Updated Preliminary Ecological Appraisal, Preliminary Roost Assessment and Nesting Bird Assessment of Maes Emlyn, Rhyl

Date	Author	Project Number	Approved by	Version	Comments
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Report Reference: EE.5433.25.DA

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Wildlife Trust Consultancies

Aelod o Cymdeithas Ymgyngoriaethau Ymddiriedoleathau Natur

Mae Enfys Ecology yn is-gwmni I Ymddiriedolaeth Natur Gogledd Cymru

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Ymddiriedolaeth Natur Gogledd Cymru North Wales Wildlife Trust

Contents

Site	Maes Emlyn, Rhyl, LL18 3SF	**OS Grid Reference**	SJ0148 8161
Surveyors	Daisy Askari (accredited agent on NRW bat licence S092545/1) and Lowri Parry	**Survey Date**	12/11/2025
Type of Survey	Preliminary Ecological Appraisal, Preliminary Roost Assessment, Daytime Bat Walkover and Nesting Bird Survey.		
Summary of Proposed Work	Demolition of the existing buildings and construction of a residential development.		
Designated Sites Affected	There will be no designated sites affected by the works proposed.		
Habitats Affected	Trees, buildings, hardstanding and amenity grassland.		
Species Affected	There is potential for impacts on bats, nesting birds, reptiles, amphibians, hedgehogs and other fauna from the works. RAMS will be given in a forthcoming Mitigation and Conservation Plan to minimise the impact of works on protected species.		
Survey Results	• Phase 1 habitats within the survey area included amenity grassland, hedgerow, buildings, hardstanding, mixed parkland and scattered trees. • Invasive non-native montbretia, cotoneaster and buddleia species were present onsite. • There was no evidence or signs of roosting bats or nesting birds observed onsite during the survey.		
Survey Conclusions	• Overall the site had low potential to support bats. The buildings had negligible- low suitability for roosting bats, there were no potential roosting features in the trees and the site had low quality foraging habitat for bats. • It is possible that birds could use the buildings, trees and hedgerows for nesting. The site had potential for other protected species including reptiles and amphibians. • The native-species hedgerow onsite was a Habitat of Principle Importance.		
Further Surveys Required	• A pre-works check for bats by an ecologist will be required before the buildings are demolished. • Any works within nesting bird season will require pre-works checks of the buildings, trees and vegetation onsite. • A Mitigation and Conservation Plan will be produced once the plans for the site are finalised.		

1.0 Introduction

1.1 Project Introduction

1.1.1 Enfys Ecology were commissioned by Wales and West Housing Association to undertake a Preliminary Ecological Appraisal (PEA), Preliminary Roost Assessment (PRA) and Nesting Bird survey of an area of land at Maes Emlyn, Rhyl, which was formerly used as sheltered housing.

1.1.2 The site was previously surveyed by Enfys Ecology Ltd in 2023, and this document serves as an updated survey report, building on the results and recommendations of the previous PEA and PRA (Payne, 2023).

1.1.3 The proposed works at the time of the survey (November 2025) involve demolition of the existing buildings and construction of a residential development comprising 25 housing units, including flats, bungalows and houses, and associated infrastructure.

1.1.4 The primary objectives (CIEEM, 2017a) of a Preliminary Ecological Appraisal Report (PEAR) are to:

- identify the likely ecological constraints associated with a project;
- identify any mitigation measures likely to be required;
- identify any additional surveys that may be required to inform an Ecological Impact Assessment (EcIA); and,
- identify the opportunities offered by a project to deliver ecological enhancement.

1.1.5 This document has been produced to advise a client of ecological constraints and opportunities to inform their design options (avoidance), likely mitigation, restoration and compensation requirements, and the need for further surveys. In addition, the report may provide initial recommendations in relation to relevant ecological enhancement opportunities given the site's context. This report may not necessarily provide the Local Planning Authority with enough information to assess the ecological impacts of a proposal.

1.1.6 This report has been produced in accordance with CIEEM (2017a) 'Guidelines for Preliminary Ecological Appraisal' and CIEEM (2017b) 'Guidelines for Ecological Report Writing'.

1.1.7 The survey work to inform this report was carried out on 12th November 2025. Habitats and species found within a discrete area of land are subject to change, this report should therefore be considered valid for a period of eighteen months in accordance with best practice (CIEEM, 2019).

1.1.8 Relevant legislation and planning policy information are included in Appendix A.

1.2 Project Proposals

1.2.1 The reports / drawings provided by the client at the time of production of this PEAR are detailed in Table 1.1.

Table 1.1: Project Information Sources

Information	Organisation	Reference and Date
Previous Ecological Survey Report	Enfys Ecology Ltd	EE.3801.23.AP; 2023
Proposed Site Plan	RLH architecture; Wales & West Housing	R622 - 104A; Proposed Residential Development, Maes Emlyn, Rhyl, Denbighshire LL18 4AB; 11/11/25

2.0 Site Description

2.1 Survey Area

2.1.1 The site was located in the north of the town of Rhyl, approximately 0.6 km from the coast. The immediate surrounding areas comprised a railway adjacent to the southern site boundary and residential houses in all other directions. There was a road leading to the site from the north-west? and a public footpath running along the north-eastern boundary, although separated from the site by a stone wall. Within the site boundary were buildings surrounded by areas of amenity grassland with broadleaf trees. The approximate survey area is shown in Figure 2.1.

Figure 2.1: The approximate survey area (red outline) and site surroundings.
Base image ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies, Map data ©2025

2.2 Wider Area - Connectivity and Green Infrastructure

2.2.1 The wider landscape was primarily residential and commercial properties within the town of Rhyl. The coast of the Irish sea was 0.6 km to the north, Kinmel bay was approximately 3.5km to the west and Prestatyn approximately 3 km to the east. The town of Rhuddlan was approximately 3km to the south.

2.2.2 (PPW 12, paragraph 6.2.1). Green infrastructure (GI) is defined in Planning Policy for Wales (PPW) Edition 12[1] as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*". Green infrastructure (GI) can function at a range of different scales; from entire ecosystems such as wetlands and rivers to parks, fields and gardens at the local scale and street trees, hedgerows, roadside verges, and green roofs/walls at the micro scale. Development proposals should take GI into consideration in order to avoid negative impacts on habitats and species, and seek ways to maintain and enhance biodiversity.

2.2.3 The site provided Green Infrastructure in the form of amenity grassland and several mature trees that could provide habitat for a small number of birds and foraging bats. Due to its urban location within Rhyl, the site had limited connectivity to the wider rural landscape; however, the row of trees along the southern boundary and the adjacent railway line provided a corridor for commuting and foraging small mammals and other fauna.

