

Uskmouth AW2 Battery Energy Storage System

784-B070326

Breeding Bird Protection Plan

Stroma Tidal Power Ltd.

07 January 2026

**Document prepared on behalf of Tetra Tech Limited. Registered in England
number: 01959704**



TETRA TECH

Tetra Tech Bristol, 90 Victoria St, Redcliffe, Bristol BS1 6DP

Tetra Tech Limited. Registered in England number: 01959704
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

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EXECUTIVE SUMMARY

Site Location	The site is located at Uskmouth Power Station next to the mouth of River Usk in Nash, Newport. The site is centred at Ordinance Survey National Grid Reference ST 32722 83753.
Proposals	The report seeks to provide evidence to discharge planning condition 6 of planning permission (ref. 25/0407) that has been granted with conditions for the construction of a Battery Energy Storage System (BESS) at Uskmouth Power Station.
Scope of this Report	The scope of this Breeding Bird Protection Plan are to provide a framework for the following: • A monitoring framework that demonstrates compliance with planning condition and informs adaptive mitigation and supplies data to the Local Planning Authority and South East Wales Biodiversity Records Centre (SEWBrEC) where appropriate. • Methods that will be in place to prevent killing, injuring, or taking, damaging or destroying the nest of any wild bird while it is in use or being built during the removal of PFA and construction phases of the development; • For Schedule 1 bird species, additional methods will be required to avoid disturbing these birds while they are nesting, have dependent young or in any other way to otherwise impede breeding success; and • An outline of the contingency measures if monitoring cannot be completed or if impacts to nesting birds are detected.

1.0 INTRODUCTION

1.1 BACKGROUND

Tetra Tech Limited (Tetra Tech) was commissioned by Stroma Tidal Power Ltd. to prepare this Breeding Bird Protection Plan (BBPP) to discharge planning condition 6 of planning permission (ref. 25/0407) that has been granted with conditions for the construction of a Battery Energy Storage System (BESS) at Uskmouth Power Station. Hereafter this is referred to as the “site”.

This report has been prepared by Assistant Ecologist Fraser McCarterBSc (Hons). The conditions pertinent to it are provided in Appendix A.

1.2 SITE DESCRIPTION

The site is located at Uskmouth Power Station, adjacent to the River Usk in Nash, Newport, South Wales. The proposed Battery Energy Storage System (BESS) facility will be installed on land associated with the former Uskmouth A Power Station, referred to as ‘AW2’. The extent of the site is shown on the submitted Site Location Plan (Figure 1).

To the immediate north of the site is the Severn Power Combined Cycle Gas Turbine (CCGT) Power Station; to the southeast is the former coal stockpile area, where a new BESS development is currently under construction (under planning permission ref: 23/0835); and to the south lies Newport Wetlands National Nature Reserve.

The development is approximately 4 ha of land currently used for the storage of pulverised fuel ash (PFA). The PFA storage area comprises a concrete slab beneath the PFA stockpiles bound on all side by a 2.4 m high reinforced concrete walls. The application site boundary also includes part of the internal access road through the Uskmouth site, rough grassland, disused railway tracks, and a balancing pond to the west.

The development site is centred at National Grid Reference ST 32572 83548.

1.3 DEVELOPMENT PROPOSALS

The works relate to the removal of stored PFA from the site and the installation of a battery energy storage system (BESS) with associated infrastructure. It includes the raising of land levels to create an elevated engineered platform designed to support the new infrastructure and mitigate flood risk.

The site would comprise the following elements:

- Site clearance including the removal of circa 140,000 tonnes of PFA currently stored on site.
- Raising the ground level for the electrical infrastructure above predicted flood levels.
- Laying out of containerised battery storage units along with associated inverters mounted on concrete slabs / piers.

The PFA is proposed to be removed from the site via the road network over a 15-month period starting 1st February 2025. This will be undertaken during normal working hours (indicatively, 07:00 to 19:00 Monday to Friday; and 07:00 to 13:00 on Saturdays and at no time on Sundays or bank holidays). This process will result

in approximately 30 HGVs movements i.e. 15 arriving and 15 departing the site per day. The site will then be cleared to make way for the BESS facility.

