

Alexandra Docks

Shadow Habitat Regulations Assessment

Burroughs
61271
March 2026



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List of Abbreviations

Abbreviation	Full Description
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
LSE	Likely Significant Effects
NGED	National Grid Electricity Distribution
NGR	National Grid Reference
OS	Ordnance Survey
PEA	Preliminary Ecological Appraisal
SAC	Special Area of Conservation
SPA	Special Protected Area
SSSI	Site of Special Scientific Interest
ZoI	Zone of Influence

1 INTRODUCTION

1.1 Background

1.1.1 TACP (UK) Ltd (TACP) was commissioned by Burroughs in January 2026 to carry out a Shadow Habitat Regulations Assessment (sHRA) for Alexandra Docks (hereafter referred to as 'the Site') as part of 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 A.

1.1.2 The sHRA is required as part of the planning permission submission to identify if the proposed development would impact any European designated sites (considered under the Habitats Regulations to consist of Special Protection Areas, Special Areas of Conservation and Ramsar sites) within the Zone of Influence. These were:

- Severn Estuary/Môr Hafren SAC
- Severn Estuary Ramsar
- Severn Estuary SPA
- River Usk SAC

1.2 Site description

1.2.1 The proposed 33/11kV electricity substation at Alexandra Docks ('the Site') is located within Newport Docks, to the west of East Way Road. The main waterbody of Alexandra Dock is situated to the west and south, with the River Usk, Special Area of Conservation (SAC) & Site of Special Scientific Interest (SSSI) located to the east. The Site location is shown in Appendix A.

1.2.2 The proposed Project will be situated adjacent to the Alexandra Docks Road and immediately adjacent to the Island Steel UK Ltd warehouse. The current Site is dominated by hard standing, buildings and bare ground with some ruderal vegetation within the gravel areas, an area of dense scrub is located to the west of the Site area.

1.3 Proposed Project

1.3.1 This report relates specifically to the construction of the proposed 33/11kV electricity substation. This development will involve the replacement of an existing substation and other industrial buildings currently present on Site, building on an existing hard standing/gravel plot within a working industrial/commercial docks site. The project proposal is shown in Appendix B.

1.4 Purpose of this Report

1.4.1 The purpose of this report is to present the findings of a shadow Habitat Regulations Assessment (sHRA).

1.4.2 As per the The Conservation of Habitats and Species Regulations 2017 (hereafter referred to as 'the Habitat Regulations'), the competent authority can only agree to the Proposed

Scheme after it has been confirmed that it will not affect the integrity of any European site or sites (Regulation 63(5)). Regulation 63(3) also requires that the Competent Authority consult with the Statutory Nature Conservation Body (Natural Resources Wales) and have due regard to any responses from that body. This sHRA report can be used by the relevant Competent Authority under the Habitat Regulations, to inform their own Habitats Regulations Assessment process.

1.5 Legislation, Policy, and Guidance

Relevant Legislation

- 1.5.1 The need for a Habitat Regulations Assessment is driven by the requirements of The Conservation of Habitats and Species Regulations 2017.
- 1.5.2 The Habitat Regulations originally transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives) into UK law. The Regulations were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to allow them to remain operable from 1st January 2021 (after the UK left the EU).
- 1.5.3 Under the Habitat Regulations it is a requirement to create and maintain a national site network within the UK territory comprising those protected sites already designated under the Nature Directives (Special Areas of Conservation – SACs – and Special Protection Areas – SPAs), and any further sites designated under the Habitat Regulations. SACs and SPAs are high-quality conservation sites that make a significant contribution to conserving the habitats and species identified in Annexes I and II of the Habitats Directive. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
- 1.5.4 In addition to SACs and SPAs, Ramsar sites (both listed and proposed) are designated under national planning policy as a material consideration and are treated the same as Natura 2000 sites within the planning process. Ramsar sites are wetlands of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands. Within the UK, the boundaries of Ramsar sites typically overlap those of SACs and/or SPAs.
- 1.5.5 Where a Plan or Project has the potential to have an impact on an SAC, SPA or Ramsar site, there is a requirement to carry out a HRA to identify the risk of a significant effect on the site. Such a proposal is required to be assessed both alone and in combination with other plans and projects (Potential SPAs and possible SACs should be treated as equal to fully designated SPAs and SACs under the Habitat Regulations). A HRA can only be carried out by a "Competent Authority" which is an organisation or individual responsible for granting consent for a Plan or Project (e.g. Statutory Nature Conservation Organisations, local planning authorities, the Welsh Government, and the Secretary for State.)
- 1.5.6 Under the Habitat Regulations, specific Conservation Objectives are applied to SACs and SPAs (refer to 1.6.12). No such objectives apply to Ramsar sites. The Ramsar Convention predominantly covered wetland conservation and 'wise use,' with three main 'pillars' of activity:
- a) The designation of wetlands of international importance as Ramsar Sites;
 - b) The promotion of the wise use of all wetlands in the territory of each country; and
 - c) International co-operation with other countries to further the wise use of wetlands and their resources.
- 1.5.7 The Environment Act 2021 legislated for the potential to amend Part 6 (Assessment of Plans and Projects) of the Habitats Regulations. The Secretary of State may make regulations to amend the Habitat Regulations only if satisfied that the regulations do not reduce the level of environmental protection provided by them

