



DAVID CLEMENTS ECOLOGY LTD

**EDUCATION LIBRARY & RESOURCE CENTRE, PORT TALBOT
ECOLOGICAL ASSESSMENT**

July 2025

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Photographs of the Site

SUMMARY

- The site is in a suburban setting directly north of Port Talbot town centre, within Neath Port Talbot County Borough, South Wales. It comprises the disused building and associated grounds of an Education Library and Resource (ELRS) Centre, including areas of hardstanding and trees.
- The site does not contain or lie adjacent to any statutory sites of biodiversity interest designated for bats or birds, such as SSSIs, NNRs or LNRs etc.
- The proposed development includes the refurbishment of the main ELRS centre building and surrounding hard surfaces for use by pupils. An area of staff carparking will be created in the east of the site, and fencing to be installed enclosing the site.
- No habitats considered under Section 7 of the Environment (Wales) Act 2016 (EWA), as 'habitats of principal importance for conservation in Wales,' were recorded on site.
- No specially protected, 'Section 7' (i.e. 'Priority') or nationally rare or scarce plant species are recorded on the site to date.
- The scattered trees on site provide suitable habitat for nesting birds. Bats are also likely to commute and forage on site, and may roost within the trees and buildings which contain a number of potential roosting features. The rubble piles may provide suitable refugia, foraging and basking opportunities for common reptiles and refugia for hedgehog.
- Resident 'Section 7' (i.e. 'Priority') fauna species are likely to include common nesting bird species. It is also possible that other notable species such as common reptiles and hedgehog may also occur, as well as roosting bats.

Evaluation

- The mature common lime trees and the ELRS building, which have features with potential to support roosting bats, and the ephemeral/short perennial vegetation which has suitability for slow-worm, are assessed as being of Local Value.
- The other remaining habitats including hardstanding, fence and wall are assessed as being of Negligible Value for wildlife.

Implications of the Development Proposals

- The main impact of the development proposals would be the potential disturbance of roosting bats and nesting birds in the ELRS building, if present and if left unmitigated. If any trees are to be removed or significantly impacted, it is also possible roosting bats could be affected, if present. Hibernating hedgehog could also be affected.
- It is recommended that the mature common lime trees habitats are retained and suitably protected from the development works.
- The habitats of the site are of currently considered to be of no greater than local value to wildlife. Based on current evidence, the overall impacts are unlikely to be significant beyond the local scale and are considered to be of low ecological significance. However, further survey of the ELRS building for roosting bats is required before the impacts of the development can be fully assessed.
- Any artificial lighting within the site, which can adversely affect activity by a variety of fauna, particularly foraging bats, nesting birds and invertebrates, should be in accordance with the current Bat Conservation Trust (BCT 2023b) guidance.



- Appropriate mitigation measures are recommended, along with opportunities for the enhancement of the site for wildlife.
- Provided adequate further surveys are conducted and mitigation measures are implemented as necessary to avoid or minimise impacts to the identified protected species and features of interest, it is considered on current evidence that the proposed development of this site would not be unacceptably constrained by biodiversity and nature conservation issues.

1.0 INTRODUCTION**Report prepared by:**

1.1 David Clements Ecology Ltd (DCE), Cardiff

On behalf of:

1.2 Tilbury Douglas

Instructed via:

1.3 -

Site Name

1.4 Education Library and Resource (ELRS) Centre, Port Talbot

OS Grid Reference

1.5 Centre of site: SS 77039 90347

Elevation & Aspect

See Plan 1

1.6 The site lies at approximately 17m ASL.

Location & Extent

1.7 The site is approximately 0.4ha in extent and lies 0.7km north of Port Talbot town centre. Neath Port Talbot.

Brief Description of Site

1.8 The site consists of the disused building and associated grounds of an Education Library and Resource (ELRS) Centre, including an additional storage building, areas of hardstanding and scattered trees.

Site Context

1.9 The site is in a suburban setting directly north of Port Talbot town centre. Velindre Community School is found directly to the east, with areas of residential housing surrounding the site to the north, south and west. Areas of woodland and upland common land are found further east and west, as the site is situated within a valley where the River Afan flows from the north of the site southwards. The M4 is located further south, where it runs parallel to the River Afan.

Designated Wildlife Sites in the Vicinity

See Plan 1 & Appendix 1

Statutory Sites

1.10 There are no statutory sites, Special Areas of Conservation (SACs) or Sites of Special Scientific Interest (SSSIs), designated specifically regarding bats, within 10km of the proposed site.

Site Development Proposals

- 1.11 The proposed development includes the refurbishment of the main ELRS centre building and surrounding hard surfaces for use by pupils. An area of staff carparking will be created in the east of the site, and fencing to be installed enclosing the site.

Purpose of Surveys

- 1.12 The present survey comprises a baseline Extended Phase 1 ecological assessment (also known as a Preliminary Ecological Survey or PEA) and daytime building inspection of the buildings on site. These surveys were carried out in order to establish the present ecological interests of the site and an assessment of the likely ecological impacts of the proposed development. Recommendations are made regarding suitable mitigation and compensation measures, together with the requirements for further survey where necessary.

Existing Records

Data from South East Wales Biodiversity Records Centre (SEWBRcC)

- 1.13 In addition to original survey, a data trawl was carried out with the local environmental records centre (LERC) in order to obtain access to any existing ecological information or records of bats within 2km and roof-nesting birds within 150m from the site. Data was provided via Aderyn, which is the main repository for biodiversity and wildlife records in the region. Relevant records are referred to in the descriptive text (Ref: 0256-227, July 2025).

Survey Methods

- 1.14 The site was subject to an Extended Phase 1 ecological survey in calm and clear weather conditions on 25th June 2025, carried out in accordance with the recommendations of the Chartered Institute of Ecology and Environmental Management (CIEEM 2017) and based on a custom modification of the Phase 1 Habitat Survey methodology developed by the former Nature Conservancy Council (JNCC 2010). The habitats and features of the site were assessed against the criteria set out at Appendix 2.

Building Inspection

- 1.15 A building inspection was carried out on the two main buildings on site, conducted in accordance with current best practice guidance provided by BCT (2023a), on 25th June 2025. The survey was carried out by an experienced licenced surveyor. The interior and exterior of the buildings were searched using a high-powered lantern (Clulite FAN1). Other equipment was available as required, including a digital endoscope (Rigid Seesnake CA350) for the examination of any crevices, etc., and ladders to inspect high areas. A search was made especially for evidence such as bat droppings, as well as for sightings of actual bats (e.g. in cracks and crevices) and secondary signs such as fur-oil and urine stains, scratch marks, etc.

The layout and construction of the buildings were recorded, briefly described and characterised, with an estimate made of the potential attractiveness and suitability for bats with reference to a range of factors including human disturbance, light levels, air movement, exposure and thermal stability, etc.

- 1.16 The larger trees of the site were also subject to preliminary ground-based assessment for their potential to support roosting bats, in accordance with the guidance provided by BCT (2023a), supplemented by Andrews (2018) (see Appendix 3 for more details).

The bat roosting potential of the trees was categorised as follows:

- 1A : Tree occupied by bats
- 1B : High probability of occupation by bats



- 2A : Moderate probability of occupation by bats
- 2B : Low probability of occupation by bats
- 3 : Negligible probability of occupation by bats

Survey Constraints

- 1.17 The recommended time of year to complete ground-based visual assessments of trees for bat roosting potential is December to March. Ground-based tree assessments can also only determine the presence of roosting features visible from the ground, and therefore features present on the sky facing surface of limbs may be missed. These factors should not have significantly affected the reliability of the survey and assessment, however.

The loft voids of B1, and interior of B2 and the boiler room could not be accessed for inspection. Instead, where possible the interiors and loft void were inspected from external positions, using binoculars and a high-powered lantern (Clulite FAN1). However, it is not considered likely that these constraints significantly affect the viability of the survey.

2.0 SURVEY RESULTS

A Habitats & Vegetation See Plan 2

A2.1 Lists of the plant species recorded are given at Appendix 4.

Priority & Notable Habitats See Appendix 1

A2.2 No habitats under Section 7 of the Environment (Wales) Act 2016 (EWA) as ‘habitats of principal importance for conservation in Wales (also referred to as ‘priority habitats’; see WBP 2016a) have been recorded present on site.

Protected, Priority & Notable Plant Species See Appendix 1

A2.3 No protected, ‘priority’ (i.e. ‘species of principal importance for the conservation of biodiversity in Wales’, as listed under Section 7 of the EWA 2016 (see WBP 2016b) or nationally rare or scarce plant species have been recorded from the site to date.