The construction period is anticipated to take approximately 24 months and will be undertaken during the normal working hours (as the PFA removal above). The BESS infrastructure is proposed to be delivered to the site via the road network, which will be detailed within a construction programme.

The BBPP provides details of how breeding birds will be protected during the removal of the PFA heaps and during the construction period.

1.4 AVAILABLE DATA

This BBPP has been produced for the Ash Storage Area and immediate working compound for the Uskmouth AW2 Battery Energy Storage System. The details are based on Breeding Bird Survey (BBS) (Tetra Tech, 2025a)(see Appendix B) and the Habitats Regulations Assessment (HRA) (Tetra Tech, 2025b). The BBS provided details of the presence and territories of birds on and adjacent to the site including that of Schedule 1 species (notably Cetti's warbler *Cettia cetti*); the HRA provides site context and zones of influence.

This BBPP refers to vantage points and walked routes shown on the BBS Figure 2 Breeding Birds Territories (see Appendix B).

1.5 OBJECTIVES

The objectives of this BBPP are to provide a framework for the following:

- Provide a monitoring framework that demonstrates compliance with planning condition informs adaptive mitigation and supplies data to the Local Planning Authority and South East Wales Biodiversity Records Centre (SEWBRc) where appropriate;
- To detail methods that will be in place to prevent killing, injuring, or to taking, damaging or destroying the nest of any wild bird while it is in use or being built breeding birds during the removal of PFA and construction phases of the development;
- In addition to the above point, for Schedule 1 bird species, to detail methods required to avoid disturbing these birds while they are nesting, have dependent young or in any other way to otherwise impede breeding success; and
- Define contingency measures if monitoring cannot be completed or if impacts to nesting birds are detected.

2.0 LEGAL FRAMEWORK

The Wildlife & Countryside Act 1981 (as amended) makes it an offence to intentionally kill, injure or take wild birds, or to take, damage or destroy the nest of any wild bird while it is in use or being built. In relation to the Uskmouth AW2 Ash Storage Area this requires avoidance of vegetation clearance and noisy activities during the breeding season (generally March–August inclusive) where nests or breeding behaviour are present.

Species listed on Schedule 1 of the Wildlife & Countryside Act 1981 (as amended) receive stricter protection against disturbance while nesting or breeding; disturbance that would impair breeding success is an offence unless an explicit licence is granted by Natural Resources Wales. If Schedule 1 species, e.g. Cetti's warbler and peregrine *Falco peregrinus* should be considered for the site, are confirmed on or immediately adjacent to the site the ECoW must implement bespoke exclusion zones, increased monitoring and, where avoidance is not possible, seek the appropriate licence before any potentially disturbing works proceed.

The HRA (Tetra Tech 2025b) for the site informs the competent authority (Newport City Council) whether the proposed development could have likely significant effects on nearby European- or Ramsar-designated features. The BBPP must therefore implement the avoidance and mitigation measures set out in the HRA, provide monitoring and reporting to the LPA and statutory consultees, and demonstrate (through pre-construction surveys, ongoing monitoring and adaptive mitigation) that there will be no adverse effect on site integrity.

3.0 SURVEY METHODS, MONITORING LOCATIONS AND ROUTES

3.1 SURVEY METHODOLOGY

The survey methods for monitoring of nesting birds will be consistent with the 2025 breeding bird survey (Tetra Tech 2025a). This includes four survey visits during peak breeding season (mid-March to July) following standard territory-mapping methodology. Monitoring will be undertaken to ascertain if any birds (especially schedule 1 species Cetti's warbler, peregrine) are present along the western and southern boundaries of the site that might be affected by works.

Surveys will combine vantage point watches and walked transects to record territorial behaviour, singing males, nest building, adult carrying food, and fledglings.

Surveys will be conducted early morning surveys (from first light to ~10:00) and an evening session as necessary (BBS included one evening session ~20:00–22:15) to capture species with crepuscular activity.

Surveys will only be conducted during suitable conditions (low wind Beaufort 0–3, no heavy rain).

Monitoring locations and vantage points

The vantage points and walked routes mapped in the Figure 2 (of the BBS (Tetra Tech 2025a) (see Appendix B) as the baseline monitoring locations. These include:

- Vantage Point A: northern boundary overlooking ash storage platform.
- Vantage Point B: eastern edge overlooking disused wet areas and reed fringe.
- Vantage Point C: western margin adjacent to River Usk edge/industrial fringe.