2.2.4 The wider landscape surrounding the site is shown in Figure 2.2 below.

[1] See: https://www.gov.wales/planning-policy-wales

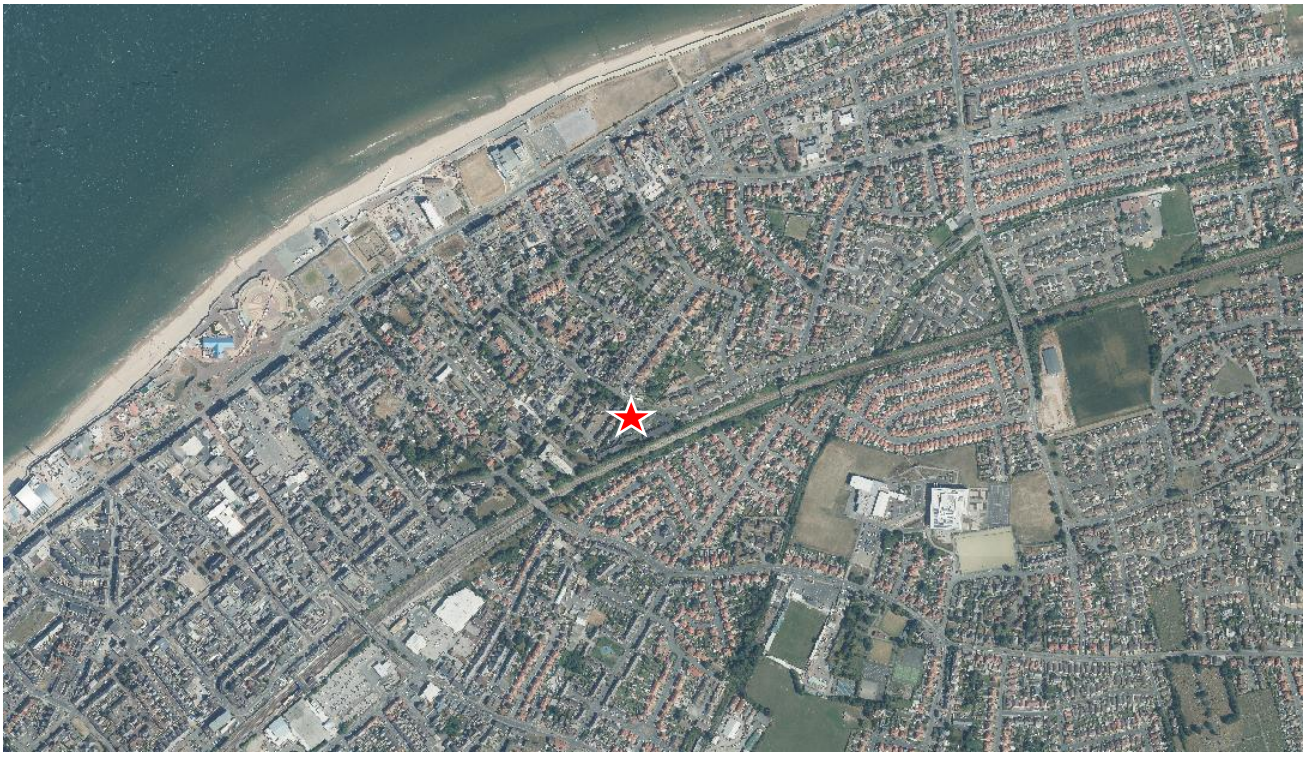


Figure 2.2: The wider landscape surrounding the site (red star).
Base image ©2025 Airbus, Bluesky, Infoterra Ltd & COWI A/S, Maxar Technologies, Map data ©2025

3.0 Methodology

3.1 Desk Study

3.1.1 A desk study was undertaken through Cofnod, the North Wales Environmental Information Service, to determine the presence of statutory and non-statutory sites for nature conservation, and records of protected, or species and habitats of principal importance listed under Section 7 of the Environment (Wales) Act 2016. Desk study data was provided by Cofnod on 12/11/2025. The records were used to inform the survey and recommendations, and to provide context for evaluating the species and habitats found during the survey. Any relevant species results from the desk study are referred to in Section 4.

3.1.2 The desk study used the following search radii for this project: 1km for statutory nature conservation sites and 1km for non-statutory nature conservation sites and protected species records.

3.2 Preliminary Ecological Appraisal

3.2.1 The Preliminary Ecological Appraisal (PEA) was conducted on Wednesday 12th November 2025 by Daisy Askari and Lowri Parry of Enfys Ecology Ltd.

3.2.2 The weather conditions during the survey were overcast and still.

3.2.3 All parts of the site were visited where possible, the habitats were mapped following the standard Phase 1 Habitat Survey methodology (JNCC, 2010). Any rare or invasive species or incidental sightings of protected species were recorded, as necessary. A search for evidence or potential for protected species was carried out, including amphibians, bats, and reptiles. Evidence of badgers (*Meles meles*) including setts, dung pits, hairs, footprints, and scratching posts or trees was searched for. Trees with suitable features for roosting bats, including knot holes and other crevices, hollow trunks and dense ivy coverage were identified.

3.3 Preliminary Roost Assessment

3.3.1 The inspections of the buildings at Maes Emlyn were carried out by Daisy Askari (accredited agent on NRW bat licence S092545/1) and Lowri Parry on Wednesday 12th November 2025. The Preliminary Roost Assessment (PRA) was carried out following the Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) (Collins, 2023).

3.3.2 The buildings were assessed for any signs of bats; these included droppings, feeding remains, live/dead bats, and other indicative marks. Features of potential use to bats such as crevices, cracks, holes, and potential access points into the building were also assessed. High powered torches were used to inspect any identified features. Both the interior and exterior of the buildings were examined where accessible (See section 3.5 Limitations). Photographic and biological evidence was taken where necessary.

3.4 Nesting Bird Assessment

3.4.1 The internal and external inspections of the buildings were carried out by Daisy Askari and Lowri Parry in tandem with the PRA on Wednesday 13th November 2025.

3.4.2 The buildings were assessed for any signs of use by birds; these included droppings, in/active nests, live/dead birds, and other indicative marks. Features of potential use to birds such as crevices, holes, and potential access points into the building were also assessed and noted. High powered torches were used to inspect any identified features, where appropriate.

3.4.3 Both the interior and exterior of the buildings were examined, where feasible (see Section 3.5). Photographic evidence was taken where necessary.

3.5 Limitations

3.5.1 The results of this survey consist only of those species encountered during a short space of time on one day. Species that use the site infrequently or are present at different times of the year may not be recorded, and the absence of species from the results of a single survey should not be taken as indicating the species' definite absence from the area in question. Descriptions of plant species concentrate on the most obvious and abundant species present as determinants of habitats present.

3.5.2 While reasonable efforts have been made to search for invasive non-native species (INNS), and any seen were recorded, this is not a comprehensive invasive species survey and does not claim or imply the definite absence of Japanese knotweed or other invasive plants, for which a specific survey should be commissioned.

3.5.3 Bats are highly mobile animals and it is possible that they may move into a building after the survey had occurred. Therefore, the absence of bats cannot be guaranteed. The survey was carried out during the month of November 2025, which is within the appropriate survey window for Preliminary Roost Assessment as per the 'Bat Surveys for Professional Ecologists - Good Practice Guidelines' (Collins, 2023).

