

OXFORD CARE HOLDINGS (BIRA CARE)
CEFN LODGE NURSING HOME, SKEWEN
PRELIMINARY ECOLOGICAL APPRAISAL

06 October 2025



Telephone:- 07969146776
e-mail:- davidrees@bayecology.co.uk

OXFORD CARE HOLDINGS (BIRA CARE)

CEFN LODGE NURSING HOME, SKEWEN

PRELIMINARY ECOLOGICAL APPRAISAL

Document Ref: Doc 01 – 06/10/2025

Issue	Revision	Stage	Date	Prepared by
1		DRAFT FOR REVIEW	15/07/2025	David Rees
2		FINAL	06/10/2025	David Rees

CONTENTS

Summary

1.0 Introduction

2.0 Methodology

Desk study
Field Survey
Activity Survey

3.0 Results

Desk study
Field Survey
Activity Survey

4.0 Legislation, Policies and Plans

5.0 Conclusions and Recommendations

References

Appendix I: Site Location Plan

Appendix II: Phase 1 Map & Target Notes

Appendix III: Tree Removal Plan

Appendix IV: Soft Landscape Plan

SUMMARY

Bay Ecology Ltd was commissioned by Oxford Care Holdings (BIRA Care) to undertake an ecological appraisal of the existing Cefn Lodge Nursing Home site curtilage. The care home gardens are proposed to be cleared and a new care home constructed on the footprint.

The combination of desk study conducted on the site confirmed that the site does not contain any statutory or non-statutory nature conservation designations, or protected species records. However, multiple records were identified with a 1km radius. The field survey undertaken at the site identified the footprint being comprised of the Cefn Lodge Nursing Home overgrown gardens. The overgrown gardens are comprised of overgrown ornamental planting, conifer treelines, irregularly managed amenity grassland and species poor neutral grassland that is becoming more botanically diverse; whilst areas of ruderal habitat was colonising the former tennis courts. Areas of scrub, bracken and tall ruderal habitat were also colonising the site. The site is bordered by mature tree lines as well as species rich and poor hedgerows. The site was generally surrounded by residential developments with large residential gardens located to the north and south, whilst the was Cefn Lodge care home was located immediately to the west. The site was bordered by Pen-Y-Heol road immediately to the east, whilst the M4 was also located approximately 60m west of site.

In terms of the ecological importance of the site the amenity grassland, species neutral grassland, ruderal habitat, bracken, scrub, tall ruderal habitat and ornamental shrubs were considered to be of ecological interest on a site context; whilst the boundary treelines/woodland corridor, conifer treelines and hedgerows were Section 7 Priority Habitat under the Environment (Wales) Act 2016 and considered to be of ecological interest on a local context. The habitats onsite were likely to be utilised by a variety of species such as birds, foraging & commuting mammals, common amphibians and potentially small isolated population of reptiles. The proposed new care home building has been positioned to retain the mature boundary treelines/woodland corridor and hedgerows with appropriate Root Protection Zones and suitable buffers to facilitate management. The retention of the boundary features also satisfies Policies EN6 Biodiversity EN7 of the Neath Port Talbot LDP. However, the construction of the care home building will result in the loss of ornamental shrubs, amenity grassland, species poor neutral grassland, scrub, bracken, ruderal and tall ruderal (ecological importance on a site context) and conifer treelines (Section 7 Priority Habitat under the Environment (Wales) Act 2016). The loss of the conifer trees and individual standard trees will be offset with mitigation planting that will include species of local provenance. The loss of the amenity grassland, ruderal habitat and species natural grassland will be offset with Meadow Grassland seeding with appropriate management; whilst the loss of the scrub will be offset with the planting of a species rich hedgerow that will include fruiting species of local provenance.

The trees that were considered to contain PRF-M are to be retained onsite. However, the conifer treelines and individual standard trees that contain PRF-I are to be lost as part of the development and will require a visual inspection by the Tree Surgeon prior to sectional felling. Any felled trees will be left in situ for 24-48hrs to allow any potential roosting bats to disperse of their own accord. Bat boxes will be erected on retained trees to offset the loss of any trees with roosting features. Any site lighting should be designed in accordance with Guidance Note 8-Bats and Artificial Lighting/Bat Conservation Trust and the Institution of Lighting Professionals, 2023.

The likely presence of nesting birds within the habitats onsite means that any clearance is conducted outside the bird nesting season (March-September) or preceded by a visual check, with erection of bird boxes to offset the loss of nesting habitat (including the planting of a species rich hedgerow to provide offset nesting habitat). The presence of small numbers of common reptile species could not be ruled out, and as such it is recommended that a precautionary sensitive directional vegetation clearance is adopted with the creation of log piles to create hibernaculas/habitat piles.

A disused mammal hole was identified onsite and should be monitored prior to vegetation clearance and earth works on a precautionary basis to establish whether any mitigation or licencing is required.

The proposed development will incorporate bird (Swallow boxes/bricks and House Martin (if practicable) and bat boxes into the walls of the structure. The soft landscaping seeding/planting will include species rich meadow mix (where practicable) that would also benefit pollinators. It is recommended that any proposed development incorporates, Hedgehog 'highways'.

1.0 INTRODUCTION

- 1.1 Bay Ecology Ltd was commissioned by Oxford Care Holdings (BIRA Care) to undertake an ecological appraisal of the existing Cefn Lodge Nursing Home site curtilage (Grid Ref: SS 72153 96539)(Appendix I). The care home gardens are proposed to be cleared and a new care home constructed on the footprint.
- 1.2 The site footprint is comprised of the Cefn Lodge Nursing Home overgrown gardens. The overgrown gardens are comprised of overgrown ornamental planting, conifer treelines, irregularly managed amenity grassland and species poor neutral grassland that is becoming more botanically diverse; whilst areas of ruderal habitat was colonising the former tennis courts. Areas of scrub, bracken and tall ruderal habitat were also colonising the site. The site is bordered by mature tree lines as well as species rich and poor hedgerows. The site was generally surrounded by residential developments with large residential gardens located to the north and south, whilst the was Cefn Lodge care home was located immediately to the west. The site was bordered by Pen-Y-Heol road immediately to the east, whilst the M4 was also located approximately 60m west of site.
- 1.3 This report provides a summary of the preliminary ecological appraisal conducted on the 26th June 2025, and includes recommendations on any ecological constraints/ opportunities associated with the proposed development.

2.0 METHODOLOGY

- 2.1 In order to establish the baseline ecological conditions on site and in the adjoining habitats, a combination of desk-based consultation and field survey was undertaken in June 2025.

Desk study

- 2.2 This element of the work primarily involved a South East Wales Biodiversity Records Centre (SEWBRc) data search within a 1km radius to identify any statutory or non-statutory conservation designations, as well as records of rare, protected or notable flora and fauna (see plan in Appendix I).

