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Site Assessment Survey

PROJECT TITLE: Proposed creation of sheltered accommodation dwellings

SITE ADDRESS: Former Changing Rooms, Rhodes Avenue, Port Talbot, NPT

DATE: 13th March 2025

The applicant is seeking planning consent to develop a parcel of land which is a former changing rooms at Rhodes Avenue, Port Talbot. The site consists of areas of bramble scrub, hedgerow, single storey buildings and tarmac hardstanding car park. Planning permission is sought to build a sheltered accommodation complex which includes two semi-detached bungalows, six flats within a two storey building, residents garden and 10 car parking spaces.

The site is centred at approximately SS 75526 90492. An aerial image showing the development site within the context of the wider complex is provided in Appendix 1 at the end of this report. This report focuses on the land and habitats within the site boundary only. A habitat Map is available within Appendix 3.

Site Location

The development site is almost rectangular in shape but with the south west corner of the site cut off at approximately 45° and sits on a north west to south east axis. The site is level across most of its area, however land to the rear of the building is uneven.

The site is located on the south west side of Rhodes Avenue immediately east of Neath Port Talbot Hospital and within the residential area of Aberavon within Port Talbot. Residential housing mainly comprising of semi detached properties and traditional terraced housing are located to the north, east and south. The M4 motorway is located approximately 305m away to the north east and follows a north west to south east direction. The M4 runs parallel with the east side of Swansea Bay with the closest section of coast located approximately 1.41km away to the south west.

The River Avan is the closest significant watercourse and meanders roughly north east to south west before entering Swansea Bay, with the closest section of the river is located approximately 860m away to the south east.

There are three small areas of standing water apparent on an OS map within the 1km data search radius. All three ponds are located within the grounds and located immediately to the south of Neath Port Talbot Hospital. From aerial images the northern two ponds appear to seasonally dry up, the pond to the south of these is surrounded by woodland and is holding water in the aerial images. The southern of the three ponds is located approximately 191m to the south west of the proposed site. The presence of ponds in nearby gardens and woodland areas cannot be discounted.

Green areas within and beyond the community of Aberavon include; sports fields, cemetery, scrub, tree lines, scrub, hillside, river corridor, pockets of broad-leaved and coniferous woodland.

Desktop Study

A data search was requested from SEWBRc. The data search (LERC Reference: 0245-871) took a 1km buffer around a central point of the proposed development site. The site does not lie within or directly adjacent to a statutory protected site. Protected sites returned as part of the data search include:

- There are two Local - non-statutory designated Site of Interest for Nature Conservation (SINC) within 1km of the proposed development site. Panasonic SINC is the closest such site and is located approximately 805m away to the north west at its closest boundary.
- Approximately 56.44% of the 1km search area including the whole of the proposed site is designated as a B-Line. B-Lines are non-statutory protected sites which aim to restore and create wildflower habitats forming stepping stones that link existing wildlife areas together creating a network of habitats across the landscape benefiting not only pollinators but a host of other wildlife.

Given the localised and small scale nature of the development proposals it is highly unlikely any protected sites will be impacted as part of the proposed works.

Protected species records of note returned within 500m of the site include:

- Soprano Pipistrelle (*Pipistrellus pygmaeus*) - four foraging/commuting records were returned from the 1km data search, the closest record is located approximately 458m away to the north east.
- Common Pipistrelle (*Pipistrellus pipistrellus*) - five records were returned from the 1km data, the closest record is located approximately 457m away to the north east and involved a foraging/commuting bat. The closest roost record is located approximately 532 away to the south east within a building.

