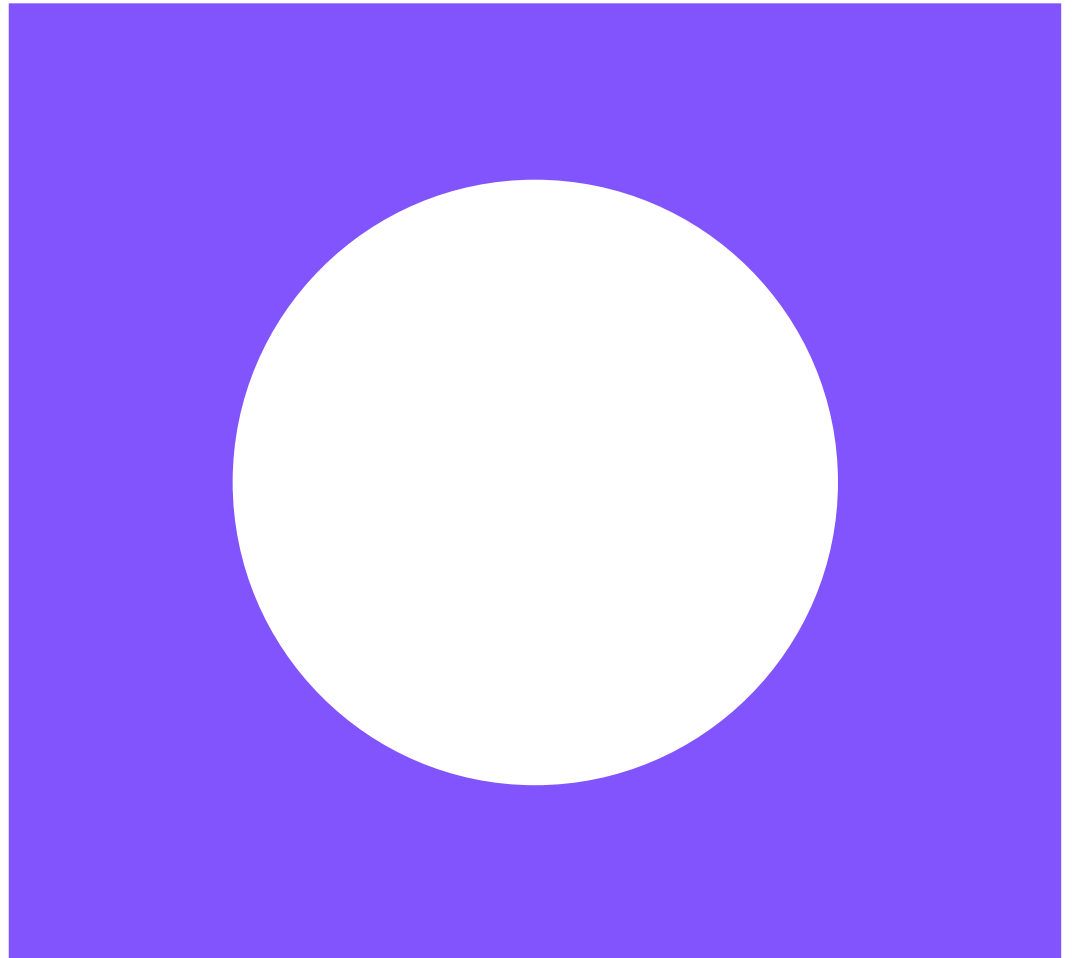




Preliminary Ecological Appraisal Report

SV18 Afan WwTW - IED

December 2025

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Preliminary Ecological Appraisal Report

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Issue and Revision Record

Revision	Date	Originator	Checker	Approver	Description
P01	December 2025	H Beckett	E Hughes	T McNiven	To Inform

Document reference: SV18 | B16399-123532-XX-XX-RP-NA-EI0039 | P01

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Executive summary

Mott MacDonald Bentley (MMB) have been commissioned by Dŵr Cymru Welsh Water (DCWW) to undertake works at Afan Wastewater Treatment Works (WwTW). As part of this work a permanent cabin containing offices will be installed and remain onsite post completion of the scheme.

