

Site Assessment Survey

PROJECT TITLE: Proposed Residential Development

SITE ADDRESS: Red Dragon Pub, Port Talbot

DATE: 28th August 2024

The applicant is seeking planning consent to demolish the current building and redevelop the site into a number of residential flats. The proposed development site is centered at grid reference SS 74670 89875, located within Port Talbot. The building was previously a pub with first floor residential dwellings. The majority of the site is a tarmac car park with the pub building to the north of the site. There are two very small sections of amenity grassland verge within the site.

The development proposes to demolish the existing building complex and create 20 new flats within seven building blocks on site. Tarmac and permeable paving car parking, along with planting around the site boundary and a small garden space in the centre of the site is proposed.

An aerial image showing the development site location is provided in Appendix 1 at the end of this report. This report focuses on the land and habitats within the proposed development site boundary only.

Site Location

Located within the suburb of Aberavon, Port Talbot, the site was previously a pub within an urban setting. The development site is surrounded on all sides by residential housing and roads. To the southwest of the property, a newly built flat complex is present and immediately north of the sites boundary lies two recently built houses.

The property is located approximately 370 m northeast of Aberavon seafront with a leisure centre and football pitch located between here and the site. Further east, the River Afan runs south into the sea and is approximately 980 m away at its closest point, housing lies between the river and the site. Tata steel works plant and Port talbot docking area is located further southeast approximately 2 km away. The M4 motorway runs east to west approximately 1.4 km northeast of the site and Mynydd Dinas mountain is further north from the road.

Desktop Study - Species Records

A data search was undertaken via Aderyn for the proposed development site and surrounding area (ref: 0245-359). A 2 km buffer zone was searched and records returned within 500 m of site are noted below:

- 12 records of West European Hedgehog (*Erinaceus europaeus*) - closest being approximately 100 m east.
- Two records of bat commuting and foraging activity were returned within 500 m of the site for Common Pipistrelle (*Pipistrellus pipistrellus*) and an unknown bat species. The closest record being for a Common Pipistrelle approximately 180 m west.
- Bird species listed under Section 7 of the Environment (Wales) Act 2016 (EWA 2016) include – Bar-tailed Godwit (*Limosa lapponica*), Black-headed Gull (*Chroicocephalus ridibundus*), Herring Gull (*Larus argentatus*), House Sparrow (*Passer domesticus*), Lapwing (*Vanellus vanellus*), Linnet (*Linaria cannabina*), Reed Bunting (*Emberiza schoeniclus*), Ringed Plover (*Charadrius hiaticula*) and Starling (*Sturnus vulgaris*).
- Bird species listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) include – Black Redstart (*Phoenicurus ochruros*), Little Gull (*Hydrocoloeus minutus*), Mediterranean Gull (*Ichthyaeetus melanocephalus*), Purple Sandpiper (*Calidris maritima*), Whimbrel (*Numenius phaeopus*) and Whooper Swan (*Cygnus cygnus*).

Records of note returned for the rest of the 2 km buffer zone are detailed below:

- Common Frog (*Rana temporaria*).
- Common Toad (*Bufo bufo*).
- Smooth Newt (*Lissotriton vulgaris*).
- Adder (*Vipera berus*).
- Common Lizard (*Zootoca vivipara*).
- Grass Snake (*Natrix helvetica*).
- Slow-worm (*Anguis fragilis*).
- Eurasian Badger (*Meles meles*).
- Eurasian Otter (*Lutra lutra*).
- Harvest Mouse (*Micromys minutus*).
- 18 records of bat commuting and foraging activity were returned within the rest of the buffer zone for four species including: Common Pipistrelle, Soprano Pipistrelle (*Pipistrellus pygmaeus*), Myotis Bat species (*Myotis sp.*) and Noctule Bat (*Nyctalus noctula*).

- Six records of bat roosts were returned within the rest of the buffer zone for Common Pipistrelle and unknown bat species. The closest roost being a maternity roost from 2022 of 50 plus Common Pipistrelles approximately 540 m east, within a house.
- 95 species of invertebrates were returned within 2 km of the site. The closest 10 records listed under Section 7 of the Environment (Wales) Act 2016 (EWA 2016) include: Small Blue (*Cupido minimus*), Lackey (*Malacosoma neustria*), Cinnabar (*Tyria jacobaeae*), Wall (*Lasiommata megera*), Brown-Banded Carder Bee (*Bombus humilis*), Moss Carder Bee (*Bombus muscorum*), Shril Carder Bee (*Bombus sylvarum*), Latticed Heath (*Chiasmia clathrata*), Buff Ermine (*Spilosoma lutea*) and Knot Grass (*Acronicta rumicis*).
- 25 bird species were returned that are listed under Section 7 of the Environment (Wales) Act 2016 (EWA 2016) within the rest of the buffer zone. The closest 10 species include – Herring Gull, Starling, Black-headed Gull, Curlew (*Numenius arquata*), Dunnock (*Prunella modularis*), House Sparrow, Kestrel (*Falco tinnunculus*), Lapwing, Linnet and Reed Bunting.
- Bird species listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) within the rest of the buffer zone include – Redwing (*Turdus iliacus*), Snow Bunting (*Plectrophenax nivalis*), Little Gull, Purple Sandpiper, Peregrine (*Falco peregrinus*), Black Redstart, Red Kite (*Milvus milvus*), Brambling (*Fringilla montifringilla*), Cetti's Warbler (*Cettia cetti*) and Fieldfare (*Turdus pilaris*).

