

DAYS MOTOR PARK NEATH – PRELIMINARY ECOLOGICAL APPRAISAL

On Behalf of
Avalon Architecture
August 2025



Eryrgwyn Ecology



Eryrgwyn Ecology

Eryr Gwyn Ecology
7 Highland Terrace
Pontarddulais
Swansea
SA4 8JY

Legal Disclaimer

This report was prepared by Eryr Gwyn Ecology at the instruction of, and for use by Avalon Architecture solely. It does not in any way constitute advice to any third party who is able to access it by any means. Eryr Gwyn Ecology excludes to the fullest extent lawfully permitted all liability whatsoever for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.

We confirm that in preparing this report we have exercised reasonable skill and care, taking into account the project objectives, the agreed scope of the work and prevailing site conditions. Advice in this report is based on the judgement of Eryr Gwyn Ecology and the interpretation of data gathered during the course of their survey on the property named in this document. The findings and advice given during the course of this report is provided by Eryr Gwyn Ecology, acting only on behalf of Eryr Gwyn Ecology. The ecologists may hold other paid employment but none of the advice or work undertaken in respect of producing this report refers to any roles or responsibilities held in any other employment. All work undertaken in this report is the sole responsibility of Eryr Gwyn Ecology.

This document is valid for a period of two years from the front cover date.

Report by Aaron Davies MCIEEM MSc BSc (Hons)

Quality Control

Issue / Revision	First Issue	Date
Author	Aaron Davies	23/08/2025
Reviewer	Steve Hancock	28/08/2025

Executive Summary

Eyr Gwyn Ecology ('EGE') was commissioned to undertake a Preliminary Ecological Appraisal (PEA) of the habitats within a plot of land at Days Motor Park Neath, Neath Abbey Road, Neath Port Talbot, SA10 7DF; the 'Site'. The purpose of the surveys was to inform the planning application for a change of use from Sui Generis vehicle dealership to Class B8 with ancillary trade counter use and associated development (hereafter referred to as the 'Proposed Development'). It is understood that the Proposed Development will be limited to splitting the existing building internally into two sections. There will be alterations externally, but this will be limited to new line marks and alteration of fencing positions. There will be no excavation works or vegetation clearance.

A desk study was undertaken as part of the PEA. No statutory designated site of international importance was recorded within 2km of the Site. The desk study identified eight non-statutory sites within 2km of the Site. NPT Watercourses SINC is located directly adjacent to the western boundary of the Site. General environmental protection measures should be implemented during the construction phase of the Proposed Development to protect the SINC. Mitigation measures are provided in the report. Due to the nature and scale of the Proposed Development (confined to the Site boundary), lack of pathway for potential impacts and distance from the sites, it is considered that the Proposed Development will not impact all other non-statutory sites located outside or beyond the Site boundary.

The Site and a wider 'Survey Area' was described and mapped following standard Phase 1 habitat types. Six Phase 1 classification types were identified within the Survey Area. Of these, four were within the Site; J1. 2 Amenity Grassland, J3.6 Buildings, J2.4 Fence, and J2.5 Wall. G2. Running water and A2.1 Dense/Continuous Scrub was outside the Site.

One building was found within the Site. This was the Sui Generis vehicle dealership, a currently empty commercial building with flat roof. The inside was completely open with no loft voids. No suitable roosting features for bats were identified. Herring Gulls *Larus argentatus* were recorded on the roof of the building on Site during the site survey. White staining, indicative of bird droppings was also recorded. Therefore, it is considered possible that Herring Gulls could be nesting on the roof the building on Site.

It is understood that the Proposed Development will not impact habitats that have suitability for protected/notable species. Therefore, further surveys or preliminary avoidance and/or mitigation measures for protected/notable species are not recommended at this time.

One Invasive Non-Native Species (INNS) was identified within the Survey Area: Himalayan balsam *Impatiens glandulifera*. Due to the location of the Himalayan Balsam relative to the Site, it is not anticipated that the works will take place close to the INNS. It is therefore not impacted that INNS will be impacted by the Proposed Development.

Net Benefit for Biodiversity (NBB) enhancements are also recommended, such as the seeding of wildflower meadows and bird and bat box installation. Removal of INNS from the wider Survey Area is also recommended. These recommendations help demonstrate a stepwise approach in line with the DECCA framework and encourage resilient ecological networks and green infrastructure, as per Policy 9 of the Future Wales: The national Plan 2040.

Contents

.....	
1 Introduction.....	1
1.1 Background.....	1
1.2 Scope of Report.....	1
1.3 Relevant Legislation and Policy	1
2 Methods	2
2.1 Overview	2
2.2 Desk Study.....	2
2.3 Habitat Survey.....	2
2.4 Daytime Bat Walkover (DBW)	3
2.5 Protected Species Assessment	4
2.6 Dates of Survey and Personnel	4
2.7 Notes and Limitations.....	5
3 Results and Discussion	6
3.1 Designated Sites	6
3.2 Habitats	7
3.3 Daytime Bat Walkover (DBW)	8
3.4 Protected and Notable Species Assessment.....	9
4 Recommendations.....	11
4.1 NPT Watercourses SINC	11
4.2 Ecological Enhancement Opportunities.....	11
4.3 Environmental Best Practice	11
5 Figures.....	13
Appendix A.....	17
Appendix B.....	20

1 Introduction

1.1 Background

Eryrgwyn Ecology (hereafter referred to as ‘EGE’) was commissioned to undertake a Preliminary Ecological Appraisal (PEA) of the habitats within a plot of land located at Days Motor Park Neath, Neath Abbey Road, Neath Port Talbot, SA10 7DF (Grid reference SS 74302 97538); hereafter referred to as the ‘Site’; shown on Figure 1.

The purpose of the surveys was to inform the planning application for a change of use from Sui Generis vehicle dealership to Class B8 with ancillary trade counter use and associated development (hereafter referred to as the ‘Proposed Development’). It is understood that the Proposed Development will be limited to splitting the existing building internally into two sections. There will be alterations externally, but this will be limited to new line marks and fencing position altered. There will be no excavation works or vegetation clearance. The purpose of this PEA is to provide sufficient information to update the baseline ecological information about the Site to support the planning application for the Proposed Development.

1.2 Scope of Report

Eryrgwyn Ecology were commissioned in July 2025 to complete a PEA of the Site and a wider survey area as shown on Figure 1; the ‘Survey Area’. The brief was:

- To provide baseline ecological information about the Survey Area with reference to whether legally protected and / or notable sites, species or habitats are present or likely to be present.
- To provide recommendations to enable compliance with relevant nature conservation legislation and planning policy; and
- If necessary, to identify the need for avoidance, mitigation, compensation, or enhancement measures and / or further ecological surveys.