Two circular transects covering the western and southern perimeter and an extended transect along the immediate off-site linear habitats will be conducted.

If updated mapping is required, the ECoW will GPS-locate and provide coordinates for each vantage point and transect prior to pre-construction monitoring.

Timing and duration of monitoring

Pre-construction baseline:

- Minimum of four full breeding-season (mid-March to July) visits in the season immediately preceding construction start, matching BBS timing and effort (as used in July 2025 BBS).
- Additional evening session(s) if species of interest (e.g., night-activity species) are suspected/recorded — BBS included an evening visit (27/06/25 20:00–22:15).

Construction-phase monitoring:

- Weekly vantage point checks for the first four weeks of any new noisy / bird-disturbing activity within 200 m of known territories or Schedule 1 records (reducing frequency to fortnightly if no breeding activity is recorded).

Data recording, presentation and dissemination

Monitoring records – required fields will include:

- Date, start and end times, weather, observer name(s).
- Vantage/transect location (GPS coordinates).
- Species, count, behaviour (e.g., singing, nest-building, carrying food, alarm calling).
- Estimated breeding status (e.g., probable, confirmed).
- Territory mapping and species-specific notes (including Schedule 1 species details).

Territory mapping and outputs will include:

- Maps showing territory extents with GPS coordinates for observations will be produced.
- Species-specific notes (evidence for breeding, Schedule 1 particulars, unusual behaviour) will be recorded.
- Raw survey data and GIS layers will be appended.

Reporting timetable and format will include:

- Interim monitoring summary: brief weekly email will be sent to the contractor and project manager during active PFA removal and construction period.
- Full monitoring report: one consolidated report will be produced.
- Final submission: monitoring report will be submitted within 6 weeks of the end of the monitoring period.

Data submission and notifications will include:

- Validated species records will be submitted to SEWBRc — within 3 months of survey completion.
- Copies of final reports and GIS layers will be provided to the LPA, Natural Resources Wales (if requested), and the project file.
- All Schedule 1 species and any records relevant to protected sites will be highlighted in reports and notified to statutory advisors as required.

4.0 AVOIDANCE MEASURES

Avoid vegetation clearance, earthworks and noisy works within the breeding season (1st March – 31st August inclusive) wherever reasonably practicable.

Where clearance within the breeding season is unavoidable, all vegetation to be checked no more than 24 hours prior to clearance by an experienced ornithologist/ECoW. If active nests are found, a protective buffer will be implemented. Clearance must not proceed within buffer until nest is no longer active (confirmed by the ECoW).

Buffer distances and disturbance controls:

- Standard precautionary buffer: 5–10 m for common species where works are low disturbance and short duration (subject to ECoW judgement). For more sensitive species and confirmed nesting sites, the ECoW shall set species- and site-specific exclusion zones. Examples:
 - Ground-nesting passerines: minimum 10 m no-go zone for clearance; increase as required if repeated disturbance observed.
 - Colonial gulls (Lesser/Greater black-backed, Herring gull) — maintain 50 m min. buffer for direct disturbance and 200 m for major noisy works depending on colony locations recorded in BBS (site recorded presence and numbers).
- Schedule 1 species (if recorded active): bespoke exclusion zones and disturbance minimisation will be required that will be specific to that species. For persistent disturbance sources unless ECoW advises otherwise; all works in vicinity require ECoW supervision.
- Exclusion zones to be clearly marked on-site (barrier tape/signage) and shown on the Construction Environmental Management Plan (CEMP) site plan.

Special provisions for Schedule 1 species

The BBS recorded Schedule 1 species (see (see Appendix B: BBS Tetra Tech 2025a Figure 2) — any confirmed nest/territory of a Schedule 1 species triggers immediate protective prescriptions:

- No works within the Species Protection Zone (SPZ) without prior written consent from Natural Resources Wales and LPA. SPZ extent to be advised by ECoW on a case-by-case basis; default initial buffer 200 m.
- If disturbance cannot be practicably avoided, an application for a license (e.g., to NRW/Statutory Agency) will be made before works proceed. All licensing and statutory approvals to be obtained before impact-causing works commence.
- Enhanced monitoring visits (minimum twice-weekly) while the SPZ is active.