Invasive Non-native Plant Species See Appendix 1

A2.4 It is an offence to allow the spread of species listed under Schedule 9 of the Wildlife & Countryside Act 1981 into the wild, whether accidentally or deliberately.

Buddleia (*Buddleja davidii*) shrubs are present throughout the site, growing most commonly on the building’s exterior walls, and from cracks within the hardstanding. While not listed under Schedule 9 of the Wildlife and Countryside Act 1981, it is a non-native species with limited ecological value, and is considered invasive.

Description of the Habitats & Vegetation See Plan 2

Scattered Trees

A2.5 A total of 11 mature common lime (*Tilia x europea*) trees are present along the northern and southern boundaries of the site. They appear to be of the same age, reaching a height range of 15-20m and DBH of 50-70cm, and appear to have a history of heavy pruning where new growth is extensive on main trunks. A combination of new shoots and dense ivy obscures the majority of the trunk for all trees.

It is currently unknown which, if any, trees are to be affected by the proposed development.

Table 1: Description of trees and assessment of roosting potential.

No.	Description	Potential Roost Features (PRFs)	Roosting Potential
T1	Mature common lime; 15m height, DBH 70cm. Features shallow split bark and some ivy coverage.	No visible PRFs.	3- Negligible
T2	Mature common lime; 15m height, DBH 60cm. Features shallow split bark and very sparse ivy coverage.	No visible PRFs.	3 – Negligible

T3	Mature common lime; 15m, DBH 60cm.	Shallow (max. depth approx. 5cm) cavities within healed branch wounds.	2B – Low
T4	Mature common lime; 15m, DBH 60cm.	No visible PRFs.	3 – Negligible
T5	Mature common lime; 15m, DBH 60cm. Dense ivy growth on main trunk	Shallow (max. depth approx. 5cm) cavities within healed branch wounds, and tree largely obscured by foliage and ivy growth which could provide a PRF	2B – Low
T6	Mature common lime; 15m, DBH 70cm. Dense ivy growth on main trunk.	Dense foliage and ivy growth obscures the trunk and could provide a PRF. No other visible PRFs.	2B – Low
T7	Mature common lime; 15m, DBH 50cm. Moderate ivy growth on main trunk.	Small, shallow (max. depth approx. 2cm) cavity within healed branch wound, with high light ingress. Ivy growth on main trunk could also provide a PRF	2B – Low
T8	Mature common lime; 15m, DBH 60cm.	No visible PRFs.	3 – Negligible
T9	Mature common lime; 15m, DBH 50cm. Moderate ivy growth (stem diameter approx. 3cm) on main trunk	No visible PRFs.	3 – Negligible
T10	Mature common lime; 15m, DBH 60cm.	No visible PRFs.	3 – Negligible
T11	Mature common lime; 15m, DBH 60cm.	No visible PRFs.	3 – Negligible

Ephemeral/short perennial on disturbed land

A2.6

In the west of the site, patches of ephemeral/short perennial vegetation become more extensive where bare soil is exposed by gaps in the hardstanding. These areas are typically dominated by wild clematis (*Clematis vitalba*), red valerian (*Centranthus ruber*), or nipplewort (*Lapsana communis*), often a combination of all three. Other species recorded include abundant bramble (*Rubus fruticosus* agg.), field bindweed (*Convolvulus arvensis*), black medick (*Medicago lupulina*) and greater plantain (*Plantago major*). Frequently recorded species include petty spurge (*Euphorbia peplus*), cleavers (*Galium aparine*), herb Robert (*Geranium robertianum*) and dandelion (*Taraxacum officinalis* agg.), with occasional false oat-grass (*Arrhenatherum elatius*), Canadian fleabane (*Conyza canadensis*), creeping buttercup (*Ranunculus repens*), curled dock (*Rumex crispus*) and autumn hawkbit (*Scorzoneroides autumnalis*). Daisy (*Bellis perennis*), spear thistle (*Cirsium vulgare*), hemp agrimony (*Eupatorium cannabinum*), common ragwort (*Jacobaea vulgaris*), and smooth sow-thistle (*Sonchus oleraceus*) are also present, but rare.



Hardstanding

- A2.7 Forming the carpark, hardstanding covers the majority of the site excluding some small patches towards the west which have been colonised by ephemeral/short perennial vegetation. Overall, it is in poor condition, where cracks are frequent with ephemeral/short perennial species growing from them, in addition to rarely occurring saplings of sycamore (*Acer pseudoplatanus*), ash (*Fraxinus excelsior*), and rowan (*Sorbus aucuparia*). Buddleia saplings and shrubs are also present across the hardstanding.

Rubble and Brash Piles

- A2.8 In the north-west of the site, large brash and rubble piles are found on top of the hardstanding. The piles comprise large branches and tree limbs from previous pruning, in addition to miscellaneous discarded items such as plastic containers, fabrics, metals, etc.

A2.9 ***Shipping Containers***

Three shipping containers are located in the west of the site, on top of the hardstanding. Vegetation such as ivy and wild clematis has begun to colonise the sides of some of the containers.

Fencing

- A2.10 The site is enclosed with 1.5m high metal fencing on the northern and southern boundaries, and 3m fencing on the eastern boundary.

Wall

- A2.11 A 1.5m high brick wall in good condition is present along the westernmost boundary.

B Fauna

- B2.1 Fauna species recorded from the site are listed at Appendix 4.

Protected, Priority & Notable Fauna Species

See Appendix 1

- B2.2 No bat or bird species are currently recorded from the site. There is some suitable habitat for nesting birds, common reptiles, and roosting and foraging bats, all of which are afforded some degree of statutory protection.

No resident bat or bird 'priority species', i.e. those listed on Section 7 of the Environment (Wales) Act 2016 as being of 'principal importance for the conservation of biodiversity in Wales', are recorded from the site to date.

Description of the Fauna

Bats

- B2.3 All species of bat and their roosting sites are protected under the Conservation of Habitats & Species Regulations 2017 (the 'Habitats Regulations' – See Appendix 1). The roosting places used by bats are also protected against unauthorised disturbance or

obstruction under the amended Wildlife & Countryside Act 1981. Several bats are listed as priorities for conservation under Section 7 of the Environment (Wales) Act 2016.

There records of bats within a 2km radius of the site, including three bat roost records for common pipistrelle, the closest record pertaining to an older record for a pipistrelle roost over 1.4km away. Other species recorded commuting and foraging within 2km include common pipistrelle, soprano pipistrelle, noctule, a *Myotis* sp. and brown long-eared bat.

The site offers very limited foraging habitat for bats, with some commuting potential along the site boundaries, however these areas are subject to high light levels from overhead streetlights. Roosting potential has been identified within the buildings on site B1 and B2 (see details below).

Building Inspection Results

See Plan 2

- B2.4 The site contains two main buildings: Building 1, comprising the ELRS building found in the centre of the site, which also includes an associated service outbuilding and subterranean boiler room; and Building 2, a shed used for storage located in the south-western corner of the site. All buildings and structures were inspected externally; however interior access was only possible for B1 and excluded access to the loft voids. All buildings were assessed for their potential to support roosting bats as follows:

Table 2: Description of buildings and assessment of roosting potential.

	Description	Evidence of Bats	Potential for Use
	ELRS Building (B1) Two-storey building with a central courtyard, constructed of red brick with roughcast render panels, and a clay-tiled roof of complex design with multiple gables and intersecting rooflines. Scaffolding present on the south-east and west elevation. The roof is in moderate condition, with a small number of slipped, lifted and missing tiles present on all elevations. Two brick chimneys are also present on the southern and eastern elevations. Timber soffits, fascia and bargeboards are present and in poor condition overall, with missing or rotten sections. Lead flashing appears to be well-sealed. Small pitched roof vent structures with timber slats are present on the eastern and western elevations. Slats are often open or entirely missing, possibly providing direct access into interior. Multiple large timber-framed single-glazed windows are found on all elevations, in overall good condition excluding occasional missing or damaged panes which have since been securely boarded-up. PRFs include: raised roof tiles, bargeboards and fascia; slightly lifted ridge tiles.	None found	Moderate

