

COASTAL HOUSING GROUP

FORMER GWALIA BUILDING, KINGSWAY, SWANSEA

BUILDING INSPECTION (PROTECTED SPECIES) & BAT ACTIVITY SURVEY

November 2024



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Document Reference: E24126101 / Doc 01 – November 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for Review	06 November 2024		Dr. M Watts (Director)	M. WATTS
2	Appx. IV Plan updated	FINAL DRAFT	08 November 2024		Dr. M Watts (Director)	M. WATTS

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1.0 INTRODUCTION

- 1.1. Soltys Brewster Ecology (SBE) were commissioned by Coastal Housing Group to undertake an ecological appraisal of the existing buildings at 7 – 13 Kingsway, Swansea – former Gwalia Office Buildings. The building has been identified for mixed use redevelopment comprising of residential apartments and retail units (ground floor) – this will require partial demolition & refurbishment of the existing buildings. The former offices, which includes a basement car park is currently vacant and has been subject to an internal soft strip of fixtures/fittings along with removal of asbestos containing material (ACM). In order to inform the planning application for the demolition/redevelopment works, consideration of use of the building by protected species – e.g. nesting birds or roosting bats - is required as part of the submission along with biodiversity enhancement measures.
- 1.2. The development site comprises the existing Gwalia Office buildings and a separate stand alone structure (former garage building) to the north west of the plot. The buildings are over three storeys with a fourth storey to the south east corner, with a flat roof. A basement car park is present accessed via an open courtyard area from the north side. The building is set within a predominantly commercial area along Kingsway in Swansea, with offices and retail units present to all boundaries. There is limited green space in the immediate surrounding area comprising of ornamental/formal landscape planting along Kingsway to the south with two Sycamore *Acer pseudoplatanus* present to the west on a grass bank. Plans showing the existing site location and block plan are included in Appendix I.
- 1.3. The current report presents the findings of an ecological data search, daytime building inspection survey and bat emergence survey undertaken at the site in August 2024. This is a stepwise approach which follows industry best practice guidelines (e.g. CIEEM, 2017 & BCT, 2023). The current report describes the existing ecological conditions as well as identifying any potential ecological constraints/opportunities associated with the proposed demolition and redevelopment at the site. The report also includes advice on mitigation associated with the proposed works and opportunities to incorporate enhancements as part of the scheme.

2.0 METHODOLOGY

- 2.1. In order to establish the baseline ecological conditions on site, a combination of desk-based consultation, and daytime building inspection survey were undertaken in August 2024. The scope of survey work was based on best practice guidelines (BCT, 2023).

Desk study

- 2.2. The desk study primarily involved review of a report previously undertaken at the site in 2021 (Celtic Ecology, 2021) and consultation with the South East Wales Biodiversity Record Centre (SEWBRc) to identify any existing ecological records of bats or roof nesting birds in the surrounding area (2km radius for bats, 150m for birds). The SEWBRc study also involved a search for any Sites of Special Scientific Interest (SSSIs) or Special Areas of Conservation (SACs) within a 10km radius of the site which have been designated for bats. Given the extent of the proposed development and conditions at the site (i.e. demolition within the existing building footprint), a more extensive search for all statutory and non-statutory designated sites and other protected species was not considered of benefit for the ecological appraisal. A summary plan of the SEWBRc data provided is included in Appendix II.
- 2.3. The survey work undertaken in November 2021 (Celtic Ecology) was intended to inform an application for demolition of the building and comprised of a data search and day-time inspection.

Building Inspection Survey

- 2.4. The current site survey was undertaken on 19 August 2024 by a suitably experienced ecologist¹ and comprised of an external/internal check of the building to search for evidence of bats or nesting birds. The survey aimed to identify:
- if bats are, or have been, present within the building and, if so, which species are present;
 - the type of roost (e.g. maternity roost, day roost used by males or non-breeding females, feeding perch, night roost, mating roost, transitional roost, hibernaculum);
 - how bats use the buildings (e.g. location of roosting bats, exit and entrance points to the roost); and
 - the intensity of use (e.g. likely number of bats, time and duration of use).
- 2.4 The external survey at the site involved the use of binoculars to identify possible access/entry points into the building and aimed to identify any evidence of use by bats such as droppings, staining, prey remains

¹ Full Member of the Chartered Institute of Ecology & Environmental Management (MCIEEM) & NRW bat licence holder S094325/1
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etc. The external survey was undertaken from ground-level, with internal inspections of the basement car park and all floors accessible via stairwells. No roof void is present and soft strip/asbestos removal over the ground – 3rd floors are such that ceilings and blockwork walls are all exposed – i.e. no plaster or render remains.

2.5 Any evidence of use of the buildings or surrounding areas by other protected species, such as nesting birds, was also noted alongside a check for any invasive plant species.

2.6 During external/internal inspections, the surveyor searched for roost evidence (dead specimens, droppings, staining, scratch marks, noise, etc.) as described above and an assessment of the buildings potential to support nesting birds was also undertaken. The scope of the bat inspection survey, including timing, survey effort etc., was based on guidelines published by the Bat Conservation Trust (BCT, 2023). The potential of the building to support roosting bats was determined based on the following categories (BCT 2023):

- **Known or confirmed roost**
- **High** - 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. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
- **Moderate** – A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this list is made irrespective of species conservation status, which is established after the presence is confirmed).
- **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).
- **Negligible²** – 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.

² Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

- **None** – No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

Potential Flight-paths and Foraging Habitats

2.7 Combining the information gathered in the data search, aerial imagery (e.g. Google Earth™) and the site visit for the building inspection, the presence of habitat features within the landscape was also assessed using a similar categorisation system as that outlined above for structures and trees and based on guidelines published by the Bat Conservation Trust (Collins, 2023):

- **High** – Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
- **Moderate** – Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
- **Low** – 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. Suitable but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
- **Negligible** – No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
- **None** – No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).

Constraints

2.8. The building in the north west corner of the site does not form part of the former Gwalia offices and appears to be a separate business unit (currently vacant) – the metal roller door to the western side would suggest a garage or similar. No access to this part of the site was possible during the survey visit on 19 August although a subsequent visit was undertaken on 16 September (see Appendix III and 3.7 below). No other constraints were encountered during the survey and those identified were not considered significant for informing the day-time inspection and the interpretation of findings.