Disturbance-minimising working methods

- Use quieter plant where possible and orient noisy activity away from confirmed territories.
- Restrict on-site personnel numbers near SPZs; avoid loud communications and bright lights near territories at dawn/dusk.
- Keep dogs off-site or securely controlled at all times.
- Limit working hours to reduce disturbance during peak bird activity (avoid noisy work at dawn/dusk near territories).

5.0 MITIGATION

If monitoring cannot be completed as scheduled (e.g. access denied, adverse weather) then the following course of action will be undertaken:

- Immediate notification from ECoW to project manager and LPA within 48 hours, stating reason and proposed alternative dates;
- Re-schedule monitoring within 7 days where practicable; if not practicable before critical works commence, works must be suspended until monitoring can be completed and ECoW provides clearance;
- If an active nest is discovered during works:
 - Immediate suspension of works within the buffer (as defined by ECoW).
 - ECoW to assess and set temporary protection measures; works to resume only when nest is inactive as determined by ECoW.

If unexpected mortality or injury to birds occurs:

1. Cease relevant activities immediately;
2. Secure and record the scene (photograph, GPS).
3. Notify LPA and NRW within 24 hours.

ECoW will investigate cause, recommend remedial actions (e.g., additional exclusion, revised working methods), and prepare incident report. Any injured bird will be placed safely in a suitable container and transferred to wild hospital such as at City Wildlife Care (tel. 07794 179 207) or Swan Rescue South Wales (tel. 01633 895241)

If Schedule 1 species are present and disturbance is occurring:

- Suspend offending works immediately.
- Notify statutory body and LPA; agree additional mitigation and monitoring before resumption. Licensing may be required.

Species-specific prescriptions as per BBS (Tetra Tech 2025a)

- Colonial gulls (Lesser black-backed, Herring, Great black-backed): avoid disturbance to loafing/feeding areas; maintain buffer(s) from any known loafing/colonial site shown in BBS Figure 2 (see Appendix B); avoid sudden loud disturbance during colony attendance period (April–July). Monitor for any breeding activity; if a colony establishes, ECoW to implement colony protection zone and liaise with LPA.
- House martin / swift / starling / swallow / hirundines: avoid removal of nesting substrate on buildings during breeding season; if removal required, schedule out of breeding season or provide alternative / mitigation measures (e.g., nest cups).
- Water rail / reed fringe species: avoid disturbance to reed fringe and wet land edges; keep machinery and stockpiling activities away from riparian vegetation; if works require access near reedbed, install temporary barriers and use directional lighting to minimise disturbance.
- Schedule 1 species (e.g., Cetti's warbler or peregrine that were recorded during 2025): avoid disturbance of nesting cliffs/buildings; maintain recommended buffers (minimum 200 m default

unless refined by ECoW); avoid bright lights and tall vehicle/plant movement within buffer during breeding season.

- General: Avoid use of pesticides/herbicides in and adjacent to breeding territories during breeding season.

6.0 IMPLEMENTATION AND COMPLIANCE

The ECoW is responsible for ensuring BBPP measures are implemented and all site staff are given a toolbox talk on bird protection measures before any site works begin. The BBPP to be appended to the CEMP and to be included in site induction materials.

Any deviation from the BBPP must be approved in writing by the ECoW and notified to the LPA.

6.1 REPORTING AND SIGN-OFF

Works will start prior to the beginning of the breeding bird season (1st February) so we do not envisage the need for preconstruction surveys. The ornithologist would however undertake a walkover survey of the site prior to the commencement of works. Should works go into March and beyond breeding bird surveys would be required before the beginning removal of the PFA piles. This pre-construction report would include territory maps, species list, and recommended buffers.

The ornithologist, as ECoW would attend site every two weeks between March and June to confirm the status of breeding birds, particularly Schedule 1 around the boundaries of the site. These visits would be recorded in an ECoW diary and the contractor will be advised on appropriate action following each visit by email.

ECoW confirmation that BBPP mitigations were implemented and whether objectives met; included in final project completion ecology certificate submitted to LPA.

