

Your Ref: P2025/0187
Our Ref: CRM.9026.001.EC.R.002A

Date: 28th April 2026

Email: charlie.kempson@enzygo.com

FAO: Western Bio Energy Limited (the client)
c/o: Barry Collins
Longlands Lane
Margam
Port Talbot
SA13 2NR

By Email: Barry@durantaenergy.com

RE: Bat Mitigation Technical Note – Land at Tyn-y-Caeau, Margam

Further to recent correspondence, please find this technical note regarding planning application reference P2025/0187 for the *“erection of a data centre (use class B8) and supporting infrastructure, parking, alteration to access, drainage, landscaping and associated works. Including demolition of existing annex and retention of the existing building for ancillary use, substation and power connection to the existing Western Wood Biomass Plant”* at Land at Tyn-y-Caeau, Margam, Port Talbot, SA13 2NR (herein referred to as ‘the site’).

Background

The above planning application was submitted to Neath Port Talbot (NPT) council on Thursday 20th March 2025 and validated on Tuesday 1st April 2025. This application is supported by an Ecological Impact Assessment (EclA) (Enzygo Ltd, 2026), which identified baseline ecological conditions present on the site and evaluated the impact of the proposed development on these features in light of proposed mitigation measures.

Following the submission of the planning application, the following consultation has been received from NPT council and Natural Resources Wales (NRW):

- Consultation from NPT Council – via email dated 2nd December 2025 (pre-app);
- Consultee Comment from NRW (ref. CAS-292360-POS3);
- Consultee Comment from NRW (ref. CAS-303245-P3G7);
- Consultee Comment from NRW (ref. CAS-305525-S7N5); and
- Consultation from NPT Council – via Microsoft Teams meeting dated 20th April 2026.

This technical note has been produced in response to requests from NPT Council and NRW for additional information regarding the proposed mitigation concerning Bats present on-site. Please find contained within detailed information on the baseline ecological conditions as well as the proposed mitigation and compensation measures to prevent a significant adverse impact on European Protected Species (EPS). This technical note has been updated to ‘Revision A’, following consultee comment received on 24th April 2026.

Relevant Ecological Baseline

Bat Preliminary Roost Assessment

There are three buildings present on the site. B1 (Tyn-y-Caeau) is a large residential property which has been abandoned and is in a state of disrepair. B2 is an annexe building, which is also abandoned but is of a much more recent construction than B1 and as such is in a relatively limited state of disrepair. B3 is a small barn in the garden of B1. B3 is also abandoned and in a state of disrepair.

B1 was assessed as being of 'High' suitability for roosting Bats, as per the Bat Conservation Trust (BCT) guidelines (Collins, 2023), as it is *"a structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat"*. In addition, B1 has a cellar below ground level with no external windows which has suitability as a *'classic cool/stable hibernation site'*.

The EcIA described B1 as follows: *"Once inside, the house essentially functions as one continuous roost. The damage to the inside of B1 is such that a Bat could move freely between all rooms, the internal wall and ceiling cavities and the cellar through gaps in the floors, walls and ceiling"*.

B2 and B3 were assessed as having a roosting suitability of 'None', as per the BCT guidelines (Collins, 2023). B2 lacks Potential Roosting Features (PRFs) providing access to the internal building structure. B3 is too dilapidated to support roosting Bats – there are large external gaps in the building resulting in draughts and unstable temperature, as well as no internal void spaces or crevices.

As such, three nocturnal emergence surveys for Bats were undertaken by Enzygo Ltd on B1 across June and August 2026, as well as monthly hibernation surveys on the cellar of B1 from November 2025 to March 2026.

Bat Emergence & Hibernation Surveys

During the nocturnal emergence surveys, 3No. Lesser Horseshoes were recorded emerging from a broken first-floor window on the north-eastern aspect of B1. Additionally, 1No. Soprano Pipistrelle was recorded emerging from a lifted roof tile on the south aspect of B1. **CRM9026001-ENZ-XX-XX-DR-Z-0002 – Bat Emergence Survey** shows the locations of the identified egress points on B1.

The hibernation surveys identified a peak count of 3No. Lesser Horseshoes hibernating within the cellar (by visual inspection). Bats were free-hanging from roof fixtures in the cellar.