1.3 Relevant Legislation and Policy

The appraisal has been compiled with reference to the following relevant nature conservation legislation, planning policy and the UK Biodiversity Framework from which the protection of sites, habitats and species is derived in Wales.

- The Conservation of Habitats and Species Regulations 2017 (as amended) (Habitats Regulations).
- The Wildlife and Countryside Act 1981 (as amended) (WCA).
- Countryside Rights of Way Act 2000.
- The Town and Countryside (Environmental Impact Assessment) (Wales) Regulations 2017.
- The Protection of Badgers Act 1992.
- The Wild Mammals (Protection) Act 1996.
- Environment (Wales) Act 2016.
- The Wellbeing of Future Generations (Wales) Act 2015.
- The UK Post-2010 Biodiversity Framework (2011-2020) (JNCC and DEFRA, 2012).
- UK Biodiversity Action Plan (UKBAP).
- Planning Policy Wales (PPW) (Edition 12) 2024; and
- Technical Advice Note 5; Nature Conservation and Planning 2009.

2 Methods

2.1 Overview

This appraisal has been prepared with reference to current good practice guidance published by the Chartered Institute for Ecology and Environmental Management^{1 2}, Joint Nature Conservation Committee³; and guidance contained in the British Standard - Code of Practice for Biodiversity and Development BS42020:2013⁴.

This PEA is based on the following data sources:

- An ecological desk study.
- A habitat survey of the Survey Area; and
- A protected / notable species assessment.

A Daytime Bat Walkover (DBW) of the Survey Area was undertaken. All structures and trees within the Survey Area were subject to ground level roost assessments to assess their suitability for supporting roosting bats. These assessments were made in line with good practice guidelines⁵.

2.2 Desk Study

A desk study was undertaken in August 2025 to review existing ecological baseline information available in the public domain and to obtain information held by relevant third parties. The desk study was undertaken following current good practice guidance^{1 2}.

To provide the baseline data for the ecological desk study, the following information was requested from the South East Wales Biodiversity Records Centre (SEWBReC):

- Records of legally protected and notable species within 2km of the Site.
- Records of statutory sites designated for national and international importance within 1km of the Site; and
- Records of non-statutory sites designated for nature conservation value, and priority habitats within 2km of the Site.

The findings of the desk study have been incorporated within Section 3 and Appendix A of this report.

2.3 Habitat Survey

Habitats were described and mapped following standard Phase 1 habitat types as per JNCC guidelines³. Descriptions of recorded habitats are in Section 3.2 and shown in Figure 2.

¹ Chartered Institute of Ecology and Environmental Management (CIEEM) (2017a). Guidelines for Preliminary Ecological Appraisal. CIEEM, Winchester.

² CIEEM (2017b). Guidelines for Ecological Report Writing. CIEEM, Winchester.

³ Joint Nature Conservation Committee (JNCC) (2016). Handbook for Phase 1 habitat survey – a technique for environmental audit. JNCC, Peterborough.

⁴ BS42020 : 2013 Biodiversity : Code of Practice for Planning and Development

⁵ Collins J. (ed.) (2023) Bat Surveys for Professional Ecologists, Good Practice Guidelines (4th Edition). The Bat Conservation Trust, London.

Where appropriate consideration was given to whether habitats qualify, or could qualify, as priority habitats following habitat descriptions published by the Joint Nature Conservation Committee⁶.

Habitats were marked on a mobile mapping computer and were subsequently digitised using a Geographical Information System (GIS).

Target notes were made to provide information on specific features of ecological interest (e.g. reptile habitat piles). These are shown on Figure 2.

Any invasive plant species listed on Schedule 9 of the WCA 1981 (as amended) which were evident during the habitat survey were also target noted. Detailed mapping of such species; or a full survey for all invasive plant species is beyond the scope of this commission.

2.4 Daytime Bat Walkover (DBW)

The Survey Area was subject to a DBW in accordance with good practice guidelines⁵ with the objective of recording habitats suitable for bats to roost, commute, and forage both within the Survey Area and its surroundings. All qualifying habitat features within the Survey Area were assigned suitability according to the criteria as described in Table 1.

Table 1 - Guidelines for assessing the suitability of habitats for Bats⁵

Habitat Feature	Suitability	Description
Habitat Suitability Assessment	None	No habitat features on site likely to be used by and commuting or foraging bats at any time of the year.
	Negligible	No obvious habitat features on site likely to be used as flightpaths or by foraging bats; however, may be used irregularly by bats as a result of non-standard behaviour.
	Low	Habitats within the site that could be used by small numbers of bats. Habitats typically consist of open hedgerows or single trees / patches of scrub isolated from wider habitats.
	Moderate	Habitats within the site with continuous connectivity within and to the wider landscape. Habitats typically consist of lines of trees, connected gardens and scrub.
	High	Habitats within the site of high quality with continuous connectivity within and to the wider landscape that are likely to be used regularly by bats. Habitats typically consist of broadleaved woodland, tree-lined watercourses, and grazed parkland. Site close and connected to known roosts.
	None	No habitat features on site likely to be used by roosting bats at any time of year.

⁶ JNCC Biodiversity Reporting and Information Group (2008). UK Biodiversity Action Plan

Habitat Feature	Suitability	Description
Preliminary Roost Assessment (PRA)	Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
	Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year.
	Moderate	A structure with one or more potential roost sites that could be used by multiple bats. Unlikely to support a roost of high conservation status such as maternity and hibernation.
	High	A structure with one or more potential roost sites that are suitable for use by large numbers of bats on a regular basis. Structures have high potential to support high conservation roosts.
Ground Level Tree Assessment (GLTA)	None	Either no Potential Roost Features (PRFs) within the tree or unlikely to be any.
	FAR	Further Assessment Required to establish the presence of PRFs within the tree.
	PRF	A tree with at least one PRF present.

Habitat Features were considered as requiring further surveys if they were assessed, Low, Moderate, or High. Roost features were considered as requiring further surveys if they were assessed FAR or PRF and within the Survey Area, or at a distance where they may be likely to suffer disturbance from lighting, vibration or noise, or likely to support a roost of high conservation status that may be impacted by the severing of commuting routes from the roost, and lighting, noise, vibration impacts.

2.5 Protected Species Assessment

The potential for the Site and Survey Area to support legally protected and notable species was assessed using the desk study results and combined with field observations during the habitat survey. The assessment of habitat suitability for protected and notable species was based on professional experience and judgement.

Findings from field and desk elements were supplemented by standard sources of guidance on habitat suitability assessment for key faunal groups and species, for example bats⁵.

2.6 Dates of Survey and Personnel

The PEA was completed on 16th August 2025 by Aaron Davies MCIEEM. Aaron has been a consultant ecologist since 2012, holds a degree in a related discipline and is a full member of CIEEM. Aaron has experience of undertaking PEAs of similar habitat types.

