

Preliminary Roost Assessment (PRA)

for

Bulldogs Development Centre, Port Talbot



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1 Summary

1.1 Proposed Development

- 1.1.1 This report has been written to support a planning application to Neath Port Talbot Council for the extension of an existing community facility, together with the creation of a new car park area and all associated landscaping. A number of semi-mature trees are also scheduled to be removed as part of the proposals. Due to the potential presence of roosting bats, bat surveys are required as part of the planning application submission.

1.2 Surveys

- 1.2.1 A Preliminary Roost Assessment (PRA) of the Site was completed in February 2022 and an assessment for breeding birds was made at the same time.

1.3 Results and Assessment

- 1.3.1 No evidence of bats was noted during the PRA, however a number of features within the existing building that may potentially be suitable for roosting bats were identified. No evidence of nesting birds was noted within the building.
- 1.3.2 The surveys classified the trees scheduled for removal as having low potential for bats. Nesting bird opportunities are present associated with these trees and surrounding scrub.

1.4 Recommendations

- 1.4.1 A number of recommendations have been given within the report, including a) further survey work for bats, b) tree felling/scrub clearance at an appropriate time of year, c) tool box talk for contractors felling/clearing the site, d) bat and bird box installation, e) appropriate tree planting plan and aftercare, f) repeat surveys after two years.

2 Introduction

2.1 The Proposed Development

- 2.1.1 Koru Ecology Associates was commissioned in January 2022 by C Stilwell (“the Applicant”) to complete a Preliminary Roost Assessment (PRA) at the Bulldogs Development Centre at Baglan in Port Talbot (“the Site”). The Site is centred on approximate National Grid Reference SS7464691959 and its location is shown in Figure 1 below.

Figure 1. Site Location (red pin).



- 2.1.2 This report has been prepared as part of a planning application to Neath Port Talbot Council for the proposed extension to an existing community facility, together with the creation of a new car park area and all associated landscaping. A number of semi-mature trees are also scheduled to be removed as part of the proposals.

2.2 Study Aims

- 2.2.1 This report details the results of the PRA and gives an initial assessment of the likely impact of the development proposals on bats. An assessment of impacts on breeding birds is also given.
- 2.2.2 Where appropriate, advice is given to help minimise impacts on bats and breeding birds, together with recommendations for additional survey work required and European Protected Species (EPS) mitigation licensing. If followed correctly, this advice will ensure that the development complies with current nature conservation policy and legislation.

3 Methodology

3.1 Study Scope

3.1.5 Koru Ecology Associates was commissioned by the Applicant to complete the following works in relation to the Site:

1. Desk-based study, including written consultation with the local biodiversity records centre to identify records of bats within the local area, and nearby protected sites designated for bats.
2. Preliminary Roost Assessment of the existing building, together with a number of trees scheduled for removal.
3. A check for signs indicating the presence of nesting birds.

3.1.6 All surveys were completed in accordance with current guidance (Collins, 2016).

3.2 Surveyor Qualifications and Experience

3.2.1 Diana Clark MSc MCIEEM completed the survey work for this project and wrote this report. Diana has worked as a consultant ecologist since 2003 and holds two degrees in related disciplines. She is also a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and holds a Natural Resources Wales science, education and conservation licence with respect to bats (licence number S088381/1). Koru Ecology Associates is also a CIEEM Registered Practice.

3.2.2 This report has been subject to technical review by Steve Hancock CEnv MCIEEM. Steve has worked as a consultant ecologist since 2009 and holds a degree in a related discipline. Steve is a Chartered Environmentalist, a full member of CIEEM and holds a Natural Resources Wales science, education and conservation licence with respect to bats (licence number S088498/1).

3.3 Study Limitations

3.3.1 Every effort was made during field visits to complete comprehensive surveys and produce a detailed description of the Site. However, no investigation can ensure the

complete characterisation and prediction of the environment 100% of the time. Natural and semi-natural habitats change over time, and thus results given in this report may become less reliable in the future. Repeat surveys are usually recommended if a significant period of time elapses between when surveys were completed and when works commence. Further details are given in Section 6 of this report.

- 3.3.2 No significant constraints were encountered during the survey, however several sections of the internal eaves areas could not be fully inspected due to the small size and lack of visible tie beams to traverse safely. This was addressed by way of accessing as much as possible and using a powerful torch to inspect inaccessible areas, together with binoculars where necessary.