Extended Phase I Habitat Survey

- 2.3 Fieldwork was undertaken on the 26th June 2025 by a suitably qualified ecologist and followed standard Phase 1 Habitat Survey protocol (JNCC 1990) as amended by the Institute of Environmental Assessment (1995). All habitats within the proposed development site were classified. All habitats considered having potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Badger setts and dung-pits). The survey also incorporated a subjective, ground-based assessment of the potential of mature trees or structures on site to support roosting bats. See Appendix II for Phase 1 Map.
- 2.4 During the field survey, any trees immediately adjacent to the site were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2023)(relevant guidelines at the time of the surveys). The categories are as follows:
- Known or confirmed roost
 - High Roost Suitability – A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats (PRF-M) on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
 - Moderate Roost Suitability – A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
 - Low Roost Suitability – A tree of sufficient size and age to contain Potential Roosting Features (PRFs) but with none seen from the ground or features seen with only very limited roosting potential. The tree only contains PRFs that are suitable for individual or small numbers of bats (PRF-I).

- Negligible - Negligible habitat features on site likely to be used by roosting bats.

Building Inspection

- 2.5 The ecological appraisal comprised of an external and internal inspection of the buildings onsite. In order to establish the potential presence of roosting bats (or nesting birds) at the blocks, the survey aimed to identify:
- if bats are, or have been, present within the building and, if so, which species are present;
 - the type of roost (e.g. day roost, feeding perch, night roost, hibernaculum);
 - how bats use the buildings (e.g. location of, exit and entrance points to potential roosts);
- 2.6 External surveys at the site involved the use of binoculars and ladder to identify possible access/entry points into the buildings and aimed to identify any evidence of use by bats such as droppings, staining, prey remains etc. The internal survey searched for similar evidence of current or historical use by bats. The survey was undertaken from ground-level around the exterior of the buildings; and was assisted by the use of close-focus binoculars and a high powered torch (1 million candlepower). No internal loft space was evident in Classroom 1, whilst only limited access to Classroom 2 was possible from the loft hatches due to safety concerns. The main school loft space was inaccessible due to the ceiling height and position of the loft hatch, whilst no loft hatch was evident in the annex. The storage sheds were both locked and no access was possible.
- 2.7 The surveyor searched for roost evidence (droppings, staining, scratch marks, etc.) as described above and an assessment of the buildings potential to support nesting birds was also undertaken. The scope of the bat inspection survey was based on guidelines published by the Bat Conservation Trust (BCT)(2023).

Additional Considerations

- 2.8 Additionally any species listed as a pernicious weed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended) were also noted during the field survey. Examples of such species include Japanese Knotweed *Fallopia japonica* and Himalayan Balsam *Impatiens glandulifera*.

3.0 RESULTS

Desk study

- 3.1 Data provided by the SEWBrEC confirmed that the site did not contain any statutory nature conservation designations. However, the Tennant Canal Site of Importance for Nature Conservation (SINC) was located approximately 650m south west of site and was designated for its exceptional aquatic and emergent flora. The SINC was of negligible relevance to site due to the physical separation and absence of hydrological connectivity. Pentrefrynnon SINC was located approximately 650m east of site and was designated for its diverse botanical composition of vascular plants and bryophytes having that has colonised the former spoil and industrial waste onsite. The habitats onsite and physical separation between the designation meant it was of negligible relevance to site. The Neath Estuary SINC that was located approximately 800m east of site was of negligible relevance to site due to the physical separation and lack of hydrological connectivity. Areas of Ancient Semi Natural Woodland, Restored Ancient Woodland and Plantation on Ancient Woodland were located within a 1km radius of site. However, there was no connectivity between the woodland and the application site and as such the woodland sites were considered to be negligible relevance.
- 3.2 No records of protected species were identified within the site boundary. However, a number of notable and protected species records were identified within 1km of the site. The majority of the mammal records were dominated by Hedgehog *Erinaceus europaeus*. However, numerous records of bats were identified within the 1km radius that were dominated by Pipistrelle species *Pipistrellus sp.* and included roosting and foraging Common Pipistrelle *Pipistrellus pipistrellus* and Soprano Pipistrelle *Pipistrellus pygmaeus*. The records also include foraging Noctule *Nyctalus noctula*. The bat records were of relevance to the boundary habitats onsite.
- 3.3 Records of Badger *Meles meles* were identified within a 1km radius of site but were only considered to be of limited relevance to site due to the surrounding roads and residential properties; whilst multiple Great Crested Newt *Triturus cristatus* records were identified within 700m of site. However, the M4 provided a physical barrier and no standing water was present on site, and as such the GCN were not considered to be of relevance. No SEWBrEC records of common reptiles or Dormice *Muscardinus avellanarius* were identified in a 1km radius of site.

Extended Phase 1 Field Survey

Overview

3.4 The results of the day-time inspection are summarised in the following sections.

Amenity Grassland

3.5 An amenity grassland lawn was located at the north eastern extent of site (Cover Photo & Photo 1)(Target Note 5) and was managed on an irregular basis and as such the botanical composition was beginning to become more diverse. The grassland was dominated by species such as Yorkshire Fog *Holcus lanatus* (A) and Annual Meadow Grass *Poa annua* (A); with species such as Creeping Bent *Agrostis stolonifera* (O), Perennial Rye-grass *Lolium perenne* (F), Creeping Soft-grass *Holcus mollis* (O) and Cat's-ear *Hypochaeris radicata* (F) also identified. Species such as Selfheal *Prunella vulgaris* (O) and Heath Bedstraw *Galium saxatile* (F) were evident around the margins.

3.6 The amenity grassland onsite was only considered to be of ecological value on a site context due to its size and limited botanical composition.

Species Poor Neutral Grassland

3.7 A narrow corridor of species poor neutral grassland was located along the southern boundary of site (Photo 2 & Target Note 12) and was dominated by species such as Yorkshire Fog *Holcus lanatus* (A), Creeping Buttercup *Ranunculus repens* (A), Ribwort Plantain *Plantago lanceolata* (F), Smooth Hawk's-beard *Crepis capillaris* (A), Cat's-ear (A), Common Fleabane *Pulicaria dysenterica* (F), Selfheal (F), Common Centaury *Centaureum erythraea* (O), Daisy *Bellis perennis* (F), Horsetail *Equisetum arvense* (F), Broad-leaved Dock *Rumex obtusifolius* (O) and Herb Robert *Geranium robertianum* (O).

3.8 The species poor neutral grassland onsite was only considered to be of ecological value on a site context due to its size and limited botanical composition.

Ruderal Habitat

3.9 Former hard standing tennis courts were located at the southern extent of site (Photo 3 & Target Note 17 & 22). The courts have been colonised by species such as Sphagnum sp. (A), Rough Hawkbit *Leontodon hispidus* (A), Druce's Crane's-bill *Geranium x oxonianum* (O), Bird's foot Trefoil *Lotus corniculatus* (F), Wild Strawberry *Fragaria vesca* (F), Common Centaury (O) and Selfheal (O).