- 2.9. The dusk emergence survey was undertaken on 16 September, which is outside the optimal survey period (for identifying maternity roosts) but within the recognised survey window (BCT 2023). However, this was not considered a significant constraint as the day-time inspection and consideration of flight/feeding corridors had identified the building as of Negligible/Low bat potential based on the occasional or irregular use by individual or small numbers of roosting bats.

Bat Emergence Survey

- 2.10. The dusk emergence survey was undertaken on 16 September 2023 by a team of four suitably experienced ecologists including an NRW bat licence holder.³ The bat activity survey aimed to identify:
- if bats are present within the surveyed parts of the building and, if so, which species are present;
 - the type of roost (e.g., maternity roost, day roost used by males or non-breeding females, feeding perch);
 - how bats use the building and curtilage (e.g., location of roosting bats, flight paths and flight behaviour, exit and entrance points to the roost); and
 - the intensity of use (e.g., likely number of bats, time and duration of use).
- 2.11. The dusk survey commenced 5 – 10 minutes before sunset at 19.20h and extended for 90 minutes after sunset to 21.00h. Surveys were conducted using broad-band bat detectors (Peersonic, EMT-2 & Pettersen D240x). Bat calls were either identified in the field or using computer-based sonogram analysis software (e.g., Wavesurfer or Analook Insight). Surveyors (2) were positioned on the ground at the north west corner of the building and on the roof (2) to allow direct views of the roof-top structure on the garage building and the 4th storey element of the offices where desk study records (see 3.2) had identified individual records of roosting bats. To supplement the surveyor observations, Night Fox Whisker night vision camera was positioned to view part of the four storey structure – the camera was set up to record over the duration of the survey (i.e. from 19.20h – 21.00h). The features visible from surveyor locations are illustrated in Plates 1 - 3 with a still image taken from the Night Fox at 20.20h at Plate 4.
- 2.12. Weather conditions were not considered a constraint during the survey with air temperatures 18°C at the start (19.20h) and 16°C at the end of the survey, no rain and calm conditions (Beaufort scale Light Air – Force 1). Street and car park lighting is present immediately north of the building along Northampton Lane.

³ NRW Licence: S094325/1
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Plate 1 Surveyor View Of North West Corner (Garage Building)



Plate 2 Surveyor View Of Roof-Top Structure To Garage Building



Plate 3 Surveyor View of West Elevation of Four Storey structure



Plate 4 Night Fox Image of Part of Western Elevation



3.0 RESULTS

Desk Study

- 3.1 The site is not covered by any form of nature conservation designation, and neither is it located in close proximity to any such site so as to be of ecological relevance. The building is situated within a residential/commercial area in the centre of Swansea city. The closest greenspace nearby is Rosehill Quarry nature reserve, and the site is located approx. 750m west of the application site. One statutory site designated for bats was identified within the 10km search radius - Limestone Coast of South West Wales Special Area of Conservation (SAC). This site comprises a series of coastal habitats and caves along the coast between Swansea and Pembrokeshire – the closest part of the SAC to the application site is at Pwll Du Head, approximately 9.4km to the south west. The sea caves support roosts of Greater Horseshoe bats *Rhinolophus ferrumequinem* – although were not considered of relevant to the current application based on the physical separation and known roosting/foraging requirements of this species.
- 3.2 The SEWBReC data search identified 90 records of bats and 53 records of birds within the search area. Three records of bats (dated June or July 2014) were specifically associated with the site itself: a soprano pipistrelle (*Pipistrellus pygmaeus*), a brown-long eared bat (*Plecotus auritus*) and a common pipistrelle (*Pipistrellus pipistrellus*). These records were also identified as part of the Celtic Ecology report of 2021 but were referred to as being associated with the ‘adjacent’ building immediately east. The 2021 survey was limited to the former Gwalia offices although the ‘adjacent’ building is physically connected and forms part of the overall building footprint – for the current application, the 2014 records relate to the proposed. No subsequent records of bats were identified from the desk study records and the 2021 survey found no evidence associated with the Gwalia offices – the 2021 report identified the building as of Negligible bat roost potential.
- 3.3 The closest bat records which were not directly located at the site were approximately 420m north of the site, associated with separate buildings in a residential area adjacent to a strip of trees. No other bat species were identified within the 500m radius of the site although a cluster of records were associated with Rosehill Quarry nature reserve, located approximately 750m to the west - a total of 16 of the 90 bat records provided related to this site with three species confirmed as present – Pipistrelle *spp*, Myotis *spp*. and brown-long eared bat (*Plecotus auritus*). Scattered records of these species were also identified throughout the search area (see plan in Appendix II).
- 3.4 No roof nesting birds were recorded directly on the site although a total of 12 species of bird were recorded within the buffer radius, with 8 of these species being recorded very close to the site (93m west).

- 3.5 The species recorded from the data search which were considered of relevance to the application site (comprising the existing building) include Swift (*Apus apus*), Blue Tit (*Cyanistes caeruleus*), Jackdaw (*Coloeus monedula*), House sparrow (*Passer domesticus*), Starling (*Sturnus vulgaris*), Pied wagtail (*Motacilla alba*) and Wren (*Troglodytes troglodytes*). Records of other species, such as a variety of gulls were also considered of relevance based on the flat-roof construction and location of the building in the city centre with associated rubbish/debris from discarded take away food etc. Records of and Peregrine Falcon (*Falco peregrinus*), were not considered of relevance based on known habitat/nesting requirements.

Walkover and Building Inspection Survey

- 3.6 A summary of the site features and building inspection survey findings are provided in the following sections with further description in the target notes and supporting photographs included in Appendix III. The Gwalia building is located on the Kingsway, Swansea, a busy commercial street in the city centre with buildings and hard standing the dominant land use. With the exception of some ornamental landscape planting to the building frontage (southern elevation) and 2no. Sycamore on a low earth bank to the west, there is no green space or connectivity to other green spaces in the immediate (within 100m) local area. Street lighting is also present along The Kingsway with street and car park lighting to the north of the building along Northampton Lane.
- 3.7 The former Gwalia Building is a three storey flat-roofed building of brick or block construction with rendered finish and stone (quartz) cladding to ground floor. A fourth storey is present to the south east corner of the building with a separate business unit (Evan Rees Building) in the north west corner also forming part of the overall building footprint. All buildings are vacant and have been subject to an internal soft strip and removal of asbestos containing materials (ACM). The building is locked and all windows and doors are sound with the exception of 2no. windows on the 1st & 2nd floor on the southern side which have been boarded. Window boards are missing to the north west corner of the Evan Rees building with windows also missing from a roof-top structure of this part of the building – the open windows provide an obvious means of access for birds – particularly Feral Pigeon – or bats. As noted in section 2.8, no access into this part of the building was possible during the 19 August visit although an access route was identified (via the basement and external fire escape) to allow an internal check on 16 September.
- 3.8 The interior of the building includes a basement car park, which is accessed via a ramp on the northern side of the building – the ramp is secured by a metal roller door and no external or internal evidence of bats or birds was associated with the door. The access ramp to the car park is uncovered although mesh has been installed which would presumably limit/prevent access to the car park area by birds or bats – the entrance