This report has been subject to technical review by Steve Hancock CEnv MCIEEM. Steve has worked as a consultant ecologist since 2009 and holds a degree in a related discipline. Steve is a Chartered Environmentalist, and a full member of CIEEM.

2.7 Notes and Limitations

Every effort has been made to provide a comprehensive description of the Survey Area; however, the following specific limitations apply to this assessment:

- Ecological survey data is typically valid for two years⁷ unless otherwise specified, for example if conditions are likely to change more quickly due to ecological processes or anticipated changes in management.
- Records held by local biological record centres and local recording groups are generally collected on a voluntary basis; therefore, the absence of records does not demonstrate the absence of species, it may simply indicate a gap in recording coverage.
- The Phase 1 habitat survey was conducted over the period of a single day, as such only a selection of all species that occur within the Survey Area will have been recorded. However, through use of desk study information to supplement Site survey data, it is considered that an accurate assessment of the potential for the Site and Survey Area to support protected species or those of conservation concern was possible; and
- The Phase 1 habitat map (Figure 2) has been produced using mapping software in the field. Whilst this provides a sufficient level of detail to fulfil the requirements of a PEA, owing to irregularities in GPS accuracy the maps are not intended to provide exact locations of key habitats.
- Distances from the Site to Neath Port Talbot (NPT) Watercourses SINC and B-Lines have been provided, however the shapefiles provided as part of the desk study request from SEWBReC were do not represent it accurately, therefore they have been omitted from Figure 3.

⁷ CIEEM (2019), Advice Note on The Lifespan of Ecological Reports and Surveys. CIEEM, Winchester

3 Results and Discussion

3.1 Designated Sites

3.1.1 Statutory Sites

No statutory designated site of international importance was recorded within 2km of the Site. Statutory sites are therefore not discussed further in this assessment.

3.1.2 Non-Statutory Sites

The desk study identified eight non-statutory sites within 2km of the Site. Sites consist of seven Wildlife Site/ Sites of Importance for Nature Conservation (SINCs), and one B-Line. These are detailed in Table 2 and shown in Figure 3.

Table 2 - Non-statutory sites within 2km of the Site

Site Name	Designation	Approximate Distance from Site	Description
Neath Port Talbot (NPT) Watercourses	SINC	5m	Freshwater ecosystems provide habitats for a fifth of NPT's priority species, many of which are associated specifically with this habitat.
Gwlyptir Mynachlog Nedd	SINC	135m	A large flat expanse of marshy grassland, lying north of the A465 adjacent to Neath Abbey. Reason for selection: H9:3 Purple moor-grass and rush pastures H9:4 Reedbed H16 Mosaic habitats
Tennant Canal	SINC	191m	The Tennant canal supports exceptional aquatic and emergent flora along much of its length. Reason for selection: H13 Standing open water and canals
Roman Way Reedbed	SINC	202m	Reason for selection: H9:4 Reedbed
Neath Estuary	SINC	358m	Reason for selection: H4:1 Coastal and Floodplain Grazing Marsh H12:1 Rivers H18:1 Coastal Saltmarsh H18:2 Intertidal Mudflats

Site Name	Designation	Approximate Distance from Site	Description
Neath Canal	SINC	536m	The Neath Canal supports outstanding aquatic and emergent flora along much of its length. Reason for selection: H13 Standing open waters and canals
Coed Bach a'r Cwm	SINC	812m	Coed Bach a'r Cwm is native, largely W10 valley woodland, established along part of the Afon Clydach and one of its tributaries. Reason for selection: H1:3 Native woodland
B-Line	B-Line	480m	B-Lines are a national initiative to establish a pathway of connected habitats that support a wide range of invertebrate populations and is supported by 'The Action Plan for Pollinators in Wales' Welsh Government, 2013

NPT Watercourses SINC is located directly adjacent to the western boundary of the Site. General environmental protection measures should be implemented during the construction phase of the Proposed Development to protect the SINC. Mitigation measures are provided in the report. Due to the nature and scale of the Proposed Development (confined to the Site boundary), lack of pathway for potential impacts and distance from the sites, it is considered that the Proposed Development will not impact any other non-statutory site located outside of the Site boundary. They are therefore not discussed further in this assessment.

3.2 Habitats

3.2.1 Overview

The following account summarises the findings of the habitat survey. Seven Phase 1 classification types were identified within the Survey Area. Of these, five were within the Site; J1. 2 Amenity Grassland, J2.4 Fence, J2.5 Wall, J3.6 Buildings, and J4 Bare Ground. G2. Running water and A2.1 Dense/Continuous Scrub was outside the Site, but on the western boundary of the Survey Area. Most of the Site was Hard Standing which is not a Phase 1 Habitat type. The habitats are mapped on Figure 2.

A description of the habitat's location and condition within the Survey Area are provided along with an indicative species list. Target notes are shown on Figure 2 and photographs in Appendix B.

A2.1 Dense/Continuous Scrub

No dense/continuous scrub was present within the Site. However, a dense stand was present along the western border of the stream that runs on the western boundary of the Survey Area. The scrub was dominated by Bramble *Rubus fruticosus* agg., Buddleia *Buddleja davidii*, and Hedge Bindweed *Calystegia sepium*, with Rosebay Willowherb *Chamerion angustifolium*, Hemp Agrimony *Eupatorium cannabinum* and Himalayan Balsam *Impatiens glandulifera*. Immature Sycamore *Acer pseudoplatanus* and Alder *Alnus glutinosa* trees were also present.

G2 – Running Water

A small stream was present just outside the Site, along the western border, within the Survey Area. It flowed north to south and was culverted underneath the A474 which is north of the Survey Area. The stream was relatively shallow, between 10-30cm deep and was approximately 2m wide. The bank was modified with boulders. The eastern bank was amenity grassland, and the western bank was covered by dense/continuous scrub.

J1.2 – Amenity Grassland

Three parcels of amenity grassland were present within the Survey Area with one along the eastern portion of the Site, adjacent to the stream. These were all well maintained and regularly mown so were of a short sward. The bank of the small stream on the western boundary of the Survey Area was slightly less maintained and more diverse. Species recorded were dominant Perennial Ryegrass *Lolium perenne*, frequent Daisy *Bellis perennis*, Dandelion *Taraxacum officinale* agg. occasional Broadleaved Willowherb *Epilobium montanum*, Self Heal *Prunella vulgaris*, Broadleaved Willowherb *Epilobium montanum*, Self Heal *Prunella vulgaris*, Creeping Buttercup *Ranunculus repens*, White Clover *Trifolium repens*, Ribwort Plantain *Plantago lanceolata*, and rare Common Ragwort *Jacobaea vulgaris*.