- 3.10 The ruderal habitat onsite was only considered to be of ecological value on a site context due to its size and limited botanical composition.

Scrub, Bracken & Tall Ruderal Habitat

- 3.11 Areas of scrub had colonised the central area of site located south of the amenity grassland lawn and north of the hard standing tennis courts (Photo 4 & Target Notes 8 & 15), as well as along the eastern woodland corridor/treeline (Photo 5 & Target Note 24). The scrub was dominated Bramble *Rubus fruticosus* (A), Cherry Laurel, Willow sp. *Salix* sp. saplings (F), Buddleia *Buddleja davidii* (F), Dogwood *Cornus sanguinea* (F) and Sycamore *Acer pseudoplatanus* saplings (F). An area of Bracken *Pteridium aquilinum* (A) had also established in this central location situated north of the tennis courts (Photo 6 & Target Note 19). Small patches of Nettle *Urtica dioica* (F) were also identified in the south western extent of site (Target Notes 10 & 11).
- 3.12 The scrub and bracken were only considered to be of ecological value on a site context due to their size and limited botanical composition.

Ornamental Shrubs and Trees

- 3.13 The western extent of site (located east of the existing Cefn Lodge care home)(Photo 7 & Target Note 1) was comprised of overgrown ornamental shrubs and trees that included such species as Variegated Holly species *Ilex* sp., Dogwood, Andromeda shrub, Common Box *Buxus sempervirens*, Smoke Bush *Cotinus coggygri* and Strawberry Tree *Arbutus unedo*.
- 3.14 The ornamental shrubs and trees were only considered to be of ecological value on a site context due to the predominantly non-native species composition.

Treelines/Woodland Corridors

- 3.15 The northern boundary of site was comprised of a mature treeline that was comprised of such species as Sycamore *Acer pseudoplatanus*, Holly *Ilex aquifolium*, Common Lime *Tilia × europaea*, Bay Tree *Laurus nobilis*, Holm Oak *Quercus ilex* and Arizona Cypress *Cupressus arizonica* (Photo 8)(Target Note 2).
- 3.16 The eastern boundary of site was comprised of a mature treeline that had developed an understorey (Photo 9 & Target Notes 23 & 24). The mature trees were dominated by Sycamore with other species such as Holm Oak, English Yew *Taxus baccata*, Willow *Salix* sp., Bay Tree and Holly; whilst the understorey was comprised of Hazel, Bay Tree, Willow and Privet *Ligustrum ovalifolium* (Photo 10).

- 3.17 Boundary and Linear features are listed as a Section 7 Priority Habitat under the Environment (Wales) Act 2016 and were considered to be of ecological value on a local context due to their structure, connectivity and potential use as a wildlife corridor.

Conifer Treeline

- 3.18 A conifer treeline was located along the southern extent of site and was comprised of Western Red Cedar *Thuja plicata* (Photo 11 & Target Note 13) treelines and Norway Spruce *Picea abies* (Target Note 9).
- 3.19 Boundary and Linear features are listed as a Section 7 Priority Habitat under the Environment (Wales) Act 2016 and were considered to be of ecological value on a local context due to their structure, connectivity and potential use as a wildlife corridor.

Hedgerows

- 3.20 The southern boundary of site was comprised of a hedgerow that appeared to possess more than five woody species and potentially qualifies as a species rich hedgerow (Photo 12 & Target Note 14) that was comprised of Hazel, Sycamore, Hawthorn, Holly and Bay Tree.
- 3.21 The eastern extent of the northern boundary was comprised of a short residential species poor hedgerow (Photo 13 & Target Note 6) that was comprised of such species as Cherry laurel *Prunus laurocerasus*, Sycamore and Privet.
- 3.22 Hedgerows are listed as a Section 7 Priority Habitat under the Environment (Wales) Act 2016 and were considered to be of ecological value on a local context due to their structure, connectivity and potential use as a wildlife corridor.

Invasive Species

- 3.23 Individual Japanese Knotweed plants were evident in the southern extent of site. The Japanese Knotweed was colonising the southern neutral grassland (Photo 14)(Target Note 12). Small stands of Cotoneaster sp. and Rhododendron were also located at the eastern extent of site situated north of the footpath and parking area. Japanese Knotweed, Rhododendron and Cotoneaster sp. are invasive and listed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended), making it is an offence "to plant or otherwise encourage" their growth. Japanese Knotweed is also classed as 'controlled waste' and as such it and any soil containing rhizomes must be disposed of safely at a licensed landfill site according to the Environmental Protection Act (Duty of Care) Regulations 1991.

Photo 1: Overgrown amenity grassland lawn (view looking north)(Target Note 5).



Photo 2: Species poor neutral grassland (view looking east)(Target Note 12).



Photo 3: Ruderal habitat colonising former tennis courts (view looking south)(Target Note 21).



Photo 4: Scrub located south of amenity grassland lawn (view looking south)(Target Note 8).



Photo 5: Bramble scrub bank located east of the amenity grassland and west of the eastern boundary treeline/woodland boundary (view looking east).



Photo 6: Bracken stand located north of the former tennis courts (View looking north west)(Target Note 19).



Photo 7: Ornamental planting located at eastern extent of site (view looking north east)(Target Note 1).

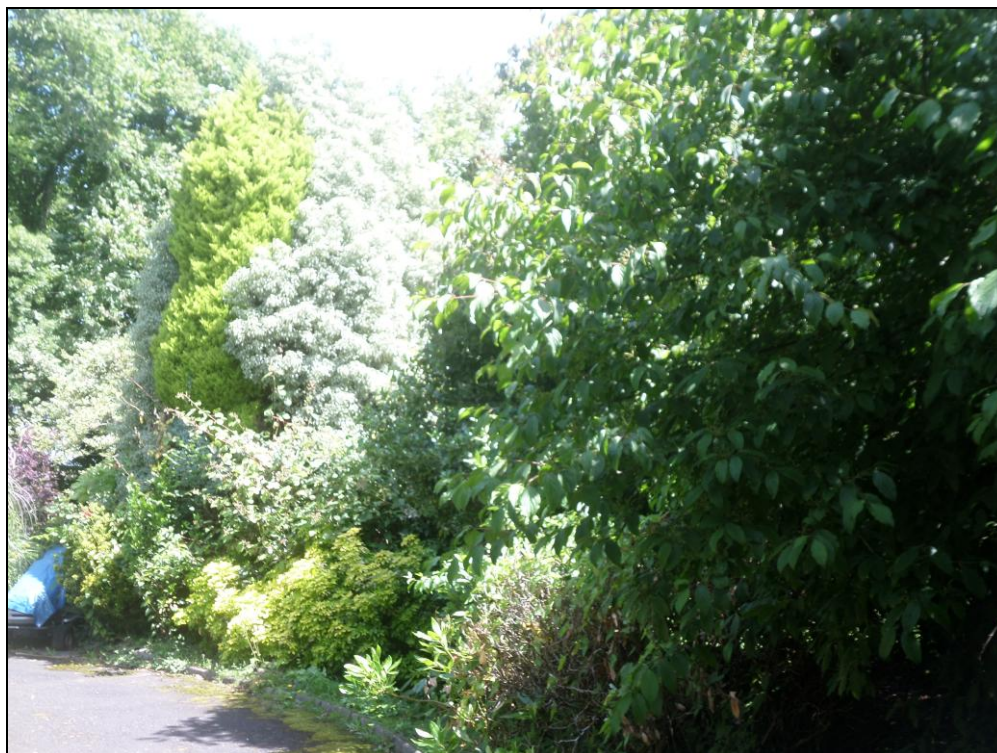


Photo 8: Northern mature treeline (view looking west)(Target Note 2).