3.5.4 The nesting bird assessment was undertaken outside of the nesting bird season (March to August inclusive). Therefore, the absence of nesting birds cannot be guaranteed. It is possible that birds could occupy the site after the survey was completed.

3.5.5 There was limited access for surveyors into the buildings to carry out the internal bat and nesting bird assessments. This was due to health and safety concerns regarding asbestos and broken glass. Flat number 50, within the southern building of flats, was inspected internally. The other buildings were of the same construction and building materials, so the results of the internal survey of Flat 50 are considered likely to be similar to the other buildings that were not inspected internally. The results of this report are not considered to be significantly impacted by this limitation.

3.6 Terminology

3.6.1 In this report 'site' and 'survey area' are used to refer to the area surveyed by the ecologist, which is subject to the proposed development or planning application. The only exception may be some unavoidable use of 'site' when discussing designated sites such as SSSIs. 'Search area' refers to the area from which data was obtained for the desk study.

3.6.2 English species names are generally (but not exclusively) used in the text for readability, however Appendix C contains a list of species recorded and gives scientific names.

4.0 Results

4.1 Desk Study – Designated and Notable Sites

4.1.1 There were no statutory or non-statutory designated sites within 1km of the survey area.

4.2 Desk Study – Species Records

4.2.1 Cofnod holds 536 records within 1km of the site from the previous 20 years, including 207 records of UK and European protected species; individual records can include a number of sightings and therefore reflect the minimum number of plants or animals of a given species observed in the area. There were no records from within the survey area itself.

4.2.2 The results of the desk study for protected fauna are detailed in Table 4.4, Section 4.6. Results of the Cofnod data search are provided in Appendix B; full data (e.g. specific locations) has not been provided for sensitive data.

4.2.3 There were no records of notable flora from within the study site. Notable records of European protected flora species within 1km of the site include native bluebell, recorded 200m south of the site in 2017, and jersey cudweed, recorded 550m south-east in 2024.

4.2.4 The previous survey report (Payne, 2023) identified 2 invasive non-native species within the site: montbretia and cotoneaster species. There were no additional records of invasive species recorded within 500m of the site.

4.3 Phase 1 Habitat Survey

4.3.1 The following Phase 1 Habitat and feature types were recorded within the site:

A3.1	Scattered/planted trees
A3.3	Mixed parkland/scattered trees
J1.2	Amenity grassland
J2.3.2	Hedgerow
J3.6	Buildings
J5	Hardstanding

4.3.2 A Phase 1 Habitat map with target notes is provided in Figure 4.1 below. Descriptions of the habitats are provided in Table 4.2 with information associated with target notes provided in Table 4.3. Where relevant, photographs are included with the text. From hereon, reference to the 'previous survey' within this report, refers to the site visit and PEA carried out by Enfys Ecology in 2023 (Payne, 2023).

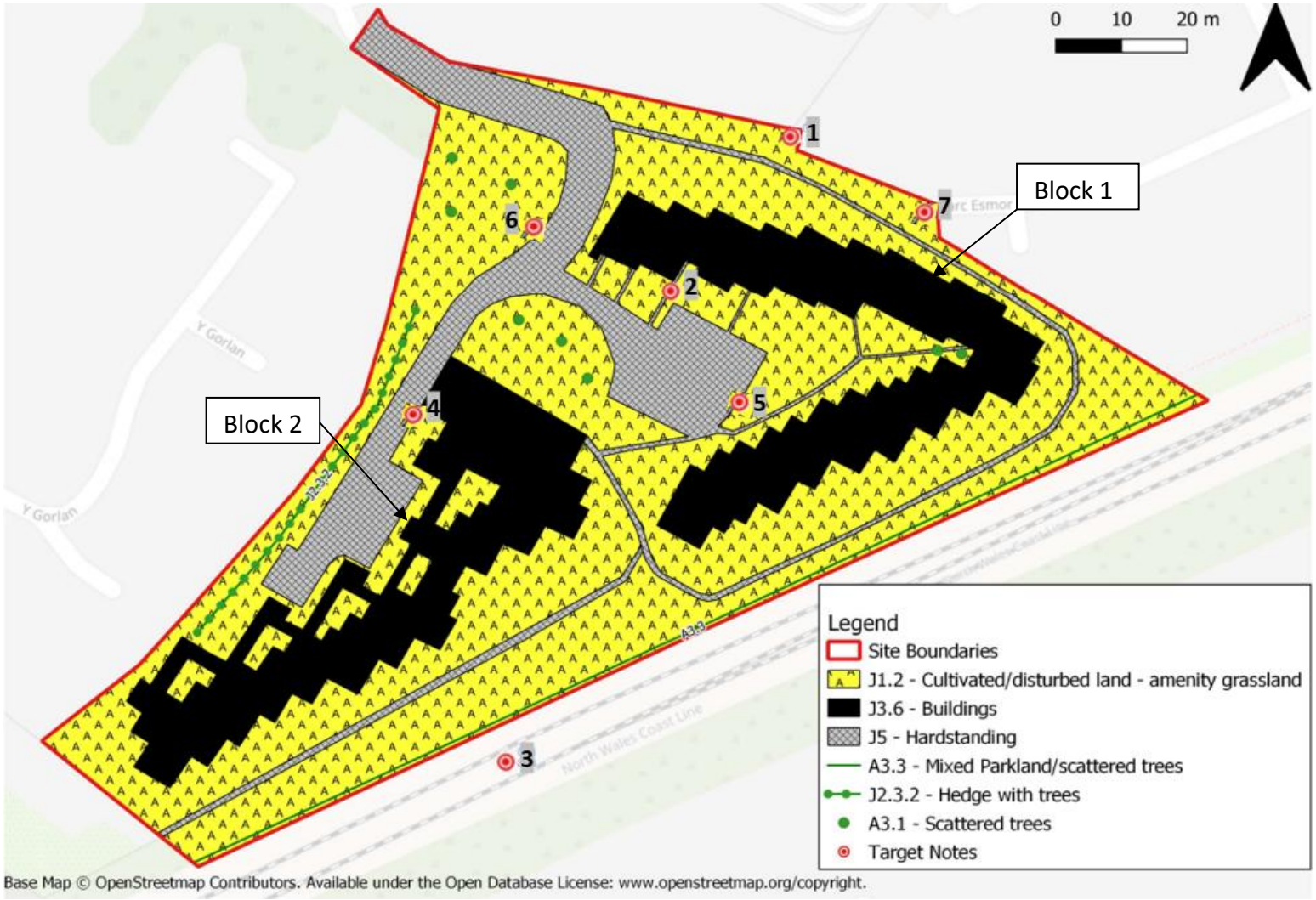
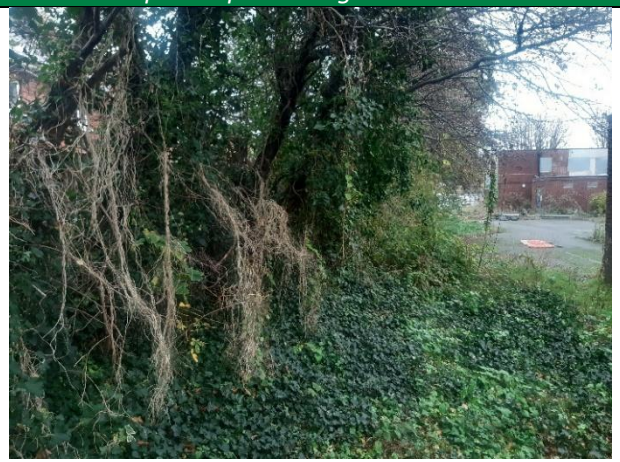