Desk Top Study - Protected Sites

- The site does not lie within or directly adjacent to any statutory protected site.
- The Site is located within the Neath Port Talbot (NPT) Watercourses Site of Nature Conservation (SINC). The NPT Watercourses SINC extends across the county. As a watercourse does not appear to be present within the site boundary or directly adjacent to it, potential impacts to this SINC are considered unlikely.
- There are six other SINC's within 2 km of the site. The closest such site is Little Warren SINC approximately 920 m away to the south.
- The site is located within a B-Lines designation. 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.

Survey Constraints

The site visit was completed during July which is an optimal time of year to undertake habitat assessments. It was possible to draw broad conclusions on habitat types within the site boundary.

Internal access into the property within the site boundary could not be gained. No internal assessment for bat roosting potential could be undertaken. The rooms within the building are used by separate tenants and trying to co-ordinate access to attic spaces was not considered to be pragmatic. An assessment of bat roosting potential was drawn from outside of the property only.

The absence of desk study records cannot be relied upon to determine absence of particular species/ habitat. Often, the absence of records is a result of under-recording within the given search area.

Site Visit

A walkover survey of the site was completed on the **25th July 2024**. Photographs of the site can be found in Appendix 2.

The site had no vegetated areas within the boundary except for a very small area of amenity grassland approximately 1 m x 4 m in size, along the east of the building and some vegetation growing through gravel to the northwest. All other areas of the site were occupied by a hardstanding carpark and the building complex. The site is bounded on the west and north by a tall brick wall and on the south and east by a lower brick wall along with road entry points. The entire south half of the site is used as a car parking area.

The Red Dragon Inn building is located to the north of the site. The building appears to be brick built and painted white. The main central section of the building is two storeys in height. The roof is pitched with hipped gable ends and tiled with pantile roof tiles. Two brick built chimneys are present on the northern elevation of the main pitched roof. White soffit and fascia boards are present around the eaves of the main roof in the central section of the roof.

Various single storey and two storey extensions are present to the east, west and north of the central section wrapping around the building. All extensions appear to be flat roof buildings, however a small conservatory style roof is present in the eastern single storey extension roof line. Some extensions have plastic uPVC barge boards while a small number of the extensions appear to have coping stones perhaps indicating a parapet wall.

Potential Development Impacts

- Careful consideration must be given to the use of lighting within the development site, as this can adversely affect the activity of a variety of fauna, particularly bats and nesting birds. Light spillage onto potential bat roost features must be avoided and brightness kept to the lowest permissible level.
- The Red Dragon Inn building was assessed for its potential to supporting roosting use by bat species. Appendix 3 contains a table highlighting the various potential features noted around the building which bats could utilise. The building has been assessed as having **MODERATE** bat

roost potential. As such, bat emergence/re-entry activity surveys will be required on the building.

- The site itself has little vegetated habitat and so it unsuitable for bird nesting and foraging. The building structure could provide opportunities for bird nesting. The flat roofed areas of the building complex provide areas for bird nesting by species such as gull. Compensation measures for the loss of bird nesting opportunities will be required. A check for nesting birds should be undertaken prior to any works being undertaken on the building.

Legislation

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, Bechstein, Noctule, Brown long-eared, Common pipistrelle, Soprano pipistrelle, Greater horseshoe and Lesser horseshoe bats are also listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

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.

Conclusions and Recommendations

Broad recommendations are made below to help inform the design process. The building within the site will be demolished and the creation of 20 new flats within seven building blocks on site is proposed. Tarmac and permeable paving car parking, along with planting around the site boundary and a small garden space in the centre of the site are outlined within the proposal.