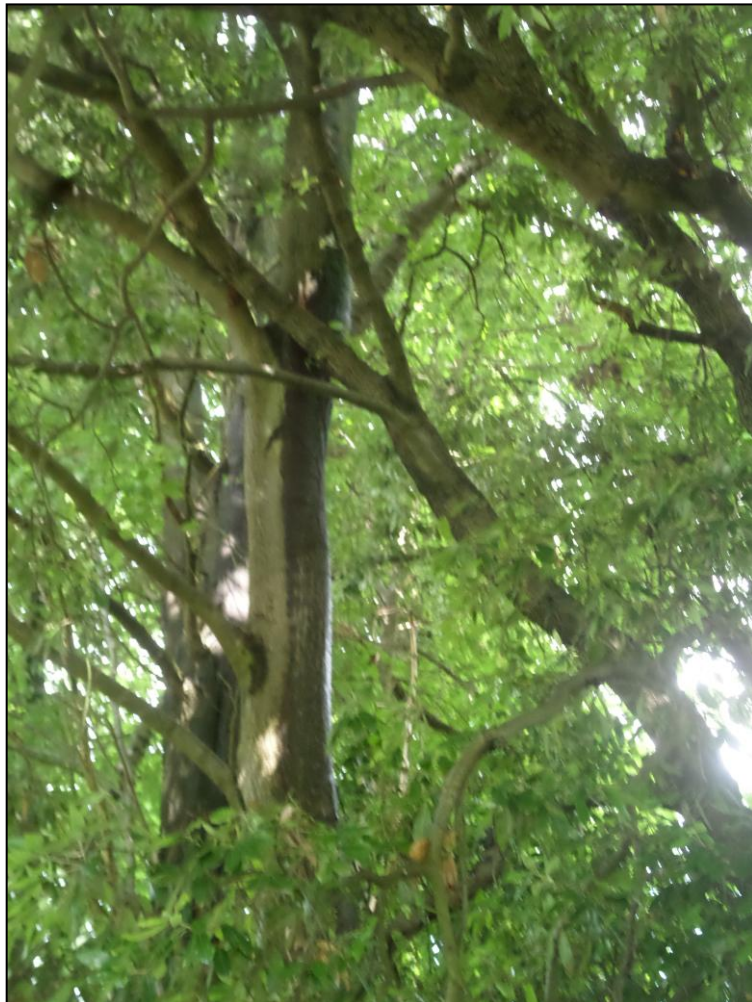


Photo 9: Mature eastern treeline/woodland corridor (View looking east)(Target Note 23).



Photo 10: Understorey associated with eastern treeline/woodland corridor (view looking north)(Target Note 23).



Photo 11: Conifer treeline located in southern extent of site (View looking south)(Target Note 13).



Photo 12: Southern boundary hedgerow (potentially species rich) (view looking south east)(Target Note 14).



Photo 13: Species poor residential hedgerow located at the eastern extent of northern boundary (View looking north)(Target Note 6).



Photo 14: Japanese Knotweed fronds in species poor neutral grassland (Target Note 12).



Fauna

1.1 In the course of the survey, a search for field signs of protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report notable species were those considered to meet any of the following criteria:

- Species protected by British or International law;
- Environment (Wales) Act Section 7 Priority Species or local BAP species;
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists)

Birds

1.2 During the surveys multiple bird species were noted onsite and in adjacent habitat including Blackbird *Turdus merula*, Starling *Sturnus vulgaris* and Dunnock *Prunella modularis*. The species aren't considered to be particularly rare or endangered, but Starling is listed as red within the Birds of Conservation Concern Wales 4 (2022) due to declining populations. The boundary treeline/woodland, scrub, ornamental planting were considered to be suitable nesting habitat for bird species such as Blackbird and Dunnock.

Bats - Wooden Outbuilding

1.3 A wooden storage outbuilding was located at the northern extent of the curtilage (Photo 15, Target Note 3). The building was clad in wood with a mono pitched roof fibre glass roof with uPVC fascias and French patio doors. No evidence of roosting bats was identified externally or internally and the outbuilding was considered to be of negligible suitability for roosting bats.

Photo 15: Northern storage building (view looking south west).



Bat -Trees

- 1.4 The mature treelines/woodland corridor that bordered the northern (Target Note 2) and eastern boundaries (Target Note 23) were of size that prevented thorough inspection for PRFs. However, Ivy growth was evident along with the occasional broken and dead limbs that could support multiple bats, and as such the trees were collectively considered to possess PRF-M and were of moderate suitability for roosting bats. The majority of the understorey tree species associated with the eastern boundary treeline/woodland corridor were only considered to be of negligible suitability for roosting bats due to their absence of PRFs and were considered to be of negligible suitability for roosting bats; whilst the occasional tree possessed PRFs that could support individual bats on an occasional basis and were considered be PRF-I and of low suitability for roosting bats.
- 1.5 The conifer treelines located at the southern extent of site (Target Notes 9 & 13) were considered to only contain PRFs that could be utilised by individual bats and as such was considered to support PRF-I, and were of low suitability for roosting bats; whilst the ornamental trees/shrubs were only considered to be of negligible suitability for roosting bats.
- 1.6 A fallen *Eucalyptus* *Eucalyptus* sp. was located in the eastern scrub bank (Photo 16 & Target Note 7), the tree once potentially possessed PRFs that were not visible due to the scrub bank preventing a thorough

assessment. However, any PRFs would be now accessible to ground based predators and as such the tree was now considered to be of negligible suitability for roosting bats.

- 1.7 The treelines/woodland corridor, scrub and hedgerow were considered to be suitable linear features that can be utilised as a foraging and commuting resource for the local bat species.

Photo 16: Fallen Eucalyptus tree in eastern scrub bank (Photo 7).



