

Alexandra Docks, Newport

Preliminary Ecological Appraisal

Burroughs
61271
March 2026



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LIST OF ABBREVIATIONS

Abbreviation	Full Description
CIEEM	Chartered Institute of Ecology and Environmental Management
NERC	Natural Environment Research Council
PEA	Preliminary Ecological Appraisal
PRA	Preliminary Roost Assessment
SINC	Sites of Importance for Nature Conservation
SSSI	Site of Special Scientific Interest

EXECUTIVE SUMMARY

PURPOSE

TACP (UK) Ltd (TACP) was commissioned by Burroughs to undertake a Preliminary Ecological Appraisal (PEA) on an area of land within Alexandra Docks, Newport (hereafter referred to as the Site). The central Ordnance Survey grid reference is ST 31613 85814 and the boundary of the Site is shown in Appendix D.

This PEA has been commissioned to support National Grid Electricity Distribution (NGED) securing planning permission for the construction of a 33/ 11Kv electricity substation (hereafter referred to as the Project) on land owned by Associated British Ports (ABP).

This report provides an ecological overview of the Site, including a description of potential ecological receptors.

RESULTS

A Preliminary Ecological Appraisal (PEA) was undertaken by TACP in April 2025 which consisted of a desk study and field survey following the Chartered Institute of Ecology and Environmental Management (CIEEM) Preliminary Ecological Appraisal (**CIEEM, 2017**) guidelines and standard Phase 1 Habitat Survey protocol (**JNCC, 2010**).

The Project may result in impacts on wildlife and habitats affecting the following protected species: bats; reptiles; and, nesting birds

Several buildings are present on Site with access points that bats could use, and due to limited access to the buildings for the surveyor, the suitability of the buildings for roosting bats could not be determined.

The scrub and exposed rocky habitat identified on site would provide suitable habitat for reptiles to bask and shelter.

The single, multi-stem birch on Site, as well as the line of trees just outside the northern boundry could provide suitable nesting habitat for birds.

RECOMMENDATIONS

On the basis of the PEA, TACP recommends further surveys for the presence of bats.

Due to the number of buildings present on Site and their accessibility to bats, it is recommended that a Preliminary Roost Assessment is undertaken prior to submission of a planning application to determine their suitability to support roosting bats.

Prior to work commencing, a pre-work inspections for the presence of reptiles should be carried out of the suitable scrub habitat identified on Site, to avoid disturbance or injury to reptiles.

Prior to work commencing, a nesting bird check must be undertaken on any trees present on or in the immediate vicinity of the Site.

1 INTRODUCTION

1.1 Background

- 1.1.1 TACP UK (Ltd) (TACP) was commissioned by Burroughs in March 2025 to carry out a Preliminary Ecological Appraisal (PEA) at Alexandra Docks (hereafter referred to as 'the Site') to National Grid Electricity Distribution (NGED) securing planning permission for the construction of a 33/11kV electricity substation (hereafter referred to as 'the Project'). The central Ordnance Survey (OS) grid reference is ST 31613 85814 and the boundary for the Site is shown in Appendix D
- 1.1.2 This PEA was commissioned to identify whether there are known or potential ecological receptors (nature conservation designations and protected and notable habitats and species) that may constrain or influence the design and implementation of the Project). The PEA was undertaken in accordance with the Guidelines for Preliminary Ecological Appraisal published by the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2017).
- 1.1.3 This PEA provides an ecological overview of the Site covered by the Project, including a description of the potential ecological receptors and gives a preliminary ecological appraisal in relation to the Project as it currently stands. This appraisal includes general recommendations for mitigation and enhancement in relation to the potential impacts identified, based on available information.

1.2 Site Description

- 1.2.1 The Site is located within Newport Docks, with the main waterbody of Alexandra Dock to the west and south, River Usk Site of Special Scientific Interest (SSSI) to the east and is predominantly surrounded by industrial buildings. The Site location is shown in Appendix D - Target Notes and Phase 1 Habitat Map.

1.3 Proposed Project

- 1.3.1 The Project would be constructed on the Site of an existing electrical substation which along with a number of other buildings, would be demolished.
- 1.3.2 Construction is anticipated to commence no sooner than 1st May 2026 and would take approximately 18 months to complete.