Stages of a Habitat Regulations Assessment

1.5.8 Under the Conservation of Habitats Regulations, Regulation 63 states:

- a) A competent authority, before deciding to undertake, or give any consent, permission, or other authorisation for, a plan or project which—
 - is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and
 - is not directly connected with or necessary to the management of that site,
 - must make an appropriate assessment of the implications of the plan or project for that site in view of that site's Conservation Objectives.

1.5.9 The HRA process can be broadly broken down into four stages with the requirement for any one stage determined by the findings of the previous stage. The four stages can be summarised as follows and outlined in Figure 1:

- a) **Stage 1 – Screening:** This stage has two parts. The first identifies whether the plan or project is necessary for the management of any SACs, SPAs and Ramsar sites. Where this is confirmed as not the case, the second part then tests for a likely significant effect on the relevant sites by the proposed plan or project (either alone or in combination with other projects or plans). Where a likely significant effect is identified further assessment is then required during Stage 2 Appropriate Assessment.
- b) **Stage 2 – Appropriate Assessment:** Where a likely significant effect has been identified during Stage 1, a detailed assessment of impact likelihood and severity on the sites is undertaken. This incorporates a detailed review of the proposal in relation to the structure and function of the European Sites along with their Conservation Objectives to identify whether the integrity of the site(s) will be impacted. Consideration of mitigation is included during this Stage.
- c) **Stage 3 – Assessment of alternative solutions:** Where Stage 2 cannot show that significant effects on the integrity of the protected site(s) can be avoided, Stage 3 identifies and examines alternative ways of achieving the objectives of the plan or project that avoids these adverse effects.
- d) **Stage 4 – Assessment where no alternative solutions exist and where adverse effects remain:** Where significant adverse effects remain after Stage 3, Stage 4 seeks to present the case for Imperative Reasons of Overriding Public Interest (IROPI). Where IROPI applies, Stage 4 also seeks to identify and present appropriate compensatory measures needed to maintain the overall coherence of the protected site(s) across the region.