J2.4 – Fence

A metal palisade fence was present along the south west boundary of the Site. Another metal fence was present within the hard standing in the southern central section of the Site.

J2.5 - Wall

A small 0.5m tall brick wall was present along the northern boundary of the Site.

J3.6 Buildings

One building was present within the centre of the Site. Further details are provided in Section 3.3.

J4 Bare Ground

There was a narrow section of bare ground along the eastern boundary of the building, which comprised of decorative stone chippings.

3.3 Daytime Bat Walkover (DBW)

One building was found within the Survey Area. This was the Sui Generis vehicle dealership, an empty commercial building with flat roof. The inside was completely open with no loft voids. No suitable roosting features for bats were identified within the building.

The impact of the Proposed Development on bats roosting in buildings is therefore not considered further.

No trees within the Survey Area were identified which had suitable potential roosting features (PRF) for bats. Therefore, the impact of the Proposed Development on bats roosting in trees is not considered further.

3.3.1 Habitat suitability assessment

The Site itself is considered of negligible habitat suitability for bats, as per guidance specified in Table 1. There are no obvious habitat features on site likely to be used as flightpaths or by foraging bats; however, the Site may be used irregularly by bats as a result of non-standard behaviour. The stream, and line of trees within the east of the Survey Area provides some potential flightpaths and foraging resourcing and does provide some connection to wider woodland and the Tennant Canal and River Neath to the south. However, these are disconnected and severed by roads, so the Survey Area is considered of Low habitat suitability. Therefore, the impact of the Proposed Development on bats is not considered further.

3.4 Protected and Notable Species Assessment

The potential for the Site to support legally protected species and notable species has been assessed using the results of the desk study and observations made during the survey of habitats within the Site. A summary of desk study information is included within Appendix A. Desk study records have only been considered below if they are recent (from the last 10 years) and / or if they relate to species that may be supported by habitats at the Site. Habitats present within the Site were considered suitable for the following species:

- Birds.
- Invasive Non-Native Plant Species (INNS).

The Site does not provide suitable habitat for other protected, notable species or other species beyond those listed above. Due to the nature and scale of the Proposed Development (confined to the Site boundary), and lack of pathway for potential impacts, the habitats within the Survey Area solely (dense/continuous scrub and running water) have been excluded from this assessment. Therefore, species/ species groups other than those listed above are not considered further in this assessment.

3.4.1 Birds

The Habitat Regulations 2017 Part 1 Regulation 10(2) & (3) state that local authorities '*must take such steps in the exercise of their functions as they consider appropriate to contribute to...the preservation, maintenance and re-establishment of a sufficient diversity and area of habitat for wild birds in the UK including by means of the upkeep, management and creation of such habitat...*'. The legislation continues to state that economic and recreation requirements must be taken into consideration in considering which measures are appropriate.

Under the WCA all wild birds are protected from killing and injury, and their nests and eggs protected from taking, damage and destruction whilst in use. Additional protection is extended to species listed under Schedule 1 of the Act, meaning it is also an offence to disturb these species at or near the nest, or whilst they have dependent young.

Various bird species are also listed as Priority Species in accordance with Section 7 of the Environment (Wales) Act 2016.

The desk study returned 291 records from 61 species of birds, from within the last 10 years and within 2km of the Site. A full list of species can be found in Appendix A.

Herring Gulls *Larus argentatus* were recorded on the roof of the building on Site during the site survey. White staining, indicative of bird droppings was also recorded on the walls of the building. Therefore, it is considered possible that Herring Gulls could be nesting on the roof the building on Site. No other habitats on Site were considered suitable for nesting bird species. It is understood that the Proposed Development will be limited to splitting the existing building internally into two sections. There will be no alterations externally to the building. There will be no other external alterations beyond new line marks and alterations to fencing positions. Further surveys and / or mitigation measures with relation to breeding birds are therefore not considered necessary.

3.4.2 Invasive Non-Native Plant Species

Certain plant species are listed on Schedule 9 of the WCA. It is an offence to plant or otherwise cause these species to grow in the wild.

The desk study returned 14 records of five Schedule 9 INNS within 2km of the Site; Himalayan Balsam, Himalayan Cotoneaster *Cotoneaster simonsii*, Montbretia *Crocasmia pottsii x aurea* = *C. x crocosmiiflora*, Variegated Yellow Archangel *Lamium galeobdolon subsp. Argentatum*, and Wall Cotoneaster *Cotoneaster horizontalis*. The closest record was for Himalayan Balsam, 395m from Site.

At the time of survey, Himalayan balsam was recorded within the Survey Area and on the margins of the Site. No other INNS were recorded within the Survey Area. It is understood that the Proposed Development will be limited to splitting the existing building internally into two sections. There will be no alterations externally to the building. There will be no other external alterations beyond new line marks and alterations to fencing positions. Further surveys and / or mitigation measures with relation to INNS are therefore not considered necessary.

4 Recommendations

4.1 NPT Watercourses SINC

General environmental protection measures should be implemented during the construction phase of the Proposed Development to protect the watercourse that runs along the western boundary of the Site. Any works within 5m of NPT Watercourses SINC should include the production of an appropriate Method Statement (MS) for working adjacent to the SINC, to be presented within a Construction Environmental Management Plan (CEMP). The MS/CEMP should also specify the following:

- Storage facilities for all fuels, oils and chemicals should be further than 5m from the watercourse.
- How watercourses will be protected including from dust deposition from construction.
- Any sources of pollution (including silt), potential pathways for that pollution to enter and appropriate pollution control measures to be implemented on Site.
- Details of the nature, type and quantity of materials to be imported onto the Site.
- Measures for dealing with any contaminated material.
- Details on waste types that will be produced and how they will be managed.

4.2 Ecological Enhancement Opportunities

Planning Policy Wales (2024) states that the planning system must ensure development results in a net benefit for biodiversity (NBB) and ecosystem resilience to enhance well-being.

It defines a net benefit as development leaving “biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long term, measurable and demonstrable benefit, primarily on or immediately adjacent to the Site.”

To support local authorities in achieving their Section 6 duty to “promote the resilience of ecosystems” when determining planning applications, the DECCA Framework should be adhered to, in order to ensure a NBB (CIEEM, 2022). This includes following the stepwise approach to minimise land take within the Site.

To encourage compliance with planning policy additional measures have been identified and are recommended for inclusion within the Proposed Development; where possible:

- Installation of bird⁸ and bat boxes⁹ on the building on Site to provide additional refuge sites for these species’ groups.
- Removal of Schedule 9 INNS, Himalayan Balsam from the Survey Area, and within the NPT Watercourses SINC to encourage greater diversity.
- Planting of wildflowers and nectar rich species (of a composition native to the area) within the parcels of amenity grassland.