	<u>Courtyard</u> A central enclosed courtyard is present. Extensive ivy growth and vegetation has colonised sections of exterior walls and guttering, obscuring potential access points and PRFs. All other features are in a similar condition to that of the rest of the building exterior. <u>Interior</u> The building is currently not in use, and has multiple rooms on both floors. It is in a semi-derelict state, however is largely well-sealed including where windows have been boarded up, leaving only rare small gaps (~2.5cm). The majority of interior has high light ingress, excluding two small rooms containing a lift, which are well-sealed. All fireplaces appear blocked, however one dead bird found at the base suggests external chimney access. Ceiling panels are all in good condition, excluding within a large hall on the ground floor where panels are damaged creating a large hole, providing access into the loft interior. Multiple feathers and bird droppings are found directly beneath this, suggesting access from the exterior, likely via the damaged external vent. No PRFs nor signs of bats were found internally. <u>Boiler Room</u> A semi-subterranean boiler/plant room is present on the eastern elevation adjacent to the main entrance. It is partially below ground level, and features brickwork with air gaps providing direct access into the interior. <u>Service Outbuilding</u> A small outbuilding is found on the south-eastern corner of the main building, of rendered brick construction, a flat roof and timber doors with large gaps where the wood has rotted at the base. A damaged metal vent is present on the western elevation potentially providing access to the interior. No PRFs nor signs of bats were found.		
	Shed (B2) Single-storey brick-built outbuilding with a pitched gable roof clad in corrugated asbestos sheeting which is raised in places. Guttering is missing in places, exposing gaps present under roof sheeting where fascia absent. Ridge tiles are	None found	Low

	lifted and appear absent in places. Several windowpanes are missing on the northern elevation providing direct access to interior. Roof interior is unlined with exposed rafters, with high light ingress, however stored materials limit visibility of interior. Narrow vents present on the eastern and western elevations may also provide access to interior. Dense ivy growth on the southern external wall may obscure PRFs. PRFs include: gaps beneath roof sheeting; gaps under ridge tiles.		
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Otter

- B2.5 Otter is also a 'Habitats Regulations species' afforded legal protection which is similar to that of bats (see above). It is also a 'Section 7' listed species.

While the River Afon is found adjacent to the site (400m north-east), due to the unsuitability of the habitats on site, as well as it being fully enclosed with fencing and overall poor connectivity, the likelihood of otter using the site is considered to be negligible.

Dormouse

- B2.6 Dormouse is also a 'Habitats Regulations species' afforded legal protection which is similar to that of bats (see above). It is also a 'Section 7' listed species.

There are no habitats within nor well-connected to the site that are suitable for supporting dormouse. The likelihood of dormouse occurring on site is considered to be negligible.

Badger

- B2.7 Badger is fully protected in the UK under the terms of the Protection of Badgers Act 1992, which includes its nesting sites (see Appendix 1). Current interpretation of the Act also infers a degree of protection to areas which are of key significance to foraging badgers.

No signs of badger activity, such as push-throughs, setts, or latrines, were recorded during the survey. There are no suitable habitats for badger present on site, with the nearest potentially suitable habitat, a small stretch of woodland found to the east, is separated from the site by roads, residential housing, fencing and the River Afon. Due to the unsuitability of the site, the likelihood of badger occurring on site is considered to be very low.

Other Mammals

- B2.8 A range of common and ubiquitous mammals is likely to occur on the site. These are likely to comprise a mixture of resident synanthropic species such as brown rat and house mouse, and visitor species such as fox and mole etc. 'Section 7' species such as hedgehog may also occur on site.

Birds

- B2.9 Nearly all bird species are protected against killing or injury as individuals, and this protection extends to their nests, eggs and young. A number of especially rare species

are subject to enhanced protection and may not be disturbed whilst nesting without authorisation ('Schedule 1 species' - see Appendix 1). Many bird species are listed as being of 'red list' (i.e. high) or 'amber list' (i.e. medium) conservation status either in Wales and/or in the wider UK (RSPB 2021; 2022), with several of these also being listed as being of 'principal importance' for conservation in Wales.

A range of bird species have been recorded within 2km of the site, across habitats ranging from urban to coastal. During the survey, jackdaw, herring gull and feral pigeon were observed on or adjacent to the site. The mature trees offer nesting opportunities for common species, with buildings also providing some potential, however foraging habitat is limited due to the majority of the site comprising hardstanding. Evidence of bird presence and nesting was also noted within the main ELRS building (B1), where droppings and feathers were recorded underneath a ceiling hole, in addition to an unidentified bird carcass found at the base of a fireplace/chimney.

Reptiles

- B2.10 Four native reptile species occur in South Wales, comprising common lizard, slow-worm, adder and grass snake. These four species are all afforded so-called 'partial protection' under the amended Wildlife & Countryside Act 1981, which prohibits the deliberate killing or injury of individuals. However, there is no direct protection extended to the habitats which support these species. All four common reptiles are listed as 'Section 7' species in Wales.

The site has limited potential to support reptiles, where suitable habitats are limited to small patches of ephemeral/short perennial vegetation and rubble/brush piles in the west of the site, which may offer refugia and basking opportunities. The surrounding landscape also contains limited suitability for reptiles, such as gardens and the tree- and scrub-lined banks of the River Afan, however these features are separated from the site by physical barriers such as fences, roads, houses and walls. The likelihood of reptiles being present is considered to be very low but cannot be ruled out entirely.

Amphibians

- B2.11 Five native amphibian species occur in South Wales, comprising common frog, common toad, smooth newt, palmate newt and great crested newt (GCN). The latter species is a nationally rare and declining 'Habitats Regulations' species afforded full protection under UK legislation, which also extends to the habitats which support it. The other four species are not afforded any direct statutory protection, other than with respect to trade. Common toad is listed as a 'Section 7' species in Wales (see Appendix 1).

There are no habitats suitable for breeding use by any amphibian species within the site itself, and there does not appear to be other such suitable habitats located nearby. The presence of common amphibian species within the site is considered to be unlikely, and the occurrence of the specially protected GCN is considered extremely unlikely.

Invertebrates

- B2.12 Upwards of 37,000 species of terrestrial and freshwater invertebrates are recorded in Britain, including around 29,000 insect species, occurring in every available habitat. About 40 invertebrate species are afforded full statutory protection in the UK, and many other species are accorded varying levels of conservation significance (see Appendix 1).

Several ladybird species were observed during the survey, predominantly the invasive harlequin ladybird (*Harmonia axyridis*), which was most frequently seen in association



with the lime trees. While the site offers some value for invertebrates, particularly within areas of flowering vegetation, there is no reason to expect the presence of rare or notable species.

3.0 ECOLOGICAL ASSESSMENT OF THE SITE

See Plan 3

- 3.1 There is currently no nationally accepted system for the categorising of sites or features of biodiversity significance below the level of national value, criteria for which are set out by the former Nature Conservancy Council (1989, as amended by JNCC 2019 *et seq*). However, guidance for the identification of non-statutory sites of county significance (i.e. SINC's) is available in this instance (WBP 2008).

For the purposes of this study the habitats and features of the site have therefore been evaluated and graded in accordance with the categories set out in Appendix 2.

Local Value

- 3.2 Based on current evidence the mature broadleaved trees (see Table 1) and buildings on site (see Table 2) are assessed as being of Local Value as they are of ecological interest and provide suitable habitat for nesting birds and roosting bats. The ephemeral/ short perennial vegetation and rubble piles are also assessed as being of local value as they are of some suitability to slow-worm.

Negligible Value

- 3.3 The hardstanding, shipping containers, wall and fencing are currently assessed as being of Negligible value for wildlife.

4.0 IMPACTS OF DEVELOPMENT**Development Proposals**

- 4.1 The proposed development includes the refurbishment of the main ELRS centre building and surrounding hard surfaces for use by pupils. An area of staff carparking will be created in the east of the site, and fencing to be installed enclosing the site.

Potential Impacts of Development

- 4.2 The main impact of the development would comprise the loss of small areas of ephemeral/short perennial vegetation and rubble/brash piles, which has some, albeit low suitability for common reptiles, in particular slow-worm. Refurbishment works on B1 and B2 may also result in the loss of suitable roosting features for bats.

Nesting birds could also be impacted during the building refurbishment works or if trees are affected inadvertently, all species of which are afforded statutory protection.

There would also be an increase in disturbance from noise and lighting during the construction and operational phase of the development. This may affect the activity of nocturnal fauna, including foraging bats, as well as other mammals and invertebrates such as moths, if left unmitigated.

Significance of Development Impacts

- 4.3 Based on the information currently available, the majority of habitats likely to be affected by the proposed development are considered to be of no greater than local value. As such, any impacts on these areas are unlikely to be significant beyond the local context and are assessed as being of low ecological significance.

Potential roosting features were identified within buildings B1 and B2. Any work affecting these buildings could adversely affect roosting bats, and further survey is required.