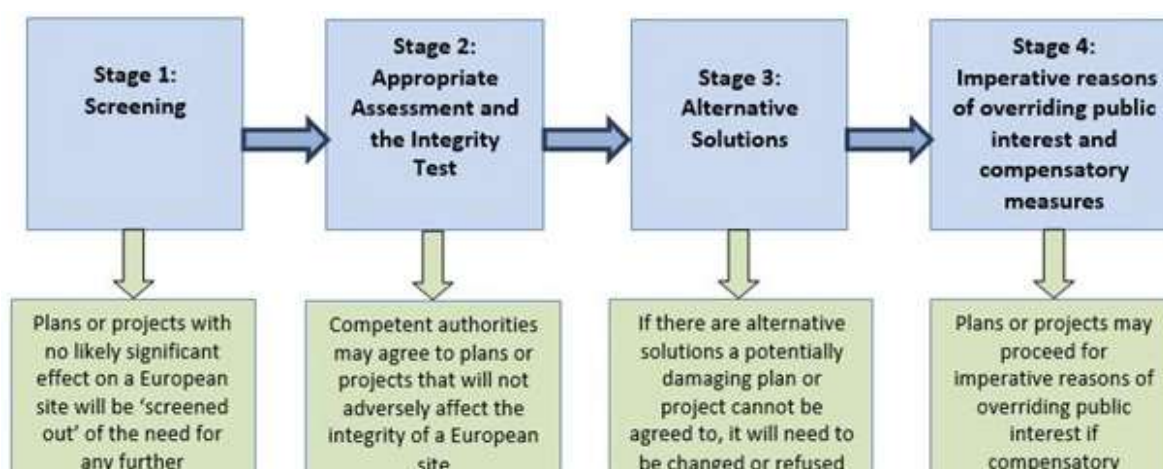


Figure 1 - The HRA Process

Likely Significant Effect: Definition

1.5.10 In regard to Stage 1, under the Habitats Regulations a significant effect is considered likely, if:

- a) It cannot be excluded, in that it is capable of having an effect, on the basis of objective information; and
- b) An effect is significant if it undermines the site's Conservation Objectives.

1.5.11 During the HRA process the precautionary principle applies. That is, where the likelihood of significant effects is deemed uncertain, the Conservation Objectives of the site(s) take precedence and an impact on the site must be assumed. In addition, for an assessment to be deemed appropriate it must be specific to the qualifying features of the site(s), as opposed to broad references to habitat features or similar.

Policy

1.5.12 Wales Planning Policy Edition 12 (2024) has been considered.

Guidance and Supplementary Advice

1.5.13 The following documents have been referenced for this report:

- a) Government guidance for England and Wales: "Habitats regulations assessments: protecting a European site" (<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>)
- b) Newport Council's Supplementary Planning Guidance "Wildlife and Development – December 2025"

2 RELEVANT EUROPEAN SITE(S)

2.1.1 It is considered that due to the small scale of the proposals at Alexandra Docks, that the potential impact pathways and overall Zone of Influence (Zoi) will be limited. Screening for relevant sites has been carried out as per the criteria presented in paragraph 3.1.3, which has identified 4 designated sites (as recorded in Table 1). These sites will be assessed/screened within this shadow HRA report, with relevance to potential impacts from the proposed Project.

2.1.2 The Site is located within 100m of the nearest watercourse (the River Usk) therefore the potential for a hydrological/hydrogeological connection to any riverine or marine SAC or any designated Site containing a ground water dependent terrestrial ecosystem (GWDTE) has been considered.

2.1.3 For the purposes of this Screening Report, on a precautionary basis, the following potential Zoi have been considered:

- 2km – For any Site
- 5km – for Sites with mobile species as qualifying features (larger developments may consider up to 10km for sites with bats as qualifying features).
- Any Site that has a hydrological connection via the River Usk.

2.1.4 Under the above criteria, two SACs, one SPA and one Ramsar site have been identified within the potential Zol. These are presented in Table 1 - Designated Sites within the Zol of Alexandra Docks.

Table 1 - Designated Sites within the Zol of Alexandra Docks

Site	Distance	Qualifying Features
River Usk/Afon Wysg SAC	c.100m	Annex I habitats that are a primary reason for selection of this site - Not applicable Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site - Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation Annex II species that are a primary reason for selection of this site - Sea lamprey <i>Petromyzon marinus</i> - Brook Lamprey <i>Lampetra planeri</i> - River lamprey <i>Lampetra fluviatilis</i> - Twaite shad <i>Alosa fallax</i> - Atlantic salmon <i>Salmo salar</i> - Bullhead <i>Cottus gobio</i> - Otter <i>Lutra lutra</i> Annex II species present as a qualifying feature, but not a primary reason for selection of this site: - Allis shad <i>Alosa alosa</i>
Severn Estuary/Hafren Môr SAC	c.3.3km (Hydrological connection via River Usk)	Annex I habitats that are a primary reason for selection of this site - Estuaries - Mudflats and sandflats not covered by seawater at low tide - Atlantic salt meadows <i>Glaucopuccinellietalia maritima</i> Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site - Sandbanks which are slightly covered by sea water all the time - Reefs Annex II species that are a primary reason for selection of this site - Sea lamprey <i>Petromyzon marinus</i>