to the car park is open so in the absence of the mesh, birds/bats would be able to access. The car park and basement includes a number of side rooms/storage areas and in one of these areas on the west side of the building, large piles of old bird droppings were present suggesting that birds were able to access in the past. No current evidence of birds or bats was associated with the basement area.

- 3.9 The ground – second floor interior and the third floor to the south eastern side of the building are all light and open with ceilings/walls exposed following the soft strip and asbestos removal. Steel joists and concrete beams are visible at the ceiling and no obvious features suitable for use by bats were identified – no internal evidence of bats was noted.
- 3.10 A number of open windows were present (see notes in Appendix III) and this has allowed Feral Pigeon to access with several piles of droppings and scattered feathers noted on the first and second floor with 5 no. birds perching on the exposed ceiling joists on the third floor.
- 3.11 Evidence of use by Feral Pigeon was extensive throughout the Evan Rees Garage building with several live birds and large concentrations of droppings present to the ground floor, stairwell and first floor areas (see Appendix III). The open window on the north west side (first floor) of the building and window openings to the roof-top structure allow easy access for birds. Several Gulls were also noted on the roof of this part of the building prior to the emergence survey on 16 September.
- 3.12 The interior of the garage building has been similarly subject to a soft strip and only exposed steel joints and concrete panel ceilings remain – no features suitable for use by roosting bats were identified and the window openings are such that the first floor in particular is well lit (Plate 5).
- 3.13 The flat roof of the building was accessed via an open hatch (cover has been removed and placed on the roof) on the second floor. Numerous chicken bones were visible scattered across the roof suggesting at least irregular use by gulls or corvids – the flat roof with surrounding parapet wall could also be used by nesting gulls during the breeding season. The fascia and soffit of the third floor structure on the roof were generally sound (as noted during the 2021 survey report) and no obvious bat features were identified although this part of the building is where individual bats were recorded as roosting (records from 2014 as noted in section 3.2).
- 3.14 A brick built plant or storage room is present to the roof of the Evan Rees building in the north west of the plot – no direct access into this part of the building was possible (ladder present on the first floor was not considered safe to access although window openings were noted which could provide access for birds or bats – evidence of use by birds was prevalent to first and ground floor rooms (see 3.11 & Appendix III)).

Plate 5 First Floor of Garage Building with evidence of use by Feral Pigeon.

3.15 Overall, the building was considered of Negligible/Low potential for roosting bats based on a combination of the relative lack of features, no evidence of current use and the location of the building within an existing commercial area of the City Centre with very limited habitat connectivity. However, records of bats have previously been identified in the immediate area. The likelihood of regular use by even individual or small numbers of bats was considered to be low but could not be precluded based on the day-time inspection.

Potential Flight-paths and Foraging Habitats

3.16 The application site offers very limited foraging habitat for bats, with buildings and hard standing the dominant features. The two Sycamore trees and grassland on the bank to the west of the building are likely to provide some foraging resource in the immediate locality although these trees are isolated features in an area dominated by buildings and hard standing. Street trees and some trees/shrubs are present along Mansel Street and associated rear gardens, approximately 75m north although a car park separates these features from the Gwalia Building. The closest contiguous/connected area of tree and shrub cover is located at Heathfield, approximately 250m to the north. The limited connectivity associated with the building and immediately surroundings area (within 100m) was considered of Low quality as foraging habitat or flight corridors.

Bat Emergence Survey

- 3.17 No bats were seen to emerge from any of the survey positions and levels of bat activity were generally low over the survey period, particularly for the roof area with only 2 observations of bat activity made by the surveyors. A single pass by Common Pipistrelle was noted by the surveyor on the east side of the roof at 20.18h (approx. 50 minutes after sunset) with the surveyor on the west side of the roof also observing 2 bats moving north to the north east of the building at 20.10h – no echo-location calls were heard for these two bats due to the distance (bats were seen, not heard).
- 3.18 The western side of the four storey structure was covered in netting – presumably as a deterrent to nesting birds and it was considered that this would limit/prevent any access to the building at this location. No obvious bat roost features were identified here (e.g. see Plates 3 & 4) although desk study records (from 2014) identified records of individual bats in this area. Review of the Night Fox camera footage confirmed no observations of emerging bats over the course of the survey.
- 3.19 Regular foraging by up to two individual Common Pipistrelle was observed by the surveyors to the north west corner of the building, with bats foraging around and below the canopies of the Sycamore trees located to the west of the building. The first bat was noted at 19.50 hours with regular foraging by up to two individuals until 20.20h. Thereafter, foraging was more sporadic with the last recorded observation at 20.56h. Neither of the bats was observed investigating/entering the building via the open window to the north west.

4.0 LEGISLATION, POLICIES AND PLANS

- 4.1 The following legislation relating to bats and nesting birds is considered of relevance to the area surveyed and to the proposed refurbishment/extension works at the site.

Legislation Pertaining to the Protection of Bats

- 4.2 All species of bats in Britain are afforded legal protection under the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2017). This means it is an offence (subject to certain specific exceptions) to deliberately capture or kill/injure a bat, to damage or destroy a place used for shelter or protection (e.g. roosts) or to deliberately disturb a bat in such a place.

4.3 Case Law has placed an onus on local planning authorities to satisfy ‘three tests’ under the Conservation of Habitats and Species Regulations when determining applications that could affect European Protected Species. Essentially, these three tests are: i) that there is no satisfactory alternative; ii) that the proposed development is in the over-riding public interest (including those of a social or economic nature) and iii) the proposed development would not adversely affect the Favourable Conservation Status (FCS) of the species locally. Even without the requirement for planning consent in this instance a licence will be required to undertake the works. To obtain a licence from Natural Resources Wales (NRW) the third test will need to be met which means appropriate measures will need to be in place to demonstrate how the works can be achieved without adversely affecting the FCS of the species present.