- Noctule Bat (*Nyctalus noctula*) - One record was returned from the 1km data search, the record is located approximately 457m away to the north east and involved a foraging/commuting bat.
- Myotis Bat sp. (*Myotis sp.*) - One record was returned from the 1km data search, the record is located approximately 457m away to the north east and involved a foraging/commuting bat.
- Hedgehog (*Erinaceus europaeus*) - Many records were returned from the 1km data search, the closest record is located approximately 265m away to the north west and involved a field record.
- Badger (*Meles meles*) - Six records were returned from the 1km data search, the closest record is located approximately 333m away to the north east and involved a road mortality.
- Otter (*Lutra lutra*) - Seven records were returned from the 1km data search, the closest record is located approximately 371m away to the north east and involved a road mortality.
- Birds - Species listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) include; Black Redstart (*Phoenicurus ochruros*), Peregrine (*Falco peregrinus*) and Red Kite (*Milvus milvus*).
- Birds - Species listed under Section 7 (S7) of the Environment (Wales) Act 2016 (EWA 2016) include; Black-headed Gull (*Chroicocephalus ridibundus*), Dunnock (*Prunella modularis*), Grasshopper Warbler (*Locustella naevia*), Herring Gull (*Larus argentatus*), House Sparrow (*Passer domesticus*), Kestrel (*Falco tinnunculus*), Lapwing (*Vanellus vanellus*), Reed Bunting (*Emberiza schoeniclus*), Song Thrush (*Turdus philomelos*), Skylark (*Alda arvensis*) and Starling (*Sturnus vulgaris*).
- Coleoptera - Black Oil Beetle (*Meloe proscarabaeus*) - One record was returned from the 1km data search, the record is located approximately 481m away to the north.

Protected species records of note returned beyond 500m and within the 1km data search include:

- Harvest Mouse (*Micromys minutus*)
- Amphibians - Common Frog (*Rana temporaria*) and Common Toad (*Bufo bufo*).
- Reptiles - Slow Worm (*Anguis fragilis*) and Viviparous Lizard (*Zootoca vivipara*).
- Birds - Species listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) include; Cetti's Warbler (*Cettia cetti*), Dartford Warbler (*Curruca undata*), Fieldfare (*Turdus pilaris*), Kingfisher (*Alcedo atthis*) and Redwing (*Turdus iliacus*).

- Birds - Species listed under Section 7 (S7) of the Environment (Wales) Act 2016 (EWA 2016) include; Linnet (*Linaria cannabina*) and Tree Pipit (*Anthus trivialis*).
- Butterflies - Species listed under Section 7 (S7) of the Environment (Wales) Act 2016 (EWA 2016) include; Grayling (*Hipparchia semele*), Small Blue (*Cupido minimus*), Small Heath (*Coenonympha pamphilus*) and Wall (*Lasiommata megera*).
- Moths - Species listed under Section 7 (S7) of the Environment (Wales) Act 2016 (EWA 2016) include; Blood-vein (*Timandra comae*), Cinnabar (*Tyria jacobaeae*), Dusky Brocade (*Apamea remissa*), Lackey (*Maloscosoma neustria*) and Latticed Heath (*Chiasmia clathrata*).
- Brown-banded Carder Bee (*Bombus humilis*)
- Plants - Bluebell (*Hyacinthoides non-scripta*), Cornflower (*Centaurea cyanus*) and Oxtongue Broomrape (*Orobanche picridis*).

Site Visit

Lee Gregory from Ecological Services attended site on 28th February 2025 to assess the potential ecological impacts of the proposed works. The site visit was completed during late February which is outside of the optimal timeframe for undertaking such surveys. However it was still possible to draw broad conclusions to the habitats present within the development site boundary. Photographs of the site can be found in Appendix 2. **This report concentrates on the land within the proposed development site boundary only.**

The north east site boundary along the west side of Rhodes Avenue and part of the south eastern boundary with the adjacent residential dwelling (no. 35 Rhodes Avenue) is an approximate 1.5m high metal bow top railing fence. The remaining site boundary is an approximate 1.8m high metal triple pointed palisade fence. Growing inside of the south west and south east sections of palisade boundary fence is an approximate 4m - 4.5m high Hawthorn (*Crataegus monogyna*) **hedgerow**. Ivy (*Hedera helix*) was growing up many of the Hawthorns trunks and up the palisade fence, a thorough search of the ivy and hedgerow failed to reveal any old birds nests.