		- River lamprey <i>Lampetra fluviatilis</i> - Twaite shad <i>Alosa fallax</i> Annex II species present as a qualifying feature, but not a primary reason for selection of this site - Not applicable
Severn Estuary/Hafren Môr SPA	c.3.3km (Hydrological connection via River Usk)	Internationally important populations of regularly occurring Annex I species: - Bewick's swan <i>Cygnus columbianus</i> Internationally important populations of regularly occurring migratory bird species: - European white-fronted goose <i>Anser albifrons</i> - Dunlin <i>Calidris alpina</i> - Redshank <i>Tringa totanus</i> - Shelduck <i>Tadorna tadorna</i> - Gadwall <i>Mareca strepera</i> Internationally important assemblage of waterfowl: - Wigeon <i>Mareca penelope</i> - Teal <i>Anas crecca</i> - Pintail <i>Anas acuta</i> - Pochard <i>Aythya ferina</i> - Tufted duck <i>Aythya fuligula</i> - Ringed plover <i>Charadrius hiaticula</i> - Grey plover <i>Pluvialis squatarola</i> - Curlew <i>Numenius arquata</i> - Whimbrel <i>Numenius phaeopus</i> - Spotted redshank <i>Tringa erythropus</i>
Severn Estuary/Hafren Môr Ramsar	c.3.3km (Hydrological connection via River Usk)	Internationally important populations of wintering waterfowl - Bewick's swan <i>Cygnus columbianus</i> - European white-fronted goose <i>Anser albifrons</i> - Dunlin <i>Calidris alpina</i> - Redshank <i>Tringa totanus</i> - Shelduck <i>Tadorna tadorna</i> - Gadwall <i>Mareca strepera</i> Internationally important assemblage of waterfowl: - Dunlin <i>Calidris alpina</i> - Redshank <i>Tringa totanus</i> - Ringed plover <i>Charadrius hiaticula</i> - Whimbrel <i>Numenius phaeopus</i> - Wigeon <i>Mareca penelope</i> - Teal <i>Anas crecca</i> - Pintail <i>Anas acuta</i>

		• Pochard <i>Aythya ferina</i> • Tufted duck <i>Aythya fuligula</i> • Ringed plover <i>Charadrius hiaticula</i> • Grey plover <i>Pluvialis squatarola</i> • Curlew <i>Numenius Arquata</i> • Spotted redshank <i>Tringa erythropus</i>
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3 SHRA STAGE 1: SCREENING

3.1 Stage 1 (a) Purpose of the Project

3.1.1 The Screening stage of the HRA Process (Stage 1) of the HRA process can be broken down into two parts with Stage 1 (a) answering the following question:

Is the Project either directly connected with or necessary to the (conservation) management of the European Site's qualifying features?

3.1.2 As detailed in Section 1.4, the development proposal aims to construct a new 33/ 11kV electricity substation. As such, the Project is not directly connected with or necessary to the management to either of the SAC's qualifying features and the HRA process moves on to Stage 1 (b) – the test for likely significant effects (LSE).

3.2 Stage 1(b): Test for Likely Significant Effect

3.2.1 The following section aims to review to development proposals against the relevant Conservation Objectives of the identified Designated Sites to ascertain whether a significant effect is likely.

3.2.2 The following details the Conservation Objectives for the above sites:

River Usk SAC

Conservation Objectives

3.2.3 The River Usk SAC also contains the River Usk (Lower Usk)/Afon Wysg SSSI.

3.2.4 The detailed conservation objectives for the River Usk are presented in the Core Management Plan for the site, available from https://afonyddcymru.org/wp-content/uploads/2022/11/river_usk-sac-core-plan.pdf.