3.4 Desk Study

- 3.4.1 South East Wales Biodiversity Records Centre (SEWBReC) was contacted and asked to supply records of bats within 2km of the Site. Records of roof-nesting birds within 150m were also requested.
- 3.4.2 The MAGIC website (<http://magic.defra.gov.uk>) was searched for details of Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs) relevant to bats within 10km of the Site.
- 3.4.3 Whilst biological data searches aren't always necessary for smaller projects such as those impacting a single building, due to the isolated nature of the building, together with the presence of linked tree/woodland habitat close by, a data search was considered appropriate for this project. Desk study data can help provide some additional information with regards to local context.

3.5 Preliminary Roost Assessment

- 3.5.1 A Preliminary Roost Assessment was completed by Diana Clark on 7th February 2022. During the visit, the building was assessed for its potential to support roosting bats, in accordance with current guidance (Collins, 2016), and included both external and internal inspections. Information searched for included locating clear evidence of bat presence (such as live or dead specimens, droppings, staining and/or vocalisations) and/or potential roosting locations/access points (such as lifted tiles, gaps between

fascias and walls, missing mortar in stonework, lifted lead flashing, gaps in timber joints, hanging tiles etc.).

3.5.2 A high-powered torch was used to inspect internal areas of the building, and an endoscope was used to more closely examine cracks, holes and gaps where required. Additionally, close-focusing binoculars were used to visually check any inaccessible parts of the external roof structure. Photographs and notes were taken of the building and any features of interest.

3.5.3 The area of trees scheduled for removal as part of the proposals were also subject to a ground-based visual inspection, with the aid of binoculars and a high powered torch where required.

3.6 Breeding and Roosting Birds

3.6.1 During the Preliminary Roost Assessment visits, the building and the trees were also checked for evidence of breeding and/or roosting birds. Evidence indicating their presence includes signs of nesting (for example, associated with chimney structures, internal beams, at the top of internal attic walls, within walls themselves, externally attached to buildings immediately below eave boards etc.). Additionally, the presence of birds themselves, droppings, pellets and broken egg shells were also looked for. Where present, notes were taken with regards to the location of any evidence and (where possible) likely species.

4 Results

4.1 Desk Study

- 4.1.1 No Special Areas of Conservation (SACs) or Sites of Special Scientific interest (SSSIs) designated for the presence of bats are located within 10km of the Site.
- 4.1.2 SEWBRc returned 16 records of bats within 2km of the Site, the majority of which are foraging, commuting or acoustic records and all of which are located at least 500m from the Site. Species recorded include common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, noctule *Nyctalus noctula* and myotis *Myotis* sp. One roost record was noted, approximately 545m from the Site (species unknown) and two records were of rescued common pipistrelle bats, located 438m and 788m away.
- 4.1.3 SEWBRc returned 16 records of roof-nesting birds within 2km of the Site, including Eurasian blue tit *Cyanistes caeruleus*, kestrel *Falco tinnunculus*, European herring gull *Larus argentatus*, lesser black-backed gull *L. fuscus*, pied wagtail *Motacilla alba*, great tit *Parus major*, house sparrow *Passer domesticus* and starling *Sturnus vulgaris*. All of these records are located at least 450m from the Site.

4.2 Site Context

- 4.2.1 The Site is located within the settlement of Baglan, Port Talbot, and is bordered to the north by Fenbrook Close, a residential area. To the south is Baglan Way, beyond which are further residential areas, and to the east is Port Talbot Town Cricket Club and associated grounds. The M4 is located approximately 300m to the east of the Site.