The site is located in an industrial area adjacent to the Port Talbot steel works / Harbour. There is a variety of different habitats within the wider area surrounding the site however the site within the operational site boundary is dominated by hardstanding, structures and processing equipment with a few small patches of grassland. The tarmac access road is also included within the redline boundary for the scheme, no widening or passing places are required along this tarmac road.

A desk study and ecological walkover concluded that there were no ecological constraints present on the site expected to be disturbed by the permanent presence of the cabin on site.

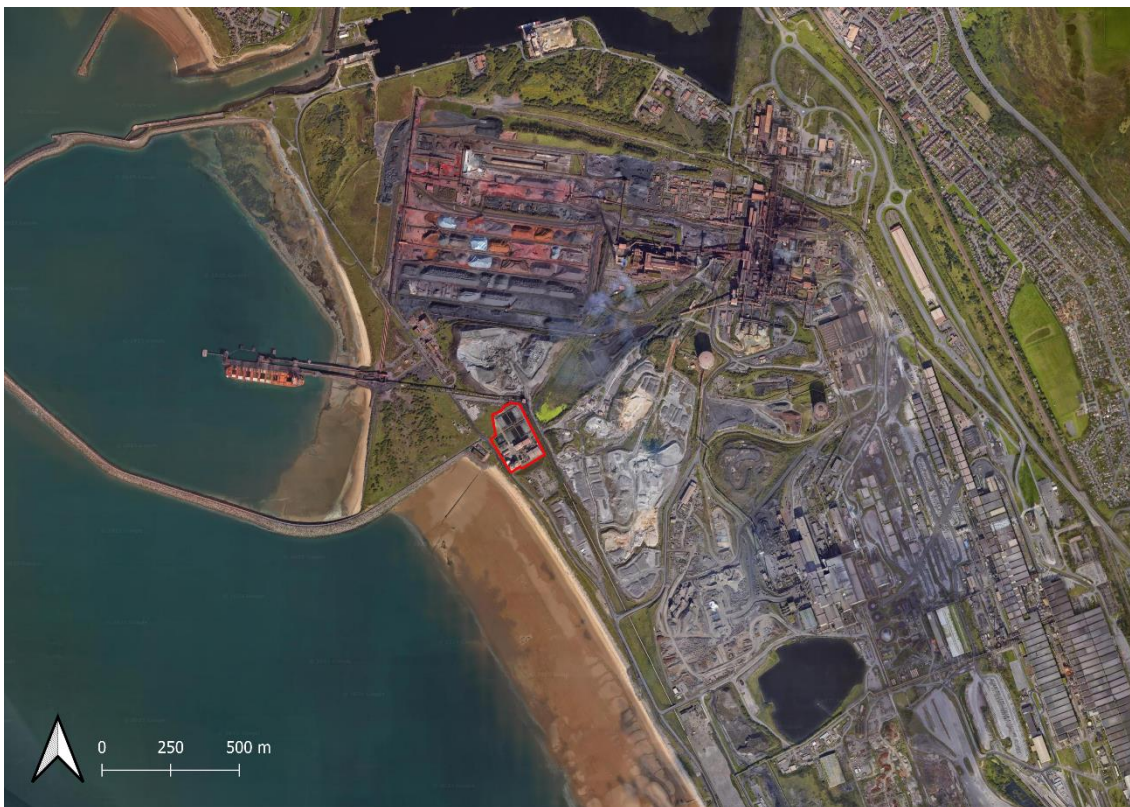
1 Introduction

1.1 Project Background and Site Description

Mott MacDonald Bentley (MMB) have been commissioned by Dwr Cymru Welsh Water (DCWW) to undertake works at Afan Wastewater Treatment works (WwTW) from here on referred to as the 'Site'.