1.4 Purpose Of Report

- 1.4.1 A PEA is typically a rapid site assessment, the primary objectives of which are to identify:
- Likely ecological constraints associated with the Scheme.
 - Any mitigation measures likely to be required (with reference to the Mitigation Hierarchy).
 - Any additional surveys that may be required to inform an Ecological Impact Assessment (EclA) (It should be noted that where a PEA does not identify the need for further survey, adequate information may be presented to fully identify ecological impacts).
 - Any opportunities available to deliver ecological enhancement.

1.4.2 Taking the above into account, the objectives of this report are therefore to:

- Document the method and findings of the desk study.
- Document the method and findings of the field surveys.
- Detail the key ecological constraints associated with the Scheme.
- Provide information on the potential need for mitigation.
- Make recommendations for additional surveys, if required.
- To inform an Ecological Impact Assessment (EclA), if required.

1.5 Quality Assurance

1.5.1 This survey and subsequent report were undertaken in line with TACP's Integrated Management System (IMS), certified to ISO 9001, 14001 and 45001, accredited by LRQA UK. This was combined with TACP's adaptability to ensure that projects are managed efficiently to maximise project and client benefits.

1.5.2 All TACP Ecologists who worked on this project are members of (at the appropriate level) CIEE) and follow their code of professional conduct (CIEEM, 2022) when undertaking ecological work.

2 LEGISLATION AND PLANNING POLICY

2.1 Legislation

- 2.1.1 There are several Acts and Regulations which refer to the protection of wildlife. These are summarised in Appendix A. In particular, the legislation relating to possible protected species on the Project is outlined below. This is a brief summary of the legislation and is not to be regarded as a definitive legal opinion. When dealing with individual cases, the client is advised to consult the full texts of the relevant legislation and obtain further legal advice.
- 2.1.2 Compliance with legislation may require relevant protected species licences prior to the implementation of work for the Project.

2.2 Local Planning Policy

- 2.2.1 Local Development Plans (LDPs) must be produced by every Local Planning Authority in Wales. Any Project proposal will be tested against the policies within the LDP. The LDPs follow the planning guidance provide in PPW, including biodiversity and natural heritage policies. These include protecting designated sites and other areas of importance for biodiversity conservation; safeguarding protected species and priority species, including those listed in local biodiversity action plans and retaining, creating and enhancing features of importance for biodiversity conservation where appropriate.
- 2.2.2 The Newport Replacement Local Development Plan (RLDP) 2015 recognizes the need for new or improved infrastructure to support development, including electricity substations.

3 METHOD

3.1 Desk Study

3.1.1 The objectives of the desk study are to review the existing information available in the public domain concerning species and habitats to identify the following:

- Internationally, nationally and locally designated sites, up to 2 km from the Project/Scheme using the Multi Agency Geographic Information for the Countryside (MAGIC) website (www.magic.gov.uk);
- Protected and Priority species records and records of locally designated sites up to 2 km from the Site, using the South East Wales Biological Records Centre (SEWBRc) website (aderyn.lercwales.org.uk).
- Special Areas of Conservation (SACs) and Sites of Special Scientific Interest (SSSIs) designated for bats within a 10 km radius of the Site in accordance with Bat Conservation Trust (Collins, 2016) recommendations;
- Section 7 list of Species and Habitats of Principal Importance for Conservation of Biological Diversity in Wales;
- Ancient Semi-Natural Woodland (ASNW), Plantation on Ancient Woodland Site (PAWS), Restored Ancient Woodland Site (RAWS) or Ancient Woodland Site of Unknown category (AWSU) within or adjacent to the Project boundary using LLE dataset (<http://lle.gov.wales/home>);
- Aerial photographs and Ordnance Survey (OS) maps were reviewed to identify features of ecological interest surrounding the Project including ponds within 500 m, nearby areas of ecological interest and features connecting these habitats (hedgerows, watercourses, railway lines).

3.2 Field Survey

3.2.1 An Extended Phase 1 Habitat Survey was carried out by George Carson BSc (Hons) on April 8th 2025 to provide a baseline to assess the value of the habitats and their potential to support protected species. This survey was conducted following appropriate CIEEM guidelines (CIEEM, 2017) and the methods outlined in the Joint Nature Conservation Committee (JNCC)'s 'Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit' (JNCC, 2010). All habitats within the Site were classified and mapped with detailed target notes and species lists produced for each habitat area.

3.2.2 The survey involved a walkover and preliminary assessment of key habitats, land use and ecological features. The plant species defining the habitat types on the Site were recorded. Evidence of any invasive plant species subject to legal controls was recorded. The Site was assessed for its potential to support protected or notable species in order to identify potential ecological constraints and to guide recommendations for further surveys.