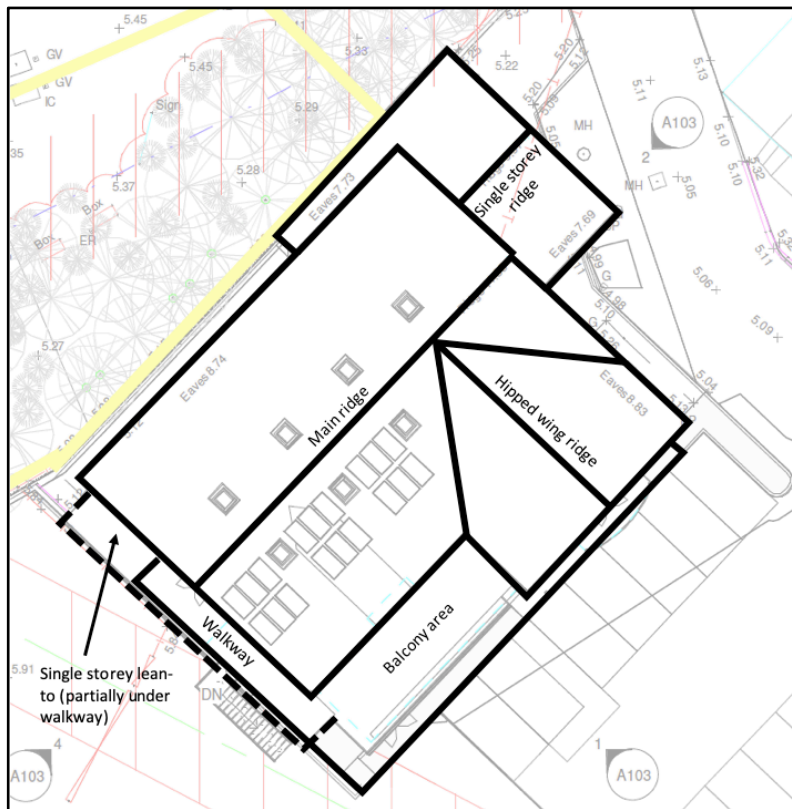
4.3 PRA of the Building

- 4.3.1 Figure 2 below shows the existing layout of the building. This comprises two-stories and has a main ridge line running approximately south-west to north-east, with a hipped wing extending from the eastern corner. A single storey section with its own ridge line is located at the northern corner, and a further single story section constructed as a lean-to is located along the south-western edge of the main building. An area of outside space is present at the upper level, and includes a narrow walkway on the south-

western side (above the single storey lean-to) and a wider section on the south-eastern corner.

- 4.3.2 Figures 3 and 4 show the north eastern and south western view of the main building. Figure 5 shows the rear of the building (north-western edge).

Figure 2. Existing layout of the building.



- 4.3.3 The building is of block construction and largely faced with bricks, aside from the lean-to area which is rendered. The majority of the roof covering is well-sealed and of imitation clay tiles, likely Decra system or similar, which are extremely lightweight and based around a steel core. The roof covering of the lean-to area is of (likely composite) slate tiles, with lead flashing along the join with the main building (see Figure 6). The soffits, fascia boards, gutters, downpipes, windows and doors are uPVC, and are largely well-sealed. A number of solar panels are attached to the south east elevation of the main roof area, alongside several Velux windows.



- 4.3.4 Internally, the majority of the roof spaces in the main part of the building have been lost to rooms built into the upper floor; only eaves cupboard spaces remain in the main roof structure. Some examples of these spaces are shown in Figures 7 and 8 below.
- 4.3.5 Modern truss structures have been used to create the main roof, resulting in multiple beams crossing these spaces. Breathable roofing membrane has been used underneath the tiling system, and all of the eaves cupboards are insulated with fibreglass.
- 4.3.6 The single storey section to the north of the building had its own specific hatch access and again was revealed to be constructed in modern truss style (see Figure 9 below). No insulation is present in this roof space.

Figure 7. Small eaves cupboard.



Figure 8. Large eaves area to rear.

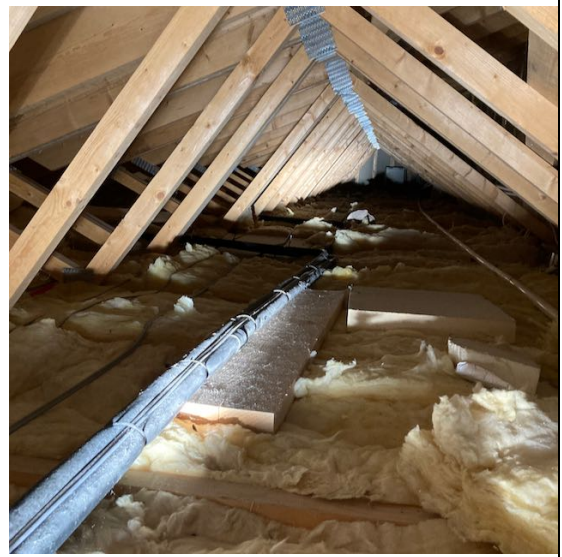
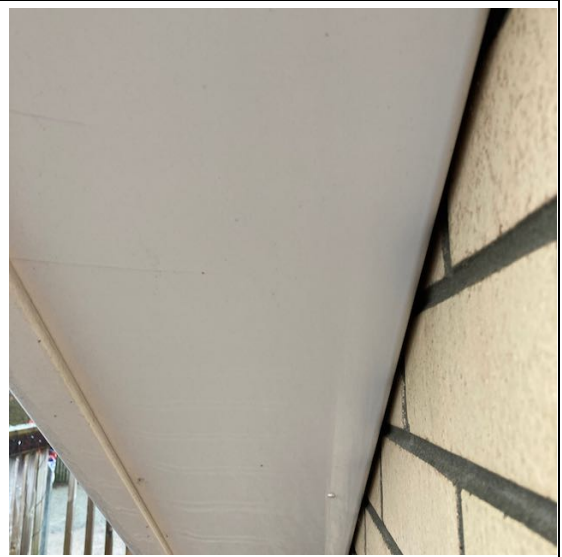


Figure 9. Loft space above single storey section to the north.