Potential bat roosting features were also identified in some of the trees on site; if any such trees are to be affected by the development further survey will be required.

Any clearance works affecting the trees and buildings on site could adversely affect nesting birds, if unmitigated.

Mitigation & Compensation Measures

- 4.4 No mitigation or compensation measures are currently considered necessary in respect of the habitat loss, given the low ecological value of the affected habitats, however, should any of the mature trees be removed, these should be replaced on a minimum 3-to-1 basis.

Potential risks to protected species such as nesting birds, roosting bats or common reptiles should be adequately mitigated for through a combination of appropriate programming and/or adequate pre-inspection at the time of the works.

Additionally, bat and bird-boxes could be installed suitable trees, to increase bat roosting and bird nesting opportunities as part of the development.

Any use of temporary or permanent artificial lighting should be designed in accordance with the guidance provided by the Bat Conservation Trust¹ (BCT 2023b).

Appropriate ecological enhancements must be included as part of the development to incorporate green infrastructure which seeks to deliver a net benefit for biodiversity. In addition, the site design must address ecosystem resilience by maintaining or improving habitat connectivity of the site with the wider environs.

Summary: Acceptability of Development Proposals

- 4.5 Provided adequate further surveys are conducted and mitigation measures are implemented as necessary to avoid or minimise impacts to the identified protected species and features of interest, it is considered on current evidence that the proposed development of this site would not be unacceptably constrained by biodiversity and nature conservation issues.

5.0 RECOMMENDATIONS

Statutory Obligations

- 5.1 Any development must seek to avoid causing adverse impacts to protected species which might possibly occur on the site, such as:
- Nesting birds
 - Roosting bats
 - Common reptiles

¹ See <https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting>

- Hedgehog

Nesting Birds: Any clearance works affecting the any trees and buildings on site should avoid the main bird-nesting season which runs approximately from March to August inclusive. If works must be carried out during this period, they must be preceded by a nesting bird survey. If nesting birds are found to be present, the nest and immediate area, should be protected until the young have fledged.

Roosting Bats: The main ELRS building (B1) is assessed as having moderate potential to support roosting bats, due to the presence of a number of potential features on the building exterior with limited bat roosting potential. A minimum of two dusk emergence surveys should be conducted to confirm the presence or likely absence of bat species before any building works commence.

The shed (B2) is assessed as having low potential to support roosting bats as there are a few exterior features offering limited roosting potential. A single dusk emergence survey should be conducted to confirm the presence or likely absence of bat species before any building works commence.

In the event that bats are found to be roosting within any of the buildings or trees on the site, it will be necessary to obtain a licence from NRW to carry out the works. The obtaining of this licence will require the formulation of a detailed method statement based on the actual refurbishment/ redevelopment details with specific mitigation provisions.

Multiple trees within the site have been assessed as having low bat roosting potential, based on the presence of features such as cavities, branch tear-outs and dense vegetation cover (see Table 1).

Further surveys will be required if any trees are identified for removal. These trees, along with any neighbouring trees that could be inadvertently affected by the felling process, will require a prior assessment for roosting bats by an experienced ecologist. If evidence of roosting bats is found, it will be necessary to obtain an NRW bat licence prior to any works that could affect the roost.

Common reptiles: The ephemeral/short perennial and rubble pile habitats on the site offers some limited foraging and shelter opportunities for common reptile species. As a precaution, any clearance of these habitats should take place during the active reptile season (March to October inclusive). Any tree root removal should also take place within this period, to avoid disturbing sheltering individuals during hibernation. Contractors should remain vigilant to the possibility of their occurrence and rubble piles should be dismantled by hand checking carefully beneath any potential sheltering areas which may be affected prior to their removal.

Hedgehog: The potential presence of hibernating hedgehog must be considered if clearing dense vegetation and brash piles from November to March, dense vegetation should be reduced to a minimum of 200mm during this period. Consideration for the potential presence of hedgehogs must also be taken from March to October when clearing suitable nesting habitat such as piles of deadwood and dense vegetation (PTES 2019).

Any open pipework with an outside diameter of greater than 120mm must be covered at the end of each workday to prevent hedgehogs and other mammals entering/becoming trapped. In addition, any trenches >0.5m in depth will either be covered at night or will be left with a gently sloped plank (or similar) running from the bottom to the surface to act as an escape ramp for any fauna which may fall in.

Other Recommendations

- 5.2 If mature trees are to be removed as part of the development, new tree planting to compensate for the loss trees should be provided on a 3-to-1 basis as a minimum, with native species which are indigenous to the region, and from stock which is of local (or at least UK) provenance (see Appendix 5 for example species).

Enhancement Measures

- 5.3 Consideration should be given to the installation of bat-boxes and bird-boxes in suitable locations within and around the site. These should be integrated within the buildings or located on suitable trees and sited in such a manner that unauthorised persons and predators such as cats cannot access them. Bat-boxes should be at least 4m (preferably 4-5m) and bird-boxes at least 2m (preferably 2-3) above ground-level. Bat-boxes should be placed on south-facing elevations whilst bird-boxes should be placed on north-facing elevations. The entrances to bat-boxes should not be illuminated at night, nor obscured by overhanging boughs or canopy vegetation etc. Bat and bird boxes should preferably be of 'woodcrete' or similar long-lasting construction rather than timber, since these are much more robust and longer-lived than traditional wooden boxes and require less after-maintenance. Suitable examples are shown at Appendix 6.

Careful consideration should also be given to the use of artificial lighting within the site, as this can adversely affect activity by a variety of fauna, particularly foraging bats, nesting birds and invertebrates. A sensitive lighting scheme, using downward directed LED lighting during the construction and operational phases of the development, should be designed in accordance with the guidance provided by the Bat Conservation Trust (2023b) to minimise nocturnal light levels and enhance the site for nocturnal fauna

Although not Schedule 9 species, consideration of the removal of the invasive species buddleia would help to increase the biodiversity value of the site.

General Provisions

- 5.4 All trees and shrubs to be retained should be treated in accordance with BS5837 (2012) *Guidance on the Treatment of Trees in Relation to Design, Demolition & Construction*, with the appropriate designation and fencing of Root Protection Zones (RPZs) etc.

Any new plantings of trees or shrubs should be primarily of native species which are indigenous to the location. All native planting or seed stock should be of Welsh, or at least UK, provenance (see Appendix 5 for example species).

The services of an appropriately qualified and licensed ecologist should be available on an 'on-call' basis throughout the entire development period in order to deal promptly with any protected species or other ecological matters which may arise during the clearance and construction works.

Further Surveys

- 5.5 A minimum of two dusk emergence surveys for B1 and one dusk emergence survey for B2 must be conducted to confirm the presence and abundance of bat species before any building works commence.

If any trees are to be adversely affected or removed to facilitate the proposed works, further tree surveys for bat roosting potential will be required.

If any bat roosts are confirmed on site, it will be necessary to obtain an NRW bat licence

and implement appropriate mitigation prior to any works that could affect the roost.

Green Infrastructure

- 5.6 In accordance with current planning policies in Wales, all developments must provide a Green Infrastructure Statement, in order to demonstrate that the development avoids and then minimises impact on relevant biodiversity and ecosystems, as well as provide opportunities for habitat creation and enhancement, thus providing a net benefit for biodiversity. These measures also consider the maintenance of habitat connectivity of the site with the wider environs to contribute towards improving ecosystem resilience.

If the proposed development includes the recommended ecological enhancements comprising the installation of bat and bird boxes, a sensitive lighting scheme and the removal of invasive buddleia, along with compensatory tree planting for any trees removed, it should provide a net benefit for biodiversity.

6.0 REFERENCES

Bat Conservation Trust (BCT 2023a) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition)*. The Bat Conservation Trust, London.

Bat Conservation Trust (BCT 2023b) *Guidance Note GN08/23: Bats and Artificial Lighting at Night*. Institution of Lighting Professionals. <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

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Chartered Institute of Ecology & Environmental Assessment (CIEEM 2017) *Guidelines for Preliminary Ecological Appraisal*. CIEEM, Winchester.

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Royal Society for the Protection of Birds (RSPB 2021) *Birds of Conservation Concern 5: The Population Status of Birds in the United Kingdom, Channel Islands & the Isle of Man*. RSPB, Sandy, Beds.

Royal Society for the Protection of Birds (RSPB 2022) *Birds of Conservation Concern: The Population Status of Birds in Wales*, 4th Edition. RSPB, Sandy, Beds.