4.3 Environmental Best Practice

General environmental protection measures must be implemented during the Proposed Development. Such measures include best environmental practice guidance outlined in the NRW Guidance for Pollution

⁸ No. 16 Schwegler Swift Box, No. 17A Schwegler Swift Nest Box,

⁹ 1FF Schwegler Bat Box, Unitura tall external bat box

Prevention¹⁰ and those outlined by the Construction Industry Research and Information Association guidance¹¹. The following minimum standards must be adhered to prevent ecological impacts beyond the Site boundary:

- Measures must be taken to prevent dust and other emissions from construction affecting land beyond the Site.
- Chemicals and fuels must be stored in secure containers.
- Spill kits must be available.
- Noise and vibration must be controlled and kept to the minimum necessary; and

If works expand beyond what it currently proposed, and the Proposed Development impacts habitats beyond the Site, these recommendations may need to be revised.

¹⁰ Natural Resources Wales (NRW) (2018). Guidance for Pollution Prevention. Available online: <https://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/>

¹¹ CIRIA (2015) Environmental good practice on site (fourth edition) (C741) Charles, P., Edwards, P (eds). CIRIA, London.

5 Figures

5.1.1 Figure 1 – Site Location Plan

5.1.2 Figure 2 – Phase 1 Survey Results

5.1.3 Figure 3 – Sites of Importance for Nature Conservation within 2km.

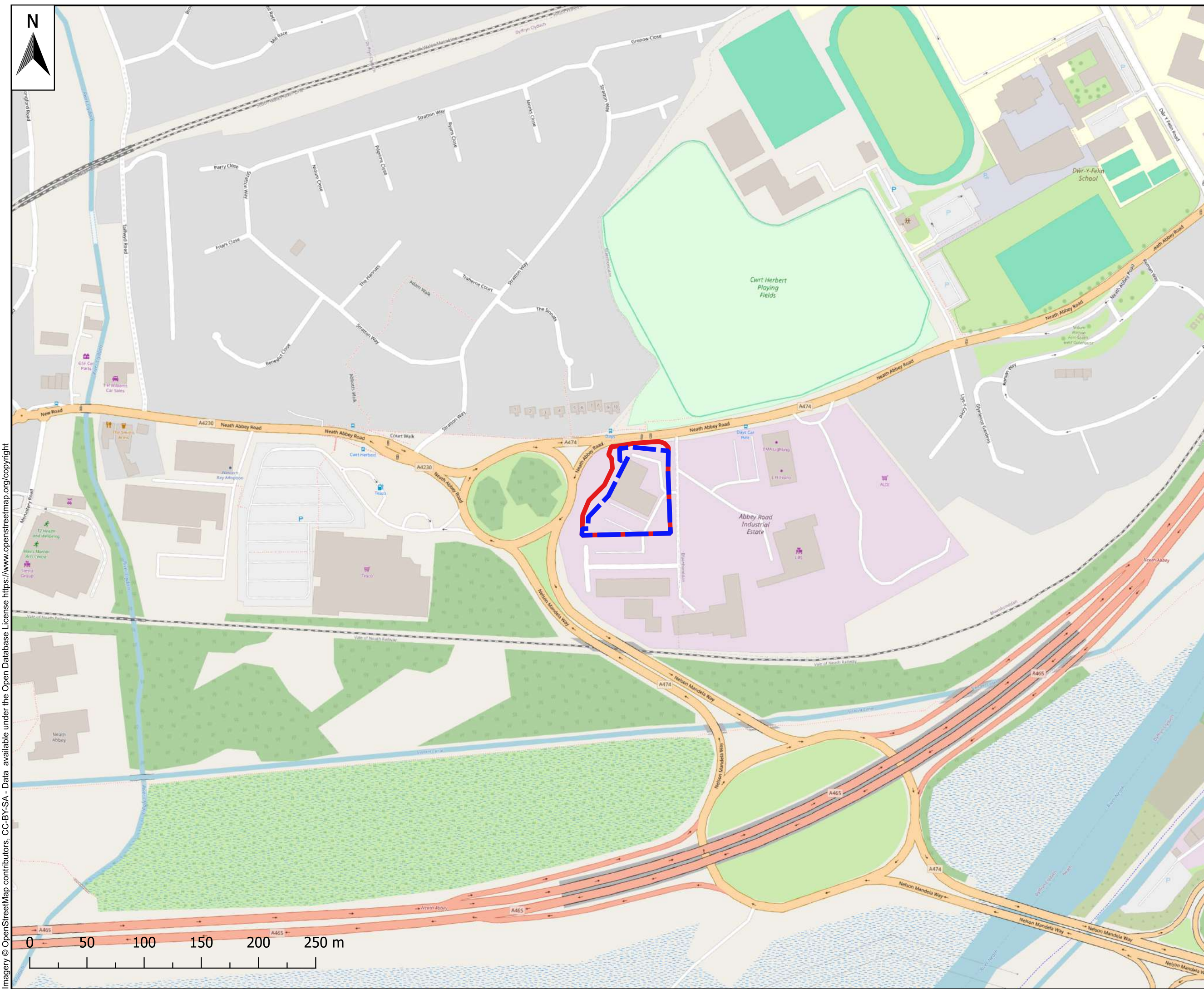


Figure 1:

Site Location Plan

Main Map Scale:1:3000 (A3)
Date Modified:28/08/2025

Legend

-  Site
-  Survey Area



Eryrgwyn Ecology

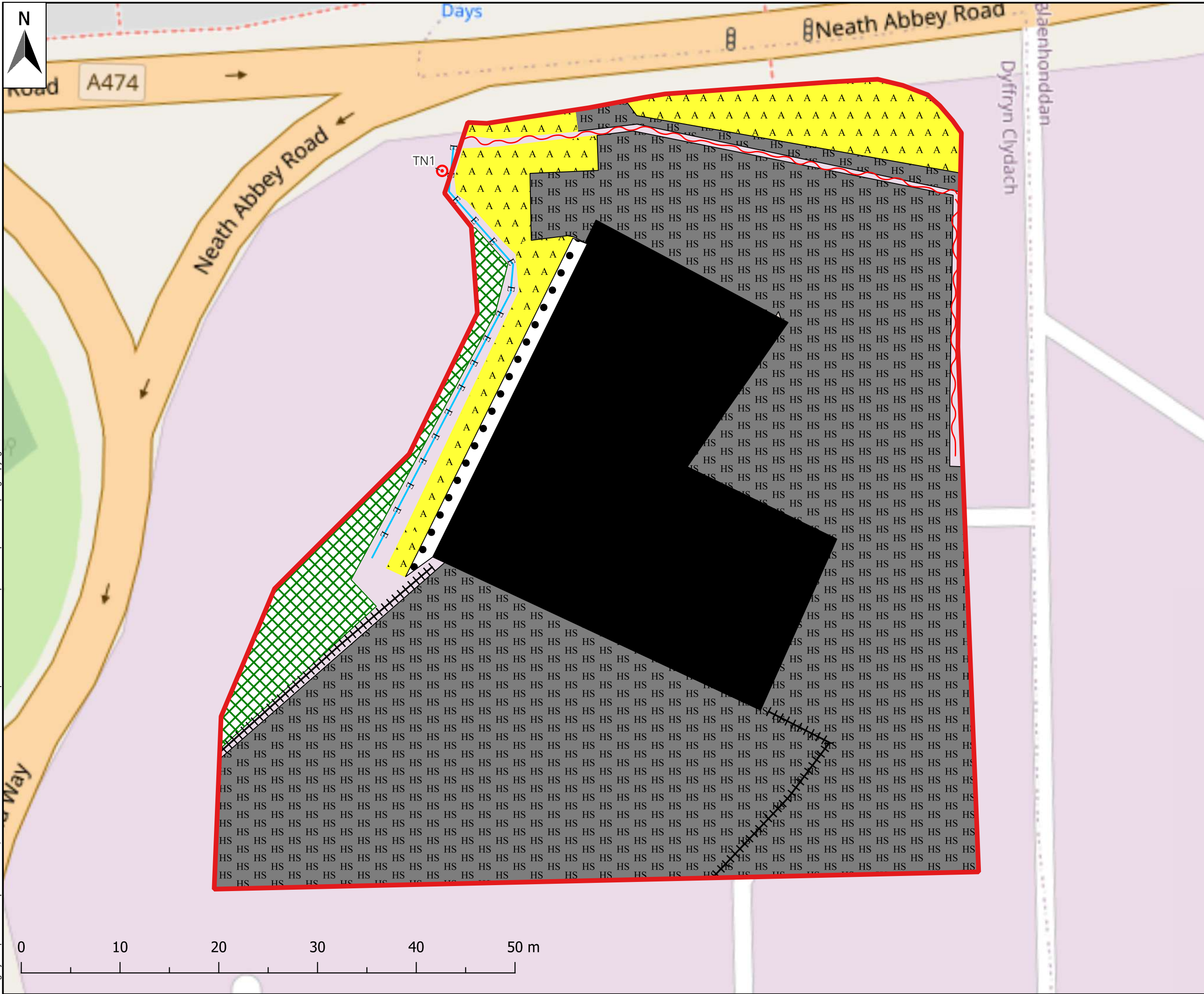


Figure 2:

Phase 1 Survey Results

Main Map Scale:1:350 (A3)
Date Modified:28/08/2025

Legend

- Survey Area
- Target Note
- Phase 1 Results**
- G2.1 - Running water
- eutrophic
- J2.4 - Fence
- J2.5 - Wall
- A2.1 - Scrub - dense/
continuous
- J1.2 - Cultivated/disturbed
land - amenity grassland
- J3.6 - Buildings
- J4 - Bare ground
- Hard Standing



Eryrgwyn Ecology

Imagery © OpenStreetMap contributors, CC-BY-SA, Data available under the Open Database License https://www.openstreetmap.org/copyright
Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights Reserved. Contains Ordnance Survey Data. Ordnance Survey Licence number AC0000849444. Crown Copyright and Database Right. https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/

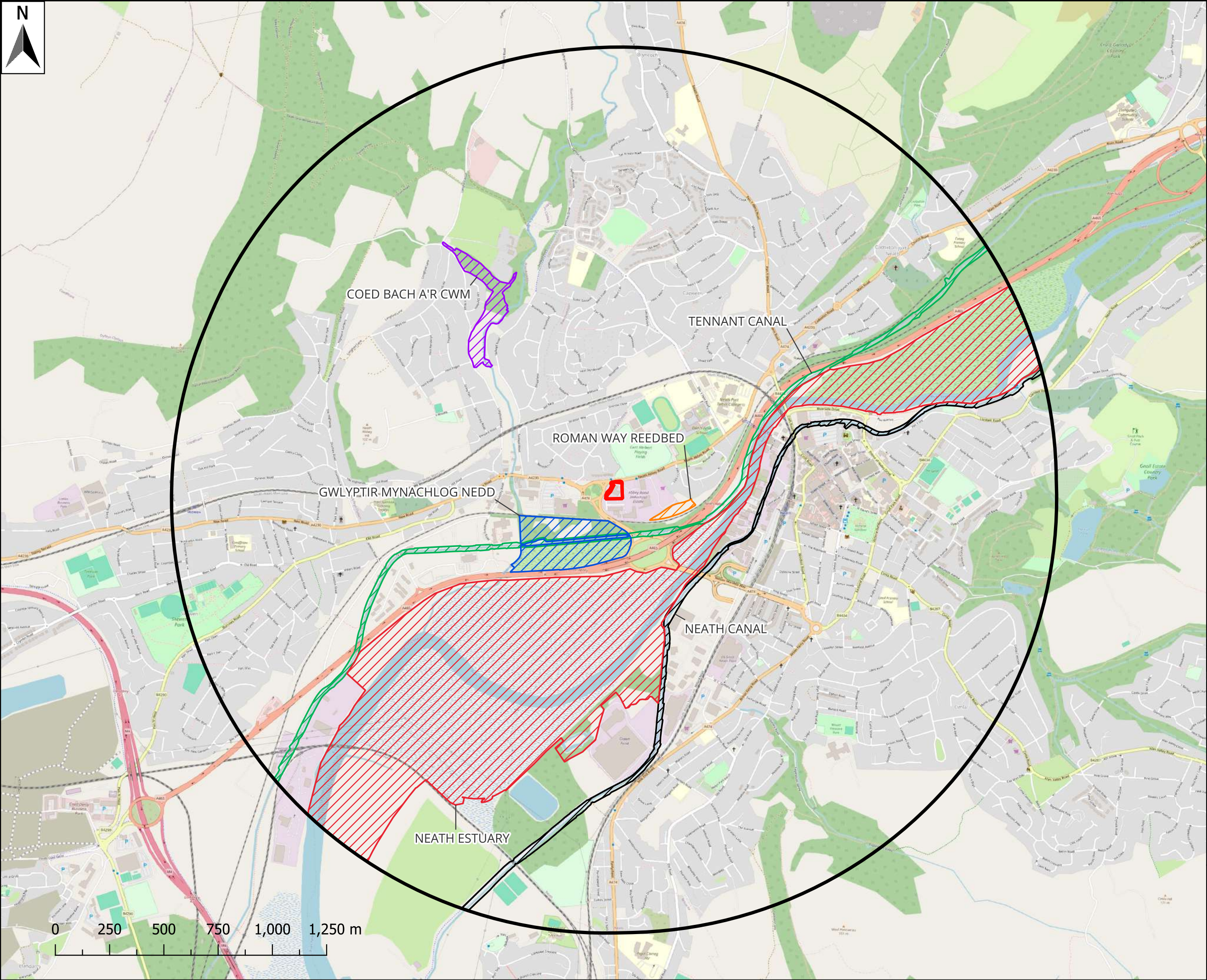


Figure 3:

Sites of Importance for Nature Conservation within 2km

Main Map Scale:1:16000 (A3)
Date Modified:28/08/2025

Legend

- Survey Area
- 2km Search Area
- Site of Importance for Nature Conservation (SINC)
 - COED BACH A'R CWM
 - GWLYPTIR MYNACHLOG NEDD
 - NEATH CANAL
 - NEATH ESTUARY
 - ROMAN WAY REEDBED
 - TENNANT CANAL

NPT Watercourses SINC and B-Lines are not shown on this figure due to an error with the shape files provided during the desk study. However, this does not effect the assessment



Eryrgwyn Ecology

Appendix A

Table A1 - Protected and notable birds for which records have been identified within 2km of the Site.

Common Name	Scientific Name	Legal / Conservation Status ¹²
Barn Owl	<i>Tyto alba</i>	WCA1, WCA9, Bern, CITES, LBAP(ANG, CLY, CON, CRM, DEN, GWY, PEM, POW, SNP, TRA, VOG, WRE), LI(BIS), LI(VC43), WS_P
Black Redstart	<i>Phoenicurus ochruros</i>	WCA1, Bern, WBAm(RSPB), UKBR(RSPB), LBAP(GWY, VOG), LI(BIS)
Black-headed Gull	<i>Chroicocephalus ridibundus</i>	BDir22, S7, WBR(RSPB), LBAP(GWY, VOG), LI(BIS)
Brambling	<i>Fringilla montifringilla</i>	WCA1, WBAm(RSPB), LBAP(CON), LI(BIS)
Bullfinch	<i>Pyrrhula pyrrhula</i>	S7, WBR(RSPB), LBAP(BBNP, CER, CLY, CON, DEN, GWY, PEM, TRF, VOG), LI(BIS), WS_C
Canada Goose	<i>Branta canadensis</i>	BDir21, WCA9, INNS
Cetti's Warbler	<i>Cettia cetti</i>	WCA1, LBAP(ANG, PEM, VOG), LI(BIS)
Common Gull	<i>Larus canus</i>	BDir22, WBR(RSPB)
Common Sandpiper	<i>Actitis hypoleucos</i>	WBR(RSPB)
Coot	<i>Fulica atra</i>	BDir21, WBAm(RSPB), LBAP(BRG), LI(BIS)
Cormorant	<i>Phalacrocorax carbo</i>	WBAm(RSPB), LBAP(CON, GWY, POW), LI(BIS), WS_C
Cuckoo	<i>Cuculus canorus</i>	S7, WBR(RSPB), UKBR(RSPB), LBAP(CON, DEN, GWY, VOG), LI(BIS), WS_C
Curlew	<i>Numenius arquata</i>	BDir22, S7, WBR(RSPB), UKBR(RSPB), LBAP(ANG, BBNP, CLY, CON, CRM, DEN, GWY, PEM, POW, SNP, VOG), LI(BIS), LI(VC43), WS_C
Dipper	<i>Cinclus cinclus</i>	Bern, WBAm(RSPB), LBAP(BRG, CLY, CON, MTR, POW, RCT, TRA), LI(BIS)
Dunnoek	<i>Prunella modularis</i>	S7, Bern, LBAP(CON, POW, VOG), LI(BIS)
Egyptian Goose	<i>Alopochen aegyptiaca</i>	WCA9, INNS
Fieldfare	<i>Turdus pilaris</i>	BDir22, WCA1, WBAm(RSPB), UKBR(RSPB), LBAP(CON, POW), LI(BIS)
Goldcrest	<i>Regulus regulus</i>	Bern, WBAm(RSPB), LBAP(CON, POW), LI(BIS)

¹² HabReg = Conservation of Habitats and Species Regulations (2017), W&CA = Wildlife and Countryside Act (1981), NERC = Schedule 42 Natural Environment and Rural Communities Act (2006), LBAP = Local Biodiversity Action Plan, RD1 (Wales) = Welsh Red Data Book listing based on IUCN guidelines, RD1 (UK) = UK Red Data Book listing based on IUCN guidelines, RD2 (UK) = UK Red Data Book listing not based on IUCN guidelines (Nationally Rare and Scarce), BDir1 = EC Birds Directive Annex 1 Species, BDir21 = EC Birds Directive Annex 2.1 Species, BDir22 = EC Birds Directive Annex 2.2 Species, Bern = The Bern Convention on the Conservation of European Wildlife and Natural Habitats, WBR (RSPB) = RSPB Welsh Red listed birds (not based on IUCN criteria), WBAm (RSPB) = RSPB Welsh Amber listed birds (not based on IUCN criteria), UKBAm (RSPB) = RSPB UK Amber listed birds (not based on IUCN criteria), S7 = Environment Act (Wales) Section 7 Species.