Figure 10. Example of gap between soffit box and wall.



4.3.7

No signs of bats were noted anywhere externally or internally, and the majority of the roof structure is sub-optimal for bats due to the materials used for construction (i.e. a steel-based roof covering). However, several features were noted that may provide access to bats and which couldn't be ruled out based on the visual inspection alone. These include the following:

1. **Gaps between the soffits/fascias and the walls of the building.** Whilst the majority of soffits/fascias are well-sealed, there are several areas where gaps are present, in particular on the gable ends to the north-east and south-east, and the lean-to section (see Figure 10 above and Figure 11 below for examples).

2. **Gaps at the verges of the lean-to structure.** These are poorly sealed and allow potential access to the space between the tiles and any underlay in this part of the building (see Figure 12 below).



4.4 PRA of Trees

- 4.4.1 The trees to the north west of the main building were found to be largely semi-mature and of a similar age. Species include Norway maple *Acer platanoides*, silver birch *Betula pendula*, Scots pine *Pinus sylvestris*, alder *Alnus glutinosa*, and ash *Fraxinus excelsior*. Some hazel *Corylus avellana* understorey is present, along with dense bramble *Rubus fruticosus* agg., particularly at the edges. Ground flora is dominated by ivy *Hedera helix*.
- 4.4.2 The trees generally appear to have grown up at a similar time and are located close together. This has encouraged rapid vertical growth with very little in the way of significant side branches being produced, and as a result opportunities for the creation of features that may be suitable for roosting bats are limited.
- 4.4.3 No features that may be suitable for roosting bats were observed during the tree inspection. Whilst it is noted that some loose ivy cladding is present on some of the trees, visibility from the ground was generally good and it was possible to see between the ivy to the trunk behind along the majority of stems.

4.5 Breeding Birds

- 4.5.1 No signs indicating the presence of nesting birds were noted anywhere within the building, and the likelihood of the building being colonised in the future is likely to be low due to lack of suitable access points.
- 4.5.2 No bird nests were noted within the trees and scrub, however it is likely that this area will be used by nesting birds in the breeding season as it comprises suitable habitat.

5 Assessment

5.1 Legislation

5.1.1 Bats and their habitats are protected under the Wildlife and Countryside Act 1981 (as amended), and by the Conservation of Habitats and Species Regulations 2017 (as amended). Taken together, these make it an offence to:

- a) Deliberately capture, injure or kill a bat;
- b) Deliberately disturb any bat, in particular any disturbance which is likely to (i) impair their ability to survive, breed, reproduce or to rear or nurture their young; or in the case of hibernating or migratory species, to hibernate or migrate; or (ii) to affect significantly the local distribution or abundance of the species to which they belong.
- c) To be in possession or control of any live or dead bat or any part of, or anything derived from a bat.
- d) Damage or destroy a breeding site or resting place of a bat;
- e) Intentionally or recklessly obstruct access to any place that bat uses for shelter or protection;
- f) Intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection.

5.1.2 A bat roost may be any structure a bat uses for breeding, resting, shelter or protection. It is important to note that since bats tend to re-use the same roost sites, current legal opinion is that a bat roost is protected whether or not the bats are present at the time.

5.1.3 The Environment Act (Wales) 2016 requires public authorities to seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales. In complying with this duty, public authorities must have regard to a list of living organisms and types of habitat which in their opinion are of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. This list must be prepared and published by the Welsh Ministers under Section 7 (1) of the same Act.

5.1.4 Until this list has been published, the list of Habitats and Species of Principal Importance previously published under Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006, should be used. Eight species of bat are on this list, including barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, noctule

Nyctalus noctula, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, brown long-eared *Plecotus auritus*, greater horseshoe *Rhinolophus ferrumequinum* and lesser horseshoe *R. hipposideros*.

5.2 Habitat Assessment for Bats

- 5.2.1 The Bat Survey Guidelines (Collins, 2016) state that habitats of moderate suitability for commuting and foraging bats include '*continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens*'.
- 5.2.2 Whilst the Site is located within the settlement of Baglan, a number of tree lines are present to the south and east, including along the edge of the cricket ground. Whilst it is acknowledged that this doesn't connect easily with the wider countryside (particularly with the M4 corridor lying in-between), there is reasonable connectivity within at least a 500m radius.
- 5.2.3 Taking the above into account, the suitability of commuting and foraging habitats for bats nearby is considered to be **moderate**.