The Site is located at Ordnance Grid Reference: SS 76073 87401 (postcode: SA13 2NG) in the county of Neath Port Talbot County Borough Council (Figure 1.1). The site is primarily comprised of hardstanding, processing plant and buildings. In the wider area is Tata steel works with associated plant and material storage areas. There are also areas of grassland, scrub, waterbodies, intertidal habitat and the Bristol channel.

Figure 1.1: Afan WwTW Location



Source: QGIS.org, 2025. QGIS Geographic Information System. QGIS Association. <http://www.qgis.org>

1.2 Scope of Works

The proposed works onsite are to install a permanent cabin onto concrete footpads that will contain offices and welfare facilities.

The cabin will be installed on an area of existing gravel which already has the appropriate utilities hookups available for connection.

All works will be taking place within the current operational site boundary of the WwTW.

Access will be via the existing tarmac road; no widening works or passing points are required.

1.3 Aims and Objectives of this Report

This PEAR has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) 'Guidelines for Preliminary Ecological Appraisal' 2nd edition (2017). The purpose of this report is to provide an assessment of the protected and / or notable habitats and species which occur or have the potential to occur within or near to the proposed development, which could be impacted by the proposed works.

The aims of this assessment are to:

- Undertake a desktop review to identify any existing information regarding protected and / or notable species and sites with a nature conservation designation, which the defined Zone of Influence (Zoi) for the proposed development;
- Carry out an Extended Phase 1 / UK Habitat Classification survey to provide a description of the existing broad habitat types both within and immediately adjacent to the proposed development;
- To record the presence or potential presence of any protected and / or notable species of flora and fauna;
- Identify the presence of any invasive plant species on or adjacent to the site;
- Provide an Extended Phase 1 / UK Habitat Classification (UKHab) map with target notes of ecological features as identified above;
- Outline any ecological constraints to the proposed development in terms of designated sites, habitats and / or protected or notable species;
- Provide recommendations for further ecological survey work or assessment, if considered necessary to provide an ecological baseline for the proposed development;
- Identify any high-level mitigation or compensation measures that may be required to offset potential development impacts; and
- Identify opportunities for enhancement in line with national and local planning policy.

1.4 Quality Assurance and Environmental Management

All ecologists involved in the production of this report are members of the CIEEM / IES and are bound by their code of conducts. Additionally, this report has been subject to Mott Macdonald Bentley Limited's internal quality assurance checks in line with ISO9001:2015.

All surveys and assessments were undertaken by suitably qualified and experienced ecologists as per CIEEMs competency framework (CIEEM, 2021) and have been undertaken with reference to the recommendations given *BS 42020:2013 Biodiversity: Code of practice for planning and development* (British Standards Institute, 2013).

As per the advice note from CIEEM (2019) *On the Lifespan of Ecological Reports & Surveys* the findings presented in this report are valid for up to 18 months from the date of survey. Following this, the survey data should be reviewed and, if appropriate, updated to ensure any assessment and mitigation approach remains valid.

2 Legislation and Policy

The legal context for ecological survey is provided by a framework of international and domestic legislation which aims to protect specific sites, habitats and species, to conserve biodiversity and promote the resilience of ecosystem services. This report and the assessment therein have been written in accordance with the following legislation, policy and guidance.

2.1 Protected Sites

Statutory protected sites include:

- European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Ramsar sites are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the International Convention of Wetlands of International Importance especially as Waterfowl Habitat (the Ramsar Convention));
- National Sites (Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)) protected under the Wildlife and Countryside Act 1981 (as amended); and
- Local Sites (Local Nature Reserves (LNRs)) protected under the National Parks and Access to the Countryside Act 1949 (as amended).

These sites are protected by the relevant legislation regardless of whether planning permission is required. Where planning consent is required, they will also be protected by Planning Policy.