4.4 Bats are also afforded protection within Wales under the Countryside and Rights of Way Act (2000) and Environment (Wales) Act 2016.

Legislation Pertaining to Birds

4.5 Under the Wildlife & Countryside Act 1981 (as amended) all wild birds are protected against killing or injury and their nests against damage or destruction whilst they are being built or contain eggs/dependent young.

Planning Policy Wales (2024)

4.6 This document set out the land use planning policies of the Welsh Government with Chapter 6 dealing with Distinctive and Natural Places which covers Biodiversity and Ecological Networks. The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN’s), with TAN 5 addressing Nature Conservation & Planning.

4.7 TAN 5 identifies a number of key principles, which the town and country planning system in Wales should consider. Those relevant are detailed below:

- *Work to achieve nature conservation objectives through a partnership between local planning authorities, Natural Resources Wales (NRW), voluntary organisations, developers, landowners and other key stakeholders;*
- *Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time;*
- *Ensure that the UK’s international obligations for site, species and habitat protection are fully met in all planning decisions;*
- *Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;*

- *Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;*
- *Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;*
- *The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.*

Updates to PPW Chapter 6: Distinctive and Natural Places (October 2023)

4.8 An updated version of PPW: Chapter 6 was published with immediate effect on 11th October 2023 in a published letter to Local Authorities from Julie James AS/MS – Minister for Climate Change⁴. These changes have now been incorporated as part of the latest edition (February 2024) of PPW. The new guidance provides an update on Net Benefit for Biodiversity and the Step-wise Approach, with extracts considered of relevance to the development site provided below:

Maintaining and Enhancing Biodiversity

- 4.9 Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.
- 4.10 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). Even if the biodiversity value has been maintained, there must still be a pro-active process to look for and secure enhancement through the design and implementation of the development.

⁴ Published letter from Julie James AS/MS (Minister for Climate Change) to Local Authorities – Heads of Planning. Reference: MA/JJ/2512/23. Dated 11th October 2023.

5.0 CONCLUSIONS AND RECOMMENDATIONS

5.1 The current development proposal requires partial demolition and refurbishment of the existing building. Based on the requirement for development to provide a net benefit for biodiversity, mitigation and enhancement measures will be required, with the latter provided by means of a green roof and atrium green walls on the refurbished building (see plan in Appendix IV) and provision of nest boxes for House Sparrow to the western elevation.

Bats

5.2 No evidence of use by roosting bats was identified over the course of the building inspection and emergence surveys and overall the building was considered of Negligible roost potential as described in Section 2.7. There are features present on the building that would allow easy access for individual or small numbers of bats although the emergence surveys only identified low levels of bat activity, none of which was associated with the building. The location of the building is such that the surrounding area was considered of Low quality for foraging/dispersing bats and is likely to support only irregular or occasional use by small numbers of bats – this is reflected in the findings of the emergence survey and the number and distribution of bat records from the desk study.

5.3 The surveys have established likely absence of bats from the building although no amount of survey could rule out the possibility that an individual or small number of bats could be present at any given time and the following reasonable avoidance measures would be appropriate to the proposed demolition works:

- Toolbox talk to contractors (by an ecologist) prior to any demolition or roof works to advise on the low risk of bats being present. Works to remove remaining fascia boards or window boards (e.g. to Grage building and Kingsway frontage) on the building to be undertaken using hand-tools (e.g. claw hammers, crowbar);
- If bats, or evidence of bats (e.g. droppings) are encountered during the works, all works will be stopped immediately and a licenced bat ecologist or Natural Resources Wales (NRW) contacted for advice on how to proceed. No disturbing works shall re-commence until a licence is in place;
- Where possible, demolition works to be undertaken in autumn/winter (Sept – March) to further reduce the risk that bats would be present and also to minimise the risk of encountering nesting birds.

Birds

- 5.4 Feral Pigeon were identified in several parts of the building with regular use likely for the Evan Rees garage building and the fourth storey element to the south east. Use of the extensive areas of flat roof by nesting gulls may also occur during the breeding season. On this basis, demolition work would ideally be undertaken in autumn/winter (Sept – March) to minimise the risk of encountering nesting birds. If the proposed works are to be undertaken during the breeding bird season (i.e. between March – August), a prior check for nesting birds will be required - if an active bird nest is found, no works can be undertaken until all chicks have fledged and the nest is no longer active. If Feral pigeon were encountered nesting, it may be possible to obtain a general licence to remove/destroy active nests – guidance on licensing, which has been subject to revisions in recent years can be found at the following link:
<https://naturalresources.wales/permits-and-permissions/species-licensing/bird-licensing/general-licences-2024/general-licence-002/?lang=en>

Other Considerations/Enhancements

- 5.5 There is no existing vegetation or other ecological feature associated with the site. The Sycamore trees and earth bank to the west of the site are outside the application boundary although care should be taken to avoid any accidental damage or storage of material that could affect the trees. The tree canopies extend towards the building and cutting back would be permissible assuming that landowner (assumed to be Swansea City Council) consent is provided and the works are undertaken outside the bird nesting season. Provision of 2no. House Sparrow nest boxes⁵ on the western elevation at tree canopy height (e.g. below parapet wall) would provide a local enhancement with the retained trees providing foraging/sheltering opportunities for the birds.
- 5.6 There is no requirement for new planting to mitigate for any loss (see above) and any new planting would constitute an enhancement to the existing site conditions. The development proposals are limited to refurbishment of the existing structure and on this basis, enhancement will be provided by means of a green roof on the building and planted green walls to the atrium within the building footprint – these measures are illustrated on the Strategic Landscape Plan in Appendix IV. The current survey identified use of the existing flat roof by Gulls and this would likely continue with the implementation of a green roof. Any required maintenance/management of the roof should therefore be programmed outside the nesting season (i.e. undertaken between August and March).