Running along the north eastern side of the site between the roadside boundary fence and the single storey buildings is an approximate 10m wide **tarmac hardstanding** car park. At the north end of the car park is an approximate 3m wide strip of **bramble scrub**. Growing around the edge of the car park and at the base of the building wall are some low growing plants with a species composition indicative of **short perennial vegetation** and remains of dead and young plants indicative of **tall ruderal vegetation**. Species noted includes the following species; Cat's-ear (*Hypochaeris radicata*), Cock's-foot (*Dactylus glomerata*), Common Mouse-ear (*Cerastium fontanum*), Common Whitlow-grass (*Erophila verna*), Dandelion (*Taraxacum agg.*), Dock sp. (*Rumex sp.*), Fleabane sp. (*Erigeron sp.*), Great

Willowherb (*Epilobium hirsutum*), Hairy Bittercress (*Cardamine hirsuta*), Hedge Mustard (*Sisymbrium officinale*), Herb Robert (*Geranium robertianum*), Ivy (*Hedera helix*), Ragwort (*Jacobaea vulgaris*), Smooth Sow-thistle (*Sonchus oleraceus*), Spear Thistle (*Cirsium vulgare*) and Wild Radish (*Raphanus raphanistrum*).

Immediately to the south east of the former changing rooms is a **concrete yard** behind a double metal palisade gate, the back of the yard is a block work wall and to the south east side of the yard is another single storey **building**. Growing inside the yard is some bramble **scrub**, an approximate 2.5m tall Hawthorn (*Crataegus monogyna*) and a Willow (*Salix sp.*) sapling.

To the south east of the block work building is an approximate 2.5m wide area of bramble **scrub** which extends to the south east boundary metal bow top railing fence.

Access to the south west rear side of the buildings was possible via a double palisade gateway at the north east end of the building. The gateway opened up into an area of **tarmac** and bramble **scrub** between the building and the north west boundary **fence**. The remaining area of the site to the rear of the building was covered in head height very dense **bramble scrub** which had been likely left to grow for many years looking at the amount of dead branches and brash build up below the previous years green growth.

Several bird species were recorded foraging within the bramble scrub including; a male Blackbird, pair of Robins, pair of Blue Tit (*Cyanistes caeruleus*), Wren (*Troglodytes troglodytes*) and 10+ House Sparrows (*Passer domesticus*). A singing male Dunnock (*Prunella modularis*) frequently passed through the site on the circuit of his territory. No birds were seen returning to a certain area indicating a likely active nest and no birds were seen to carry any food or nesting material.

A mammal digging was found to the rear south west side of the block work building and was thought likely to be Rat owing to the size of the hole and spoil heap formation.

Building Assessment

A single storey **building** (former changing rooms) sits slightly off centre and closer to the south eastern boundary of the site and runs parallel with Rhodes Avenue. The building is brick built and rendered on three sides with the north west elevation left as exposed brick work. Two roller shutter doors are located on the north east elevation and a wooden fire exit door on the north west elevation. High level windows run along the north east and south west elevations of the building and are covered in metal weld mesh security grills.

The flat roof is of sectional concrete slab construction for most of its area with a sloping section projecting above the roof line at the south east end of the building. This section of sloping roof is raised to house the water tank inside and is constructed of plywood. The whole roof is covered in bitumen felt which is in good condition with no gaps. UPVC bargeboards surround the roof at eaves level, the bargeboards have lifted away from the

wall in several places exposing possible crevices below and the open end of the bargeboard is located at the north west corner of the building.

An internal inspection of the building was possible, the building is divided into many smaller rooms with block work walls and the concrete sectional roof is tight fitting. The building was inspected with a high power torch for evidence of nesting birds and bats, no old nests or bat droppings were found, however two old mammal droppings were found and were likely Rat (*Rattus norvegicus*) due to their large size.