Wales Biodiversity Partnership (WBP 2008) *Criteria for the Selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil & Rhondda Cynon Taff (The 'Mid-Valleys Area')*. Wales Biodiversity Partnership/Welsh Assembly Government.

Wales Biodiversity Partnership (WBP 2016a) *Section 7: List of the Habitats of Principal Importance for the Purpose of Maintaining and Enhancing Biodiversity in Wales (Interim)*. Wales Biodiversity Partnership/ Welsh Government.

Wales Biodiversity Partnership (WBP 2016b) *Section 7: List of the Living Organisms of Principal Importance for the Purpose of Maintaining and Enhancing Biodiversity in Wales (Interim)*. Wales Biodiversity Partnership/ Welsh Government.

APPENDIX 1: STATUTORY & POLICY FRAMEWORK FOR BIODIVERSITY

The following sets out a brief review of the key legal and key policy elements affecting wildlife species in Wales. It is not intended to be comprehensive and only the most recent and relevant articles are mentioned.

The review sets out our interpretation and understanding of key elements of the legislation and policy insofar as they apply to typical planning and development operations, based on our experience. The interpretations given below are for guidance only, however, and do not constitute legal advice. In all cases the reader is advised to consult the original legal and policy documents for the definitive wordings, and where necessary to obtain qualified legal advice.

The Conservation of Habitats & Species Regulations 2017 ('Habitats Regulations')

The Habitats Regulations were originally enacted to implement the obligations of *EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora & Fauna* (the 'EU Habitats Directive') into British law, and in so doing created the highest tier of legal protection for wildlife species in UK, the so-called 'European Protected Species' (EPS). These species include, *inter alia*:

- All species of bats
- Hazel dormouse ('dormouse')
- Eurasian Otter ('otter')
- Great crested newt
- Natterjack toad
- Sand lizard
- Smooth snake

The Regulations also cover a small number of very rare plant species such as lady's-slipper orchid.

The requirements of the Habitats Regulations were given continuance following the UK's withdrawal from the EU ('Brexit') in 2019 by the *Conservation of Habitats & Species (Amendment) (EU Exit) Regulations 2019*, and therefore continue to apply unchanged at the time of writing. EPSs are hereafter referred to as 'Habitats Regulations Species' (HRS) to reflect this change in the legislative framework.

In summary, and *inter alia*, all HRS animal species are protected as individuals against deliberate killing, injury, capture or disturbance, at all stages of their lives, and in addition, the places used for breeding or resting by these species may not be damaged or destroyed. Breeding and resting places are also afforded protection against deliberate disturbance, or the blocking of access, under the amended *Wildlife & Countryside Act 1981* (see below). HRS plant species may not be picked (in any part), collected, uprooted or destroyed at any point in their life cycle.

The main exceptions to these provisions are either that the activities were authorised by the relevant statutory body (in this case, Natural Resources Wales – NRW) and, where required, were carried out under a licence ('derogation') obtained in advance. Offences which occur as an incidental result of some other otherwise lawful activity (ie 'accidental' or 'unintentional' offences) are not exempt under the Regulations but may be viewed more leniently where (a) they could not reasonably have been foreseen, (b) the activity causing the offence ceased as soon as the presence of HRS, or their habitats, became apparent, and (c) NRW were informed immediately and appropriate expert advice sought to evaluate and remediate the situation.

Bats

The legal protection covers any place or feature which is used for resting during the day ('day roosts') and also any places which are used for hibernation in winter. Places which are used for short periods of resting at night ('night roosts'), or as customary stations for the handling and processing of food ('feeding perches'), are not usually accorded the same level of importance as day roosts and hibernation sites, although they are in fact still subject to the Regulations and in some cases may be deemed important enough to be accorded full protection.

Dormouse

Protection is usually considered to extend to any habitat, such as woodland, scrub, hedgerows and bramble stands etc, where dormouse occurs and where nests may therefore be present. The continuity of the habitats occupied by dormouse with other areas of similar connecting habitat may also be a matter for statutory consideration under the Regulations.

Otter

Protection is usually considered to extend to any watercourse or waterbody which is used by otter, and which may therefore contain nests or resting places ('holts'). It also extends to any areas of terrestrial habitat away from watercourses and waterbodies where these also contain holts, and the connectivity of such places with the occupied aquatic habitats may also be a matter for statutory consideration under the Regulations.

Great crested newt

Protection is usually considered to extend to any watercourse or waterbody which is occupied by great crested newt (GCN), and which may therefore be used for breeding. It also extends to any terrestrial habitats used by GCN during its non-aquatic phases, especially those places which are used for hibernation in winter or sheltering during adverse weather conditions. Typically, the latter will be physically connected to a breeding pond (or ponds) but may lie anything up to

2km away. At minimum, a terrestrial hinterland of 10m width around the edges of a breeding pond will be considered to be protected where this contains habitats which are suitable for terrestrial use by GCN.

Protected Sites

The Habitats Regulations also set out to protect certain rare and valuable habitat types, such as ancient semi-natural woodland, heathland, bogs and species-rich grasslands etc. This is done through the identification and designation of specifically protected sites known as Special Areas of Conservation (SACs). SACs are subject to the highest level of legal protection against damage, destruction, degradation or harmful uses or activities which is available in the UK. All such sites are also designated as Sites of Special Scientific Interest (SSSIs) under the Wildlife & Countryside Act 1981 (see below).

The Wildlife & Countryside Act 1981 (WCA)

This much amended and complex piece of legislation is the means by which protection is afforded at the next tier of species below the HRSs and is the primary source of protection in respect of birds. Species afforded protection under the WCA include, *inter alia*:

- All species of birds
- Water vole
- Red squirrel
- Common reptiles (ie slow-worm, common lizard, grass snake, adder)
- Marsh fritillary butterfly
- Pearl mussel
- Various plants, ferns, mosses, liverworts, lichens & fungi

Birds

In summary, all wild birds are protected against deliberate killing, injury or capture, and this protection extends to their eggs and young. It is also illegal to destroy, damage or remove the nest of any bird either while it is in use or being built. For certain rare species which are listed on Schedule 1 of the Act the protections go even further: it is illegal to disturb any Schedule 1 bird species, either deliberately or unintentionally ('recklessly'), while it is building a nest or actually nesting, or to disturb the dependant young of any such bird. Exceptions to these general principles affect some specific game, food or pest species, but only under certain specified and defined conditions and usually in accordance with a licence issued in advance by NRW.

Actions which cause an adverse impact to birds or their nests which arise as an incidental result of some otherwise lawful activity, such as the trimming or removal of hedges, trees or scrub for example, would not constitute an offence provided that the activity could not have reasonably been avoided. As a general result of the provisions of the WCA therefore, the deliberate destruction, removal or clearance of habitats containing nesting birds would almost invariably constitute an offence because the impacts to birds could reasonably have been foreseen and avoided, for example by carrying out the clearance activities at a time when birds are not nesting.

Except under certain specified conditions, the clearance or removal of nests or nesting habitats is generally not illegal if it is carried out at a time of year when no birds are nesting or if it can otherwise be shown that no nesting birds are present at the time (eg by means of advance survey).

Activities which might adversely affect Schedule 1 birds such as barn owl, kingfisher or birds of prey can be undertaken provided a licence has been obtained in advance from NRW and appropriate mitigation measures are put in place.

Animals Other than Birds

Animals other than birds, such as water vole, red squirrel, marsh fritillary and pearl mussel for example, are listed on Schedule 5 of the Act, and are afforded protection which is generally similar to that of HRSs. The individual animals may not be deliberately killed, injured or captured, in any of their life stages, and it is also illegal to destroy or damage any places which these animals use for shelter or protection, or to disturb an animal using such a place or obstruct access to it, whether deliberately or unintentionally.

As with birds, impacts to Schedule 5 animals which arise as an incidental result of an otherwise lawful activity do not constitute an offence provided those impacts could not have reasonably been foreseen and avoided.

Water Vole & Red Squirrel

In the case of nest-making animals such as water vole and red squirrel, protection will normally be taken to extend to the entirety of any suitable, or potentially suitable, nesting or sheltering habitats which are occupied by a residential population of the species concerned. The connectivity of these habitats with other similar habitats in the wider vicinity may also be a matter for statutory consideration.

Marsh Fritillary Butterfly & Pearl Mussel

For species which do not make nests, protection will normally be taken to extend to the entirety of any habitats which are suitable, or potentially suitable, for breeding or sheltering and which are occupied by a residential population of the species concerned. The connectivity of these habitats with other similar habitats in the wider vicinity may also be a matter for statutory consideration.