⁵ <https://www.nhbs.com/vivara-pro-woodstone-house-sparrow-nest-box>
Coastal Housing Group
Former Gwalia Building, Kingsway, Swansea
Building Inspection (Protected Species) & Bat Activity Survey
E24126101 / Doc 01

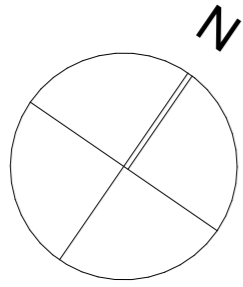
REFERENCES

Bat Conservation Trust (2023) *Bat Surveys for Professional Ecologists – Good Practice Guidelines*. Bat Conservation Trust, London. 4th Edition.

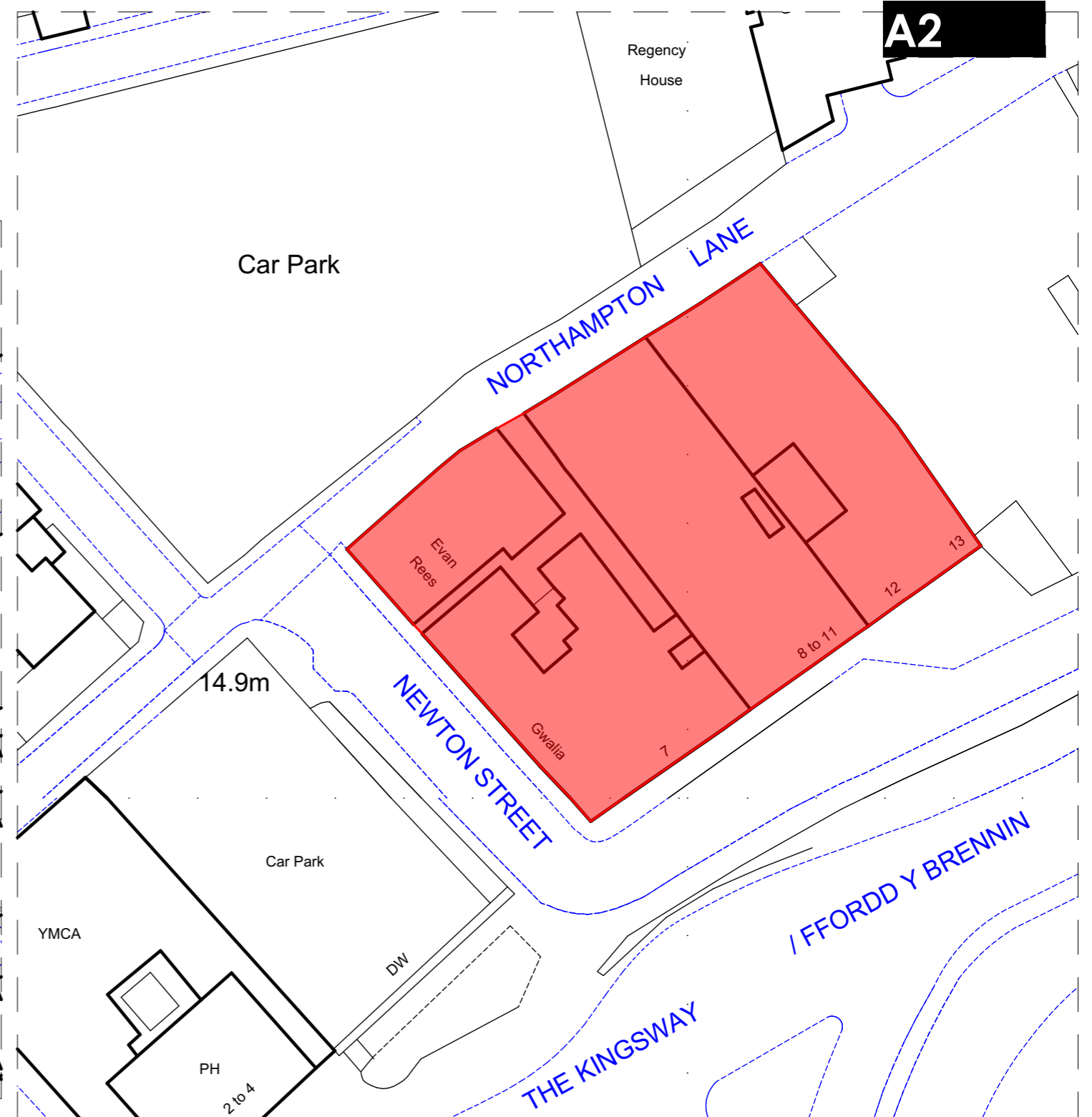
Celtic Ecology. 2021. *Building Inspection In Respect Of Bats: Ty Gwalia, 7 – 13 Kingsway, Swansea. December 2021*

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

APPENDIX I SITE LOCATION AND BLOCK PLAN



OS Promap 1:1250



Os Promap 1/500

A2

Pre App. Subm.

- NOTE:**
- All dimensions to be checked on site and not scaled from the drawing.
 - This document and its design content is copyright ©.
 - It shall be read in conjunction with all other associated project information including models, specifications, schedules and related consultants documents.
 - Immediately report any discrepancies, errors or omissions on this document to the Originator.
 - All dashed boundary locations obtained from OS data.
 - If in doubt ASK.