2.2 Protected and Priority Species and Habitats

Statutory protected species include:

- European Protected Species (EPS) protected under the Conservation of Habitats and Species Regulations 2017 (as amended); and
- Nationally Protected Species, protected under the Wildlife and Countryside Act 1981 (as amended) (WCA); Protection of Badgers Act 1992; Countryside and Rights of Way Act 2000 (CRoW); and Salmon and Freshwater Fisheries Act 1975.

This legislation protects different species to varying degrees, and in most cases their habitats also, regardless of whether planning permission is required. In addition, these species are also afforded protection through Planning Policy, which requires that they are a 'material consideration' of any planning application.

Species and habitats of conservation concern which receive non-statutory protection (protection is via Planning Policy) include:

- Section 7 species and habitats listed in the Environment (Wales) Act 2016 (the Environment Act). These species and habitats are also known as 'Species and Habitats of Principal Importance for the Conservation of Biodiversity in Wales'; and
- Locally Protected Species which may be identified within County Local Biodiversity Action Plans (LBAPs), the Royal Society for the Protection of Birds (RSPB) 'Birds of Conservation Concern' or Red Data books for example.

There is also specific legislation relating to the protection of biodiversity and ecosystem resilience;

- Section 6 of the Environment (Wales) Act 2016 that requires all public authorities to seek to maintain and enhance biodiversity so far as is consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems.
- Also relevant is the Wellbeing of Future Generations (Wales) Act 2015, which requires Public Bodies listed in the Act to embed sustainable development principles, aiming at achieving the seven well-being goals, including to maintain and enhance a biodiverse natural environment. Whilst Welsh Water is not a Public Body under the Wellbeing Act, it is aiming to contribute to Wales achieving the wellbeing goals and has embedded wellbeing objectives in its '2050 vision'¹. To maintain and enhance biodiversity as part of its function will support Welsh Water's contribution to the Wellbeing goals, and the company's '2050 vision'.

2.3 Invasive Non-Native Species

Invasive non-native species (INNS) listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) may also occur within or adjacent to where schemes are to be delivered. It is illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9, or to release or allow to escape into the wild any animal which is listed in Schedule 9.

The Invasive Alien Species (Enforcement and Permitting) Order 2019 (the 'Invasive Species Order') strengthens the legislation in relation to widely spread species of European Union concern; requiring effective management measures to be put in place to minimise their impacts. It is an offence to import, keep, breed / grow, transport, sell, allow to reproduce, or release into their environment the species listed in Schedule 2 of this Order.

2.4 National Planning Policy

At national level, Planning Policy Wales Edition 12² Chapter 6 (Distinctiveness and Natural Places) paragraph 6.4 (Biodiversity and Ecological Networks) requires Local Authorities, when formulating development plan strategies, policies, and development proposals, must consider the need to:

- Support the conservation of biodiversity, in particular the conservation of wildlife and habitats;
- Safeguard protected and priority species and existing biodiversity assets from impacts which directly affect their nature conservation interests and compromise the resilience of ecological networks and the components which underpin them, such as water and soil, including peat; and
- Secure enhancement of and improvements to ecosystem resilience by improving diversity, condition, extent, and connectivity of ecological networks.

Planning Policy Wales is supplemented by Technical Advice Note (TAN) 5³ (Nature Conservation and Planning) which provides further advice and detail about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. The TAN brings together advice on sources of legislation relevant to various nature conservation topics which may be encountered by local planning authorities.

¹ Welsh Water (2018) 'Welsh Water 2050'. Available at: <https://corporate.dwrwymru.com/-/media/project/files/page-documents/corporate/our-plans/water-2050/dcww-2050-march-2018-low-res.ashx>

² Welsh Government (2024) 'Planning Policy Wales Edition 12'. Available at: [Planning Policy Wales - Edition 12](#)

³ Welsh Assembly Government (2009) 'Technical Advice Note 5: Nature Conservation and Planning'. Available at: [tan5-nature-conservation.pdf](#)

2.5 Local Planning Policy

Neath Port Talbot County Borough Council (NPTCBC) Local Development Plan (2011-2026) (Adopted 2016) sets out the following policies in relation to nature conservation:

Policy SP15 – 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:*
 - *Special Areas of Conservation (SACs) and Ramsar Sites;*
 - *Sites of Special Scientific Interest (SSSIs); and*
 - *National Nature Reserves (NNRs).*
 - 2 *The identification and protection of sites of regional and local importance; and*
 - 3 *The protection of important natural heritage features.”*

Policy EN6 – 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 (SINC)s, sites meeting SINC criteria of sites supporting Local Biodiversity Action Plan (LBAP) or S42 habitats or species will only be permitted where:*
 - *They conserve and where possible enhance the natural heritage importance of the site; or*
 - *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 EN7 – 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:*
 - *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*
 - *The biodiversity value and role of the relevant features has been taken into account and where removal is unavoidable, mitigation measures are agreed.”*

The Local Development Plan also sets out objective **OB15**: *“Conserve Neath Port Talbot’s important landscapes, countryside, undeveloped coast, important wildlife, habitats and geodiversity sites, ensuring that developments throughout the County Brough respect of all landscapes and minimise adverse impacts.”*

NPTCBC have also produced a Biodiversity Duty Plan (2023) in line with the 2016 Act. This plan sets out six objectives within the Nature Recovery Action Plan (NRAP) for Wales. These include:

- **Objective 2** – Safeguard species and habitats of principal importance and improved their management;

- **Objective 3** – Increase the resilience of our natural environment by restoring degraded habitats and habitat creation; and
- **Objective 4** – Tackle key pressures of habitats and species.

Neath Port Talbot (NPT) Local Nature Partnership has produced a local NRAP for NPT (2023) which outlines actions for the recovery of habitats in NPT, including specific actions for 11 habitat types and includes the following actions relevant to all habitat types:

- Nature Networks – Improve the condition, connectivity and resilience of protected sites; and
- Invasive Non-Native Species (INNS) – Prevent the encroachment of INNS on important habitats in NPT.

2.6 Welsh Water Plans and Policies

Welsh Water have translated their legal obligations into several internal policies, strategies, and reports including the following:

- Welsh Water 2050 (March 2018) Strategic Response 14: Supporting Ecosystems and Biodiversity which states; “We will look for ways to help nature, enhance biodiversity and promote ecosystem resilience while we carry out our water and sewerage activities”.
- Making Time for Nature (2020): Welsh Water’s revised plan for maintaining and enhancing biodiversity under Section 6 of the Environment (Wales) Act 2016.
- Doing the Right Thing for Nature (December 2019): Welsh Water’s statutory report on the Biodiversity Duty under Section 6 of the Environment (Wales) Act 2016.

Developers must ensure that they comply with the above legislation and policy by fully assessing the potential impacts on protected and priority species and habitats from the proposed development. Where planning permission is required, this assessment must be finalised prior to and included with the submission of the planning application. The Planning Authority can then ensure that the necessary protected species and habitats information has been provided to inform an assessment and that proposals are in full accordance with relevant legislation and planning policy.

3 Methodology

3.1 Study Area and Zone of Influence

The current guidance on ecological impact assessments⁴ recommends that all ecological features that occur within a ‘Zone of Influence’ (Zol) for a proposed development are investigated. The Zol includes:

- Areas directly within the land take for the proposed development and access;
- Areas which will be temporarily affected during the construction;
- Areas likely to be impacted by hydrological disruption;
- Areas where there is a risk of pollution and noise disturbance during construction and / or operation; and
- There are no survey buffers for the tarmac road as it is remaining unchanged.

The Zol is variable depending on the ecological receptors affected. The size of study areas are determined by considering the potential Zol for each receptor. Table 3.1 below summarises the study area used for ecological receptors.

Table 3.1: Zone of Influence for the assessment.