Common Reptiles

Slow-worm, common lizard, grass snake and adder are afforded so-called ‘partial protection’ under the WCA. The animals themselves may not be deliberately killed or injured, but they may be captured and the habitats which support them are not afforded any direct protection in themselves.

As with other Schedule 5 animals, adverse impacts which arise as an incidental result of an otherwise lawful activity do not necessarily constitute an offence provided those impacts could not reasonably have been foreseen and avoided. Under current interpretation this is taken to mean that the destruction or clearance of habitats which are known to support common reptiles, or where such reptiles could reasonably be expected to occur, without the implementation of measures to minimise or avoid causing incidental death or injury to reptiles, would be likely to constitute an offence.

Protected Plants

About 180 species of plants, ferns, mosses, liverworts, lichens and fungi are afforded protection under Schedule 8 the WCA. These may not be intentionally picked (in any part), uprooted or destroyed, unless authorised under licence. As with Schedule 5 animals, adverse impacts which arise as an incidental result of an otherwise lawful activity do not necessarily constitute an offence provided those impacts could not reasonably have been foreseen and avoided.

Protected Sites

The WCA also sets out mechanisms for the protection and conservation of habitats and features of high biodiversity value through the identification and designation of specifically protected sites. These include Sites of Special Scientific Interest (SSSIs), National and Local Nature Reserves (NNRs/LNRs) and National Parks etc. Such sites are subject to wide-ranging legal protection against damage, destruction, degradation, exploitation or other harmful activities or uses.

The Protection of Badgers Act 1992 (PBA)

Badger is protected primarily in relation to animal welfare and cruelty, as a result of illegal persecution. Badgers are protected against intentional killing, injury, ‘cruel ill-treatment’ or capture in all of their life stages. Their nesting burrows (‘setts’) may not be destroyed, damaged, dug into or obstructed and it is illegal to disturb a badger while occupying a sett, either deliberately or ‘recklessly’ (ie unintentionally as a result of failure to take due care). The PBA is also taken to confer a degree of protection to foraging areas which are critical to the support of a badger family-group (‘clan’) where the loss of this would otherwise result in their starvation. As with other protected species, adverse actions which arise as a result of an otherwise lawful activity do not constitute an offence provided those impacts could not reasonably have been foreseen and avoided. A number of specified exemptions are provided in connection with certain legal farming and fox-hunting activities which may impact badgers.

The protection of setts only applies to those which are in ‘current use’ and not to those which are abandoned. However, many badger setts are occupied only intermittently throughout the year and therefore ‘current use’ should not be taken to imply *continuous* use.

Actions to remove badger setts on development sites may be undertaken under a licence issued by NRW and in accordance with agreed mitigation measures, and licences may also be issued to allow the removal or exclusion of badgers from sites. Such operations may not occur during the breeding (‘close’) season, however, which is usually taken to be between December to June inclusive, due to the risk of trapping lactating females and young below ground.

Environment (Wales) Act 2016 (EWA)

Section 7 of the EWA contains the most recent lists of species and habitats which are considered to be of ‘principal importance for the conservation of biodiversity in Wales’. These lists replaced those which were previously given under s.42 of the *Natural Environment & Rural Communities Act 2006*, which in turn replaced the ‘Priority Species’ listed under the UK Biodiversity Action Plan of 1995 and its Welsh equivalent. Species listed under s.7 of the EWA include many of those afforded protection under the articles described above, including otter, dormouse, water vole, nesting birds, common reptiles and great crested newt, for example, as well as additional species such as:

- | | | |
|-------------------------------------|------------------------------|---------------------|
| • W. European hedgehog (‘hedgehog’) | • Atlantic salmon (‘salmon’) | • Hornet robberfly |
| • Brown hare | • Brown & sea trout | • Shrill carder bee |
| • Harvest mouse | • Garden tiger moth | • Flat sedge |
| • Polecat | • Cinnabar moth | • Wild chamomile |
| • European eel (‘eel’) | • Small heath butterfly | • Common toad |

and many other plant and animal species which are not otherwise specifically afforded statutory protection for wildlife conservation reasons (although they may in some cases be afforded some element of protection for other reasons, such as animal welfare or cruelty).

Section 7 of the EWA also identifies a number of habitat-types which are of ‘principal value for conservation in Wales’. These include:

- Lowland mixed deciduous woodland
- Hedgerows
- Lowland meadows
- Upland flushes, fens & swamps

Purple moor-grass & rush-pastures (in Wales, often referred to as ‘rhos pastures’)

- Reedbeds
- Blanket bog
- Sand dunes
- Rivers & ponds

Although not protected as such, the EWA requires statutory authorities to take such ‘Section 7’ species and habitats into account when considering the management and development of sites in Wales, and to take “*all reasonable steps*” to maintain and enhance their populations. The presence of such species and habitats is a ‘material consideration’ on sites where planning permission is sought for development. ***Planning Policy Wales (2021)*** (PPW, 11th Edition) requires Local Planning Authorities (LPAs) to have regard to the presence of ‘Section 7’ species and habitats and to avoid adverse impacts as a result of development wherever possible. Developments which are considered essential in the public interest must seek to minimise adverse impacts and incorporate appropriate mitigation/compensation measures where adverse impacts cannot be avoided.

Sites of Importance for Nature Conservation (SINCs)

SINCs comprise so-called ‘third-tier’ sites which have been identified as having biodiversity conservation value at the sub-national (ie regional, county, county-borough or local) level. They are usually identified by the LPA, often in collaboration with other local conservation bodies such as the county Wildlife Trust and may appear under range of different names (eg ‘Wildlife Site’, ‘County Wildlife Site’ etc). Such sites are not specifically protected in law (ie they are ‘non-statutory’) but they are recognised as a ‘material consideration’ on sites where planning permission is sought for development. As with ‘Section 7’ habitats, PPW (2021) requires LPAs to avoid adverse impacts as a result of development wherever possible, and developments which are considered essential in the public interest must incorporate appropriate mitigation/compensation measures where adverse impacts cannot be avoided.

Invasive Non-native Species

Schedule 9 of the ***Wildlife & Countryside Act (1981)*** sets out lists of plant and fauna species which are subject to statutory regulation in Britain. These currently include plants such as Japanese knotweed (*Fallopia japonica*), Himalayan balsam (*Impatiens glandulifera*) and wall cotoneaster (*Cotoneaster horizontalis*), and animals such as signal crayfish, aquarium terrapin, Asian hornet and copyu. The lists are updated regularly.

The import, sale, transport, cultivation and keeping of these species is generally forbidden except under a specially issued licence, and it is illegal to allow these species to escape or spread into the wild, either deliberately or by accident. This includes any part and all life-stages of the species concerned. Earthworks which might accidentally result in the transfer of Schedule 9 plant material to another location or which encourages it to spread either within or off the site, for example, is forbidden. Any works on a site which might involve contamination by, and potential spread of, any of the listed species must be carried out under an approved method statement designed to prevent them being accidentally dispersed off of or within the site, and which preferably results in their complete elimination wherever this is possible.

APPENDIX 2: DEFINITIONS OF SITE VALUE

International Value

Site carrying an internationally recognised designation such as Ramsar Site, World Heritage Site, Special Protection Area, Special Area of Conservation, Biosphere Reserve or Biogenetic Reserve, or:

Habitats: site supporting nationally significant areas of habitats of defined international community interest.

Species: site supporting nationally significant populations of species of defined international community interest.

National Value

Site meeting published Site of Special Scientific Interest (SSSI) designation criteria (NCC 1989; JNCC 2019 *et seq*), whether so designated or not.

Habitats: site supporting nationally significant areas of habitats of defined national rarity or interest.

Species: site supporting nationally significant populations or communities of UK Red Data Book, Nationally Notable or protected species (other than badger).

County Value

Site identified as a County Wildlife Site (CWS), Site of Importance to Nature Conservation (SINC) or similar at the county level (ie greater than district, borough or city level); meeting published CWS designation criteria (where these exist), but falling short of SSSI designation criteria, whether designated as a CWS or not.

Habitats: site supporting good examples of nationally threatened habitats, or extensive areas of habitats which are rare or unique in the county.

Species: site supporting large or strong populations or communities of nationally rare or protected species (other than badger), or of species which are rare in the county and uncommon nationally.

District Value

Sites failing to meet County Value criteria, but nevertheless supporting habitats, species or communities which appreciably enrich the ecological resource of the county, especially by virtue of their size or extent.