HGA

CLIENT
Matthew Price

JOB TITLE
Ty Menyn former Ty Gwalia Building for Coastal Housing

TITLE
Proposed Site Location & Block Plan

7-13 The Kingsway, Swansea SA1 5JN

DATE: 2024.10.22 DRAWN: MP CHECKED: HG

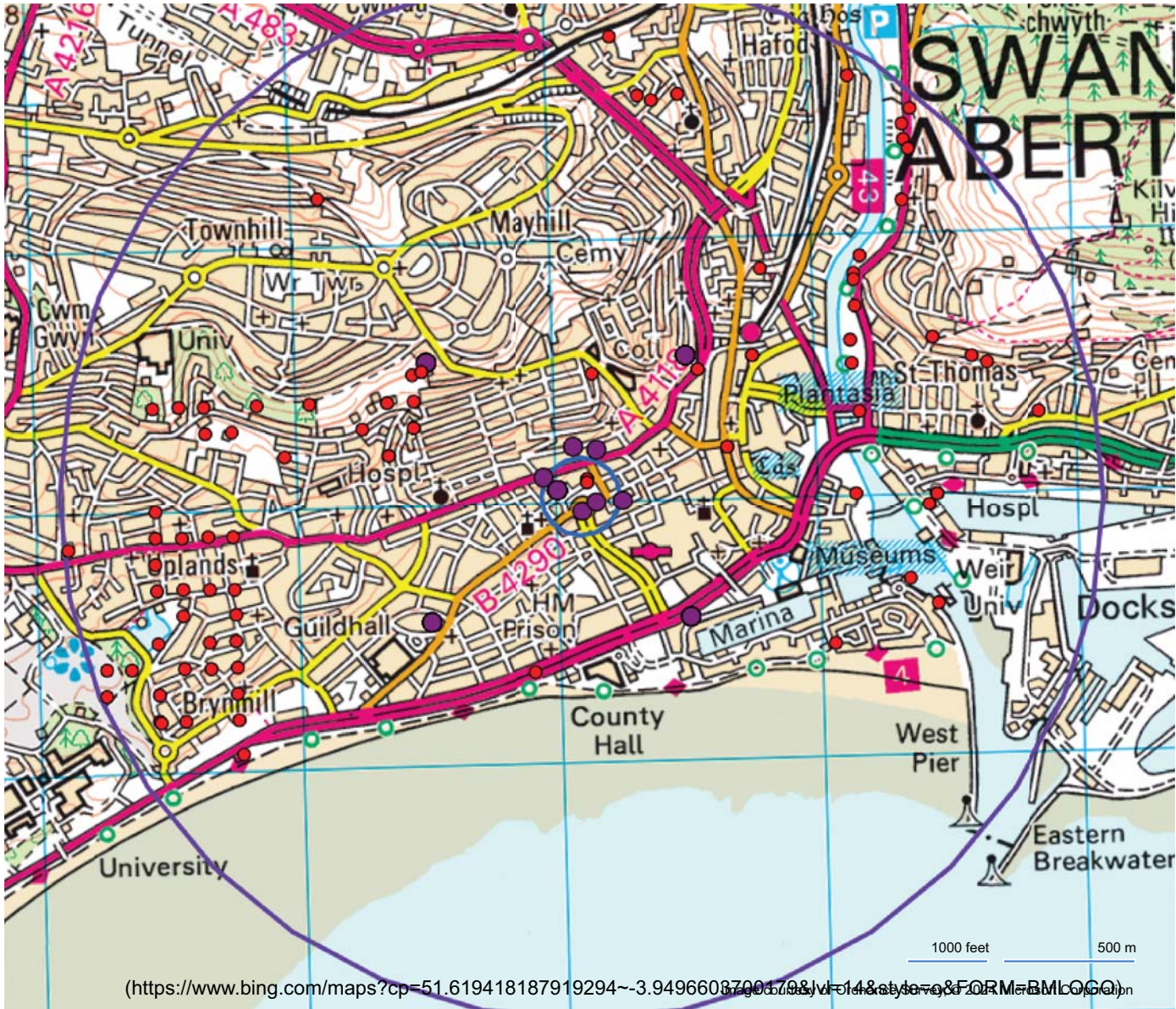
Scale @ A1
1:1250, 1:500

DWG. NO.
HG. - 00

APPENDIX II DESK STUDY INFORMATION PROVIDED BY SEWBRcC

Species Map


Species records are mapped below. Records are mapped as centred points (centre of grid reference polygon).






Icon	Name
●	Bats
●	Birds

(<https://www.bing.com/maps?cp=51.619418187919294~-3.94966087006779&w=14&style=s&FORM=BMLO60>)

APPENDIX III TARGET NOTES & PHOTOGRAPHS (AUGUST & SEPTEMBER 2024)

RECORD OF SITE VISIT	
SITE NAME	Former Gwalia Building, Kingsway, Swansea
DATE	19 August & 16 September 2024
PURPOSE OF VISIT	Walkover survey / preliminary building inspection for protected species to inform planning submission for demolition and redevelopment.
General	<p>Three storey flat-roofed building of brick or block construction with rendered finish and stone (quartz) cladding to ground floor. Fourth storey is present to the south east corner. Parapet to edge of the flat roof. Building is vacant and has been secured – all windows and doors are sound with exception of 2no. windows on the 1st & 2nd floors which have been boarded. Small area of cracked render visible to southern elevation below parapet wall but no external evidence and crack appears very shallow/superficial (as viewed through binoculars).</p>  <p>Building is located along Kingsway which is a busy commercial road in the city centre. No notable green-infra-structure in the immediate or local areas with buildings and hard standing the dominant features.</p> <p>Overall Negligible/Low potential for use by roosting bats</p>
Birds seen/heard:	Feral Pigeon, Herring Gull

<p>Landscape planting and Trees</p>	<p>Area of short mown amenity grass and ornamental planting to site frontage along southern side of building (Kingsway).</p>  <p>2no. Sycamore trees on grass bank located to west of the building. Larger of the trees has a dense cover of ivy which could be used by nesting birds. No other features noted of bat roost potential (PRF-I). Smaller tree with no obvious features (Negligible roost potential). Trees and grassland are an isolated feature – no connectivity to other green spaces.</p> 
<p>Western elevation</p>	<p>West elevation with rendered finish is sound with street lighting and wall lights present to entrance door (protected by metal roller door). 2no. open windows to NW corner could provide access for birds or bats.</p>

	
<p>Evan Rees Building</p>	<p>Separate 2 storey, flat roofed rendered building to the north west corner of the plot – Evan Rees is carved into the stonework above the large roller door.</p>  <p>No external evidence of birds or bats to roller door but raised window boarding noted to first floor and window boarding is missing to NW corner – provides obvious means of access for species such as Feral Pigeon. Broken glass in window to northern side of the building but external metal grille prevents any access by birds or bats.</p>
<p>Northern elevation</p>	<p>Rendered finish with doors/windows all sound. Gap around top of metal roller door leading to car park access ramp but no external evidence noted of birds or bats (see also internal notes).</p>



Fascia to north-east corner is slightly raised (zinc or other metal fascia) – no external evidence of birds or bats visible on render. Street lighting is present. Gull noted perching on corner of adjacent building to the east.