Figure 4.1: Phase 1 Habitat Survey Map of Maes Emlyn

Table 4.2: Habitat Descriptions

Habitat Description	Photo
Amenity Grassland	
The majority of the site surrounding the buildings was amenity grassland. Dominant species were perennial rye grass, Yorkshire fog, creeping buttercup, dandelion and common nettle. Other species present included ragwort, carrot, ribwort plantain, broad-leaved plantain, bindweed, milk thistle, hogweed, petty spurge, self heal, cat's ear, black nightshade, white stonecrop and sorrel. The sward height was higher than on the previous survey. There was ornamental planting around some of the buildings with species including buddleia, stinking iris, elephant ears, oleander and aquilegia.	 
Species-poor Hedgerow with Trees	
There was a strip of native-species hedgerow with trees along the western border. This was largely hawthorn with several alder trees. The ground flora included ivy, bramble, common nettle, white clover, harebell, honesty, chicory, shepherds purse and rosebay willow herb. There was also a low, loose 'hedge' of bramble growing through the fence with white clover, harebell, honesty, chicory and shepherds purse.	 

Mixed parkland & scattered trees	
Mixed parkland habitat was present along the southern border of the site, adjacent to the railway line. Tree species included sycamore, cherry, ash and horse-chestnut. There were scattered native and non-native broadleaf trees around the central carpark, the northeast border and the northwest border. These included sycamore, hawthorn, cherry and horse chestnut species.	 
Hardstanding	
The road leading into the site to the central carpark and to the western border, constituted the main areas of hardstanding. In addition, there was a pathway around the perimeter of the site and individual pathways leading to some of the flats. This habitat was partially colonised by mosses and white stonecrop.	
Buildings	
There were two buildings comprising 57 flats, divided into two blocks. These were largely uniform in construction and are discussed further in Section 4.10.	See Section 4.10.

Table 4.3: Target Note Descriptions

Target Note	Description	
1	A single stand of cotoneaster, which is an invasive non-native species, was found growing in the wall that constitutes the northern border of the site. No other stands were noted along the wall.	
2	The invasive non-native species Montbretia was seen growing within the centre of the site. It appeared to be a single stand; however, due to the time of year it is possible that the full extent of this species was not visible.	
3	There was a railway line immediately beyond the southern border of the site. The grass verge following the railway was south-facing and lined with scrub, which provided good habitat for a number of species including reptiles and amphibians. The site was accessible from the railway through gaps in the security fence.	
4	A pile of rubble and broken tarmac was present within hardstanding to the west of the site, which could provide basking habitat for reptiles and shelter for other fauna.	
5	There was a pile of disused furniture in the former carparking area, which could provide shelter for small mammals and other fauna.	
6	There were 4 disused radiators located on the edge of the road to the north-west.	

7	There was a stone wall at the northern and eastern site boundaries. It appeared to be well-sealed with no visible crevices for birds and other fauna to use.	

4.4 Flora

4.4.1 Floral diversity of the site was low, with the majority of the site being hardstanding and amenity grassland with ornamental planting. The hedgerow was species-poor and the grassland had low species diversity.

4.4.2 None of the species recorded during the survey are protected by the Wildlife and Countryside Act 1981 (as amended) or listed under Section 7 of the Environment (Wales) Act 2016. No other nationally or locally rare species were recorded.

4.4.3 Appendix C contains a list of plant species recorded during the survey.

4.5 Invasive Non-Native Species

4.5.1 There were 2 invasive non-native species identified onsite during the survey and no additional invasive non-native species were recorded since the aforementioned previous survey in 2023. Montbretia was observed in a single stand, located amongst ornamental planting adjacent to the northern block of flats. Wall cotoneaster was growing on the wall that formed the northern site boundary. Montbretia and wall cotoneaster are listed as invasive non-native species under Schedule 9 of the UK Wildlife & Countryside Act and are therefore illegal to plant or cause to spread in the wild. Buddleia was also present at the western site boundary and is considered to be an invasive species, however it is not listed under Schedule 9 as it is considered widely naturalised in the UK.

4.6 Fauna

4.6.1 No protected or notable species or signs of the presence of protected or notable species were seen within the survey area during the survey.

4.6.2 The survey results for protected species, including records within a 1km radius of the site, are described in Table 4.4 below.

Table 4.4: Results of Protected and Notable Species Assessment

Species	Suitability of Habitat	Desk Study Records (within 1km of the site)
Amphibians – including great crested newts *Triturus cristatus* (GCN)	No signs of amphibians were found during the survey. The site had no standing water, and so there was no breeding habitat for amphibians within the survey area. The grassland provided a small area of cover and connectivity for foraging amphibians between the site and the railway line to the south. The hedgerow and treeline at the western site boundary could also provide foraging, shelter and commuting habitat. Habitat piles present in the form of a rubble pile, disused furniture and radiators could provide places of rest for amphibians including great crested newts that may use the site (see Table 4.3 target notes).	There were no GCN records within 1km of the site. There was a record of a common and smooth newt 796m to the southeast.
Badger *Meles meles*	No evidence of badgers was seen. There was no habitat onsite considered suitable for sett building. As no evidence was seen, including trails, it is not thought likely that a sett is present. The site could be visited by commuting or foraging badgers from the nearby areas.	There was a record of a badger sett 414m to the northeast of the site.
Bats	The buildings and their potential for use by roosting bats is discussed further in Section 4.8.	There were no records of bats within 1 km of the site in the last 20 years.

Birds	The suitability of the habitats for nesting birds is discussed in Section 4.9. The buildings and their potential for nesting birds are discussed in section 4.10.	There were 696 records of 176 species of birds within a 1km radius of the site; the closest was a mute swift recorded 90m southeast of the site. There were several Schedule 1 species recorded within the 1km grid square of the site, including (but not limited to) black tailed godwit, common scoter, hobby, peregrine, and red throated diver.
Hedgehogs	The site has some limited potential for hedgehogs and connectivity to other suitable hedgehog areas via the railway line.	There were hedgehog records 30m to the north and 70m to the south of the site.
Reptiles	No signs of reptiles were noted at the time of the survey. The site did not provide highly suitable habitat for reptiles as there were no areas of long grass or scrub. The area of amenity grassland on the site and the line of trees along the southern border were connected to the scrub alongside the railway (the metal security fence is passable to reptiles) which is suitable reptile habitat for foraging, commuting and shelter/hibernation. The pile of rubble and tarmac to the west of the site, could provide a small area of reptile basking habitat, so although the site did not provide highly suitable habitat for reptiles it is possible that they use the site.	There was a common lizard recorded 955m to the east of the site.
Water vole	No watercourses or ditches were present onsite so there was no suitable habitat for water voles.	There were no records of water vole.

