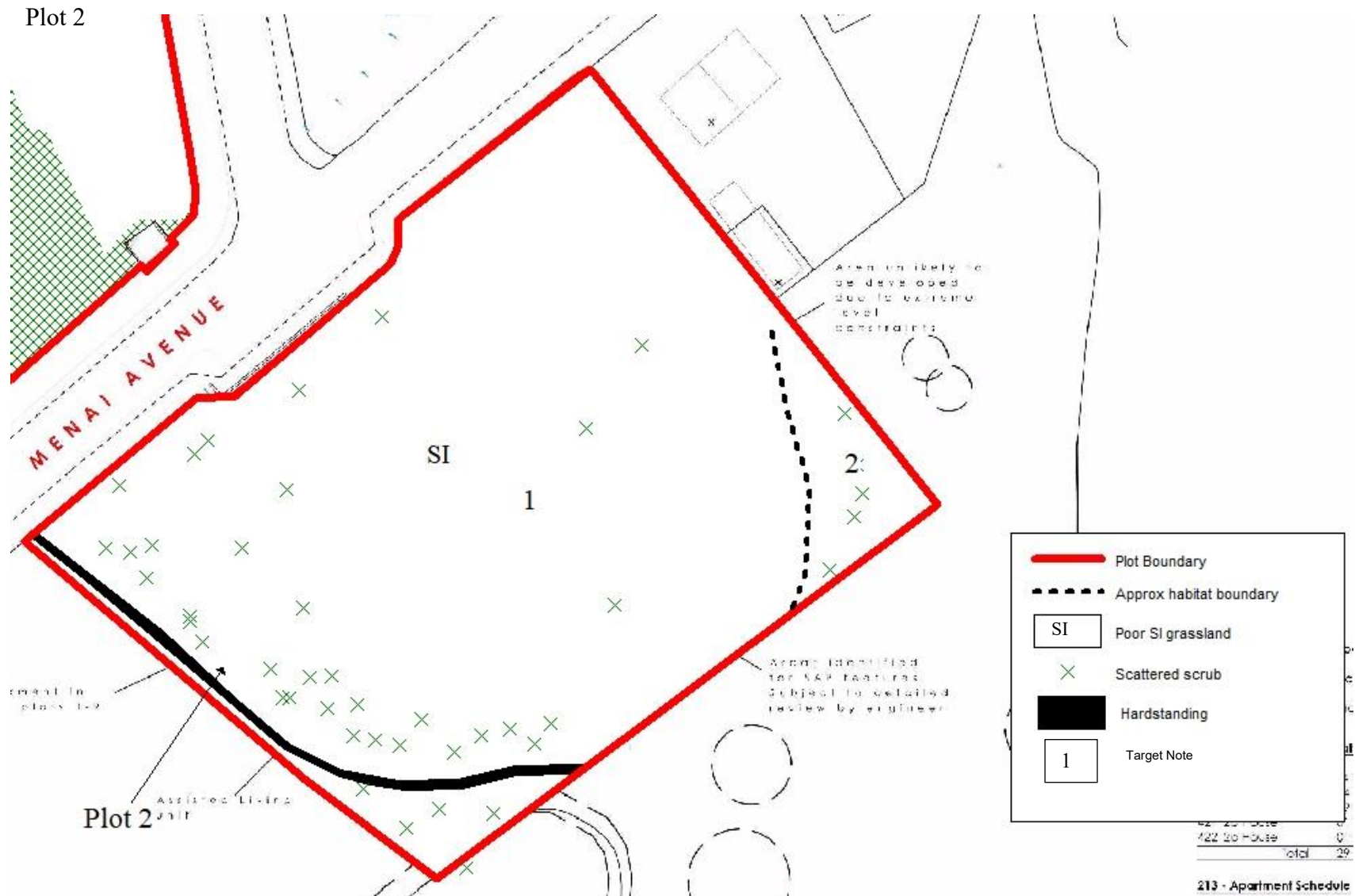
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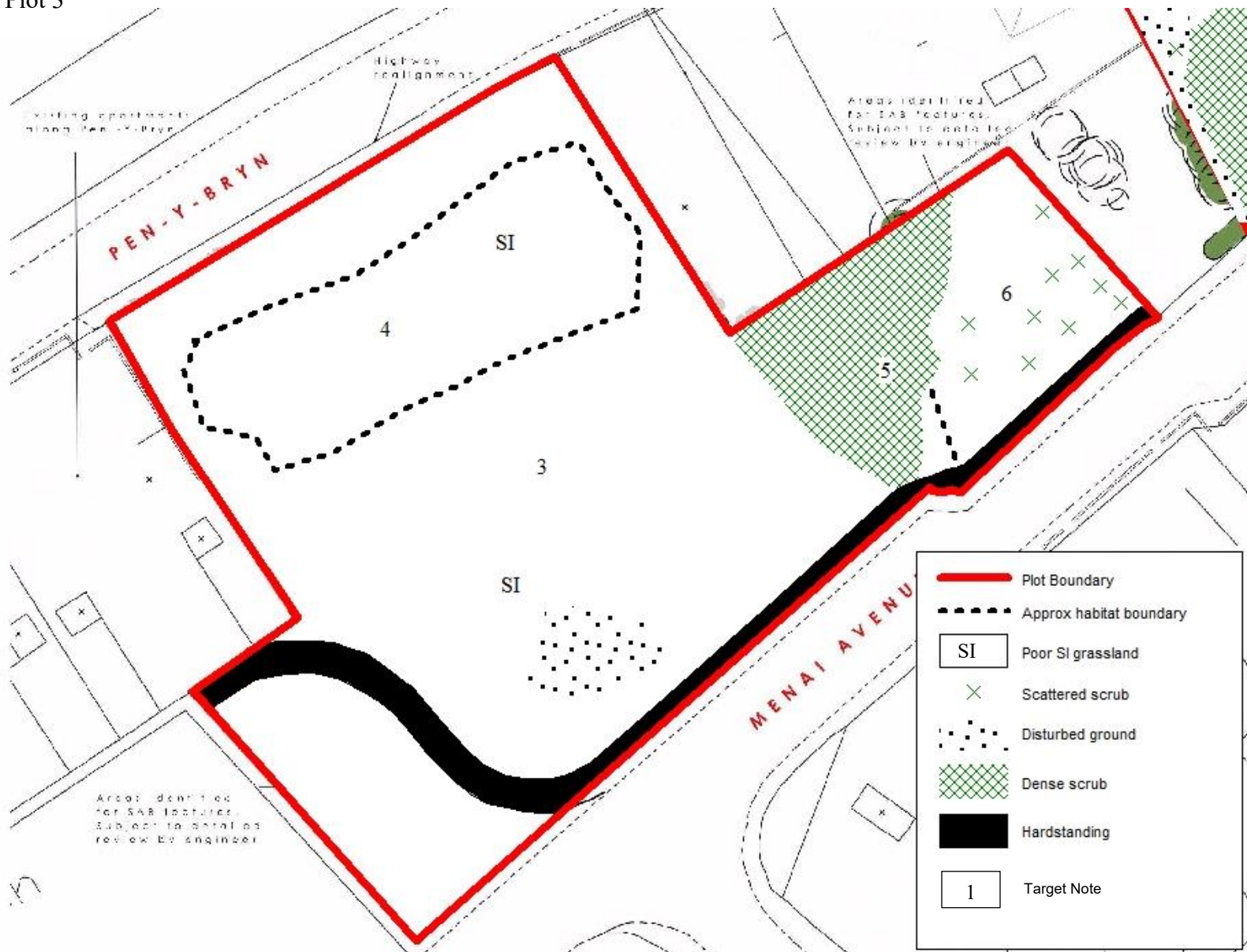
**FIGURE 1:
PHASE 1 HABITAT MAP**