It was concluded that B1 is a roost of 'county' significance, and supports the following:

- 1x Lesser Horseshoe Day Roost (First-floor room on north-eastern aspect – internal volume of 134.0m³ – capable of supporting 3No. individual Bats);
- 1x Soprano Pipistrelle Day Roost (capable of supporting 1No. individual Bat); and
- 1x Lesser Horseshoe Hibernation Roost (below-ground cellar – internal volume of 87.4m³ – capable of supporting 3No. individual Bats).

The entire cubic volume of B1 is approximately 2,100m³. As stated above, it is considered that this is the total volume of space available to roosting Bats – although this volume far exceeds the requirement for the number of Bats identified during the emergence and hibernation surveys.

Impacts of the Development

The proposed development will require renovation works to be undertaken to B1 in order to refit the building to be suitable for ancillary purposes. In the absence of any mitigation this would result in the loss of day and hibernation roosts of 'county' level importance, as well as the risk of injuring a European Protected Species.

Proposed Mitigation Measures

Lesser Horseshoe Day Roost

The room on the north-eastern aspect of the first floor (which currently contains the identified egress point for the Lesser Horseshoes) will be retained as a day roost feature throughout the proposed development. The option of retaining part of the loft space and fitting it to be suitable for a day roost was explored, but this isn't considered feasible as there are multiple roof lines present within B1 and the volume available for roosting Bats is minimal. Therefore, a suspended ceiling will be installed to the first-floor room to provide another discrete roosting area within B1. The only works to take place to the first-floor room are those required to improve its suitability to support roosting Bats. **Table 1** (below) provides a specification of the retained day roost feature. **Appendix A** provides a visual overview of the below.

Table 1 – Specification of the Retained and Improved Day Roost

Characteristic	Description
Location	First-floor room at the north-easternmost point of B1. Approximately 3m above ground level.
Orientation	North-eastern – it is acknowledged that a south-western aspect is ideal for roosting features to maximise solar gain. However, as Bats are already roosting in this feature at this orientation, it is considered suitable in terms of solar gain and necessary internal temperatures.
Dimensions/m (length x width x height)	6.6 x 5.8 x 3.5
Area/m ²	38.3
Volume/m ³	134.0
Construction Materials	Existing construction materials comprise wood (floorboards, beams, window frames, ceiling), bricks (walls), glass (windows) and insulation/cladding. These materials will be largely unchanged, but windows will be bricked up. Reduction in glass will improve the overall insulation of the roost. Existing gaps in woodwork will be patched up. The existing door will be replaced with a thick door which shall remain locked to prevent general access but allow for ecological monitoring. A

	suspended ceiling will be added to create a loft void providing additional roosting conditions. Soundproofing will be installed on the walls to dampen any noise from ancillary use in the rest of B1. Features which allow Lesser Horseshoes to 'free-hang' (rafters, beams, etc.) will be installed. These will likely be made of wood/metal.
Egress Point	'Letterbox style' egress point to be installed. This style of egress reduces drafts and excludes birds and predators from accessing the roost.
Egress Point Location	The same north-eastern aspect of the room which currently features the missing windowpane used for access. Facing out onto a mature tree which is to be retained, as well as boundary hedgerow.
Egress Point Dimensions/cm (width x height)	20 x 30 (as is ideal for Lesser Horseshoes)

Lesser Horseshoe Hibernation Roost

The cellar will be retained as a hibernation roost feature throughout the proposed development. The only works to take place to the cellar are those required to provide access from the retained day roost. **Table 2** (below) provides a specification of the retained hibernation roost feature. **Appendix A** provides a visual overview of the below.