3.2.5 There is one conservation objective for each qualifying feature with each conservation objective consisting of two elements:

- Vision for the feature
- Status and Management Requirements

3.2.6 The conservation objectives for each qualifying feature can be summarised as follows:

- **European otter *Lutra lutra*:** The population size should not be limited by the availability of suitable undisturbed breeding sites. Where these are insufficient, they should be created through habitat enhancement and where necessary the provision of artificial holts. No otter breeding site should be subject to a level of disturbance that could have an adverse effect on breeding success. Where necessary, potentially harmful levels of disturbance must be managed. **Assorted fish species:** The population of the seven fish species (refer to Table 1) should be stable or increasing, with the natural range also not reduced.
- **Watercourses of plain to montane levels with the *Ranunculus fluitantis* and *Callitriche-Batrachion* vegetation:** The natural range of the plant communities represented within this feature should be stable or increasing in the SAC. The area covered by the feature within its natural range in the SAC should be stable or

increasing.

Severn Estuary SAC

Conservation Objectives

3.2.7 The Severn Estuary SAC also contains the Severn Estuary (Wales) SSSI.

3.2.8 The detailed conservation objectives for the Severn Estuary are detailed below:

3.2.9 'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring';

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

3.2.10 The conservation objectives cover the following habitats and species:

- H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks
- H1130. Estuaries
- H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats
- H1170. Reefs
- H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*); Atlantic salt meadows
- S1095. Sea lamprey (*Petromyzon marinus*)
- S1099. River lamprey (*Lampetra fluviatilis*)
- S1103. Twaite shad (*Alosa fallax*)

3.2.11 With reference to the Preliminary Ecological Appraisal (PEA) completed for the works, the following designated sites have been identified as being within the Zone of Influence of the development:

- a) Severn Estuary/Môr Hafren SAC
- b) Severn Estuary Ramsar

- c) Severn Estuary SPA
- d) River Usk SAC

Severn Estuary SPA

Conservation Objectives

3.2.12 The conservation objectives for the Severn Estuary are detailed below:

3.2.13 'Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring';

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and;
- The distribution of the qualifying features within the site.

3.2.14 The conservation objectives cover the species listed in Table 1.

Severn Estuary Ramsar

Conservation Objectives

3.2.15 The Ramsar site does not have its own detailed conservation objective, however a generalised objective based on NRW guidance and assumptions made from the overlapping SPA designation have been detailed below:

3.2.16 'Aim to stem wetland loss and protect its internationally important habitats and species, specifically its massive tidal range, saltmarshes, mudflats, and migratory bird/fish populations'.

3.2.17 The conservation objective focuses on maintaining or restoring the extent, distribution, and structure of these features, alongside supporting populations of wintering waterbirds (e.g., Bewick's swan and dunlin) and fish species (e.g., shad and salmon).

3.2.18 Key conservation objectives include;

- Safeguarding extensive intertidal mudflats, sandflats, and saltmarsh communities
- Ensuring favourable conditions for internationally important populations of migratory waterfowl, including Bewick's swan, European white-fronted goose, dunlin, redshank, and shelduck.
- Maintaining crucial routes and habitat for species such as Atlantic salmon, sea trout, sea/river lamprey, and twaite/allis shad.
- Managing the site to prevent deterioration of habitats (e.g., *Sabellaria* reefs) and minimising disturbance to species from human activities.