4.7 Daytime Bat Walkover

4.7.1 There was limited commuting and foraging habitat for bats onsite in the form of the hedgerow and treelines bordering the site. The site was surrounded by residential areas with little habitat connectivity beyond the boundary. No potential roosting features (PRFs) were identified in any trees within the site. There was some connectivity to the wider landscape via the row of trees and railway line to the south, which could provide a habitat corridor for foraging and commuting bats. However, the habitats on the site itself had low suitability for bats.

4.8 Preliminary Roost Assessment (PRA)

4.8.1 The buildings were well sealed externally and had minimal features external that could be used by bats. There were small gaps behind the cladding and pebbledash at the corners of the blocks of flats, but the gaps were fully visible with a high-powered torch, and no signs of bats were observed. There were several entry points for bats into block 2 of the flats via boiler outlets vents. Internally, both blocks of flats were well-sealed with light and airy conditions, providing unsuitable conditions for roosting bats. There were no loft spaces within the buildings. The outbuildings were also well-sealed externally with no potential roosting features observed.

4.8.2 There were no bat droppings or evidence of bats observed within the buildings or onsite during the PRA. See section 4.10 below for further information on the construction of the buildings, potential roosting features (PRFs) and photographs.

4.9 Nesting Bird Survey

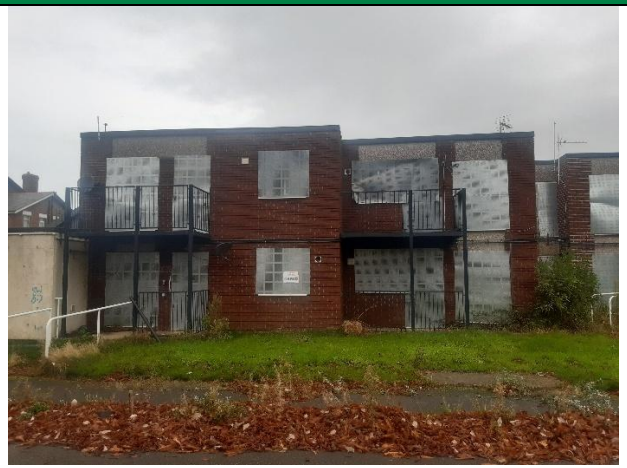
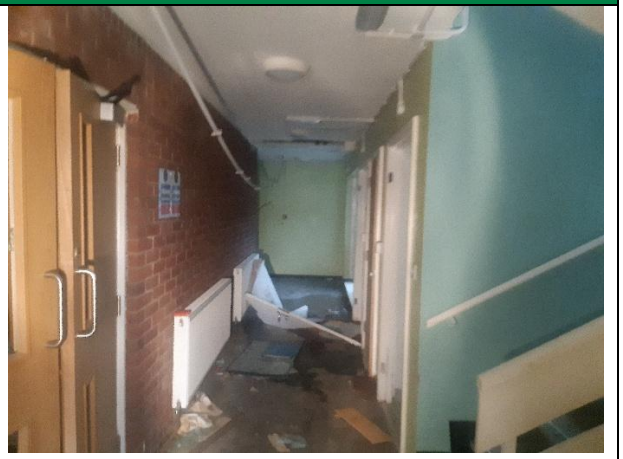
4.9.1 There was no evidence of nesting birds within the buildings or the habitats within the site during the survey. However, the survey was undertaken outside of the bird breeding season and it is possible that birds use the building, trees or hedges for nesting. It is possible that herring gulls could nest on the flat roofs of the buildings. There was internal access into block 2 for small bird species, via the boiler vents. Table 4.6 provides further information on the features observed in the buildings.

4.10 Structure Description and Potential Roosting & Nesting Features

4.10.1 There were 57 flats within the site boundary that were assessed for bat potential. The buildings were divided into two blocks with numbers 2-34 comprising the 1st block and buildings 35-59 comprising the second block; the blocks are labelled on Figure 4.1. Although it was not possible to gain entry to all of them internally, the internal areas were largely uniform and all were assessed externally. Descriptions and photographs of each building are shown in Table 4.5 below.

4.10.2 The potential roosting features (PRFs) and potential nesting features (PNFs) of the buildings are shown in Table 4.6.

Table 4.5: Building descriptions

Maes Emlyn- Block 1 and 2			
External Description	**External Photo**	**Internal Description**	**Internal Photo**
The flats were generally uniform in construction with brick walls and flat roofs. All of the roofs appeared to be of the same construction with composite cladding/flashing along the edges. In place of the windows and doors was a pre-cast concrete section or pebbledash. Some of the upper flats had a steel balcony. On several flats some of the walls were rendered over completely. All the windows and doors were covered over with metal security sheeting.	 	Flat 50, within block 2 of the flats, was inspected internally. The walls were plastered and well-sealed with double glazed windows. There was no attic or roof space within the buildings due to the flat roofs.	 

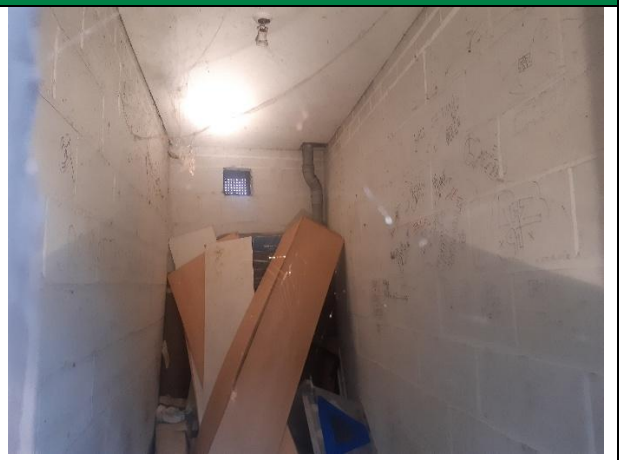
Maes Emlyn- Outbuildings			
External Description	**External Photo**	**Internal Description**	**Internal Photo**
There were brick-built sub stations and a shed at the rear of block 2. The sub-stations were approx. 2.5m high by 4m wide and 4m long, whilst the shed was the same height and length but only approximately 1.5m wide.		The plant rooms and sheds appeared to have block walls internally with false ceilings, and were used for storage. There was no attic or roof space within the outbuildings.	

Table 4.6: Maes Emlyn PRFs and PNFs

Description	Photograph
Shallow gaps between cladding and pebbledash on the flat roofs of blocks 1 and 2.	
Open door behind a small gap in the security metal sheeting at block 2.	
Vent holes in brickwork at the southern elevation of block 2, which could provide access for bats and birds into the building.	