Limitations

3.2.3 Biological records can be received from a wide variety of sources and may or may not be comprehensive and accurate. However, if assessed in conjunction with a Phase 1 Habitat survey, they can contribute to a robust ecological appraisal of a site.

3.2.4 Most of the buildings on the Site, including the corrugated metal shed (Building 1), substation (Building 2), office cabins (Building 4) and corrugated office container

(Building 5) were locked, so a full preliminary roost assessment could not be completed to determine their suitability for bats.

3.2.5 Despite the limitations described, there are deemed to be no significant limitations to this PEA.

4 RESULTS

4.1 Desk Study

Designated Sites

4.1.1 The results of the desk study of designated habitats, sites and features within proximity to the Site are listed in Table 1 below.

Table 1 - Desk Survey Results Designated Sites

DESIGNATION	DISTANCE FROM SITE	DESCRIPTION
Designated Sites	ST 31823 85899 Approximately 20m east.	<u>River Usk SSSI</u> River Usk is of special interest for its importance as a wildlife corridor, acting as an essential migration route and key breeding area for many nationally and internationally important species. Notable species recorded include but are not limited to: common otter (<i>Lutra lutra</i>), Daubenton's bat (<i>Myotis daubentonii</i>), sand martin (<i>Riparia riparia</i>), and several rare crane fly species such as (<i>Limonia omissinervis</i>), (<i>Erioptera limbata</i>) and (<i>Rhabdomastix hilaris</i>). The rare river lamprey (<i>Lampetra fluviatilis</i>) has also been recorded in the river. In addition, the Atlantic stream crayfish (<i>Austropotamobius pallipes</i>) – an endangered species in Europe – is also known to use the River Usk (citation.lercwales.org.uk).
	ST 30408 84939 Approximately 1.35km southwest	<u>Gwent Levels – St Brides SSSI</u> The Gwent Levels are one of a series of six SSSIs which span the Severn Estuary and are designated for their rhynes and ditch habitats, as well as green lanes, hedgerows and flower rich ditch banks. Notable species recorded include but are not limited to: silver colonel soldier fly (<i>Odontomyia argentata</i>), shrill carder bee (<i>Bombus sylvarum</i>), hairy dragonfly (<i>Brachytron pratense</i>) and the rare water beetle (<i>Hydaticus transversalis</i>) (naturalresources.wales).

DESIGNATION	DISTANCE FROM SITE	DESCRIPTION
	ST 31481 83831 Approximately 1.6km south	<u>Severn Estuary SSSI / SPA / SAC / Ramsar Site</u> The Severn Estuary has been designated for its range of intertidal habitats, including mudflats, sandflats, rocky platforms and islands – providing key habitats and corridors for migrating fish and wintering birds. Notable species recorded include but are not limited to: Dunlin (<i>Calidris alpina</i>), gadwall (<i>Mareca strepera</i>), shoveler (<i>Spatula clypeata</i>), pochard <i>Aythya farina</i> , Atlantic salmon (<i>Salmo salar</i>) and the critically endangered European eel (<i>Anguilla anguilla</i>) (citation.lercwales.org.uk).
Locally Designated Sites within 2km	ST 31944 85940 Approximately 229m east.	<u>Marshall's SINC</u> Designated for its mosaic neutral grassland, post-industrial land and wetland habitat (citation.lercwales.org.uk).
	ST 32698 87050 Approximately 1.4km northeast	<u>Monkey Island SINC</u> Designated for its post-industrial grassland habitat (citation.lercwales.org.uk).
	ST 33658 85880 Approximately 1.8km east	<u>Solutia Site SINC</u> A series of improved and semi-improved grasslands with traditional ditches and ponds; site supports a range of species including nesting birds such as Cetti's warbler (<i>Cettia cetti</i>), and invertebrates including hairy dragonfly (citation.lercwales.org.uk).
	ST 29699 86539 Approximately 1.95km west	<u>Gaer Pond SINC</u> Suburban pond with tall swamp vegetation and nationally scarce fly species (<i>Typhamyza bifasciata</i>) (citation.lercwales.org.uk).
	ST 30418 85749 Approximately 1km west	<u>Afon Ebbw River SINC</u> Major river system with associated semi-improved neutral grassland and marshy grassland, swamp, scrub and semi-neutral woodland. Associated species include: bulbous foxtail (<i>Alopecurus bulbosus</i>) near confluence with Usk, kingfisher (<i>Alcedo atthis</i>), sand martin and grass snake (<i>Natrix natrix</i>) (citation.lercwales.org.uk).