6.2 CONTACT LIST

- ECoW: Sean Flynn MCIEEM CEnv Tetra Tech Associate Ecologist 07976 171 893 sean.flynn@tetrattech.com
- Ornithologist: John Simper Tetra Tech Principal Ecologist 07557 582 811 John.Simper@tetrattech.com
- Project Environmental Manager: TBC.
- SEWBReC: General Enquiries 01443 808896 info@sewbrec.org.uk

REFERENCES

Tetra Tech, 2024. *Uskmouth AW2 Preliminary Ecological Appraisal*, Bristol: s.n.

Tetra Tech, 2025a. *Uskmouth AW2 BESS Breeding Bird Survey Report*, Bristol: Tetra Tech.

Tetra Tech, 2025b. *Uskmouth AW2 BESS Habitats Regulation Assessment*, Bristol: Tetra Tech.

FIGURES

FIGURE 1: SITE LOCATION PLAN



Site Location Plan

Uskmouth AW2



AW2 Energy Storage Ltd

Legend

Survey areas

Notes:

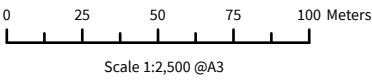
Drawn by: hannah.hamilton

Checked by: Fraser McCarter

Figure No. 1

Revision No. A

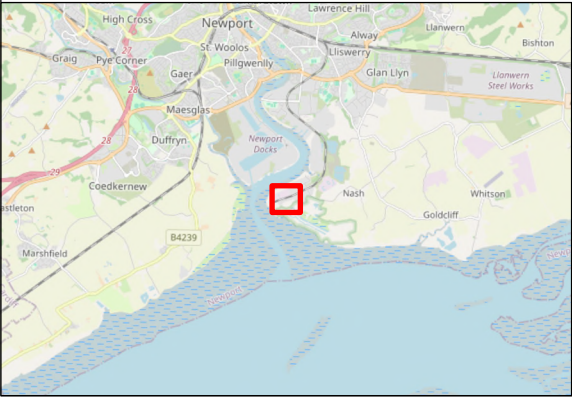
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British National Grid

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3 Sovereign Square
Sovereign Street
Leeds
United Kingdom
LS1 4ER

Tetra Tech Limited.
Registered in England
number: 01959704

APPENDIX A: REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of Stroma Tidal Power Ltd. (“the Client”) for the proposed uses stated in the report by Tetra Tech Limited (“Tetra Tech”).

The report refers, within the limitations stated, to the environment of the Proposed Development in the context of the surrounding area at the time of the inspections¹. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the Proposed Development and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

Tetra Tech reserves the right to share this Report and any related materials, surveys, drawings and/or documents at any time with the relevant Local Ecological Records Centre (LERC), any relevant statutory body or any equivalent organisation as Tetra Tech may reasonably require from time-to-time.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accepts no liability for issues with performance arising from such factors.

APPENDIX B: AW2 BREEDING BIRD SURVEY REPORT, TETRA TECH 2025

Uskmouth AW2 Battery Energy Storage System

784-B070326

Breeding Bird Survey Report

Stoma Tidal Power Ltd.

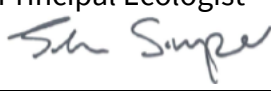
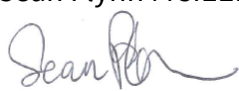
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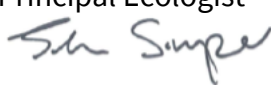
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APPENDICES