Ecological Feature	Zone of Influence
Nationally designated sites	2.0km buffer around site boundary
Internationally designated sites	5.0km buffer around site boundary
Protected species records	2.0km from site boundary
Protected species evidence	Within 30m of the site boundary*

**Unless otherwise stated below for specific species (i.e. great crested newt where consideration up to 250m would be given in accordance with best practice guidelines).*

3.2 Desk Study

A desk study was undertaken in November 2025, (Search ID:7135150) highlighting designated sites for nature conservation, habitats of conservation importance, and protected and notable (S41) species that would be impacted by the Proposed Scheme. The area for obtaining ecological data through the desk study has been determined based on good practice guidelines (CIEEM, 2019) and professional judgement.

Biological records were requested from Aderyn for a 2km radius of the Site. This has been supplemented with relevant publicly available data, publications, reports, and online databases. These included Multi-Agency Geographic Information for the Countryside (MAGIC), the Joint Nature Conservation Committee (JNCC) and the LBAP (Local Biodiversity Action Plan). Where relevant, SSSI impact risk zones were searched for as well as any protected species licence returns and application locations (as supplied on MAGIC).

A search of waterbodies within 250m of the site was conducted using aerial imagery and OS mapping.

⁴ CIEEM (2024) ‘Guidelines for Ecological Impact Assessment in the UK and Ireland; Terrestrial, Freshwater, Coastal and Marine’ Version 3.1.

3.3 Field Survey

The area for completing ecological field surveys has been determined based on good practice guidance and professional judgement based on likely effects from construction and operational phases of the Proposed Scheme. A field survey following UK Habitat Classification (UKHab Ltd, 2023) guidance was undertaken on 6th August 2025 by a suitably experienced ecologist, with all habitats within the Site being identified and their potential to support protected and notable species assessed. Any evidence of protected and notable species including any invasive species listed on Schedule 9 of the 1981 Act or Schedule 2 of the Invasive Species Order 2019 were noted.

3.4 Limitations

Biological records obtained from records centres do not necessarily represent a full and complete species list for a given area and the absence of a species or habitat record does not prove it is not present. Records are not often collected as a result of systematic surveys and therefore geographic, temporal (annual and seasonal) and species coverage is not often representative. However, the data received from the record centre alongside publicly available information is deemed sufficient to provide an overview of what habitats and species may be present within the Site and surrounding areas.

Ecological surveys are limited to factors which affect the presence of plants and animals, such as time of year, migration patterns and behaviour. With a single site visit it is possible that certain species may have been overlooked or under-recorded during the assessment as optimal survey periods vary from species to species. This document therefore cannot be considered to provide a wholly comprehensive account of the ecological interest of the Site, and it should be noted that this report does not constitute an Ecological Impact Assessment. The survey does, however, provide a “snapshot” of the ecological interest present on the day of the survey visit.

The list of invasive species listed on Schedule 9 of the 1981 Act and Schedule 2 of The Invasive Alien Species (Enforcement and Permitting) Order 2019 is extensive. During the survey the more commonly encountered species were looked for, such as Japanese knotweed *Reynoutria japonica*, Himalayan balsam *Impatiens glandulifera*, rhododendron *Rhododendron ponticum*, Virginia creeper *Parthenocissus quinquefolia*, wall cotoneaster *Cotoneaster horizontalis* and montbretia *Crocasmia x crocosmiiflora*. There is a very low risk that some less common invasive non-native species may have been omitted from the field survey.

4 Results and Interpretation

This section presents the results of the desk study and field survey along with an interpretation. To inform an assessment of potential ecological constraints, possible impact pathways from any proposed works have been identified and considered. This has been undertaken on a precautionary basis to reflect that the works scope and methodology are not yet finalised.

4.1 Desk Study

For ease of reference, desk study records for protected and notable species are included together with field sightings / evidence in Section 4.3.

4.1.1 Sites Designated for their International Importance

There are no Habitat sites designated for mobile species found within 5.0km of the proposed working location.

4.1.2 Sites Designated for their National or County Importance

No National or County important sites are found within 2.0km of the proposed working location.