5.0 Discussion

5.1 Proposed Works

5.1.1 The proposed works are for demolition of the existing buildings, and construction of 23 units of housing including flats, bungalows and houses. The plans for the proposed works and the landscaping of the site are not yet finalised. Plans at the time of report writing were provided to Enfys Ecology by Wales and West Housing on November 19th 2025, and are shown in Figure 5.1 below.

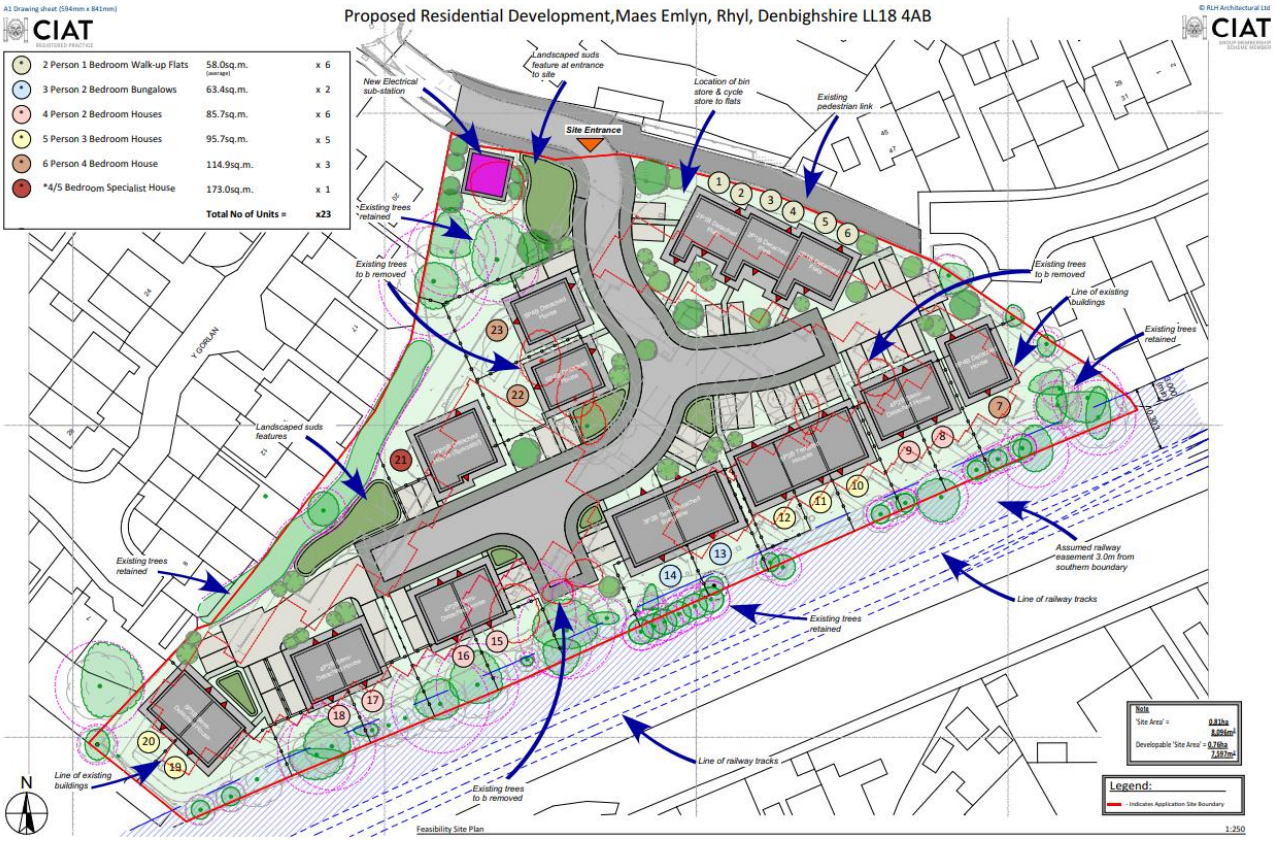


Figure 5.1: Current Plan of the Proposed Works
Base image © RLH Architectural Ltd 2025

5.2 Impacts on Designated and Notable Sites

5.2.1 The proposed works will not have an impact on any non-statutory designated nature conservation sites as there are none within 1km of the site.

5.3 Habitats

5.3.1 Table 5.1 provides information with respect to the habitats which were recorded on site and whether these habitats are listed as a 'habitat of principal importance' under Environment

(Wales) Act 2016 or listed as a local Biodiversity Action Plan habitat, or other local conservation priority habitats. Consideration of the potential impacts of the proposed project on the habitats will be made in the Mitigation and Conservation Plan once final plans are known and mitigation, compensation and enhancement measures will be recommended.

Table 5.1: Overall Site Assessment Rating

Habitat Recorded	Habitat Value	Brief Discussion
Amenity Grassland	-	This habitat is not considered to be of high quality on the site, being species-poor and dominated by perennial rye grass. It provides some value in the form of green infrastructure and habitat for fauna species.
Scattered trees	-	The trees which were a mixture of native and non-native, provide green infrastructure and habitat for nesting birds, although not HPI.
Species-poor Hedgerow	HPI	The native hedgerow onsite was a Habitat of Principal Importance under Environment (Wales) Act 2016 and it does provide green infrastructure and a linear feature for commuting bats and other fauna.
Key: HPI – Habitat of Principal Importance under Environment (Wales) Act 2016		

5.4 Flora

5.4.1 None of the plant species recorded during the survey are protected by the Wildlife and Countryside Act 1981 (as amended) or listed on Section 7 of the Environment (Wales) Act 2016. In addition, no nationally or locally rare species were recorded.

5.4.2 Montbretia and wall cotoneaster species were identified onsite and are listed as invasive non-native species (INNS) under Schedule 9 of the UK Wildlife & Countryside Act. Measures to remove the INNS onsite will be provided within the Mitigation and Conservation Plan which will also include general biosecurity measures.

5.5 Fauna

5.5.1 A Mitigation and Conservation Plan will be produced once the plans for the site are finalised and will detail compensation for habitat loss, Reasonable Avoidance Measures (RAMS) for fauna that may be present during the works, and biodiversity enhancement recommendations for the scheme.

5.5.2 ***Amphibians*** **-** Amphibians are considered unlikely to be breeding within the site as no suitable breeding habitat was recorded and there were no waterbodies in close proximity to the site. There were no records of GCN within 1km. It is likely that common amphibians will use the site for foraging on occasion and there are habitat piles present that could provide places of shelter for amphibians. It is recommended that habitat piles are disassembled by hand prior to the works and RAMS are followed to minimise any risks to amphibians.

5.5.3 ***Badger*** **-**It is possible that badgers use the site for foraging on occasion and general RAMS should be followed during the works.

5.5.4 ***Birds-*** The Mitigation and Conservation Plan will detail compensation for the nesting bird habitat that will be lost within the buildings and vegetation. A pre-works check for nesting birds within the buildings and trees is required if works take place within nesting bird season (March – September).

5.5.5 ***Hedgehog*** **-**General RAMS will be provided to minimise disturbance to hedgehogs and maintain hedgehog access across the development.