Habitats: sites supporting habitats uncommon in the county, small but unmodified fragments of nationally threatened habitats, or comprising extensive areas or systems of semi-natural habitats.

Species: sites supporting nationally rare species, or strong populations or communities of regionally uncommon species, which would not otherwise be present (ie they are critically dependant on the site characteristics).

Local Value

Habitats which fail to meet District Value criteria, but which appreciably enrich the ecological resource of the locality. This category can be further divided into:

- **High Local Value:** just failing to meet District Value Criteria; supporting species which are notable or uncommon in the county; or species which are uncommon, local or habitat-restricted nationally, and which might not otherwise be present in the area.
- **Local Value:** sites which are of ecological value only in the context of their immediate surroundings. Rare or uncommon species may occur but are not restricted to the site or critically dependent upon it for their survival in the area.

Sites failing to meet any of the above can be considered as being of 'Negligible' ecological value.

APPENDIX 3: PRELIMINARY ASSESSMENT OF TREES FOR USE BY BATS

Large standard trees are subject to a preliminary (Phase 1) survey to assess their potential suitability for use by roosting bats. These surveys are carried out from ground-level, using close-focusing binoculars, with particular attention being given to the presence of ‘potential roosting features’ (PRFs) such as those described by Andrews (2018). The trees were individually searched for features which are likely to be attractive to roosting bats such as cavities and rot-holes, splits and cracks, rugose or delaminating bark and dense ivy cover etc, and any such features were recorded together with the average diameter at breast-height (dbh) in centimetres (cm). In addition, a search was made for obvious signs of occupation by bats including droppings, urine stains and scratching around cavity entrances etc. The inspected trees were then categorised as follows:

1A	<i>Occupied by bats</i>	Bats are known to occupy features of the tree, or there is direct evidence of such occupation.	Further detailed survey by bat ecologist required. NRW licence required before any tree works.
1B	<i>High probability of bat use</i>	Tree has features which appear to be of high suitability for use by bats. Usually large old trees with numerous and/or well-developed PRFs.	Further survey by bat ecologist required per BCT (2023a) ‘high roost suitability’. NRW licence will be required if any bats are found.
2A	<i>Moderate probability of bat use</i>	Tree has features which appear moderately suitable for use by bats. Usually large and/or old trees with at least some well-developed PRFs.	Further survey by bat ecologist required per BCT (2023a) ‘moderate roost suitability’. NRW licence will be required if any bats are found.
2B	<i>Low probability of bat use</i>	Tree has overall low roosting suitability, although some features of low or marginal roosting potential may be present.	Inspection by arborist and/or bat ecologist immediately prior to and during tree works. Soft-felling preferred.
3	<i>Negligible probability of bat use</i>	Usually young and/or small trees, typically below 30cm dbh, lacking any obvious features suitable for use by bats.	No further survey required. No constraint to tree works.

Andrews, H (2018) *Bat Roosts in Trees: A guide to Identification and Assessment for Tree-care and Ecology Professionals (The Bat Tree Habitat Key)*. Pelagic Publishing, London.

APPENDIX 4: SPECIES RECORDED FROM THE SITE

Plant Species

All species recorded by DCE 2025, unless otherwise indicated:

Species	Common Name	Contributing Species for SINC designation						Other comments
		W	NG	CG	AG	MG	PIL	
Trees & Scrub								
<i>Acer pseudoplatanus</i>	sycamore							
<i>Clematis vitalba</i>	wild clematis							
<i>Fraxinus excelsior</i>	ash							
<i>Rubus fruticosus</i> agg.	bramble							
<i>Sorbus aucuparia</i>	rowan							
<i>Tilia x europaea</i>	common lime							
Herbaceous Plants								
<i>Arrhenatherum elatius</i>	false oat-grass							
<i>Asplenium scolopendrium</i>	hart's-tongue fern							
<i>Asplenium trichomanes</i>	maidenhair spleenwort							
<i>Bellis perennis</i>	daisy							
<i>Centranthus ruber</i>	red valerian							
<i>Cirsium vulgare</i>	spear thistle							
<i>Convolvulus arvensis</i>	field bindweed							
<i>Conyza canadensis</i>	Canadian fleabane							
<i>Eupatorium cannabinum</i>	hemp agrimony					MG		
<i>Euphorbia peplus</i>	petty spurge							
<i>Galium aparine</i>	cleavers							
<i>Geranium robertianum</i>	herb Robert							
<i>Hedera helix</i>	ivy							
<i>Jacobaea vulgaris</i>	common ragwort							
<i>Lapsana communis</i>	nipplewort							
<i>Medicago lupulina</i>	black medick			CG				
<i>Plantago major</i>	greater plantain							
<i>Polypodium vulgare</i>	polypody							
<i>Ranunculus repens</i>	creeping buttercup							
<i>Rumex crispus</i>	curled dock							
<i>Scorzoneroide autumnalis</i>	autumn hawkbit							
<i>Sonchus oleraceus</i>	smooth sow-thistle							
<i>Taraxacum officinalis</i> agg	dandelion							
Fungi								
<i>Auricularia auricula-judae</i>	Jelly Ear							
<i>Dacrymyces stillatus</i>	Common Jellyspot							
<i>Daldinia concentrica</i>	King Alfred's Cakes							
<i>Pleurotus ostreatus</i>	Oyster Mushroom							
<i>Trametes versicolor</i>	Turkeytail							
<i>Xylaria polymorpha</i>	Dead Man's Fingers							
Contributing Species for SINC designation		W	NG	CG	AG	MG	PIL	QS = 0
Totals recorded on site				1		1		CS = 0

(**Bold**) = SINC Qualifying species

SINC Indicator Species

AM = arable field margin, NG = neutral grassland, AG = acid grassland, CC = calcareous grassland, MG = marshy grassland, W = woodland, PI = Post-industrial/Disturbed ground.

S = 'Qualifying Species'
CS = 'Contributory Species'

Fauna Species

All records DCE 2025, unless otherwise indicated:

Birds	SOCC Lists		S7	SINC value	Notes
	UK	Wales			
Jackdaw					Visiting site
Herring gull	Red	Red			Visiting site
Feral pigeon					Visiting site

(Bold) = Schedule 1 – Specially protected

Red List = High conservation significance in UK/Wales (RSPB 2021; 2022)

Amber List – Moderate conservation significance in UK/Wales (RSPB 2021; 2022)

S7 = 'Species of Principal Conservation Concern in Wales (EWA 2016)

SINC Indicator Species

Breeding Birds:

BQS = 'Qualifying species'

BCS = 'Contributory species'

Wintering/Passage Birds:

WQS = 'Qualifying species'

WCS = 'Contributory species'

APPENDIX 5: SUITABLE SPECIES FOR PLANTING

Semi-natural Woodlands

Canopy Species		Percentage
<i>Quercus robur</i>	Pedunculate oak	40
<i>Quercus petraea</i>	Sessile oak	40
<i>Acer campestre</i>	Field maple	20
Understorey		
<i>Corylus avellana</i>	Hazel	30
<i>Crataegus monogyna</i>	Common hawthorn	30
<i>Betula pendula</i>	Silver birch	)
<i>Cornus sanguinea</i>	Dog wood	)
<i>Ilex aquifolium</i>	Holly	)
<i>Malus sylvestris</i>	Crab apple	)
<i>Prunus avium</i>	Wild cherry	) 40
<i>Prunus spinosa</i>	Blackthorn	)
<i>Rosa canina</i>	Common dog-rose	)
<i>Sorbus aucuparia</i>	Rowan	)
<i>Taxus baccata</i>	Yew	)
<i>Viburnum opulus</i>	Guelder rose	)

Planting should be carried out using 600mm bare-rooted transplants in spiral plastic guards (rabbit/vole protection) where appropriate. Standard tree aftercare should be applied.

Hedgerows

Canopy Species		Percentage
<i>Crataegus monogyna</i>	Common hawthorn	30
<i>Prunus spinosa</i>	Blackthorn	10
<i>Corylus avellana</i>	Hazel	20
<i>Acer campestre</i>	Field maple	)
<i>Cornus sanguinea</i>	Dogwood	)
<i>Euonymus europaeus</i>	Spindle	)
<i>Ilex aquifolium</i>	Holly	) 40
<i>Prunus avium</i>	Wild cherry	)
<i>Quercus robur</i>	Pedunculate oak	)
<i>Rosa canina</i>	Common dog-rose	)
<i>Sambucus nigra</i>	Elder	)
<i>Sorbus aucuparia</i>	Rowan	)
<i>Viburnum opulus</i>	Guelder rose	)

Climbers

<i>Clematis vitalba</i>	Traveller's-joy	) Alternate at 3m intervals
<i>Lonicera periclymenum</i>	Honeysuckle	)
<i>Solanum dulcamara</i>	Bittersweet	)
<i>Tamus communis</i>	Black bryony	)

Ideally plant in late autumn, after mid-November, although anytime between October and March is appropriate if the ground is not frozen. Plant 60-125mm high whips in trenches (300mm depth x 600mm width) in two lines 300mm apart to form a staggered, double row. Whips in each line should be 450mm apart, giving a total of five plants per running metre. Use a spiral guard to protect the whip from rabbits with a cane to support them. Back fill with a mixture of the topsoil excavated from the pit, mixed with organic matter.