4.1.3 Sites Designated for their Local Importance

No sites designated for local importance are located within 2.0km of the proposed working area.

4.2 Field Survey – Habitats

The following habitats were identified during the field survey:

u1b – Urban – Vacant or derelict land

The location proposed for the permanent cabin (Figure 4.1) is comprised of an area of compacted gravel which has pioneer species such as Field horsetail (*Equisetum arvense*), creeping buttercup (*Ranunculus repens*), common dandelion (*Taraxacum officinale*), and perennial rye grass (*Lolium perenne*) starting to cover it.

Figure 4.1: Cabin Location



Source: QGIS.org, 2025. QGIS Geographic Information System. QGIS Association. <http://www.qgis.org>

4.3 Protected / Notable Species

Species are included in this assessment if suitable habitat to support them was assessed as being present or potentially present within or adjacent to the site boundary.

Bats

There are a number of buildings and structures present onsite. These were initially assessed for bat roosting potential detailed in Table 4.1.

Table 4.1: Building descriptions

Building Number	Roosting potential	Description	Picture
B1	Negligible	A large building which houses processing equipment with high levels of noise disturbance. There is an approximately 2m of brickwork before metal cladding. There were no visible entry points or evidence of use during the PRA.	

Building Number	Roosting potential	Description	Picture
B2	Negligible	A large storage warehouse which is open sided with concrete panels at ground level and a pitched sheet metal roof.	
B3	Negligible	A single storey brick building with a pitched sheet metal roof. There are well fitted plastic soffits and fascia boards which provide no entry points to bats. The building contains MCC units and other operational plant.	

Building Number	Roosting potential	Description	Picture
B4	Negligible	A single storey brick-built building with a pitched sheet metal roof. The building is in a good state of repair with no potential access points for roosting bats.	

Source: MMB 2025

A total of twelve records for bat were returned from the biological records search. The closest record was a Common pipistrelle (*Pipistrellus pipistrellus*) 868m (2007) with the most recent record being Brown long-eared bat (*Plecotus auritus*) 1292m (2023).

Other mammals

No evidence of any other mammal species was observed on the Site. The vast majority of the area inside the WwTW operational site boundary fence line is hardstanding and as such provides very little opportunity for foraging for species such as badger (*Meles meles*) or dormouse (*Muscardinus avellanarius*) if they were able to gain access to the Site.

Biological records returned no records for otter (*Lutra lutra*), badger, and dormouse.

Reptiles and Amphibians

There is limited habitat suitable for both reptiles and amphibians within the WwTW operational site boundary. Hardstanding and areas of gravel provide small amounts of shelter and foraging habitat for these species. The closest freshwater body is greater than 1.2km from the proposed working area.

Biological records including historical records returned 6 records of reptiles within 2.0km of the site. These included grass snake (*Natrix helvetica*) 1237m (2009), Slow-worm (*Anguis fragilis*) 1299m (2023) and common lizard (*Zootoca vivipara*) 1299m (2023).

Biological records returned results for common frog (*Rana temporaria*), common toad (*Bufo bufo*), Smooth newt (*Lissotriton vulgaris*) all recorded 1154m away from the site in 2006.

Birds

There is the possibility that breeding birds could make nests within some of the structures within the operational site boundary. These buildings experience high levels of disturbance however so the risk of this is low. No birds are likely to nest within the footprint of the cabin as the habitat is unsuitable.

Biological records for schedule 1 birds are present with Peregrine (*Falco peregrinus*) 55m (2022), Black redstart (*Phoenicurus ochruros*) 184m (2022), Skylark (*Alauda arvensis*) 348m (2007), Merlin (*Falco tinnunculus*) 372m (2021) and Whimbrel (*Numenius phaeopus*) 375m (2021). In total including historical records there were 4590 records returned made up of 123 species.

Invertebrates

There is limited opportunity for invertebrates within the operational WwTW site boundary. There are a few areas of gravel which could provide some suitable habitat for certain species but similar is readily available in the wider area.