APPENDIX A: REPORT CONDITIONS

APPENDIX B: LEGISLATION AND POLICY

APPENDIX C: FULL LIST OF BIRD SPECIES RECORDED

EXECUTIVE SUMMARY

Contents	Summary
Site Location	The site is located at Uskmouth Power Station next to the mouth of River Usk in Nash, Newport. The site is centred at Ordinance Survey National Grid Reference ST 32722 83753.
Proposals	The Proposed Development seeks full planning permission for the removal of stored PFA from the site and the installation of a battery energy storage system (BESS) with associated infrastructure. It includes the raising of land levels to create an elevated engineered platform designed to support the new infrastructure and mitigate flood risk
Scope of this Survey(s)	The scope of the survey was to complete a suite of six breeding bird surveys to inform any potential mitigation required to facilitate the development of the site.
Results and Evaluation	A total of 37 bird species were recorded during breeding bird surveys, including: • Seven BoCC Red List species; • Seven BoCC Amber List species; • 20 BoCC Green List species; and • Two species listed as Schedule 1 of the W&CA and Annex 1 of the Birds Directive. • Only 6 species were found to be using the proposed development area with the majority of records coming from adjacent habitats. The site is considered to be of “local importance” for its breeding bird assemblage. No individual species recorded during the breeding bird surveys reach the threshold to be of County importance or higher. The species recorded on site are mostly common species within the district.
Recommendations	In order to maintain the locally important bird assemblage on site, recommendations include: • Conducting all vegetation clearance works, including scrub, woodland and grassland habitats, outside of the breeding bird season (March – September inclusive). If this is not possible, a nesting bird check must be conducted by a suitably qualified ecologist immediately prior to any vegetation clearance works. • Enhance the site through native scrub and tree planting as well as the installation of a range of bird boxes. • Native planting around the perimeter of the development area to provide a screen to adjacent habitats. • Protection and ecological enhancement of water bodies.

	• Details to protect and enhance the site will be detailed in a CEMP and LEMP.
Conclusions	With the recommended mitigation, it is considered that the proposed works can be carried out to the legal requirements for the protection of birds and should not have a significant negative impact on breeding species found within the site as well as on the wider bird population and designated sites. Additionally, with the recommended enhancements within this report will meet Planning Policy Wales (PPW) and the Newport Local Development Plan 2015 which require plans to provide enhancements for biodiversity.

1.0 INTRODUCTION

1.1 BACKGROUND

Tetra Tech was commissioned by Stroma Tidal Power Ltd in May 2025 to undertake breeding bird surveys of Uskmouth AW2, hereafter referred to as “the site”.

This report has been prepared by Principal Ecologist John Simper BSc (Hons), MSc, MCIEEM and the conditions pertinent to it are provided in Appendix A.

1.2 SITE LOCATION

The site is located at Uskmouth Power Station next to the mouth of River Usk in Nash, Newport. The site is centred at Ordinance Survey National Grid Reference ST 32550 83529 (Figure 1). It comprises a disused ash storage structure, which has started to be colonised by vegetation. Surrounding this there is a drainage ditch, scattered scrub, colonising ground and semi-improved grassland in amongst the train tracks to the north of the storage area. There are two ponds to the west of the site surrounded by scrub habitats that form a link with the Newport Wetlands NNR to the south, the NNR is consists of estuarine and coastal habitats such as saltmarsh

The survey area included the proposed development area, an adjacent pond and other surrounding habitats.

1.3 DEVELOPMENT PROPOSALS

The Proposed Development seeks full planning permission for the removal of stored PFA from the site and the installation of a battery energy storage system (BESS) with associated infrastructure. It includes the raising of land levels to create an elevated engineered platform designed to support the new infrastructure and mitigate flood risk

1.4 PURPOSE OF THE REPORT

The objectives of this report are to:

- Determine existing bird records and locally designated sites of relevance to birds;
- Summarise the findings of the bird surveys and report on the presence or otherwise of breeding bird species on and around the site;
- Determine if any potential impacts on breeding birds are likely to arise from the development;
- Provide preliminary advice and outline strategies to avoid/mitigate/compensate for any likely impacts on breeding birds; and
- Identify opportunities for enhancement to improve the carrying capacity of the site for breeding birds.

The details of this report will remain valid for a period of **eighteen months** from the date of the final survey (i.e. until January 2027) (CIEEM, 2019), after which the validity of this assessment should be reviewed to determine whether further updates are necessary. The recommendations within this report

should be reviewed (and reassessed if necessary) should there be any changes to the red line boundary or development proposals which this report was based on.

Note that scientific names are provided at the first mention of each species and common names (where appropriate) are then used throughout the rest of the report for ease of reading.

2.0 METHODOLOGY

2.1 HISTORIC SURVEYS

No previous bird surveys are currently known for the site although Tetra Tech undertook an Ecological Appraisal of the site in 2024 (Tetra Tech 2024a).