Table 2 – Specification of the Retained Hibernation Roost

Characteristic	Description
Location	Below-ground cellar at the north-easternmost point of B1.
Orientation	N/A – the building is situated below-ground, and access will exist from the ceiling (downwards from the retained day roost), so orientation is not applicable.
Dimensions/m (length x width x height)	10.4 x 4.0 x 2.1
Area/m ²	41.6
Volume/m ³	87.4
Construction Materials	Existing construction materials comprise bricks and concrete/cement. These materials will be largely unchanged. New access for bats will likely be made of wood/metal. A thick door will replace the existing door at ground-floor level to prevent

	general access but allow for ecological monitoring. Soundproofing will be installed on the walls to dampen any noise from ancillary use in the rest of B1. 'Free-hanging' features already present and in-use.
Access Point	A shaft will be installed from the floor of the day roost, through the ground-floor room and into the ceiling of the cellar, which will allow Lesser Horseshoes to access the hibernation roost via the day roost. Internal dimensions will be a minimum of 500mm², with a length of 3m to cross the ground-floor room. This 3m length will be slanted. These features will allow the Lesser Horseshoes to 'circle' upwards to leave the hibernation roost.

It is recognised that the overall volume available to Lesser Horseshoes within B1 will be reduced. However, it is confirmed that the volumes retained for roosting and hibernating Bats, coupled with the retained connectivity between the cellar and first-floor room, is sufficient to continue to support the numbers of roosting Bats identified during the emergence and hibernation surveys, therefore the reduction in overall available volume is not considered to compromise the favourable conservation status of Lesser Horseshoes within the local area.

Soprano Pipistrelle

The 1x Soprano Pipistrelle Day Roost cannot be retained throughout the proposed development, as the roof works are required to ensure the structural integrity of B1 for its proposed ancillary use. The works will be undertaken under EPS licence (see below), and a minimum of 2No. Schwegler 2F Universal Bat Boxes (or similar) will be erected in a suitable location on site, to provide compensation for the lost roost, as well as enhancement of the site for roosting Pipistrelle species.

Artificial Lighting

The proposed development will ensure that the proposed egress point for the retained day and hibernation roosts is not artificially illuminated during hours of darkness. Additionally, a dark corridor will be maintained between the egress point and nearby suitable foraging and commuting habitats on and off site, to not disturb roosting Lesser Horseshoes.

As per consultation with NPT council, a full, detailed lighting scheme for the proposed development shall be devised post-determination as part of discharging a relevant planning condition.

European Protected Species Licensing

As per consultation from NPT council and NRW, the proposed development (should it be granted planning permission), shall not take place without an EPS licence first being granted by NRW. It is the understanding of Enzygo and the client that any application for an EPS licence shall be done post-determination, as part of discharging a relevant planning condition. The EPS licence will provide further detail about the timing of works, the provision of an Ecological Clerk of Works and the methodology for the works to areas of B1 which aren't to be retained as day and hibernation roosting features.