The single storey **building** to the south east of the yard is block work built with a corrugated metal sheet roof. The building has door and window openings on north west elevation but with no doors or windows are fitted. The sheet metal roof is supported by an approximate 15cm wide wooden wall plate, the wooden wall plate was quite rotten with holes and missing sections allowing access into the building below the roof sheets. An internal inspection of this building was also possible, six old birds nests were found on top of the wall plate between the ceiling joists. The nests consisted of one Swallow (*Hirundo rustica*) nest, four Blackbird (*Turdus merula*) nests of varying ages and a very untidy nest with lots of dead leaves which was likely an old Blackbirds nest and likely modified by a Robin (*Erithacus rubecula*) which had added extra leaf material. A territorial pair of Robins and an agitated male Blackbird were seen regularly around this building and adjacent hedgerow during the site visit.

Legislation

Birds

All breeding birds are protected under schedule 1 of the Wildlife and Countryside Act (1981) as amended. Under this Act it is an offence to:

- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built.
- Intentionally take or destroy the egg of any wild bird.

Enhanced protection is afforded to species listed on Schedule 1 of the Act, this additional protection makes it an offence to:

- Intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Bats

All British bats are a European protected species and are protected under the Conservation of Habitats and Species Regulations 2017. In summary, they are protected from:

- Deliberate capture, killing and injuring,
- Deliberate disturbance of a breeding site or resting place,
- Damage or destruction of a breeding site or resting place.

Schedule 5 of The Wildlife and Countryside Act (1981) also protects all species of British bat and their roosting locations. British bats are protected from intentional or reckless disturbance and or obstruction of their roosting places. Barbastelle Bat (*Barbastella barbastellus*), Bechstein Bat (*Myotis bechsteinii*), Noctule Bat (*Nyctalus noctula*), Brown Long-eared Bat (*Plecotus auritus*), Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*) and Lesser Horseshoe Bats (*Rhinolophus hipposideros*) are also listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

Reptiles & Amphibians

Reptiles such as Slow Worm (*Anguis fragilis*), Viviparous Lizard (*Zootoca vivipara*), Adder (*Vipera berus*) and Grass Snake (*Natrix natrix*) are protected under the Wildlife and Countryside Act 1981 (as amended) from killing injury and sale. All four common reptiles are also listed as 'Section 7' species in Wales. In Wales Sand Lizard (*Lacerta agilis*), Smooth Snake (*Coronella austriaca*), Adder, Grass Snake, Slow Worm and Common Lizard are listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

The four widespread species of amphibian i.e. the Smooth Newt (*Lissotriton vulgaris*), Palmate Newts (*Lissotriton helveticus*), Common Frog (*Rana temporaria*) and Common Toad (*Bufo bufo*), are protected under the Wildlife and Countryside Act 1981 (as amended) by Section 9(5) of the Wildlife and Countryside Act 1981. This section prohibits sale of these species. Common Toad is listed in section 6 of The Environment (Wales) Act 2016.

Potential Development Impacts

The proposed development will likely result in the loss of an area of bramble scrub, several small trees, buildings and tarmac hardstanding. Indicative plans show the retention of the Hawthorn hedgerow around the south west and south east boundaries. However some temporary disturbance to the hedgerow may be experienced during

construction works. The habitats within the site are considered to have biodiversity value at a local level only.