DESIGNATION	DISTANCE FROM SITE	DESCRIPTION
Ancient Woodland	ST 29624 85556 Approximately 1.9km west	Small patches of ancient semi-natural woodland and restored ancient woodland are within 2km of the Site.

Habitats

4.1.2 The desk study also revealed that a number of Priority Habitats were located within the surrounding 2 km of the Site. These included coastal grassland, salt marsh, intertidal mud/sand, swamp, standing water, running water and intertidal cobbles/shingle. Whilst these are not designated, they do hold Natural Environment Research Council (NERC ,2006) status. These results are summarised in Table 2 below.

Table 2 – Priority Habitats within 2km of Site

HABITAT TYPE	LOCATION	RELEVANT LEGISLATION
Coastal grassland	Off site, approximately 386m east	NERC (2006)
Salt marsh	Off site, approximately 1.6km south	NERC (2006)
Intertidal mud/sand	Off site, approximately 20m east	NERC (2006)
Swamp	Off site, approximately 644m northwest	NERC (2006)
Standing water	Off site, approximately 47m west	NERC (2006)
Running water	Off site, approximately 1.1km west	NERC (2006)
Intertidal cobbles/shingle	Off site, approximately 1.6km southeast	NERC (2006)

Protected and Priority Species

4.1.3 Protected and priority species are summarised in Table 3. Note that the absence of records of other flora and fauna does not necessarily discount the possibility of protected species being on the Site or in the vicinity.

Table 3 – Protected and Priority Species Potential

SPECIES	RESULTS	LEGISLATION
Bats	Several bat species have been recorded within 2km of the Site, including: common pipistrelle (<i>Pipistrellus pipistrellus</i>) as recently as (a.r.a) 2024, whiskered bat (<i>Myotis mystacinus</i>) a.r.a 2017 and brown long-eared bat (<i>Plecotus auritus</i>) a.r.a 2024. Total of 20 recordings.	Wildlife and Countryside Act 1981 (as amended) Conservation of Habitats & Species Regulations 2017 Natural Environment and Rural Communities Act 2006
Dormice	No records.	Wildlife and Countryside Act 1981 (as amended) Conservation of Habitats & Species Regulations 2017 Natural Environment and Rural Communities Act 2006
Otters	Otters are frequently recorded within 2km of the Site and as recently as 2024, with 29 total recordings.	Wildlife and Countryside Act 1981 (as amended) Conservation of Habitats & Species Regulations 2017 Natural Environment and Rural Communities Act 2006
Badgers	No records.	Wildlife and Countryside Act 1981 (as amended) Protection of Badgers Act 1992
Water voles	3 records of water vole exist within 2km of the Site from 1965 and 1973.	Wildlife and Countryside Act 1981 (as amended) Natural Environment and Rural Communities Act 2006

SPECIES	RESULTS	LEGISLATION
Other Mammals	Hedgehogs are frequently recorded within 2km of the Site and as recently as 2024, with 25 total recordings.	Wildlife and Countryside Act 1981 (as amended) Natural Environment and Rural Communities Act 2006
Great Crested Newt	2 records of Great Crested Newts exist within 2km of the Site from 1998.	Wildlife and Countryside Act 1981 (as amended) Conservation of Habitats & Species Regulations 2017 Natural Environment and Rural Communities Act 2006
Other Amphibians	Several species of amphibian have been recorded within 2km of the Site, including: Common toad (<i>Bufo bufo</i>) a.r.a 2013, common frog (<i>Rana temporaria</i>) a.r.a 2009, smooth newt (<i>Lissotriton vulgaris</i>) a.r.a 2016 and palmate newt (<i>Lissotriton helveticus</i>) a.r.a 2016.	Wildlife and Countryside Act 1981 (as amended) Conservation of Habitats & Species Regulations 2017
Reptiles	Several reptile species have been recorded within 2km of the Site, including: slow worm (<i>Anguis fragilis</i>) a.r.a 2022, common lizard (<i>Zootoca vivipara</i>) a.r.a 2023, grass snake a.r.a 2004 and adder (<i>Vipera berus</i>) a.r.a 2021.	Wildlife and Countryside Act 1981 (as amended) Natural Environment and Rural Communities Act 2006
Birds	Many bird species have been recorded within 2km of the Site, including but not limited to: Peregrine falcon (<i>Falco peregrinus</i>) a.r.a 2023, barn owl (<i>Tyto alba</i>) a.r.a 2022, kingfisher a.r.a 2023, Cetti's warbler a.r.a 2024 and lapwing (<i>Vanellus Vanellus</i>) a.r.a 2021.	Wildlife and Countryside Act 1981 (as amended) Countryside and Rights of Way Act 2000 Natural Environment and Rural Communities Act 2006 The Directive on the Conservation of Wild Birds (Directive 2009/147/EC) Hedgerow Regulations 1997