Reptiles

- 1.8 The grassland, Bracken, scrub and ruderal habitat scrub onsite were considered to be suitable habitat to support common reptile species such as Slow-worm *Anguis fragilis*; as well as piles of dead wood debris that could be utilised as reptile hibernaculas (Photo 17 & Target Note 22). \However, no SEWBRc records were identified within a 1km radius.

Photo 17: Piles of deadwood on former tennis court (Target Note 22).



Dormice

- 1.9 No common Dormice species records were identified during the SEWBRc data search within a 1km radius; and the site was generally considered to be an isolated parcel of land within the surrounding environment due to the presence of surrounding residential properties, and Pen-Y-Heol located to the east and the M4 to the west.
- 1.10 The site possessed scrub, treelines/woodland corridors, understorey and a hedgerow that was considered to possess suitable habitat to support nesting, foraging and commuting Dormice with a number of fruiting species evident. However, only limited Hazel composition was present and as such a thorough nut search wasn't conducted. Overall the site was considered to support sub-optimal Dormice habitat due to its isolated nature with only limited connectivity to the northern verge of the M4; and as such the presence of the species was considered to be unlikely and would not be considered further in this report.

Great Crested Newt

- 1.11 Records of Great Crested Newt were identified within a 1km radius of site and the site potentially possesses suitable terrestrial habitat. However, the site has no standing water and the M4 provide a physical barrier between the GCN records and site; and as such the species shall not be considered further in this report.

Mammal Hole

- 1.12 A disused mammal hole was identified within previously excavated foundation trenches (Photo 18 & Target Note 16). Although the hole was similar in shape to a Badger outlier sett its general size was considered to small. No active pathways or other evidence of Badgers (latrines/feeding signs) were identified onsite.

Photo 18: Disused mammal hole in historic foundation trench (Target Note 16).



4.0 LEGISLATION, POLICIES AND PLANS

- 4.1 The following international, national and local legislation and planning policies relating to nature conservation and biodiversity are considered of relevance to any proposed development.

National Planning Policy

- 4.2 In terms of planning policy, a number of over-arching policies are of relevance not least of which are those described within Planning Policy Wales (PPW), which sets out land use planning policies of the Welsh Assembly Government with Chapter 6 dealing with Distinctive and Natural Places.

Environment (Wales) Act, 2016

- 4.3 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

Section 6 - Biodiversity and resilience of ecosystems duty

- 4.4 Section 6 of the Act places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity

- 4.5 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

Planning Policy Wales (2024)(12th Edition)

- 4.6 This document set out the land use planning policies of the Welsh Government with Chapter 6 relating to Distinctive and Natural Places and in particular Section 6.4 Biodiversity and Ecological Networks, which states how the planning system has a key role to play in helping to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.

- 4.7 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty). This duty applies to public authorities in the exercise of their functions in relation to Wales and will help maximise contributions to achieving the well-being goals.
- 4.8 The planning system must help to reverse the decline in biodiversity and increasing the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement. Addressing the consequences of climate change should be a central part of any measures to conserve biodiversity and the resilience of ecosystems.
- 4.9 In fulfilling this duty, planning authorities must have regard to the list of habitats and species of principal importance for Wales, published under Section 7 of the Environment (Wales) Act 2016.
- 4.10 The broad framework for implementing the Section 6 Duty and building resilience through the planning system includes addressing:
- Diversity between and within ecosystems;
 - Extent and scale of ecosystems;
 - Condition between and within ecosystems;
 - Connectivity of ecosystems including their structure and functioning; and
 - Adaptability to change of ecosystems.

Future Wales the National Plan 2040

- 4.11 Future Wales – the National Plan 2040 is our national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

Policy 9 – Resilient Ecological Networks and Green Infrastructure

To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

- identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and
- identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

- 4.12 Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment
- 4.13 Planning Policy Wales and S6 duty requires the Local Planning Authority to adopt a stepwise approach when assessing planning applications, and as such Carmarthen shire Couty Council have to maintain and enhance biodiversity and builds resilient ecological networks. This approach also details how adverse environmental effects of development are first avoided, then minimised, mitigated and, as a last resort, compensated. The stepwise approach will require the Council to reach a judgement of the biodiversity on the proposed development site i.e. important species and habitats; having regard to legal protections, statutory and non-statutory designations and all the other relevant considerations to determine ecological value.

Local Planning Policy

- 4.14 The LDP for Neath Port Talbot was adopted in 2016 superseding the Unitary Development Plan, and provides the basis for decisions on land use planning in the County Borough up to 2026. Policies of relevance to the development include:

Policy SP 15

Biodiversity and Geodiversity. Important habitats, species and sites of geological interest will be protected, conserved, enhanced and managed through the following measures:

1. *The identification of the following Internationally and Nationally designated sites within the County Borough to enable their protection:*
 - (a) *Special Areas of Conservation (SACs) and Ramsar Sites;*
 - (b) *Sites of Special Scientific Interest (SSSIs);*
 - (c) *National Nature Reserves (NNRs).*
2. *The identification and protection of sites of regional and local importance;*
3. *The protection of important natural heritage features.*

Policy EN 6

Important Biodiversity and Geodiversity Sites Development proposals that would affect Regionally Important Geodiversity Sites (RIGS), Local Nature Reserves (LNRs), Sites of Interest for Nature Conservation (SINCs), sites meeting SINC criteria or sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:

1. *They conserve and where possible enhance the natural heritage importance of the site; or*
2. *The development could not reasonably be located elsewhere, and the benefits of the development outweigh the natural heritage importance of the site. Mitigation and/or compensation measures will need to be agreed where adverse effects are unavoidable.*

Policy EN 7

Important Natural Features Development proposals that would adversely affect ecologically or visually important natural features such as trees, woodlands, hedgerows / field boundaries, watercourses or ponds will only be permitted where:

1. *Full account has been taken of the relevant features in the design of the development, with measures put in place to ensure that they are retained and protected wherever possible; or*
2. *The biodiversity value and role of the relevant feature has been taken into account and where removal is unavoidable, mitigation measures are agreed.*