Preliminary Ecological Appraisal, Two Plots of Land at Menai Avenue, Croeserw.
Hawkeswood Ecology – February 2026



Preliminary Ecological Appraisal, Two Plots of Land at Menai Avenue, Croeserw.
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Plot 3



APPENDIX 1
DAFOR SCALE OF COVER ABUNDANCE

The DAFOR scale is used as a simple measure of cover abundance for individual plant species within a habitat. The scale is as follows:

- D Dominant
- A Abundant
- F Frequent
- O Occasional
- R Rare
- (L Locally – sometimes used as a prefix to the above)

APPENDIX 2

PHASE 1 HABITAT SURVEY TARGET NOTES

Plot 2

1. A levelled area with a steep bank and footpath to the western boundary. Dominated by grasses with scattered scrub and unmanaged. Has the appearance of a neutral grassland that is being colonised by more acidic loving species such a purple moor-grass and common heather, damp. Forms part of Parc Croeserw SINC). Species noted were:

<i>Species</i>	<i>Frequency</i>
Bird's-foot trefoil	LA
Cocksfoot	A
Common bent	F
Common field speedwell	O
Common heather	LA
Cotoneaster sp.	R
Creeping bent	LA
<i>Crocospia</i>	R
Dog rose	R
Dogwood	R
False oat-grass	F
Garden privet	R
Hairy tare	LF
Hard fern	R
Hawthorn	O
Holly	R
Larch	R
Purple moor-grass	O
Ragwort	O
Red fescue	LF
Reed canary-grass	LF
Ribwort plantain	F
Silverweed	LF
Soft rush	O
Spiked sedge	R
Yorkshire fog	A