River Usk SAC

Impact Pathways

- 3.2.19 Consideration has been given to potential impacts during both the construction stage of the project and the operational stage.
- 3.2.20 Ecological baseline data from the PEA report produced by TACP (Ref: 61271_REP_AlexandraDocksPEA_P2_FI) was reviewed in relation to the proposed works, to assist in identifying any impact pathways.
- 3.2.21 The Project proposals require some vegetation clearance around the Alexandra docks site to facilitate the construction of the substation. However, none of this vegetation falls within the SAC and therefore there will be no direct impacts on either of the Annex 1 habitat types which are a qualifying feature of the SAC.
- 3.2.22 The project proposals will require installation of new pavement and tie ins for access into the site, resurfacing and foundations for the new substation building/s. There is the potential for the requirement for some ground levelling to be undertaken, however this would be minimal in scope, the biggest deficit is 0.5m in height. If not managed correctly, any of these processes could lead to runoff/pollution impacts. However given the location of the site, the adjacent roads, vegetation and other already developed sites located between the Site and the River Usk, the risk is considered negligible that these would have an impact on the qualifying features or the Conservation Objectives of the River Usk.
- 3.2.23 The Alexandra Docks site lies c.100m from the River Usk SAC. The Conservation Objectives for the European otter, qualifying feature of the SAC include reference to the requirement for undisturbed breeding sites, and no disturbance of breeding sites which could have an adverse effect on breeding success. The Scheme at Alexandra Docks requires some demolition works of existing buildings and nominal vegetation clearance. This will not result in impacts to breeding sites, and site movements will not be dissimilar to those present on a daily basis within the docks.
- 3.2.24 The Conservation Objectives for the seven qualifying fish species, refer to maintaining a stable population of each of these species and also ensuring no reduction in natural range.
- 3.2.25 The Conservation Objectives for the Watercourses of plain to montane levels include reference to the natural range of the plant communities being stable or increasing, as well as the area covered by the feature being stable or increasing. The overall risk of the works at Alexandra Docks having an impact on the watercourse is considered to be negligible.
- 3.2.26 As per 4.2.22, risks from pollution impacts as a result of run off were identified as negligible. Considering this, and the above additional information into account it cannot be reasonably argued that either the construction or the operational phase will lead to the current conservation objectives for the SAC being undermined – there is no likely significant effect. As run-off is still possible, although with negligible impacts alone, in-combination impacts have been considered in Section 6.

Severn Estuary SAC

Impact Pathways

- 3.2.27 The conservation objective listed above in paragraph 3.2.9 details 'Ensure the integrity

of the site is maintained or restored as appropriate; that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features'.

3.2.28 The only way in which the development could impact the integrity of the SAC would be impacts on the water quality from Discharge/run-off from the Alexandra Docks site. These pollution incidents would be a direct impact into the River Usk SAC and therefore indirectly into the Severn Estuary SAC.

3.2.29 As detailed in paragraph 4.2.26, runoff impacts into the River Usk SAC are considered negligible. Dilution effects on entering the Severn Estuary would reduce this further. As such, there will not be a likely significant effect on the Severn Estuary SAC as a result of the Alexandra Docks Project. Resultingly, the Severn Estuary SAC can be screened out of further assessment.

Severn Estuary SPA

Impact Pathways

3.2.30 The conservation objective listed above in paragraph 4.2.13 details 'Ensure that the integrity of the site is maintained or restored as appropriate and ensure that the site contributes to achieving the aims of the Wild Birds Directive.'

3.2.31 The bird listed in Table 1 as important features of the SPA, do not occur on the Project site, due to no suitable habitats within the docks. Therefore although they are mobile species, they are not associated with the Site due to a lack of functional habitat.

3.2.32 The only way in which the development could impact the integrity of the SPA would be impacts on the water quality from Discharge/run-off from the Alexandra Docks site, this could indirectly affect the Wild Birds through polluting food sources (fish) and polluting breeding/foraging habitats. These pollution incidents would be a direct impact into the River Usk SAC and therefore indirectly into the Severn Estuary SPA.

3.2.33 However, as detailed in paragraph 4.2.26, runoff impacts into the River Usk SAC are considered negligible. Dilution effects on entering the Severn Estuary would reduce this further. As such, there will not be a likely significant effect on the Severn Estuary SPA as a result of the Alexandra Docks Project. Resultingly, the Severn Estuary SPA can be screened out of further assessment.

Severn Estuary Ramsar

Impact Pathways

3.2.34 The conservation objective listed above in paragraph 4.2.16 details 'Aim to stem wetland loss and protect its internationally important habitats and species, specifically its massive tidal range, saltmarshes, mudflats, and migratory bird/fish populations'.

3.2.35 The development would have no impact (direct or indirect) on the intertidal mudflats, sandflats or saltmarsh. Routes for migratory fish would not be affected as the Project will have no direct impact on the size/use of the River Usk SAC and therefore indirectly passage to the Severn Estuary.

3.2.36 The only way in which the development could impact the integrity of the Ramsar site would be impacts on the water quality from Discharge/run-off from the Alexandra Docks site, this could indirectly affect the migratory bird/fish populations that potentially use the River Usk SAC and therefore link to the Severn Estuary. This could affect the 'favourable conditions for internationally important populations of migratory waterfowl.'