Our general recommendations are:

- The Building within the site has been assessed as having **MODERATE** bat roost potential. **Bat emergence/re-entry activity surveys are recommended** to be undertaken on the property within the site and must follow the guidance within the BCT Good Practice Guidelines 2023 (4th Edition).
- The flat roof sections of the building provide suitable areas for birds to nest upon. It is recommended that an ecologist **inspect the roof structure for active bird's nests** prior to any works taking place upon the building. If an active nest is identified, works should pause and a buffer zone of where no works take place around the nest must be observed until chicks have fledged. Only then can works continue. Greater buffer zones around nests may be required depending on the species present. **It is suggested that works upon the building take place outside of nesting bird season (March to August inclusive) to reduce the likelihood of encountering any active nests.**
- Ideally any excavations within the site will be securely covered over if left unattended. Any excavations that have a depth in excess of 0.5 m and that are left open overnight will have a means of escape let 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.
- Artificial lighting has the potential to affect a wide range of nocturnal species. All lighting must meet recommendations in the BCT Guidance Note 08/23 Bats and Artificial Lighting at Night in the UK document <https://www.bats.org.uk/news/2023/08/bats-and-artificial-lighting-at-night-ilp-guidance-note-update-released>
- Three Vivara Pro Woodstone House Sparrow Nest Boxes or Ibstock Eco-habitat for Swift Boxes will be provided upon three separate buildings within the new development. These boxes, ideally, should be placed away from any direct light spill. The boxes will be installed at first floor height. The bird boxes will be installed as high as possible near to the roof line. An ecologist will check the boxes once installed and provide written confirmation to the owner and Local Planning Authority that they have been installed correctly. Swifts prefer to have direct linear flight access to their roost so these boxes should be located in an area where there is no disruption to their flight lines as they approach the roosting location.

- Four Integrated, Crevice Bat Boxes will be provided upon three separate buildings within the new development. The bat boxes will be installed as high as possible near to the roof line and away from any light spill. The access gaps will be left unobstructed to ensure bat access. An ecologist will check the boxes once installed and provide written confirmation to the owner and Local Planning Authority that they have been installed correctly.
- Updated recommendations for bats may be required once further bat surveys have been undertaken on the site. Bat mitigation will benefit from the southern elevation or an elevation where there is direct access to sunlight as the bats can tolerate and prefer high levels of temperature in their roost. If the southern elevation is not available then an eastern or western facing elevation is preferred.

Biodiversity Enhancements & Green Infrastructure

The Environment Act (Wales) 2016 places a duty on competent authorities and councils to conserve and enhance biodiversity. 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 currently within the site is very limited and consists of a very small piece of amenity grassland which was well mown during the site visit. General considerations to green infrastructure to be considered as part for the development include:

- The creation of habitat corridors through and around the development site would increase the biodiversity value of the development site. Habitat corridors can include tree planting, hedgerow planting and the creation of grassland verges. These features would help to soften any hard landscaping created and improve the visual impact of the site
- The use of native species within the soft landscaping works on the site is recommended. However, native species are not always well suited for urban environments. If non native species must be chosen to ensure long term viability of the planting a preference to plant species which benefit pollinators should be given.
- Sensitive lighting to prevent light spill onto potential bat roost features. Light spill could affect how wildlife move through habitat within and adjacent to the site..
- All fencing across the site must be hedgehog friendly in design. A friendly design is considered to allow passage of small animals across the site. Close board or mesh fencing should provide either a continuous gap between the bottom of the fence and ground of approximately 13 cm or 13 cm by 13 cm gaps cut every 3 m along fencing.

Best Wishes

Beth Lewis

Ecologist

Ecological Services Ltd

Signed: *Beth Lewis* Date: August 2024

Appendix 1 – Development Site Location



Appendix 2 – Site Photographs



Photo 1. View from northwest corner of site of western elevation of building.



Photo 2. Northern elevation of building with series of flat roofed extensions off main building.



Photo 3. Southern elevation of main building section.



Photo 4. View from southeastern corner of site of east elevation.



Photo 5. View of northeastern corner of site.



Photo 6. **Feature A** - gap under lead flashing on northern elevation.



Photo 7. **Feature E**- gap under fascia of flat roof along corner of building. Fascia bends away from vertical wall slightly.



Photo 8. **Feature F**- gap in corner of plastic soffit of pitched roof.

Appendix 3 - Bat Building Assessment Feature Locations



Table 1. Bat Building Assessment-1

Features	Photographs	Bat Roost Potential
Feature A- gap under lead flashing where flat roof section meets main building.		
Feature B- gaps in slipped and lifted tiles along northern elevation of roof. Gaps where ridge tile meets roof tiles. Mortar missing in some gaps and tiles lifted creating crevices.		

Feature C- gaps in slipped and lifted tiles along southern elevation of roof. Gaps where ridge tile meets roof tiles. Mortar missing in some gaps and tiles lifted creating crevices.		
Feature D- gaps in slipped and lifted tiles along southern elevation of roof. Gaps where ridge tile that runs diagonally down side of main roof. Mortar missing in some gaps and tiles lifted creating crevices.		MODERATE
Feature E- gap under fascia of flat roof along corner of building. Fascia bends away from vertical wall slightly creating small crevice.		
Feature F- gap in corner of plastic soffit of pitched roof creating small gap.		
Feature G- Lead flashing coming away from chimney.		