SPECIES	RESULTS	LEGISLATION
Invertebrates	Many species of invertebrates have been recorded within 2km of the Site, including but not limited to: Cinnabar moth (<i>Tyria jacobaeae</i>) a.r.a 2024, shrill carder bee a.r.a 2022, brown-banded carder bee (<i>Bombus humilis</i>) a.r.a 2024, black-headed mason wasp (<i>Odynerus melanocephalus</i>) a.r.a 2022, small heath (<i>Coenonympha pamphilus</i>) a.r.a 2022 and shaded broad-bar (<i>Scotopteryx chenopodiata</i>) a.r.a 2022.	Natural Environment and Rural Communities Act 2006
Plants	Several plant species have been recorded within 2km of the Site, including: bluebell (<i>Hyacinthoides non-scripta</i>) a.r.a 2021, cornflower (<i>Centaurea cyanus</i>) a.r.a 2021 and tubular water-dropwort (<i>Oenanthe fistulosa</i>) a.r.a 2020.	Wildlife and Countryside Act 1981 (as amended)

4.2 Field Survey

Habitats

4.2.1 The habitats identified during the Extended Phase 1 Habitat Survey within the Site and their descriptions are shown in Table 4. A plan of the Site showing the location and distribution of these habitats is shown in Appendix D.

Table 4 - Habitats Identified During Extended Phase 1 Habitat Survey

MAIN HABITAT	SUB-HABITAT	DESCRIPTION
Woodland and Scrub	Scrub (Dense/Continuous and Scattered)	Areas dominated by native shrubs and ground vegetation, usually below 5m in height and occasionally with scattered trees. Species include: dogwood (<i>Cornus sanguinea</i>), perennial ryegrass (<i>Lolium perenne</i>), cock's foot (<i>Dactylis glomerata</i>), gorse (<i>Ulex europaeus</i>), yarrow (<i>Achillea millefolium</i>), bramble (<i>Rubus fruticosus</i>), bristly oxtongue (<i>Helminthotheca echinoides</i>), herb Robert (<i>Geranium robertianum</i>), white clover (<i>Trifolium repens</i>), common dandelion (<i>Taraxacum officinale</i>), sweet violet (<i>Viola odorata</i>), buddleja (<i>Buddleja davidii</i>), mugwort (<i>Artemisia vulgaris</i>), rosebay willowherb (<i>Chamaenerion angustifolium</i>), broadleaf dock (<i>Rumex obtusifolius</i>), common vetch (<i>Vicia sativa</i>), greater plantain (<i>Plantago major</i>), bracken (<i>Pteridium aquilinum</i>) and early forget-me-not (<i>Myosotis ramosissima</i>). Wild cherry (<i>Prunus avium</i>) saplings and a multi-stem silver birch (<i>Betula pendula</i>) are also present.
	Bare Ground	Small areas of ruderal vegetation within bare ground areas. Species include: Perennial ryegrass, rough hawkbit (<i>Leontodon hispidus</i>), spear thistle (<i>Cirsium vulgare</i>), common dandelion, bramble, yarrow, black medic (<i>Medicago lupulina</i>), common vetch, herb Robert, wild strawberry (<i>Fragaria vesca</i>), buddleja, rosebay willowherb, dogwood, meadow crane's-bill (<i>Geranium pratense</i>), bristly oxtongue, bird's-foot trefoil (<i>Lotus corniculatus</i>), common daisy (<i>Bellis perennis</i>), mugwort, common hogweed (<i>Heracleum sphondylium</i>) and lesser celandine (<i>Ficaria verna</i>).
Bare Ground and Buildings	Buildings	Several buildings and structures are present on Site, including a brick building, metal storage containers, wooden sheds and office cabins. Each building is numbered 1 to 5 in Appendix D.

MAIN HABITAT	SUB-HABITAT	DESCRIPTION
Hardstanding	Tarmac hardstanding	The rest of the Site consists of tarmac hardstanding, shown as Target Note 4 in Appendix D.