The biological records returned 252 records for 81 species. The only species found on the Wildlife and countryside act was Small blue (*Cupido minimus*) 750m (2025).

4.4 Summary of Ecological Constraints

Based on the findings of the desk study, field survey and interpretation of the potential for protected and notable flora and fauna. The table below summarises those receptors that require further survey, assessment or have further recommendations.

Table 4.2: Ecological receptors for further consideration.

Ecological receptor	Scoped in or out
Designated sites	Scoped out – No habitat sites are located within the ZoI
Ancient woodland	Scoped out – No woodland of any sort including Ancient woodland will be impacted as a part of the proposed works.
Priority habitats	Scoped out – No priority habitats will either be effect permanently or temporarily as part of the proposed works.
Other habitats	Scoped out – The areas proposed consist of existing hardstanding and gravel which are no considered to be of any ecological value.
Great crested newt and Amphibians	Scoped out – No ponds are located within 500m of the proposed working area and all works are scheduled to take place on existing hardstand or gravel
Badger	Scoped out – No evidence of badger activity was observed during the ecological walkover, the WwTW fence line was in a good condition with no visible access points, and the scope of works poses no risk to badgers.
Bats	Scoped out – all the structures onsite have been assessed as possessing negligible bat roosting potential. The general levels of activity across the site with wagon movements and loud processing equipment will currently create noise great that that which is expected as part of the proposed scheme.
Birds	Scoped out – There is limited bird nesting potential with a lack of vegetation onsite. There is limited potential for birds to be nesting within the buildings and structures containing processing plant but these are loud and experience high levels of disturbance.
Fish	Scoped out – No work is to be undertaken within a watercourse or within 100m of the Bristol channel high tide mark.
Hazel dormouse	Scoped out – there is no suitable habitat present for this species present within the WwTW fence line.
Invertebrates	Scoped out – no important habitat will be impacted by the proposed works.
Notable / protected plant species	A known population of <i>Orobancha picridis</i> is known to be present in the area outside of the WwTW, however as the proposed working area consists of existing hardstanding and gravel no plants are present onsite. As such this has been scoped out.
Otter	Scoped out – No evidence of otter have been observed within the proposed working area, the WwTW fence line is in a good condition with no visible access point and high levels of activity is expected to deter any foraging otter which may be present in the vicinity.
Reptiles	Scoped out – no suitable habitat is present within the proposed working area to support reptiles.
Water vole	Scoped out – No suitable habitat is present within the proposed working area to support water vole.
INNS	Scoped out – No invasive non-native species have been identified within the proposed working area. JK and HB are present in the wider area within the industrial complex of ABP land the WwTW is located on but all INNs are located outside the WwTW fence line.

5 Recommendations and Conclusions

Due to the nature of the work and the area in which the work is going to be undertaken there are no ecological constraints identified. If the design or the location of the proposed works were to change it will be necessary to reassess the likelihood of possible ecological constraints which may have become present.

In the unlikely event that a protected species is encountered during the course of the works all work onsite should be halted and a suitable qualified ecologist consulted before any works can continue.

5.1 Opportunities for Enhancement

As the job requires planning and there is a loss of low quality habitat, it will be necessary to undertake Net Benefit for Biodiversity (NBB). As such it is recommended that the habitat loss is kept to an absolute minimum as per the works plan. Along with this the following enhancements are suggested:

- Introduce control to limit the spread of the field horsetail which can spread excessively and outcompete other species. Including initial treatment of the site and biosecurity by cleaning equipment leaving the area;
- Installation of a variety of bird / bat boxes to help enhance the roosting opportunities on the site. These can be installed on buildings ideally away from the more active areas of the WwTW; and
- Installation of enhancements for invertebrates such as insect hotels, bee banks or create an area of brush / wood to provide suitable habitat for invertebrates.

Biodiversity Net Gain (BNG) also be required to meet DCWW's OFWAT requirements, however as it is not required for planning in Wales, therefore this is being delivered separately.

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