5.3 Impact Assessment on Known Nearby Roosts

- 5.3.1 None of the known roosts highlighted by the desk study will be directly impacted on by the development proposals due to being more than 500m from the Site, No indirect impacts are predicted due to the nature and small scale of the proposals.

5.4 Building Assessment for Bats

- 5.4.1 The suitability of the building for bats is generally considered to be low due to a) the largely well-sealed nature of the roof structure, b) the nature of the materials used to construct the roof covering and c) lack of high-quality features.
- 5.4.2 However, due to the presence of gaps between soffits / fascias and walls, together with gaps at the verges of the lean-to roof, the presence of bat roosts cannot be ruled out by the PRA alone. Further survey work is required in order to do this, and is described in more detail in Section 6 of this report.

5.5 Tree Assessment for Bats

- 5.5.1 Given the age and condition of these trees, together with the lack of suitable features noted in all readily visible areas, the chances of suitable features being hidden by ivy in the less visible areas is considered to be very low. The Bat Survey Guidelines (Collins, 2016) states that '*a tree of sufficient size and age to contain PRFs (Potential Roost Features) but with none seen from the ground or features seen with only very limited roosting potential*' can be classed as being of **low suitability** for bats.
- 5.5.2 In accordance with the Bat Survey Guidelines (Collins 2016), no further survey work in relation to bats and these trees is required. However, all tree felling should proceed with caution, and a recommendation in relation to a tool box for contractors is given in Section 6 of this report.

5.6 Impacts on Breeding Birds

- 5.6.1 All nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition to this, for some rarer species (listed on Schedule 1 of the Act), it is an offence to intentionally or recklessly disturb them while they are nest building, or at, or near a nest with eggs or young, or to disturb the dependent young of such a bird.
- 5.6.2 Due to the potential for nesting birds within the trees and scrub scheduled for removal, works carried out will need to take appropriate precautions in order to avoid committing an offence. Further details are given in Section 6 of this report and, if carried out as stated, will result in negligible impacts on nesting birds.

6 Recommendations

6.1 Further Survey Work for Bats

- 6.1.1 In order to fully assess the impact of the proposed works on bats, additional survey work is required in relation to the building. The Bat Survey Guidelines (Collins, 2016) state that for low suitability structures at least one survey visit should be completed between May and August inclusive.
- 6.1.2 The number of surveyors used during each visit should be sufficient to cover all potential access points at the same time, without moving around. For this building, due to the complex nature of the roof covering, the presence of a balcony structure which obscures the view of some parts of the roof from the ground, together with the building's size, at least five surveyors will be required.
- 6.1.3 Once the additional survey work has been carried out, a full assessment of the use of the buildings by bats can be completed.

6.2 Scrub Clearance and Tree Felling

- 6.2.1 All works to remove trees and areas of scrub should be timed to avoid the bird nesting season, generally considered to be March – August inclusive. Therefore as far as possible scrub and tree removal should be completed between September and February. If that is not possible, the areas concerned should be checked by a suitably competent ecologist immediately prior to removal, and only cleared/felled if no evidence of nesting birds is observed. Should any nesting birds be present, clearance should not proceed until the young have fledged the nest or if the nest becomes unviable.
- 6.2.2 A tool box talk by a suitably competent ecologist should be given to all arborist contractors prior to proceeding with the tree felling. The talk should include a) general introduction to bats, b) how and why they are protected, c) information about the suitability of the trees for bats (i.e. low) and d) what to do in the unlikely event of bats and/or their roosts being found.

6.3 Enhancements

- 6.3.1 It is recommended that bat and bird boxes be built in to the new sections of the building wherever possible. Bat and bird boxes should be suitable for species likely to use the Site and its vicinity (for example starlings, blue tit, great tit and house sparrow, all of which were highlighted by the desk study and are likely to be in the area) and be installed in appropriate locations and at appropriate density.
- 6.3.2 Other enhancements could include the inclusion of a greater diversity of tree species to replace those that will be lost as a result of the proposals, i.e. an appropriate landscaping scheme and aftercare plan, ideally comprising native species appropriate to the location of the Site.

6.4 Repeat Surveys

- 6.4.1 In order to provide robust and up-to-date data for impact assessment, it is generally considered good practice to repeat surveys should a period of two years lapse between a survey being completed and the works commencing. **This should be addressed even if planning permission has already been granted**, since bats and breeding birds are protected by legislation entirely outside the planning system.

7 References

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