Protected and Priority Species

4.2.2 Details of protected and priority species recorded are shown in Table 5. A plan of the Site showing the location and distribution of features with potential for protected or priority species, along with target notes of protected species evidence or features that have potential to support protected species are shown in Appendix D.

Table 5 - Phase 1 Protected Species Results

SPECIES	DESCRIPTION
Bats	Buildings present on Site and in the surrounding area have the potential to support roosting and foraging/commuting bats. External inspection of the buildings revealed a number of potential roost features (PRFs).
Reptiles	Scrub and exposed rocks/gravel/hardstanding has the potential to support reptiles.
Birds	No evidence of nesting birds was recorded on Site. However, many bird species are known to be present in the wider area, therefore disturbance cannot be ruled out.
Invertebrates	Vegetation present on Site is likely to support a variety of invertebrate species.

5 ECOLOGICAL CONSTRAINTS

5.1.1 The constraints and potential species presence do not include consideration of further surveys which have been recommended in Section 6.

5.1.2 The indicative potential impacts of the Project on habitats and protected species are outlined below.

5.2 Habitats

5.2.1 The Project will require the removal of vegetated habitats including scrub and trees.

5.3 Designated Sites

5.3.1 There are no statutory designations of nature conservation interest on the Site itself. There are nine statutory designations of nature conservation within 2km. These include three SSSIs, five SINCs and a patch of ancient woodland, as shown in Table 1.

5.3.2 Given the scale of the proposed Project, and the lack of likely impacts beyond the Site, the nearby designated sites are sufficiently well separated so that no impacts on their designated features are anticipated as a result of the works.

5.4 Priority and Protected Species

5.4.1 The following priority species (as listed in Section 7 of the Environment (Wales) Act 2016) were present or likely to be present on Site:

- Bats
- Reptiles
- Nesting birds

Bats

5.4.2 The local records search returned a number of records for bat species in the vicinity of the Site (see Table 3).

5.4.3 In addition, the buildings present on Site may be suitable for roosting bats due to their accessibility, see photos in Appendix B & Appendix B.

5.4.4 Each access point is shown in Appendix D as Target Note 1, 2, 3 and 5.

5.4.5 Before the buildings are demolished, a Preliminary Roost Assessment is recommended to establish the potential for supporting roosting bats.

Reptiles

5.4.7 The local records search returned a number of records for reptiles in the vicinity of the Site.

5.4.8 The scrub and exposed rock/bare ground habitat identified on Site could provide suitable habitat for a number of reptile species.

5.4.9 Pre-work inspections will be required to determine whether reptiles are present on Site and to avoid disturbance or injury to any species present.

Nesting birds

5.4.10 The local records search returned a high number of records for nesting bird species in the vicinity of the Site.

5.4.11 The on-Site trees provide limited habitat for nesting birds and therefore, the Site has the potential for nesting birds.

5.4.12 The clearance of vegetation could result in the disturbance of birds' nests, if undertaken during the nesting season,

5.4.13 Ultimate assessment of the scale and nature of impacts is dependent on final design of proposed Project and exact habitats affected.

5.5 Invasive non-native species

5.5.1 A number of Wildlife and Countryside Act, Schedule 9 invasive species have been recorded within Newport docks such as Himalayan balsam (*Impatiens glandulifera*) and Japanese knotweed (*Reynoutria japonica*), but none were identified on Site during the PEA.

5.5.2 If any are discovered during delivery of the Project, they should be controlled by implementing appropriate mitigation measures to avoid spreading to any other areas.

6 RECOMMENDATIONS

6.1 Further Surveys to Support a Planning Application

- 6.1.1 Further surveys for protected species are recommended, based on the current information available, and will be subject to consultation with relevant consultees, as part of planning requirements.
- 6.1.2 Further surveys are recommended for bats, due to the buildings present on Site and their accessibility to bats.
- 6.1.3 It is recommended that an internal Preliminary Roost Assessment (PRA) is undertaken on all structures in order to determine their suitability to support roosting bats.
- 6.1.4 Based on the findings of the PRA, further bat surveys in the form of a nighttime bat walkover or emergence surveys may be required.

6.2 Design Considerations

Lighting

- 6.2.1 Any new lighting design should avoid lighting of habitats with the potential to support wildlife (such as vegetated habitats or buildings) and/or adjacent habitats. Suggestions for mitigating external lighting and achieving the lighting recommendations above are outlined in the best practice guidance by the Bat Conservation Trust (BCT/ILP, 2023) and are applicable to several other nocturnal species.