5.0 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 The combination of desk and field surveys undertaken at the site identified the footprint being comprised of the Cefn Lodge Nursing Home overgrown gardens. The overgrown gardens are comprised of overgrown ornamental planting, conifer treelines, irregularly managed amenity grassland and species poor neutral grassland that is becoming more botanically diverse; whilst areas of ruderal habitat was colonising the former tennis courts. Areas of scrub, bracken and tall ruderal habitat were also colonising the site. The site is bordered by mature tree lines as well as species rich and poor hedgerows. The site was generally surrounded by residential developments with large residential gardens located to the north and south, whilst the Cefn Lodge care home was located immediately to the west. The site was bordered by Pen-Y-Heol road immediately to the east, whilst the M4 was also located approximately 60m west of site.
- 5.2 In terms of the ecological importance of the site the amenity grassland, species neutral grassland, ruderal habitat, bracken, scrub, tall ruderal habitat and ornamental shrubs were considered to be of ecological interest on a site context; whilst the boundary treelines/woodland corridor, conifer treelines and hedgerows were Section 7 Priority Habitat under the Environment (Wales) Act 2016 and considered to be of ecological interest on a local context. The habitats onsite were likely to be utilised by a variety of species such as birds, foraging & commuting mammals, common amphibians and potentially small isolated population of reptiles. The proposed new care home building has been positioned to retain the mature boundary treelines/woodland corridor and hedgerows with appropriate Root Protection Zones and suitable buffers to facilitate management¹ (Appendix III – Tree Removal Plan). The retention of the boundary features also satisfies Policies EN6 Biodiversity EN7 of the Neath Port Talbot LDP. However, the construction of the care home building will result in the loss of ornamental shrubs, amenity grassland, species poor neutral grassland, scrub, bracken, ruderal and tall ruderal (ecological importance on a site context) and conifer treelines (Section 7 Priority Habitat under the Environment (Wales) Act 2016). The loss of the conifer trees and individual standard trees will be offset with mitigation planting that will include species of local provenance (Appendix IV – Soft Landscape Plan). The loss of the amenity grassland, ruderal habitat and species natural grassland will be offset with Meadow Grassland seeding with appropriate management; whilst the loss of the scrub will be offset with the planting of a species rich hedgerow that will include fruiting species of local provenance.

Birds

- 5.3 The scrub, ornamental shrubs, hedgerows and treelines/woodland corridor were considered to be suitable nesting habitat for birds. The treelines/woodland corridor and hedgerows are to be retained as

¹ See: Tree Removal Plan - Cefn Lodge Nursing Home, 16 Cefn-Parc, Skewen, Wales. 19th February 2025.

part of the development. However, ornamental shrub, scrub, conifer treeline and potentially some understorey will be lost as part of the development and as such any vegetation clearance should be conducted outside the bird nesting season (March-September) or preceded by a visual check. All wild birds are protected against killing and injury under the Wildlife and Countryside Act 1981 (as amended) and their nests against damage or destruction whilst in use or being built. The loss of nesting habitat should be offset with species rich hedgerow planting (see Appendix IV – Soft landscape Plan) and the erection of a variety of bird box designs on the retained treelines.

Bats

- 5.4 The wooden outbuilding was considered to be negligible suitability for roosting bats and will not require further surveys to facilitate their demolition if required.
- 5.5 The mature boundary treeline/woodland corridor that were considered to contain PRF-M are to be retained as part of the development (See Appendix III). However, the conifer treelines, and potentially some understorey trees, are to be lost as part of the development. These trees potentially contain PRF-I and as such a visual inspection of any PRFs by the Tree Surgeons prior to felling (on a precautionary basis) should be conducted. Any trees containing PRF-I should also be sectionally felled and left in-situ for 24-48hrs to allow any individual roosting bats to disperse of their own accord. If any bats are identified by the tree surgeons the project ecologist and Natural Resources Wales should be contacted. To offset the loss of any trees containing PRF-I bat boxes will erected on retained mature trees.
- 5.6 The retained hedgerows and treelines/woodland corridor were considered to be suitable linear features for the local bat species to utilise as a foraging and commuting resource. It is recommended that development's lighting will be designed to minimise incidental artificial lighting on the retained linear features to mitigate the impact on light sensitive species such as Brown Long-eared and Daubenton's bat, with lighting specifications and design in accordance with Guidance Note 8-Bats and Artificial Lighting/Bat Conservation Trust and the Institution of Lighting Professionals, 2023. The Low level lighting onsite will be pointed towards the ground and positioned no higher than 2 m above the ground; whilst warm white light LED bulbs that are less than 2700 Kelvin will be utilised with light shields and hoods to direct light downwards and prevent vertical and horizontal light spill. To minimise prolonged periods of illumination passive infrared (PIR) motion sensors on timers will be utilised where practicable so that lights only come on when necessary.

Reptiles

- 5.7 The scrub, bracken, grassland, ruderal habitat and piles of wood (hibernacula) were considered to be suitable habitat to support common reptile species. It is recommended that any vegetation clearance

adopt a sensitive directional vegetation clearance towards the boundaries with any hibernacula removed by hand. All common reptiles are protected against intentional killing or injury under the Wildlife and Countryside Act 1981 (as amended). To offset the loss of potential reptile habitat any logs created as part of felling activities will be arranged around the perimeter of site to provide hibernacles and habitat piles.

Mammal Hole

- 5.8 An unidentified disused mammal hole was identified onsite. The hole was not considered to be Badger due to the size and absence of evidence. However, it would be prudent to monitor the hole prior to any vegetation clearance and earth works.

Ecological Enhancement

- 5.9 The proposed development will incorporate bird (Swallow boxes/bricks and House Martin (if practicable) and bat boxes into the walls of the structure. The soft landscaping seeding/planting will include species rich meadow mix (where practicable) that would also benefit pollinators. The SEWBRc data search identified Hedgehog *Erinaceus europaeus* in close proximity to site. Hedgehogs travel around one mile every night through parks and gardens in their quest to find enough food, nest sites and a mate; and as such it is recommended that Hedgehog 'highways' are retained around the site. This involves the cutting of small holes in the garden fences to improve connectivity throughout the development and help protect this endangered species.