5.5.6 ***Reptiles*** **-** The habitats within the site have limited suitability for reptiles with the short grassland, buildings and hardstanding areas being sub-optimal for them. The rubble and habitat piles present could provide small areas of habitat for reptile shelter and basking. The railway and scrub adjacent to the southern border provide more suitable reptile habitat and reptiles may well visit the site in small numbers. It is recommended that habitat piles are disassembled by hand prior to the works and RAMS are followed to minimise any risks to reptiles.

5.6 Daytime Bat Walkover

5.6.1 Overall the site itself had low potential for bat flight paths or foraging habitat as per the Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) (Collins, 2023). This is defined as habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated i.e. not very well connected to the surrounding landscape by other habitat.

5.7 Preliminary Roost Assessment and Overall Bat Potential

5.7.1 There were minimal external potential roosting features (PRFs) for crevice-dwelling bats, in the form of shallow gaps between cladding and pebbledash identified at block 1 and block 2 of the flats, as shown in Table 4.6. As the external PRFs could be easily inspected with a torch (and showed no evidence of bat usage), it is not considered necessary to carry out emergence surveys prior to the works, and instead pre-works checks will be carried out to ensure bats are not present within the buildings onsite during the works.

5.7.2 There was potential access for bats into block 2 of the flats via boiler vents and gaps behind metal sheeting. Internally the building was well-sealed with no available roosting features for bats. The interior of block 2 was inspected and conditions were light and draughty. It is deemed unlikely that bats would use the internal spaces of the building for roosting. There was no access identified for bats into block 1 or the outbuildings, and these were well sealed externally.

5.7.3 The railway and treeline along the southern border provided suitable bat foraging and commuting habitat, although there were no records of bats within 1km of the site. Due to suitability of the adjacent habitat it should be assumed that bats will visit or commute over

the site. Mitigation for foraging bats including recommendations for the site lighting design will be considered in the Mitigation and Conservation Plan.

5.7.4 Due to the buildings onsite providing bats with minimal potential roosting features (PRFs), they had negligible to low potential to support roosting bats as per the Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) (Collins, 2023). This is defined as a structure where there were no obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.

5.7.5 With the DBW and PRA findings considered, overall the site had a low potential to support bats as per the Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition) (Collins, 2023).

6.0 Further Works

6.1 Further Works

6.1.1 Prior to the demolition of the buildings, a pre-works check for bats by an ecologist will be required.

6.1.2 Any works within nesting bird season (March to September inclusive) will require nesting bird checks of the buildings and vegetation onsite, before works can commence.

6.1.3 A Mitigation and Conservation Plan will be produced once the plans for the site are finalised containing further details of mitigation, compensation and enhancement measures for the site.

6.2 Green Infrastructure Statement

6.2.1 Planning Policy Wales (PPW12, paragraph 6.2.12) states that a green infrastructure statement should be submitted with all planning applications. This statement should be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal. This will need be provided to support a planning application, and should illustrate how the step-wise approach has been adopted in relation to the project proposals.

6.2.2 Further information regarding green infrastructure requirements is given in Appendix A.

7.0 References

CIEEM. (2017a). *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2017b). *Guidelines for Ecological Report Writing*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.

CIEEM. (2019). 'Advice Note on the Lifespan of Ecological Reports and Surveys'. Chartered Institute of Ecology and Environmental Management, Winchester.

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

APPENDIX A Legislation and Planning Policy

Amphibians

The most common species are protected from sale under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). These are as follows: common frog, *Rana temporaria*; common toad, *Bufo bufo*; palmate newt, *Lissotriton helveticus*; and, smooth / common newt, *Lissotriton vulgaris.* This legislation protects them from sale, or advertising / offering them for sale.

The UK's two rarest amphibians are protected under the Conservation of Habitats and Species Regulations 2017 (known as 'the Habitats Regulations'). This is because they have declined throughout Europe in recent decades. The Habitats Regulations lists the following amphibians as European Protected Species (EPS):

- Great crested (or Warty) newt, *Triturus cristatus*
- Natterjack toad, *Epidalea calamita*

Under the Habitats Regulations, it is an offence if you:

- Deliberately capture, injure or kill any wild animal of an EPS;
- Deliberately disturb wild animals of any such species;
- Deliberately take or destroy the eggs of such an animal; or,
- Damage or destroy a breeding site or resting place of such an animal.

Disturbance is defined as that which is likely:

- To impair their ability: to survive, to breed or reproduce, or to rear or nurture their young, or, in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

There are other offences relating to the possession, transport, selling or exchange of a protected species.

Badgers

The Protection of Badgers Act 1992 fully protects badgers and their setts. Offences include:

- killing, injuring and taking (or attempting these);
- possession of a dead badger (or derivative);
- cruelly ill-treating a badger;
- damaging a badger sett or any part of it;
- destroying a badger sett;
- obstructing access to / entrance of a badger sett;
- causing a dog to enter a badger sett;
- disturbing a badger whilst occupying a sett.

Badgers are also listed on Schedule 6 of the Wildlife and Countryside Act 1981 (as amended), which prohibits certain methods of killing and capture.

Bats

All species of bat, their breeding sites and their resting places in England and Wales are protected through a 'dual' system of protection, under the England and Wales Habitats Regulations and Wildlife and Countryside Act (1981) as amended. Because two regimes give legal protection to bats, the implications of both regimes must be fully understood.

Regulation (Reg.) 43 of the England and Wales Habitats Regulations makes it an offence to:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats (which includes any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate or to affect significantly the local distribution or abundance of the species to which they belong);
- damage or destroy a breeding site or resting place of a bat; or
- possess, control, transport, sell or exchange, or offer for sale or exchange, any live or dead bat or part of a bat or anything derived from a bat or any part of a bat

Under Section 9 of the W&CA (s.9(4)(b), 9(4)(c) and 9(5) only), it is an offence (in relation to bats) to:

- intentionally or recklessly disturb a bat while it is occupying a structure or place of shelter or protection;
- intentionally or recklessly obstruct access to any structure or place used by a bat for shelter or protection; or
- sell, offer or expose for sale, or have in their possession or transports for the purpose of sale, any live or dead bat or any part of, or anything derived from a bat (or be responsible for adverts suggesting the intention to do this).

Under both laws Natural Resources Wales are empowered to issue licences to carry out work to bat roosts for reasons of overriding public interest. It is not illegal to tend to a disabled bat pending recovery.

Birds

Under the Wildlife and Countryside Act 1981 (as amended) and the Countryside and Rights of Way (CRoW) Act 2000, all wild birds, their nests and eggs are protected during the breeding season (typically March to August inclusive). This makes it an offence to:

- Intentionally kill, injury or take any wild bird.
- Take, damage or destroy the nest of a wild bird included in Schedule ZA1.
- Take, damage or destroy the nest of any wild bird while that nest is in use or being built.
- Take or destroy an egg of any wild bird.

Hedgehogs

Hedgehogs are listed under Section 7 of the Environment (Wales) Act 2016, therefore public bodies have a duty to conserve them in the exercise of their functions.