Habitat Loss, Severance and Fragmentation

- 6.2.2 Avoid removal of habitats where possible.

6.3 Construction Considerations

- 6.3.1 Should the Project be granted planning permission, the following considerations are recommended during construction:

Reptiles

- 6.3.2 To reduce the risk of killing and injury to individual reptiles, a pre-work inspection for reptiles should be carried out; if there is evidence of reptiles and likelihood of death or injury, translocation or habitat manipulation would be required at the start of construction.

Nesting birds

- 6.3.3 Removal or maintenance of habitat that have the potential to support breeding birds (e.g. Scrub and trees) should take place outside of the breeding bird season (removal between September and February inclusive). There is a potential for a clash between the removal of vegetation to avoid impacts on birds and impacts on reptiles. This will need to be managed and planned once timings are known.

Excavations

- 6.3.4 Excavations, if left unfilled overnight, should be covered to avoid animals becoming trapped or excavations fitted with a scaffolding board ramp to allow any trapped animals to exit.

Spread of Invasive Species

- 6.3.5 Although not listed as an Invasive plant on Schedule 9, buddleja is present on Site and is an invasive species, therefore, it should be treated and removed from the Project. The removal of these plants from the Project will be of benefit to improving the biodiversity within the local area.
- 6.3.6 Prevent the tracking of vehicles over or otherwise disturbing areas of invasive plant growth or areas of soil contaminated with the remains (roots, seeds, and rhizomes).
- 6.3.7 If any of the INNS found within the Newport Docks are located on site, an INNS Management Plan is recommended during construction to help prevent/limit any re-growth or re-introduction of invasive species that could be spread.
- 6.3.8 This would include preventing the tracking of vehicles over or otherwise disturbing areas of invasive plant growth or areas of soil contaminated with the remains (roots, seeds, and rhizomes).

REFERENCES

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Appendices

Appendix A

Legislation and Planning Policies

Legislation and Planning Policies

In addition to habitats, several species have been afforded protection through international/European and national law. Other species are considered to contribute to our 'quality of life'. Although these species do not benefit from legal protection, they can be material considerations in the planning process. Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) covers birds, Schedule 5 covers other animals and Schedule 8 covers plants. The table below outlines the key forms of protection afforded to species.

Species including bats, otters and great crested newts are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2017. Badgers are protected under their Act: The Protection of Badgers Act 1992. Activities affecting protected species must usually be conducted under a licence obtained from the appropriate body (in Wales, this is Natural Resources Wales. In England, this is Natural England).

Developers must be able to show that all reasonable measures have been taken to ensure that protected species are not subject to disturbance. The Countryside and Rights of Way Act 2000 has strengthened enforcement powers and introduced a new offence of "reckless disturbance" that applies to both protected sites and species.

Table 1 – Legislation in Detail

Legislation	Brief Description
The Habitats Directive	The Habitats Directive 1992 (Directive 92/43/EEC sets out the legal framework requiring EU member states to protect habitat sites supporting vulnerable and protected species, as listed within the Directive. The need for an assessment of impacts on Natura 2000 sites (the collective name for European designated sites, including SPAs and SACs) is set out within Article 6 of the Directive. The Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017) (the "Habitats Regulations") and the Wildlife & Countryside Act 1981 (as amended).
The Birds Directive	The Directive on the Conservation of Wild Birds (Directive 2009/147/EC (the codified version of Council Directive 79/409/EEC as amended)) provides a framework for the protection, management and control of all species of naturally occurring wild birds in the European territory of Member States, including the UK. The provisions of the Birds Directive are transposed into UK law by the Conservation of Habitats and Species Regulations, 2017 and the Wildlife & Countryside Act 1981 (as amended).
Wildlife and Countryside Act (1981) (as amended)	The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and (partially) the Birds Directive and the Habitats Directive are implemented in the UK. The Countryside and Rights of Way Act 2000 has strengthened this legal protection (see below).