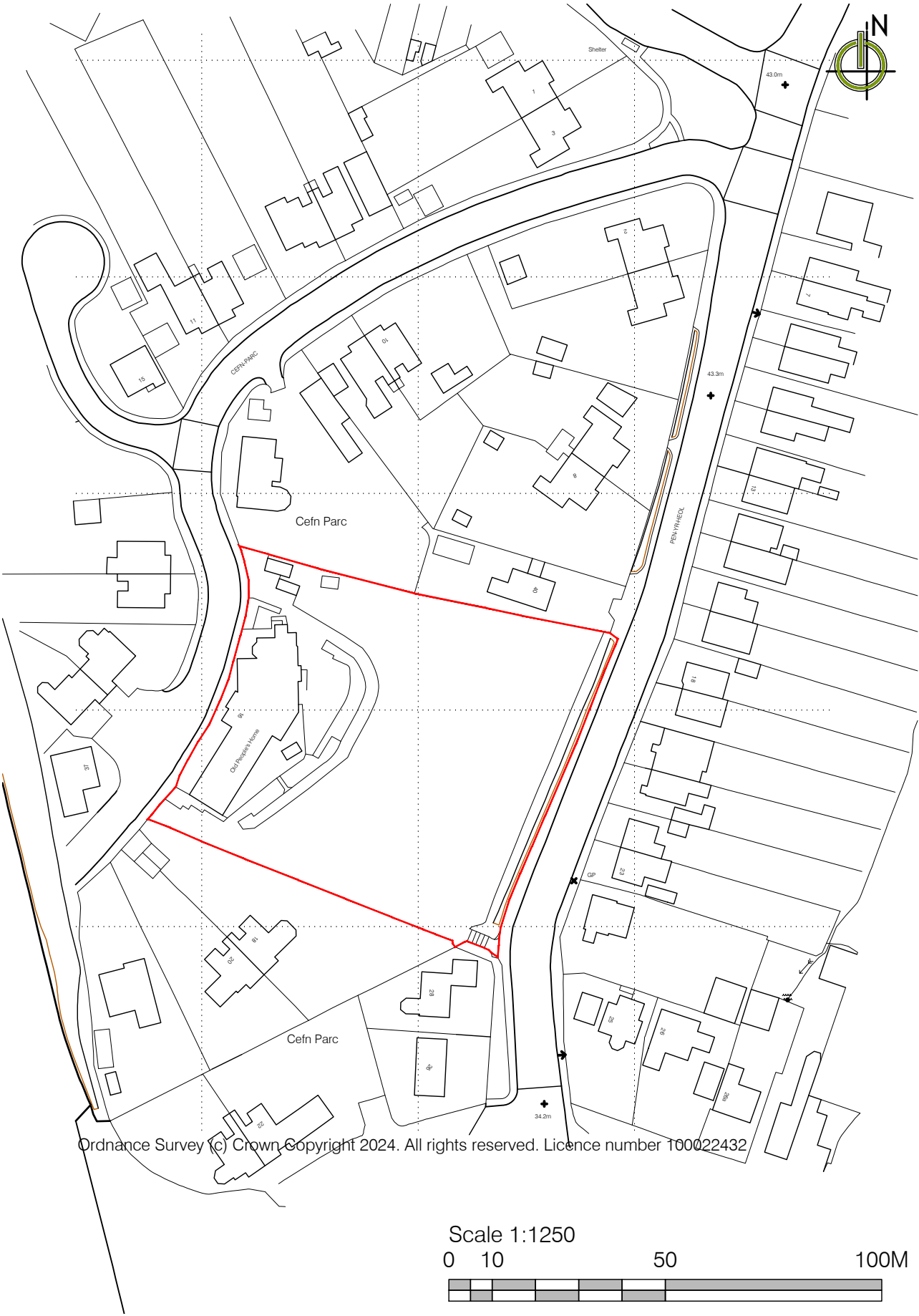
REFERENCES

Bat Conservation Trust (2023). *Bat Surveys – Good Practice Guidelines*. Fourth Edition. Bat Conservation Trust, London.

EUROPA. (2007). *Guidance document on the strict protection of animal species of Community interest under the Habitats Directive 92/43/EEC; Final version, February 2007*.
http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

Mitchell-Jones, A.J, & McLeish, A.P. Ed., (2004), 3rd Edition Bat Workers' Manual, 178 pages b/w photos, softback, ISBN 1 86107 558 8

APPENDIX I: SITE LOCATION PLAN



Revision	Date	Description
Rev		

This drawing is covered by copyright which remains with KWL Architects Ltd. and must not be reproduced in any form without their express permission. This drawing should not be scaled for construction purposes, use figured dimensions only.

Drawn

Client	OXFORD CARE HOLDING (BIRA CARE)		
Project	CEFN LODGE CARE HOME, 16 CEFN PARC, SKEWEN, NEATH, SA10 6YR		
Drawing	SIT LOCATION PLAN		
Scale	Date	Drawn	Checked
1:1250 / 1:500 @ A3	23.05.2024	DPH	
Job No.	Dwg No.	Revision	Status
5498	LP 01		SKETCH



KWL Architects

Poplar House Hazell Drive
Newport S.Wales NP108FY
T.+44 (0)1633 81 71 71
www.kwlarchitects.co.uk

APPENDIX II: PHASE 1 MAP & TARGET NOTES

Target Note	Description
1	Ornamental shrubs and trees: Variegated Holly, Dogwood, Andromeda Shrub, Conifer sp., Acer sp., Smoke Tree, Box Tree, Rhododendron, Cherry Laurel, Holm Oak.
2	Mature boundary treeline including: Sycamore <i>Acer pseudoplatanus</i> , Holly <i>Ilex aquifolium</i> , Common Lime <i>Tilia x europaea</i> , Bay Tree <i>Laurus nobilis</i> , Holm Oak <i>Quercus ilex</i> and Arizona Cypress <i>Cupressus arizonica</i> . PRF – M.
3	Wooden outbuilding with flat roof and uPVC French doors. Negligible bat roosting.
4	Crazy paving path colonised by Selfheal.
5	Occasionally managed amenity grassland: The grassland was dominated by species such as Yorkshire Fog <i>Holcus lanatus</i> (A) and Annual Meadow Grass <i>Poa annua</i> (A); with species such as Creeping Bent <i>Agrostis stolonifera</i> (O), Perennial Rye-grass <i>Lolium perenne</i> (F), Creeping Soft-grass <i>Holcus mollis</i> (O) and Cat's-ear <i>Hypochaeris radicata</i> (F) also identified. Species such as Selfheal <i>Prunella vulgaris</i> (O) and Heath Bedstraw <i>Galium saxatile</i> (F) were evident around the margins.
6	Managed species poor residential hedgerow: Privet, Hazel and Common lime.
7	Fallen Eucalyptus tree in scrub bank – negligible bat roosting.
8	Scrub bank: dominated Bramble <i>Rubus fruticosus</i> (A), Cherry Laurel, Willow sp. <i>Salix</i> sp. saplings (F), Buddleia <i>Buddleja davidii</i> (F), Dogwood <i>Cornus sanguinea</i> (F) and Sycamore <i>Acer pseudoplatanus</i> saplings (F).
9	Conifer treeline: Western Red Cedar – PRF-I.
10	Common Nettle bank.
11	Common Nettle bank, Dock, Red Champion, Sow Thistle.
12	Species Neutral Grassland: dominated by species such as Yorkshire Fog <i>Holcus lanatus</i> (A), Creeping Buttercup <i>Ranunculus repens</i> (A), Ribwort Plantain <i>Plantago lanceolata</i> (F), Smooth Hawk's-beard <i>Crepis capillaris</i> (A), Cat's-ear (A), Common Fleabane <i>Pulicaria dysenterica</i> (F), Selfheal (F), Common Centaury <i>Centaureum erythraea</i> (O), Daisy <i>Bellis perennis</i> (F), Horsetail <i>Equisetum arvense</i> (F), Broad-leaved Dock <i>Rumex obtusifolius</i> (O) and Herb Robert <i>Geranium robertianum</i> (O). <u>Fronde of Japanese Knotweed.</u>
13	Conifer Treeline: Norway Spruce – PRF-I.
14	Species rich boundary hedgerow: Hazel, Sycamore, Hawthorn, Holly and Bay Tree.
15	Bramble bank with Common Nettle, Willowherb sp. and Bracken.
16	Disused mammal hole in foundation trench.
17	Ruderal habitat colonising former tennis court.