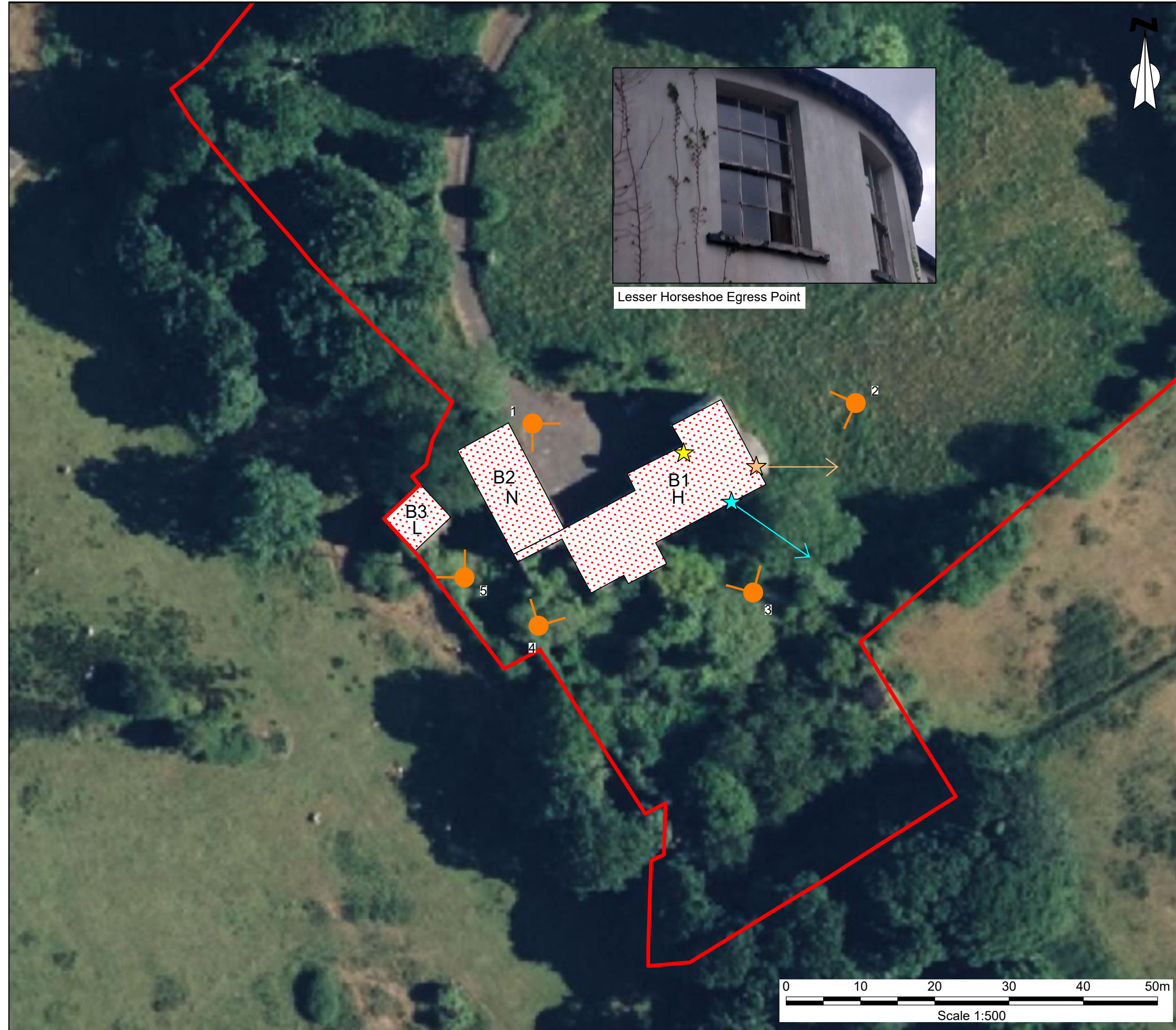
Conclusion

The information contained within this technical note will hopefully be sufficient to assist the planning and ecology officers at NPT Council to reach a decision on planning application P2025/0187. Should any further information be required, feel free to contact me.

Yours sincerely,

Charlie Kempson

Charlie Kempson BSc (Hons) MSc ACIEEM – Senior Ecologist
Enzygo Ltd



KEY:

- Site Boundary
- 1 x Soprano Pipistrelle
- 3 x Lesser Horseshoe
- Soprano Pipistrelle emergence flight direction
- Lesser Horseshoe emergence flight direction
- Location of Lesser Horseshoe droppings
- Buildings
- 1 Surveyor Location and Field of View

P02	13.10.25	Bat Information Updated	SD	CK	CK
P01	09.10.25	Issued for comment / approval	LB	CK	CK
Rev	Date	Description	DRA	CHK	APP

Project
Tyn-y-Caeau

Client
Western Bio-Energy Ltd

Drawing Title
Bat Emergence Survey

Scale 1:500 @ A3	Date 09.10.25	Status Preliminary
----------------------------	-------------------------	------------------------------