- The bramble scrub, hedgerow and buildings within the site boundaries are considered to have high potential to be used by nesting birds. Six bird nests of varying ages were found within the block work building at the south east end of the site and the building appears to have been used by nesting birds for several years. **Any building work immediately adjacent has potential to disturb nesting birds during the bird nesting season of March to August inclusive.** All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended). Removal of this vegetation could also result in the loss of nesting and foraging habitat.
- No evidence of well used mammal paths through the site were noted during the site visit. The site is fenced around its boundaries and is unlikely to be used by larger mammals such as Badger. A mammal digging was found close to the south east boundary of the site and was likely to have been a Rat burrow owing to its small size.
- The building is considered to have low bat roosting potential as per the BCT Good Practice Guidelines (4th Edition). The majority of the roof appears tight with limited potential access points for bats present. Several small potential roosting spots are present between the wall and barge board surrounding the building suitable for a small number of crevice dwelling species such as Pipistrelle bat species. An internal inspection of the building revealed a tight fitting roof of concrete slab construction and no evidence of bat presence was found such as droppings.
- Low potential buildings usually require bat activity surveys to be undertaken prior to planning consent being granted to understand bat usage of a structure to provide sufficient mitigation and compensation should bats be found to be present. However it is understood that advice has been provided by the Local Planning Authority indicating that a bat activity survey is not required to support this planning application.
- The dense bramble scrub within the site boundary has potential to support low numbers of reptiles during the summer months and for hibernation purposes. The clearance of vegetation to facilitate the proposed development has the potential to impact on common reptile species such as Viviparous Lizard and Slow Worm. Given the overgrown nature of the development site, reptile surveys are not considered suitable. Instead it is suggested a small population of reptiles is assumed and suitable precautionary measures implemented.
- Amphibians could use the site during the terrestrial stage of their life, however few local records were returned from the data search. Therefore, numbers of amphibians will likely be very small, however, care will need to be taken during the

construction stage of the build, and any amphibians found will need to be relocated to a safe location.

- Any additional external lighting, may impact on nocturnal species, such as bats and invertebrates using the site for feeding and commuting, however the site is in a highly urbanised area and already likely to be well illuminated by hospital security lighting and street lighting.

Biodiversity Enhancements & Green Infrastructure Considerations

Chapter 6 of Planning Policy Wales (version 12), paragraph 6.2.5 requires Green Infrastructure considerations to be included with all planning applications. Development proposals must detail how green infrastructure considerations which are proportionate to the scale and nature of the plans are being provided.

Green infrastructure features currently found within the site boundary are limited to bramble scrub, hedgerow, small trees and short perennial vegetation around tarmac hardstanding areas. The site is fenced around the entire site boundary, beyond the site boundaries are busy roads and buildings, therefore direct connectivity to surrounding habitat is limited. The current biodiversity value of the site is considered to be of local value only.

The proposed plans indicate that the majority of current natural habitats on site will be lost during development with the exception of the south west and south east boundary hedgerow. Direct habitat loss implications within the development site can be limited if compensatory planting can be incorporated within the site plans.

The proposals should seek to improve the remaining habitat as part of the development proposals to increase the quality of green infrastructure and overall biodiversity value within the site. Development plans could seek to plant a range of native pollinator friendly species within the flower beds, additional tree planting and provide additional native hedgerow planting along the north west site boundary and between the plot boundaries. The plans will also provide additional bat and bird boxes within the newly built residential buildings, providing additional habitat for such species not currently found at site.

Planning Policy Wales - Trees and Planning in Wales (January 2024 update) advises that compensatory planting for trees lost should be sought at a ratio of **3 for 1**. Compensatory planning must be equivalent to the quality, environmental and of ecological importance of the tree(s) lost - this must be preferably onsite or immediately adjacent to the site. No mature tree loss is expected during construction works.

Conclusions and Recommendations

Planning permission is sought to change the use of the site and build a sheltered accommodation complex which includes two semi-detached bungalows, six flats within a two storey building, residents garden and 10 car parking spaces. Given the potential impacts of the proposed development the below mitigation measures are proposed:

- A method statement for vegetation clearance works will be required. The method statement will include habitat clearance measures using sensitive timing of works, and a two-stage vegetation cut. Work will need to be undertaken with hand tools only to minimise disturbance and done under direct supervision by an experienced ecologist.
- Any external lighting required as part of the development proposals will be focused / directional lighting which is hooded or cowled to prevent light spill. The external lighting will be placed on a timer and motion activated. Sensitive lighting will reduce any negative impacts to nocturnal wildlife which use the area. This is particularly important for foraging bats and invertebrates that are likely to use the site.
- All lighting must meet recommendations in the BCT Guidance Note 08/23 Bats and Artificial Lighting at Night <https://www.bats.org.uk/news/2023/08/bats-and-artificial-lighting-at-night-ilp-guidance-note-update-released>
- All excavations within the site will be securely covered over if left unattended. Any excavations that have a depth in excess of 0.5m and that are left open overnight will have a means of escape left for any mammals (e.g. hedgehog) that may fall into them. A wooden board or equivalent will be left from the bottom to the top of the hole at an angle no steeper than 45°. This will allow any mammal to escape and avoid increased stress from being trapped.
- The buildings and vegetation within the development site have the potential to be used by nesting birds, currently there are no plans to remove any boundary hedgerow on site. If an active nest is identified a buffer zone of at least 5m around the nest must be observed until the chicks have fledged. Greater buffer zones around nests may be required depending on the species and habitat the nest is within.
- Compensatory planting will be proposed within the site plans, these could include planting a range of native pollinator friendly species within the flower beds, additional tree planting of locally sourced native trees and creation of hedgerow planting along the north west site boundary and around plot boundaries. Given the urban nature of the development site, some native species may not be suitable within the growing conditions available. Thus it is advised that species chosen for

planting are beneficial to pollinators. **A detailed planting scheme will be required to support any future planning application for the site.**

The Environment Act (Wales) 2016 places a duty on competent authorities such as Neath Port Talbot County Borough Council to conserve and enhance biodiversity. The below bullet points are some simple measures that could be achieved to enhance the biodiversity of the site. It is recommended at least 2 of the below measures are implemented :

- The provision of integrated bird boxes of varying design into buildings within the development site. Integrated boxes must be located as high as possible on the building and avoid south facing elevations to prevent overheating.
- The provision of integrated bat boxes into buildings within the development site. Integrated boxes must be located as high as possible on the building preferably on a south facing elevation to take advantage of the heat of the sun and be at least 2m away from any external light source.
- Gaps can be cut into any fencing proposed around the site to allow the movement of reptiles and small mammals across the area. 13cm x 13cm gaps will be cut every 3m along the fence line which encompass the site.
- The use of native species within the soft landscaping works on the site. Suitable long term management of soft landscaping also helps ensure spaces are useful to wildlife.

Best Wishes

Lee Gregory
Ecologist
Ecological Services Ltd

Signed: Lee Gregory Date: March 2025

Appendix 1 - Aerial Image of Development Site



Appendix 2 - Site Photographs



North east elevation of the building and tarmac hardstanding viewing south west



Bramble scrub strip along north end of the tarmac hardstanding



North west elevation of the building and bramble scrub along north west boundary viewing north



Head height bramble scrub to the rear south west side of the building



Bramble scrub between south east block work building and the residential property boundary to the south east



South east elevation of block work building with gaps in the wooden wall plate with a Robin perched and a male Blackbird in the Hedgerow



Double palisade gate into the concrete courtyard between the two buildings



North west elevation of the block work building with no windows or doors.



North east elevation of the former changing rooms and roller shutter doors



Bitumen felt flat roof in good condition over the whole building



Access into the former changing rooms



Internal corridor within the former changing rooms building with many individual rooms



Typical room detail with block work walls and concrete slab roof



Raised plywood section of the roof for the location of the water tanks



Access into the concrete court yard between the buildings



Internal view of the block work and corrugated sheet metal roof building



Old Blackbird nests within the block work building on top of the wall plate between the ceiling beams



Old Swallow nest within the block work building on top of the wall plate between the ceiling beams



North east boundary viewing west from Rhodes Avenue



North east boundary viewing west from Rhodes Avenue



View south across the site from the raised bank within the hospital grounds



South west boundary hedgerow viewing north from within the hospital grounds



South east boundary hedgerow viewing north from within the hospital grounds



Tarmac hardstanding car park to the north east of the building



Large gap underneath the barge board at the north west corner of the building



Example of lifted barge board around the former changing room building



Likely Rat burrow close to the south east boundary of the site

Appendix 3 - Habitat Map

FORMER CHANGING ROOMS, RHODES AVENUE, PORT TALBOT

Habitat Map

FEBRUARY 2025