18	Scrub colonising foundation trenches. Bramble, Willow sp..
19	Bracken stand.
20	Tall ruderal margin: Nettle, Geranium sp., Willowherb sp.
21	Ruderal habitat: Sphagnum sp. (A), Rough Hawkbit <i>Leontodon hispidus</i> (A), Druce's Crane's-bill <i>Geranium x oxonianum</i> (O), Bird's foot Trefoil <i>Lotus corniculatus</i> (F), Wild Strawberry <i>Fragaria vesca</i> (F), Common Centaury (O) and Selfheal (O).
22	Wood pile: Potential hibernaculum.
23	Mature treeline/woodland boundary dominated by Sycamore with other species such as Holm Oak, English Yew <i>Taxus baccata</i> , Willow <i>Salix sp.</i> , Bay Tree and Holly (PRF-M); whilst the understorey was comprised of Hazel, Bay Tree, Willow and Privet <i>Ligustrum ovalifolium</i> . Some trees potentially containing PRF-I in understorey.

Key:

- A Amenity Grassland
- Target Note
- boundary
- Conifer Treeline
- Ornamental Shrubs
- Hard Standing
- Tall Ruderal
- Bracken
- Scrub
- Treeline- Woodland Corridor
- Species Rich Hedgerow
- Species Poor Hedgerow
- Species Poor Neutral Grassland
- Ruderal Habitat



APPENDIX III: TREE REMOVAL PLAN

Trees to be removed:

T7, T14, T15, T16, T17, T18, 19, T20, T21, T22,
T37, G1 & G2

T25 due to its condition. Not to implement the
build.

The canopy of T29 & T30 to be selectively
reduced back on the western side to clear the new
property by 2m.

All works will be undertaken in accordance with
BS3998:2010 and take into account all relevant
wildlife legislation.

KEY



Tree Position with Canopy
Spread plus BS5837
Category A1, A2 or A3



Tree Position with Canopy
Spread plus BS5837
Category B1, B2 or B3



Tree Position with Canopy
Spread plus BS5837
Category C1, C2 or C3



Tree Position with Canopy
Spread plus BS5837
Category U



Root Protection Area (RPA)
- Based on Simple Radius
from Tree



- First significant Branch
direction (FSB)



- Trees to be removed to
facilitate development

TREE REMOVAL PLAN

Client: Oxford Care Holdings

PROJECT: Cefn Lodge Care Home,
16 Cefn Parc, Skewen, Neth

DATE: 16th November 2025

SCALE: 1:500 A3

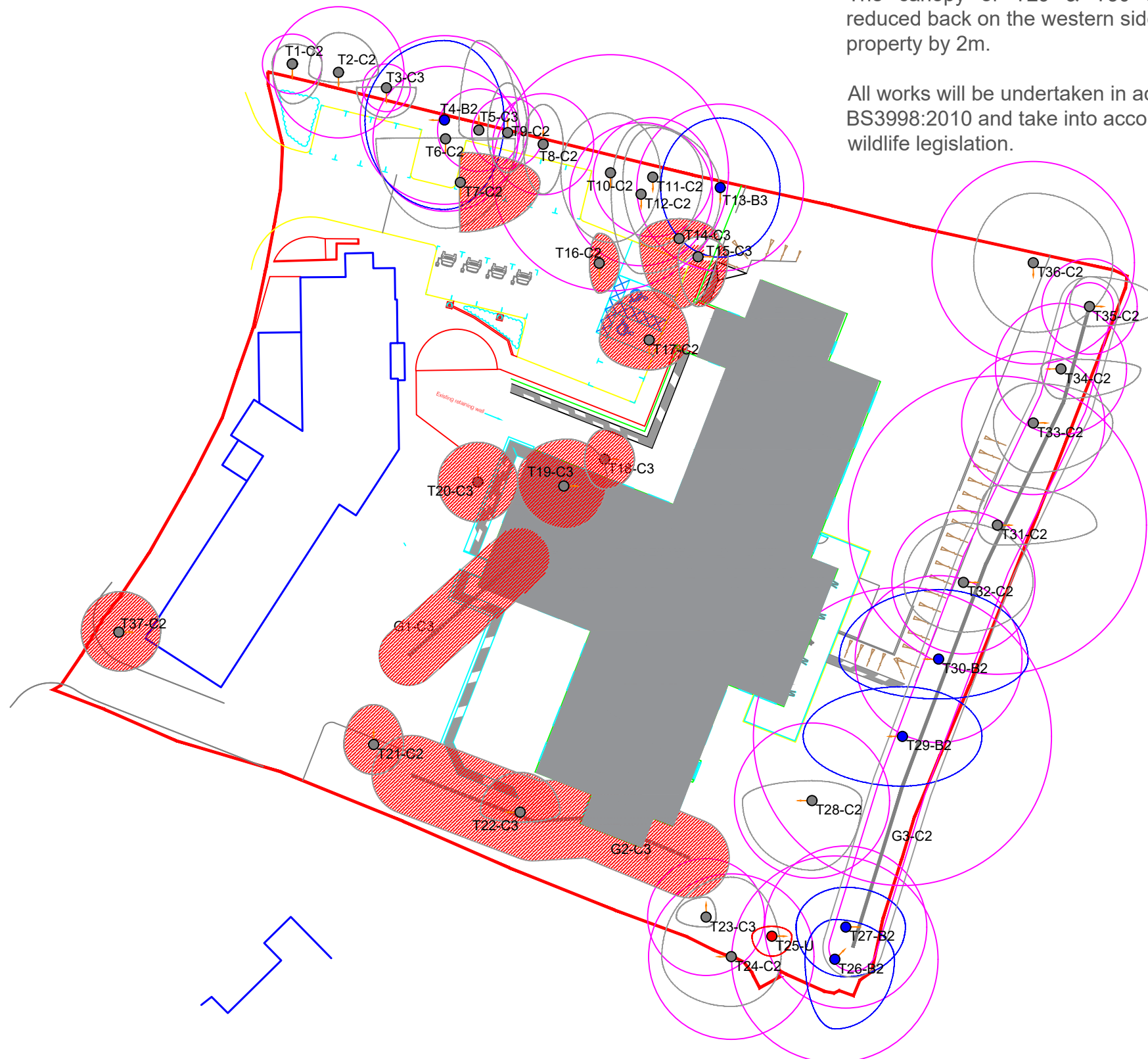


ANDREW DAY
ARBORICULTURALCONSULTANCY LTD

5 BROOK PLACE
HALSTEAD
ESSEX
CO9 1DG

TEL: 0333 242 7344 MoB: 0777 231 7770

EMAIL: andy@andrewdayconsultancy.com



APPENDIX IV: SOFT LANDSCAPE PLAN