3.2.37 However, as detailed in paragraph 4.2.26, runoff impacts into the River Usk SAC are considered negligible. Dilution effects on entering the Severn Estuary would reduce this further. As such, there will not be a likely significant effect on the Severn Estuary Ramsar as a result of the Alexandra Docks Project. Resultingly, the Severn Estuary Ramsar can be screened out of further assessment.

4 SUMMARY

- 4.1.1 Based on the assessed impacts on conservation objectives and qualifying species as well as the perceived impact pathways, detailed earlier in this report, it is considered that the proposed Project at Alexandra Docks will not have a likely significant effect on any relevant designated site. There may be some negligible level run-off into the River Usk which has been considered further under Section 5 (in-combination effects).

5 IN-COMBINATION EFFECTS

- 5.1.1 A search of the Newport Council Planning portal was carried out for applications within the same postcode as Alexandra Docks within the last two years. Three applications were found for demolition of buildings at three different sites, listed below;

- **25/093** - PRIOR NOTIFICATION OF DEMOLITION OF 2 NO. VACANT BUILDINGS
Lewis House 4 East Way Road Alexandra Docks Newport NP20 2NP
- **25/0862** - PRIOR NOTIFICATION OF DEMOLITION OF 2NO. WAREHOUSE BUILDINGS - Jamaica Terminal East Way Road Alexandra Docks Newport South Wales NP20 2NP
- **25/0095** - PRIOR NOTIFICATION OF DEMOLITION OF A FORMER SHIP ENGINEERING FACILITY AT 12 EAST WAY ROAD - 12 East Way Road Alexandra Docks Newport South Wales NP20 2NP (*this site also has 2 other planning application numbers - 25/0195 & 24/0904)

- 5.1.2 The first two were validated as not needing prior approval, however the site at 12 East Way Road required prior approval. None of these demolition works have yet taken place at the time of writing this report.

- 5.1.3 Having reviewed the locations of the applications and their proposals, it is not considered that the demolition of the property at 4 East Way Road would have any further significant effect on the designated sites, given its location within the docks and the limited works required.

- 5.1.4 Given the contained nature of the location at Jamaica Terminal and the waste already being treated within this location, alongside the location, with East Way Road and the old rail tracks running alongside the River Usk, impacts on the Usk are considered to be negligible.

- 5.1.5 The demolition at 12 East Way Road requires prior approval and would have an increased potential impact in comparison to the works at Alexandra Docks, given its location, closer to the Usk, as well as being directly adjacent to North Dock and the outflow from the Dock into the River Usk SAC. This proposal would be more damaging on the qualifying species within the River Usk and its conservation objectives and would potentially have an impact in isolation so is not considered further in-combination with Alexandra Docks.

- 5.1.6 As detailed in the paragraphs above the remaining two proposals are considered to have negligible effects, similar to those at Alexandra Docks. These have been reviewed in-combination with Alexandra docks and it is concluded that were all three sites demolished concurrently the combined-impact on the Usk would remain negligible.

6 CONCLUSION

- 6.1.1 The proposals at Alexandra Docks are not considered likely to have a significant effect on any relevant designated site, nor undermine the conservation objectives of those sites, alone or in combination with other local developments. As such, it is not necessary to carry out an Appropriate Assessment on the development.

7 REFERENCES

Government guidance for England and Wales (2023): "Habitats regulations assessments: protecting a European site" (<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>)

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Newport Council (2025) Supplementary Planning Guidance "Wildlife and Development – December 2025"

NRW (2022) River Usk SAC Core Management Plan. Accessed at https://afonyddcymru.org/wp-content/uploads/2022/11/river_usk-sac-core-plan.pdf.

TACP (2025) Alexandra Docks, Newport. Preliminary Ecological Appraisal. TACP (UK) Ltd. Cardiff

Welsh Government (2024) Wales Planning Policy Edition 12.

APPENDICES

Appendix A

Designated Sites and Site Location

Appendix B

Proposed Project Plan