Newly planted hedges are vulnerable to damage by wind, drought and severe weather for the first 2-3 years. Keep moist and mulch with a 50-75mm layer of composted bark to stop weed growth and retain moisture in the soil.

APPENDIX 6:
EXAMPLES OF BOXES FOR SYNANTHROPIC BIRD SPECIES



Schwegler 1SP House Sparrow Terrace



Schwegler 1BFN Integrated Starling Box



Vivara Woodstone House Martin Cups



Vivara Woodstone Swallow Cup



Schwegler 11 House Martin Cups



Ibstock 2 Integrated Swift Box



Ecosurv Integrated Swift Box



Vivara Woodstone Integrated House Sparrow Box



Vivara Woodstone Integrated Swift Box



Vivara Woodstone Under-Eave Swift Box

EXAMPLES OF NON-INTEGRATED BIRD BOXES FOR TREES AND BUILDINGS

Suspended Designs



Schwegler 1B
General box



Schwegler 2H open-front
'robin' box



Schwegler 5
'large owl' box



Schwegler 1CGA
'small owl' box



Schwegler 20
'starling' box



Schwegler 28 'kestrel' box



Schwegler 5KL 'nuthatch' box

Surface-mounted Designs



Schwegler 1MR general box



Vivara Pro open-front
'robin' box



Vivara Pro ova open-front
'robin' box



Vivara Pro 'starling' box



Vivara Pro 28/32mm
general box



Vivara Pro 28/32mm
oval general box

EXAMPLES OF SURFACE-MOUNTED BAT BOXES

Tree-mounted boxes



Schwegler 2F General Box



Schwegler 1FD Nursery Box



Schwegler 1FS Nursery Box (Large)



Schwegler 1FW Winter Box
(Very large box)



Schwegler 2FN
Noctule Box



Schwegler 2F DFP
Daubenton's Bat Box



Miramar General Box

Tree or building-mounted boxes



Schwegler 1FF General Box



Schwegler 1FQ Decorative Box



Schwegler 1FFH General Box



Schwegler 1FE



Vivara Woodstone Low Profile Box



NHBS Cavity Box
(Brown Long-Eared Bat Box)



NHBS Crevice Box



Beaumaris wall box

Photographs of the Site, July 2025



Mature common lime, T3.



Cavity within trunk of T3



Cavity within T3, circled



Mature common lime, T5



Dense ivy growth on T5



Ephemeral/short perennial vegetation, rubble pile and shipping container in the west of the site



Example of buddleia shrub



B1 exterior and entrance, eastern elevation



Exterior of subterranean boiler room



Boiler room interior



Service outbuilding with gap underneath door (arrow) and vent (circled)



B1 exterior, western elevation



Example of missing fascia and roof vent with open slats on B1



Example of missing and raised roof and ridge tiles on B1



Missing slats and fascia on eastern elevation of B1



B1 courtyard with dense ivy growth



B1 interior, ground floor, large gap in ceiling



View into B1 loft void from gap



Floor beneath gap with bird feathers and droppings



B2, found in the south-western corner of the site



Open and missing windows, and missing guttering on B2



B2 southern elevation with dense ivy growth



Missing fascia and gaps underneath roof sheeting on B2



Interior of B2



Centre, Port Talbot
Ecological Assessment

Plan 1 - Site Location & Context

DCE 1300 NTS June 2025



Key:

 Site Boundary

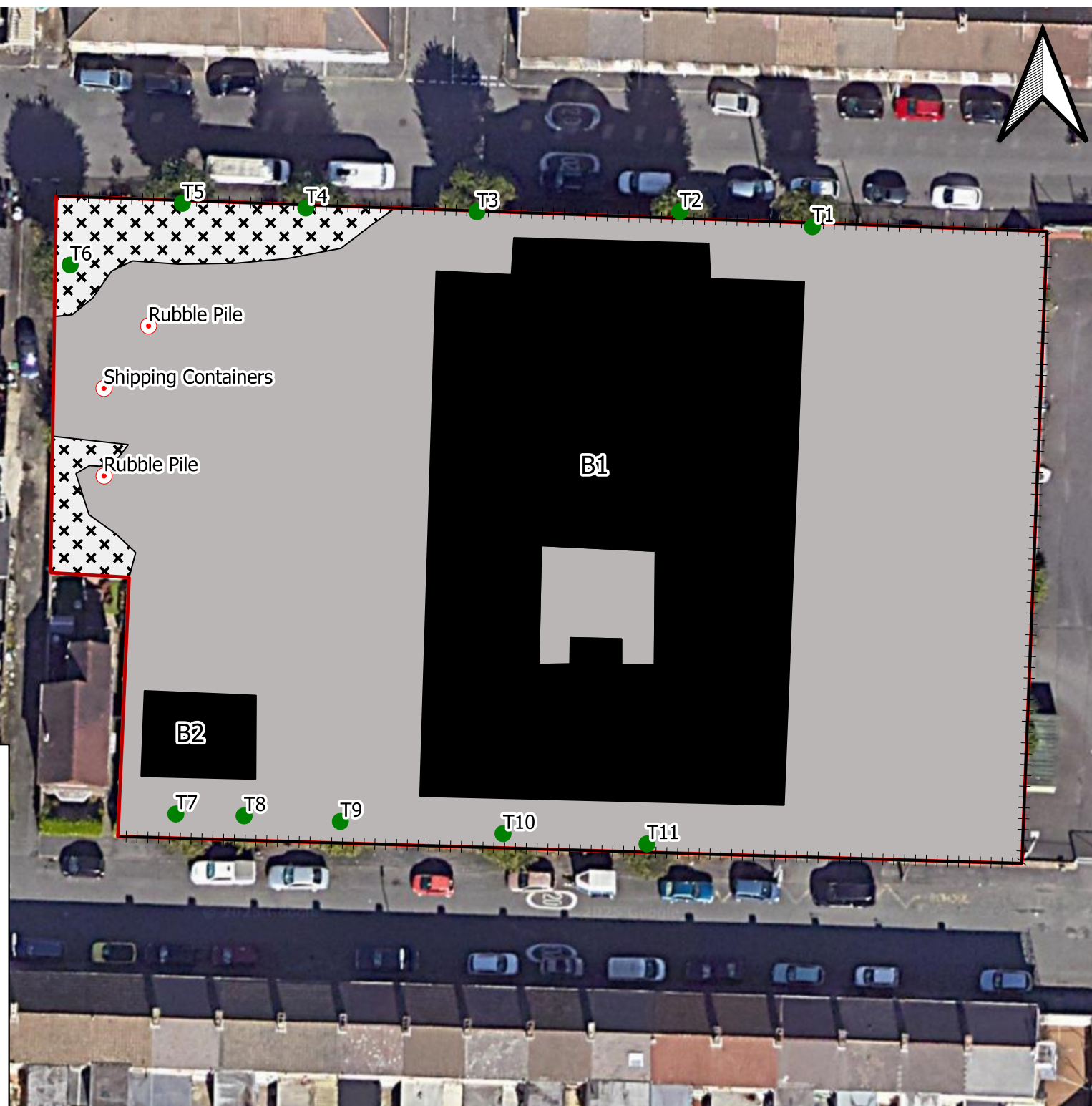
Centre, Port Talbot,
Ecological Assessment

Plan 2 - Habitats & Vegetation

DCE 1300 NTS Jul 2025

Key:

-  Site Boundary
-  J1.3 - Disturbed land - ephemeral/
short perennial
-  J3.6 - Buildings
-  J5 - Hard standing
-  J2.4 - Fence
-  J2.5 - Wall
-  A3.1 Broadleaved trees
-  Target Note





Centre, Port Talbot
Ecological Assessment

Plan 3 - Ecological Evaluation

DCE 1300 NTS Jul 2025



Key:

 Site Boundary

 Local Value

 Negligible Value