Legislation	Brief Description
	A small number of plant species are listed under Schedule 9 of the Wildlife and Countryside Act 1981, as amended, which includes species such as Japanese knotweed (<i>Fallopia japonica</i>), Himalayan balsam (<i>Impatiens glandulifera</i>), montbretia (<i>Crocsmia x crocosmiiflora</i>), giant hogweed (<i>Heracleum mantegazzianum</i>) and some cotoneaster species (<i>Cotoneaster</i> sp.). It is illegal to plant or to cause these plants to grow in the wild, and legal disposal methods for vegetation and soil subject to disturbance or clearance from a site must be used.
Convention on Biological Diversity and the Countryside and Rights of Way Act 2000	The Countryside and Rights of Way Act 2000 provides a statutory framework for biodiversity conservation. The Act places a duty on Government Departments and the National Assembly for Wales to have regard for the conservation of biodiversity and maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the Convention on Biological Diversity. Schedule 9 of the Act amends SSSI provisions of the Wildlife and Countryside Act 1981, including provisions to change SSSIs and providing increased powers for their protection and management. The provisions extend powers for entering into management agreements; place a duty on public bodies to further the conservation and enhancement of SSSIs; increases penalties on conviction where the provisions are breached; and introduce a new offence whereby third parties can be convicted for damaging SSSIs. Schedule 12 of the Act amends the species provisions of the Wildlife and Countryside Act 1981, strengthening the legal protection for threatened species. The provisions make certain offences 'arrestable' and create a new offence of reckless disturbance. The UK Biodiversity Action Plan (BAP) was published in 1994 and was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992. It provides the framework for fulfilling the UK's responsibilities towards the Convention on Biological Diversity. Conservation of biodiversity (the variety of life on earth) is an essential element of sustainable development.
Environment (Wales) Act 2016	The Environment (Wales) Act puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way. Part 1 relates to the sustainable management of natural resources. This ensures that the way in which the use of and the impacts on natural resources do not result in long term decline. The aim is to sustainably manage natural resources in a way and rate that meets the needs of present and current generations without compromising the needs of future generations.

Legislation	Brief Description
	The Act also contains at section 7, a duty for the Welsh Ministers prepare and publish a list of the living organisms and types of habitat which in their opinion are of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. This section replaces the duty in section 42 of the NERC Act 2006.
The Protection of Badgers Act 1992	The Protection of Badgers Act 1992 makes it an offence to wilfully take, kill, injure or ill-treat a badger, possess a dead badger or any part of a badger. Setts interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. The Act defines a badger sett as 'any structure or place, which displays signs indicating the current use by a badger' and Natural England takes this definition to include seasonally used setts. Work that may disturb badgers or their setts is illegal without a development licence from the relevant statutory body.
The Hedgerow Regulations (1997)	The Hedgerow Regulations (1997) make provision for the protection of important hedgerows in England and Wales. The regulations affect hedgerows which are 20 m or more in length, or connected at both ends to another hedgerow of any length. They relate to hedgerows which are on, or adjoining land used for the following purposes: agriculture or forestry; the breeding or keeping of horses, ponies or donkeys; common land; village greens; and SSSIs (They do not include hedges that are attached to, or marking the boundaries of a private house. It is an offence to intentionally or recklessly remove or cause or permit another person to remove a hedgerow or intentionally or recklessly remove, or cause or permit another person to remove, a hedgerow which is the subject of a hedgerow retention notice.

Planning Policy Wales (11th Ed. February 2021) sets out the land use planning policies of Welsh Government. It provides the policy framework for the preparation of Local Development Plans. Chapter 6, Distinctive and Natural Places, outlines Welsh Government's objectives for the conservation and improvement of natural heritage.

The Planning Policy Wales (PPW) is supplemented by a series of Technical Advice Notes. **TAN 5** provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides advice on areas including the key principles of positive planning for nature conservation, nature conservation in Local Development Plans and development management procedures. It also provides advice on development affecting designated sites and habitats, in addition to protected or priority habitats and species.

Key Principles include that the town and country planning system in Wales should integrate nature conservation into all planning decisions; that the town and country planning system should look for development to provide a net benefit for biodiversity conservation with no

significant loss of habitats or populations of species, locally or nationally and that they should ensure that the UK's international and national obligations for site, species and habitat protection are fully met in all planning decisions.

Appendix B

Project Photos



Image 1 - View of substation and office cabin



Image 2 - Central view of substation and cabin office



Image 3 - View of scrub habitat and corrugated shed



Image 4 - View of ruderal vegetation and corrugated office container

Appendix C

Photos of Ecological Constraints



Image 5 - Office cabin with open door (Target Note 1)



Image 6 - Entrance to loft space in office cabin (Target Note 1)



Image 7 - Broken window into cabin office (Target Note 2)



Image 8 – Corrugated metal and wooden shed with open door (Target Note 3)



6.3.9 Image 9 - Corrugated office container showing open window (Target Note 5)

Appendix D

Target Notes and Phase 1 Habitat Map