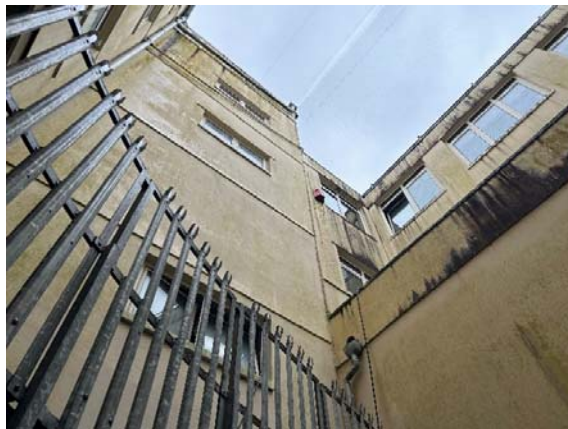


Interior – ground floor & basement

Soft strip and asbestos removal has been completed and walls/ceilings to ground, 1st & 2nd floor are exposed – bare block work and ceilings of concrete and steel beams. No obvious means of entry for birds or bats to ground floor and no evidence noted. Rooms are light/open and unsuitable for use by bats.



Basement stairwell (from ground floor) and car park are dark with flat rendered ceilings and walls. Central area over access ramp is open but bird netting is visible which is intact and would limit/restrict possible means of entry by birds or bats.



No internal evidence found on stairwell or in main car park area. Roller door to northern side of access ramp and switch/fuse room to east of door also lacking in any evidence of birds or bats.




Old bird droppings noted within storage room to west side of basement car park – no recent evidence or live/dead birds noted.







First floor



Open window to stairwell to first floor – no evidence of birds or bats noted. Scattered bird feathers and droppings to western side of first floor with larger accumulation of droppings to open window (in W/C) on western side.



	<p>Other areas of first floor as noted for ground floor – soft strip works done and ceilings/walls exposed. Light open spaces considered unsuitable for use by bats.</p> 
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<p>Second floor</p>	<p>As noted for ground and 1st floors. Scattered bird droppings to stairwell to western side of building (open window to second floor noted during external check). No accumulation of evidence here – larger area of droppings noted to eastern side of building where open access to roof is present (covering to roof hatch is open/missing).</p>  
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<p>Flat Roof</p>	<p>Flat roof area is sound and parapet walls with no obvious features for use by bats. Fascia and windows to 3rd floor rooms on roof are sound – no external evidence of bats noted. Numerous chicken bones scattered across roof suggest use by gulls/corvids. Could be used by nesting gulls during breeding season.</p>  
<p>Roof of Evan Rees Building</p>	<p>Separate flat roof to Evan Rees building with flat-roof structure with missing door/window coverings – no direct access but could provide opportunities for nesting birds.</p>

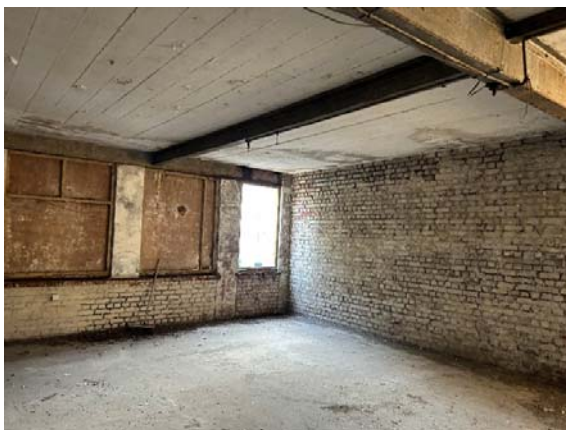
	
<p>3rd Floor</p>	<p>Open windows to southern and western sides of block provide access for birds. Minimum of 5no. live Feral pigeons seen along with 1no. carcass. Bird droppings frequent on this floor.</p> 
<p>Ground and 1st Floor of Evan Rees Building (Garage)</p>	<p>Follow up visit on 16 September after access route advised by client. Access via basement and external fire escape ladder to allow access to ground and 1st floors. Basement of Gwalia building as per conditions described above.</p> <p><i>Ground Floor</i> – Accessed via open fire door on southern side – door leads to narrow gap between this building and Gwalia offices with fire escape steps leading down into the basement of the Gwalia building. Doorway to west leading to Northampton Lane is secured by metal roller door. Open fire escape door and stairwell to first floor provide easy access for birds or bats.</p>



Feral Pigeon perched on main roller door (west side of building) and lots of bird droppings to floor and stairwell. No obvious bat features and no evidence of bats noted although amount of bird droppings could obscure individual bat droppings (if present). Stairwell to first floor with large amounts of bird guano to steps and handrail at first floor level.



First Floor – Open window to north west corner and open hatch leading to roof-top room provide easy access for birds or bats. Lots of bird droppings to floor and Feral Pigeon seen exiting via window opening to north west. Steel joists and concrete panel ceiling with no obvious bat features noted.