Goshawk	<i>Accipiter gentilis</i>	WCA1, WCA9, CITES, LBAP(CLY, CON, POW, VOG), LI(BIS), WS_P
Great Black-backed Gull	<i>Larus marinus</i>	BDir22, WBR(RSPB), WS_C
Green Sandpiper	<i>Tringa ochropus</i>	WCA1, Bern, WBAm(RSPB), LBAP(CON, VOG), LI(BIS)
Green Woodpecker	<i>Picus viridis</i>	Bern, WBAm(RSPB), LBAP(CLY, CON, DEN, GWY, PEM, POW, SNP), LI(BIS), WS_C
Greenfinch	<i>Chloris chloris</i>	Bern, WBAm(RSPB), LBAP(CON, POW), LI(BIS)
Grey Heron	<i>Ardea cinerea</i>	WBAm(RSPB), LBAP(BRG, RCT), LI(BIS)
Grey Wagtail	<i>Motacilla cinerea</i>	Bern, WBAm(RSPB), UKBR(RSPB), LBAP(CLY, CON, POW, TRA), LI(BIS)
Herring Gull	<i>Larus argentatus</i>	BDir22, S7, WBR(RSPB), UKBR(RSPB), LBAP(CON, GWY, POW, VOG), LI(BIS), WS_C
House Sparrow	<i>Passer domesticus</i>	S7, WBAm(RSPB), UKBR(RSPB), LBAP(CLY, CON, GWY, VOG), LI(BIS), WS_C
Jack Snipe	<i>Limnocyrtus minimus</i>	BDir21, WBAm(RSPB), LBAP(CON, POW), LI(BIS)
Kestrel	<i>Falco tinnunculus</i>	S7, Bern, CITES, WBR(RSPB), LBAP(ANG, CLY, CON, DEN, GWY, PEM, POW, VOG), LI(BIS), LI(VC43), WS_C
Kingfisher	<i>Alcedo atthis</i>	BDir1, WCA1, Bern, WBAm(RSPB), LBAP(CLY, CON, DEN, GWY, POW, TRA), LI(BIS), WS_C
Lapwing	<i>Vanellus vanellus</i>	BDir22, S7, WBR(RSPB), UKBR(RSPB), LBAP(ANG, BBNP, CLY, CON, CRM, DEN, GWY, MON, PEM, POW, SNP, TRF, VOG), LI(BIS), LI(VC43), WS_C
Lesser Black-backed Gull	<i>Larus fuscus</i>	BDir22, WBAm(RSPB), LBAP (CON, GWY, PEM, POW, SNP), LI(BIS), WS_C
Linnet	<i>Linaria cannabina</i>	S7, Bern, WBR(RSPB), UKBR(RSPB), LBAP(ANG, BBNP, CER, CLY, CON, DEN, GWY, PEM, VOG), LI(BIS), WS_C
Long-tailed Tit	<i>Aegithalos caudatus</i>	WBAm(RSPB)
Mallard	<i>Anas platyrhynchos</i>	BDir21, WBAm(RSPB), LBAP ((CON, GWY), LI(BIS)
Mandarin Duck	<i>Aix galericulata</i>	WCA9, INNS
Meadow Pipit	<i>Anthus pratensis</i>	Bern, WBAm (RSPB), UKBR(RSPB), LBAP(CLY, CON, POW, TRA), LI(BIS)
Mediterranean Gull	<i>Ichthyaetus melanocephalus</i>	BDir1, WCA1, Bern, WBAm(RSPB), LBAP(CON), LI(BIS)
Mistle Thrush	<i>Turdus viscivorus</i>	BDir22, Bern, WBAm(RSPB), UKBR(RSPB)
Peregrine	<i>Falco peregrinus</i>	BDir1, WCA1, Bern, CITES, LBAP(ANG, CLY, CON, GWY, PEM, POW, TRF, VOG), LI(BIS), LI(VC43), WS_P, WS_C
Pied Flycatcher	<i>Ficedula hypoleuca</i>	S7, WBR(RSPB), UKBR(RSPB), LBAP(CON, GWY, POW, SNP, VOG), LI(BIS), WS_C
Pochard	<i>Aythya ferina</i>	BDir21, WBR(RSPB), UKBR(RSPB), LBAP(CON, POW), LI(BIS), WS_C
Red Kite	<i>Milvus milvus</i>	BDir1, WCA1, WCA9, CITES, WBAm(RSPB), LBAP(CON, CRM, GWY, POW), LI(BIS), WS_P
Redshank	<i>Tringa totanus</i>	BDir22, WBAm(RSPB), LBAP(ANG, CON, GWY, POW), LI(BIS)
Redwing	<i>Turdus iliacus</i>	BDir22, WCA1, WBAm(RSPB), UKBR(RSPB), LBAP(CON, POW), LI(BIS)

Reed Bunting	<i>Emberiza schoeniclus</i>	S7, Bern, WBAm(RSPB), LBAP(BBNP, CER, CLY, CON, DEN, GWY, PEM, POW, VOG), LI(BIS), WS_C
Sand Martin	<i>Riparia riparia</i>	Bern, WBAm(RSPB), LBAP(CON, DEN, GWY, POW, VOG), LI(BIS), WS_C
Shelduck	<i>Tadorna tadorna</i>	Bern, WBAm(RSPB), LBAP(CON, GWY, VOG), LI(BIS)
Skylark	<i>Alauda arvensis</i>	BDir22, S7, WBAm(RSPB), UKBR(RSPB), LBAP(ANG, BBNP, CER, CLY, CON, CRM, DEN, GWY, PEM, POW, SNP, TRF, VOG), LI(BIS), WS_C
Snipe	<i>Gallinago gallinago</i>	BDir21, WBAm(RSPB), LBAP(ANG, CON, DEN, GWY, POW), LI(BIS), LI(VC43), WS_C
Snow Goose	<i>Anser caerulescens</i>	WCA9, INNS
Song Thrush	<i>Turdus philomelos</i>	BDir22, S7, Bern, WBAm(RSPB), UKBR(RSPB), LBAP(ANG, BBNP, CER, CLY, CON, DEN, GWY, PEM, POW, SNP, TRF, VOG, WRE), LI(BIS), WS_C
Spotted Flycatcher	<i>Muscicapa striata</i>	S7, Bern, WBR(RSPB), UKBR(RSPB), LBAP(BBNP, CER, CLY, CON, DEN, GWY, PEM, POW, VOG), LI(BIS), WS_C
Starling	<i>Sturnus vulgaris</i>	BDir22, S7, Bern, WBR(RSPB), UKBR(RSPB), LBAP(BBNP, CON, GWY, VOG), LI(BIS), WS_C
Swallow	<i>Hirundo rustica</i>	Bern, WBAm(RSPB), LBAP(ANG, CON, GWY, POW, VOG), LI(BIS)
Swift	<i>Apus apus</i>	WBAm(RSPB), LBAP(BRG, RCT, VOG), LI(BIS)
Teal	<i>Anas crecca</i>	BDir21, CITES, WBAm(RSPB), LBAP(ANG, CON, DEN, GWY), LI(BIS), LI(VC43), WS_C
Tufted Duck	<i>Aythya fuligula</i>	BDir21, WBAm(RSPB), LBAP(CON, POW, VOG), LI(BIS)
Whitethroat	<i>Curruca communis</i>	WBR(RSPB), LBAP(CON, POW), LI(BIS)
Wigeon	<i>Mareca penelope</i>	BDir21, CITES, WBAm(RSPB), LBAP(CON, GWY), LI(BIS), WS_C
Willow Warbler	<i>Phylloscopus trochilus</i>	WBR(RSPB), LBAP(CON), LI(BIS)
Yellow-legged Gull	<i>Larus michahellis</i>	UKBAm(RSPB)

Appendix B

Site Photographs



Photograph 1 – the Site



Photograph 2 – Hard Standing



Photograph 4 – the building



Photograph 5 – the building



Photograph 6 – Fence



Photograph 7 – Wall and Hard Standing



Photograph 7 – Himalayan balsam



Photograph 8 – Stream



Photograph 9 – Stream, bare ground and scrub



Photograph 10 – Amenity grassland