2. Bank at east of Site with an easterly aspect. Species noted were:

<i>Species</i>	<i>Frequency</i>
Common bent	F
Common heather	F
<i>Crocospia</i>	LA
Goat willow	O

Gorse	LF
Purple moor-grass	F
Rosebay willowherb	LF
Soft rush	F
Tormentil	LF

Plot 3

3. Rank species poor neutral grassland, heavily disturbed and with a recently used bonfire, damp, unmanaged. Species recorded were:

<i>Species</i>	<i>Frequency</i>
Broad leaved dock	o
Cocksfoot	A
Common field speedwell	O
Common sorrel	O
Creeping buttercup	LA
Creeping cinquefoil	O
Creeping thistle	R
<i>Crocsmia</i>	O
Dandelion	O
False oat-grass	LF
Field horsetail	O
Field mouse ear	O
Geranium sp.	O
Hogweed	O
Meadow buttercup	R
Red clover	LF
Red fescue	A
Reed canary grass	LF
Ribwort plantain	LF
Soft rush	LA

4. Very wet area in the grassland of TN1 dominated by soft rush with bare ground. Creeping buttercup and field horsetail are locally abundant. Species recorded were:

<i>Species</i>	<i>Frequency</i>
Common sorrel	F-LA
Creeping buttercup	LA
Field horsetail	LA
Hogweed	O
Soft rush	D
Yellow flag	LF

5. Woody and bramble scrub with occasional semi-mature goat willow and rarely occurring garden privet, bramble is abundant. Other species noted were frequent great willowherb and occasional hogweed and three semi-mature cypress trees.
6. Area of grassland similar to TN7 but has been planted with rowan, the planting has largely failed. Bird's-foot trefoil is locally frequent and silverweed occasional.

APPENDIX 3

LIST OF PLANT SPECIES RECORDED IN THE SURVEY

<i>Species</i>	<i>Scientific Name</i>
Bird's-foot trefoil	<i>Lotus corniculatus</i>
Bramble	<i>Rubus fruticosus</i>
Broad leaved dock	<i>Rumex obtusifolius</i>
Cocksfoot	<i>Dactylis glomerata</i>
Common bent	<i>Agrostis capillaris</i>
Common heather	<i>Calluna vulgaris</i>
Common oak	<i>Quercus robur</i>
Common sorrel	<i>Rumex acetosa</i>
Cotoneaster sp.	<i>Cotoneaster</i> sp
Creeping bent	<i>Agrostis stolonifera</i>
Creeping buttercup	<i>Ranunculus repens</i>
Creeping cinquefoil	<i>Potentilla reptans</i>
Creeping thistle	<i>Cirsium arvense</i>
<i>Crocosmia</i>	<i>Crocosmia</i> sp
Cypress	<i>Cupressus</i> sp
Dandelion	<i>Taraxacum officinale</i>
Dog rose	<i>Rosa canina</i>
False oat-grass	<i>Arrhenatherum elatius</i>
Field horsetail	<i>Equisetum arvense</i>
Field mouse ear	<i>Cerastium arvense</i>
Garden privet	<i>Ligustrum ovalifolium</i>
Geranium sp.	<i>Geranium</i> sp
Goat willow	<i>Salix caprea</i>
Gorse	<i>Ulex europaeus</i>
Hairy tare	<i>Vicia hirsuta</i>
Hard fern	<i>Blechnum spicant</i>
Hawthorn	<i>Crataegus monogyna</i>
Hedge woundwort	<i>Stachys sylvatica</i>
Hogweed	<i>Heracleum sphondylium</i>
Holly	<i>Ilex aquifolium</i>
Larch	<i>Larix</i> sp
Male fern	<i>Dryopteris filix-mas</i>
Maple sp	<i>Acer</i> sp
Meadow buttercup	<i>Ranunculus acris</i>
Purple moor-grass	<i>Molinia caerulea</i>
Ragwort	<i>Senecio jacobaea</i>
Red clover	<i>Trifolium pratense</i>
Red fescue	<i>Festuca rubra</i> agg
Reed canary-grass	<i>Phalaris arundinacea</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rosebay willowherb	<i>Chamerion angustifolium</i>

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Rowan	<i>Sorbus aucuparia</i>
Silverweed	<i>Potentilla anserina</i>
Soft rush	<i>Juncus effusus</i>
Spiked sedge	<i>Carex spicata</i>
Tormentil	<i>Potentilla erecta</i>
Yellow flag	<i>Iris pseudacorus</i>
Yorkshire fog	<i>Holcus lanatus</i>

APPENDIX 4 PHOTOGRAPHS

Plot 2



Looking across Plot 2 from Menai Avenue.



The bank at TN2.



Looking north east over TN1.

Plot 3



Bonfire site in TN7



Looking north across TN7 and TN8



Species poor wet neutral grassland TN8



Scrub at TN9 and open failed rowan planting area at TN10

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