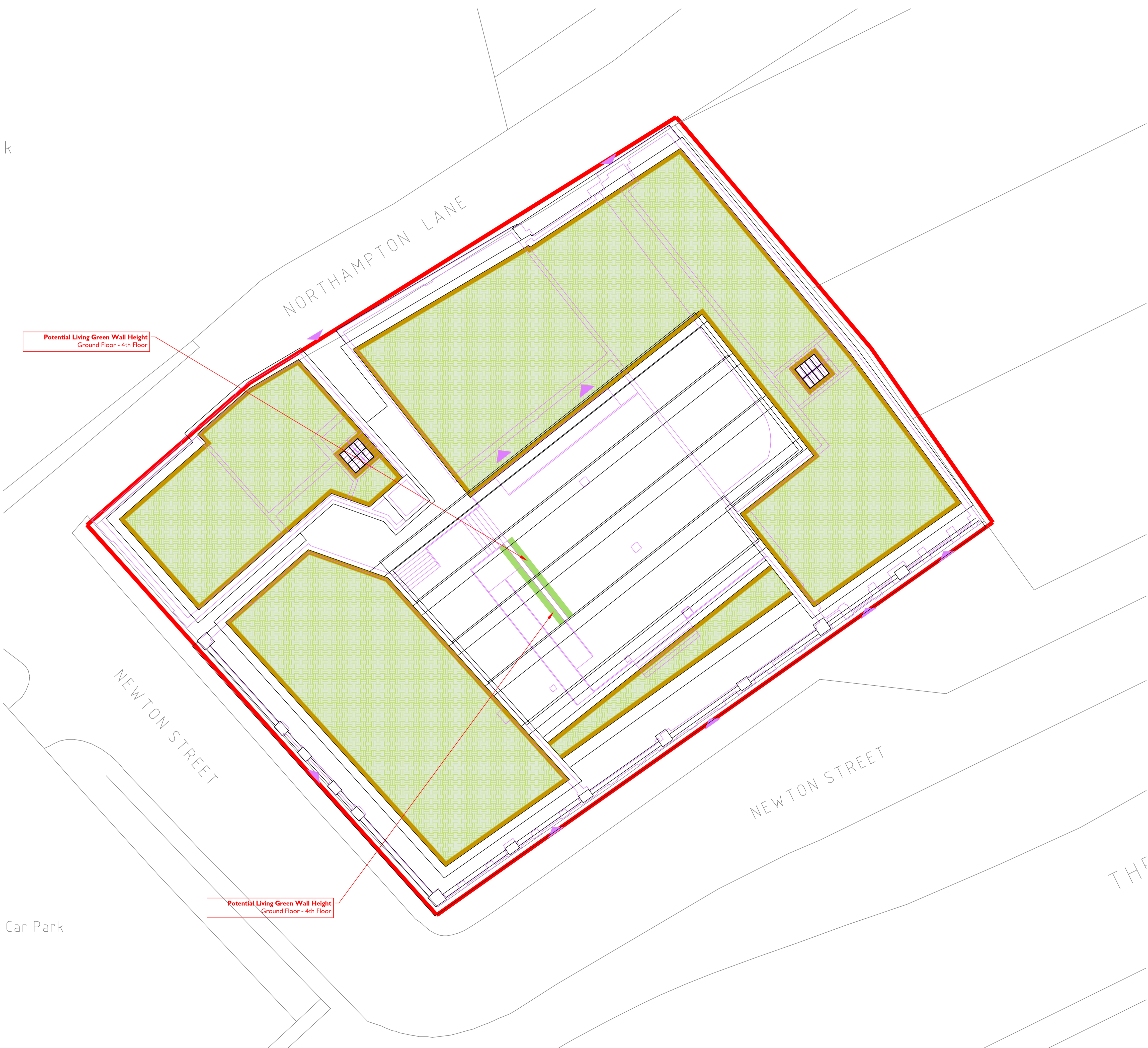


No direct access to roof-top room – existing ladder considered unsafe but rooms appear well lit with no glass to window openings as observed from roof of adjacent Gwalia building (see previous note).









APPENDIX IV STRATEGIC SOFT LANDSCAPE PLAN

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Strategic Soft Landscape Plan Key

-  Red Line Development Boundary
-  Proposed Roof Layout
-  Proposed Ground Floor Layout
-  Proposed Wildflower Meadow Green Roof
Min. Substrate depth 150mm
Plant Mix / Species to be determined at detail design with specialist supplier.
-  Proposed Gravel margin to edge of Green Roof
Indicatively shown at 300mm.
-  Potential location for Living Green Wall.
Subject to Fire Regulation confirmation.
Plant Mix / Species to be determined at detail design with specialist supplier.

GENERAL LANDSCAPE NOTES:

GREEN ROOF
The intention for the green roof on this development is to create a uniform wildflower meadow grass planted roof with the minimum substrate depth of 150mm for ecological benefits, rainwater management and reducing the urban heat island effect and not for recreation or leisure.

For a Green Roof to be installed, establish and be maintained there are several requirements and design considerations that need to be incorporated into the design of the building. These include the following.

Maintenance Access
Access to each of the roofs for maintenance personnel and their machinery along with a way for arisings to be removed from the roof. The creation of this access is likely to reduce the area available for the green roof and therefore has the potential to bring the UGF score below that required.

Safe Man System
A Safe Man style system, or other suitable fall restraint, will need to be installed on the roofs to allow maintenance operatives to work safely. This is likely to reduce the area available for the green roof and therefore has the potential to bring the UGF score below that required.

Irrigation
A form of irrigation will be required as part of the green roof installation to ensure successful establishment and long term survival of the roof in drier periods.

LIVING GREEN WALL
The following are the key aspirations and requirements for the living green wall to deliver from the client and project architect.
To create a year round evergreen focal feature within the central atrium of proposed development.
To become a defining element highlighting one of the ideologies behind the project, promoting biodiversity and sustainability within the development.
To enhance the health and wellbeing of the residents that will occupy the development, allowing them to connect with nature within the built environment improving happiness and reducing stress.
To showcase the quality of the developments design, materials and construction.

For a Living Green Wall to be installed, establish and be maintained there are several requirements and design considerations that need to be incorporated into the design of the building. These include the following.

Fire Regulations
Fire Regulations need to be reviewed regarding Living Green Walls and residential building heights. There is the risk that due to the proposed height of the building and its residential use that a Living Green Wall will not be acceptable from a Fire Regulation perspective. It will therefore be vital for a Fire Consultant and the Local authority to be consulted to determine what will be acceptable.

Water Supply
A fresh, unsoftened water feed is required at the point of the irrigation system installation.

Electric Connection
A 240v electrical supply is required at the point of the irrigation system installation.

Drainage Point
A drainage outlet is required at the base of the wall to remove run-off unless a re-circulating system is installed.

Irrigation Plant Room
This can be tailored to fit the available space. The requirements vary according to the size of the wall. The average space required for an automated system is 1200mm x 900mm floorspace, 1500mm against a wall. This needs to be within 30m of the Living Green Wall, below in the basement may be the preferred option if this is feasible.

Maintenance
Living Wall maintenance is essential. Smartscape has the largest Living Wall maintenance division in the UK. Due to the limited access to the wall internally for machinery such as scissor lifts or cherry pickers there will be the requirement to allow for maintenance at height, an abseil / man safe system will need to be incorporated alongside the green wall. Consideration of this will need to be made for in the building structure and roof design.

Auxiliary Lighting
Smartscape Horticulturists will take light readings on site to confirm requirements: 1500 lux @ 600mm from the wall is the general rule of thumb.

PAC

P03	08.11.24	Update to latest architectural layout	SB	SM
P02	06.11.24	Issue for PAC	SB	SM
P01	31.10.24	First issue for comment	SB	SM
Rev.	Date	Comment		Approved Drawn

PRELIMINARY	PLANNING	DESIGN	TENDER	CONSTRUCTION
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client	Coastal Housing
project	Ty Menyn, Swansea
drawing title	Strategic Soft Landscape Plan
scale	1:125 @ A1
drawn	SM
approved	SB
date	Oct 2024
drawing no.	2490001-SBC-00-XX-DR-L-401
revision	P03

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