DWG No. CRM9026001-ENZ-XX-XX-DR-Z-0002	Revision P02
--	------------------------

Bristol
01454 269 237

Manchester
0161 413 6444

Sheffield
0114 321 5151

Cardiff
02920 023 700

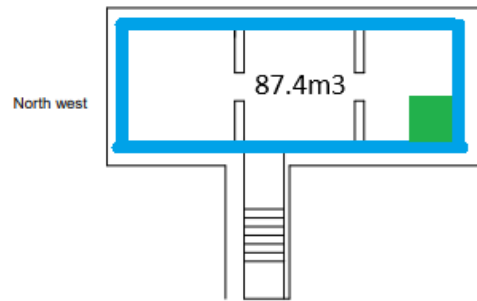
Cambridge
01799 542 473

Belfast
07377673948

@enzygo
enzygo.com
hello@enzygo.com

North East

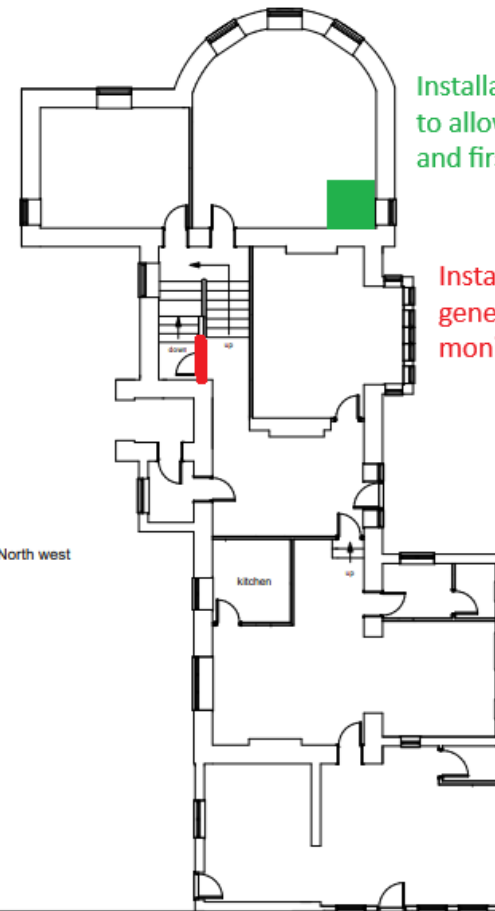
Retained as a hibernation roost
Added soundproofing



2 basement
1 : 100

Installation of a chute/tunnel to allow travel between cellar and first-floor

Installation of locked doors to prevent general access but allow ecological monitoring



1 ground floor
1 : 100

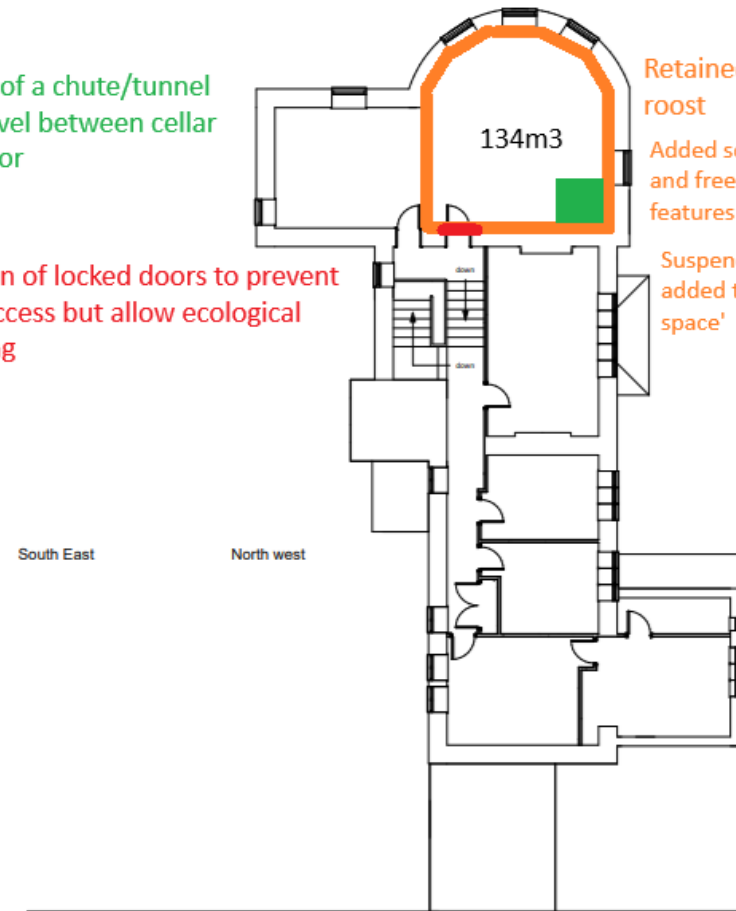
North East

Retained as a day roost

Added soundproofing and free-hanging roost features

Suspended ceiling added to create 'loft space'

134m³



3 first floor
1 : 100