They are listed under Section 6 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence for them to be killed or taken by certain methods.

Reptiles

All British reptiles are protected from intentional killing, injuring and sale under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), including the four common species:

- Adder, *Vipera berus*
- Grass snake, *Natrix helvatica**
- Slow worm, *Anguis fragilis*
- Common lizard, *Zootoca vivipara*

* The native UK grass snake (as referred to as the barred grass snake) was originally listed under *Natrix natrix* in the W&CA 1981 (as amended); formerly considered to be a sub-species of *N. natrix* (*N. natrix helvatica*), the barred grass snake was recognised as a separate species in 2017 following genetic analysis of European *Natrix* populations.

This legislation aims to protect them from persecution and also from exploitation in the pet trade, and for which the following are offences:

- Intentional killing, injuring or taking.
- Intentionally or recklessly damaging / destroying a place of shelter / protection.
- Intentionally or recklessly disturbing an animal in its place of shelter / protection.
- Intentionally or recklessly obstructing access to its place of shelter / protection.
- Possession (live or dead, including derivatives), sale and offering for sale.

The UK's two rarest reptiles are afforded additional protection under the Conservation of Habitats and Species Regulations 2017 (known as 'the Habitats Regulations'). This is because they have declined throughout Europe in recent decades. The Habitats Regulations lists the following reptiles as European Protected Species (EPS):

- Sand lizard, *Lacerta agilis*
- Smooth snake, *Coronella austriaca*

Under the Habitats Regulations, it is an offence if you:

- Deliberately capture, injure or kill any wild animal of an EPS;
- Deliberately disturb wild animals of any such species;
- Deliberately take or destroy the eggs of such an animal; or,
- Damage or destroy a breeding site or resting place of such an animal.

Disturbance is defined as that which is likely:

- To impair their ability: to survive, to breed or reproduce, or to rear or nurture their young, or, in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

There are other offences relating to the possession, transport, selling or exchange of a protected species.

Protected Plants

The Wildlife and Countryside Act 1981 (as amended) makes it illegal to uproot any wild plant without the permission of the landowner. In addition, plants which are either rare or vulnerable to exploitation are listed on Schedule 8, for which it is an offence to:

- Intentionally pick, uproot or destroy.
- Sell, offer or expose for sale.

Invasive Non-Native Species

Invasive non-native species are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), for which the following are offences:

- Release into the wild, or to allow the escape of, any animal which is not ordinarily resident, or a regular visitor to, Great Britain in a wild state, or which is included in Part 1, Schedule 9.
- Plant in the wild, or otherwise cause to grow there, any plant included in Part 2, Schedule 9.

National Planning Policy

National Planning Policy in Wales is set out in Planning Policy Wales, Edition 12 , issued in February 2024. This document sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise national planning policy.

PPW Edition 12 Section 6.4 states that "*biodiversity underpins the structure and functioning of ecosystems*" and identifies that the "*planning system has a key role to play in helping to reverse the decline in biodiversity and increase the resilience of ecosystems, at various scales, by ensuring appropriate mechanisms are in place to both protect against loss and to secure enhancement*". The broad framework for implementing the Environment (Wales) Act 2016 Section 6 Duty, securing a net benefit for biodiversity and building resilience through the planning system includes addressing all of the following attributes: diversity, extent, condition, connectivity, and adaptability to change.

Green infrastructure (GI) is defined in Planning Policy for Wales (PPW) Edition 12 as "*the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places*". Green infrastructure can function at a range of different scales, from entire ecosystems to

street trees and is capable of providing several functions at the same time and as a result offers multiple benefits, for social, economic and cultural as well as environmental resilience.

Development proposals should take biodiversity and green infrastructure (GI) into consideration in order to avoid negative impacts on habitats and species, and seek ways to maintain and enhance biodiversity. Impacts on habitats and species should be treated in a step-wise manner (PPW 12, paragraph 6.4.15), by seeking to:

- **Avoid** damage to biodiversity in its widest sense by maintaining the largest possible area of existing habitat supporting biodiversity and functioning ecosystems, particularly Section 7 habitats and species where present, through careful development design and consideration of long-term maintenance and management and ensuring that retained habitats continue to be well connected to adjacent habitats to provide connectivity for key species.
- **Mitigate** or **restore** by identifying measures to address the specific negative effects by repairing damaged habitats and disturbed species. The measures should seek to restore in excess of like for like, accounting for disturbance and time lags for the recovery of habitat and species, and in every case, mitigation or restoration measures should seek to build ecosystem resilience within the site and where possible the wider area.
- As a last resort off-site **compensation** for unavoidable damage must be provided. This must be of significant magnitude to fully compensate for any loss.
- All development must **deliver a net benefit** for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed).

PPW12 also sets out the national policy requirements in relation to planning permissions where protected species, trees, hedgerows and woodlands and *irreplaceable natural resources* have the potential to be impacted.

APPENDIX B Desk Study

Desk Study Data included as separate Appendix.

APPENDIX C Plant Species List

This list is not exhaustive but refers to species observed during the site visit. Mosses (except indicators of bog habitat if present), lichens, algae and other lower plants and fungi were not identified. No protected or notably rare plant species were found.

English Name	Scientific Name
Alder	*Alnus glutinosa*
Ash	*Fraxinus excelsior*
Aquilegia	*Aquilegia vulgaris*
Bramble	*Rubus fruticosus*
Black nightshade	*Solanum nigrum*
Broadleaf plantain	*Plantago major*
Buddleia	*Buddleja davidii*
Bulbous buttercup	*Ranunculus bulbosus*
Cherry	*Prunus sp.*
Chicory	*Cichorium intybus*
Common daisy	*Bellis perennis*
Common hogweed	*Heracleum sphondylium*
Creeping buttercup	*Ranunculus repens*
Hawthorn	Crataegus monogyna
Hedge bindweed	*Calystegia sepium*
Honesty	*Lunaria annua*
Horsetail	*Equisetum arvense*
Ivy	*Hedera helix*
Meadowgrass	*Poa sp.*
Milk thistle	*Silybum marianum*
Montbretia	*Crocosmia × crocosmiiflora*
Nettle	*Urtica dioica*
Oleander	*Nerium oleander*
Perennial rye grass	*Lolium perenne*
Purple toadflax	*Linaria purpurea*
Ragwort	*Jacobaea vulgaris*
Ribwort plantain	*Plantago lanceolata*
Rosebay willow herb	*Chamaenerion angustifolium*
Selfheal	*Prunella vulgaris*
Shepherd's purse	*Capsella bursa-pastoris*
Spear thistle	*Cirsium vulgare*
Stinking iris	*Iris foetidissima*
Sycamore	*Acer pseudoplatanus*
Wall cotoneaster	*Cotoneaster horizontalis*
White clover	*Trifolium repens*
White stonecrop	*Sedum album*
Wild carrot	*Daucus carota*
Wych elm	*Ulmus glabra*
Yorkshire fog	*Holcus lanatus*