2.2 DESK STUDY

The desktop study comprised two elements:

- A data search obtained from South-East Wales Biodiversity Records Centre (SEWBrEC) on 4th April 2024 as part of the Uskmouth Chimney BESS PEA report (Tetra Tech, 2024b); and
- An online element including a search using : Magic, Defra's interactive, web-based database for statutory designations (<https://magic.defra.gov.uk>) and Ordnance Survey (OS) and Aerial Imagery (<https://www.bing.com/maps>).

2.3 FIELD SURVEYS

2.3.1 Breeding Bird Surveys

The survey followed the methodology set out in the Bird Survey Guidelines (Bird Survey & Assessment Steering Group, 2025) and involved four survey visits to the site during the breeding season, between June and early July using the standard techniques as detailed in Bibby *et al.* (2007). This method is based on the observation that many species are territorial during the breeding season. This is found particularly amongst passerines, where territories are often marked by conspicuous song, display, and periodic disputes with neighbouring individuals. Registrations of birds were recorded on an appropriate field map, using standard British Trust for Ornithology (BTO) two letter species codes and activity codes (Gilbert *et al.*, 2002). The surveys were timed between sunrise (starting between half an hour before sunrise and half an hour after sunrise) and midday to record periods of uniform bird activity with one of the surveys being undertaken at sunset extending at least an hour beyond. Evening surveys are designed to catch evening and nocturnal singing birds as well as identify any potentially important roost sites (Gilbert *et al.*, 2002; Bird Survey & Assessment Steering Group, 2025).

The surveys consisted of observations from a walked transect route around the site which ensured full coverage of the survey area (see Figure 2). The registrations of birds, using standard British Trust for Ornithology (BTO) two letter species codes and activity codes (Gilbert *et al.*, 2002), were placed onto an appropriate field map. Specific symbols were used for singing, calling and movements of the same bird between different areas, flying, carrying food, nest building, aggressive encounters and other notable behaviour (Gilbert *et al.*, 2002). The expected outcome of this technique was that mapped registrations fell into clusters, approximately coinciding with territories.

The likelihood of breeding was determined using the BTO breeding status codes table (see link in References), using observations of activities such as singing, food carrying, aggressive encounters and actual nest building.

Confirmed – examples of confirmed breeding include:

-
- Recently fledged or downy young;
 - Adult carrying faecal sac or food for young;
 - Nests containing eggs;
 - Nest with young seen or heard; and
 - Distraction displays / injury feigning.

Probable – examples of probable breeding include:

- Pair seen in suitable habitat;
- Permanent territory (defended over at least two survey visits);
- Courtship and display;
- Visiting potential nest site;
- Agitated behaviour; and
- Nest building / hole excavation.

Possible – examples of possible breeding include:

- Observed in suitable nesting habitat; and
- Singing male.

Non-breeder – examples of non-breeding behaviour include:

- Overflying;
- Migrant;
- Summering non-breeder; and
- Observed in unsuitable nesting habitat.

The field data from each survey was transferred into a map of indicative territories of birds on the site with birds of local importance, birds on the Red and Amber list under Birds of Conservation Concern Wales (BoCC) 4, Schedule 1 and birds listed under section 41 of the NERC Act mapped in Figure 3. This map was analysed to estimate the number of breeding territories found for each species and produce a table with bird species total.

The following meteorological variables were recorded at both the start and end of each survey:

- Cloud cover (0% - clear sky, to 100% - total cloud cover);
- Wind speed (Beaufort scale (BF); Force 0 – no wind, to Force 6 – strong wind (note: surveys should not be carried out above Force 6 wind));
- Temperature (°C); and
- Precipitation (mm).

Details of the breeding bird survey dates and weather conditions are provided in Table 1 below.

Table 1. Breeding bird survey dates and weather conditions.

Survey No.	Date	Time		Air Temperature (°C)	Wind Speed	Cloud Cover (%)	Precipitation (%)
		Start	End				
1	12/06/25	05:45	08:00	17	0	10	0
2	22/06/25	05:45	08:00	19	1	20	0
3	27/06/25	20:00	22:15	13	3	100	0
4	05/07/25	05:45	08:15	19	1	20	0

2.3.2 Species Assemblage Assessment

The conservation value of the species assemblage was assessed in conjunction with Fuller (1980), which recommends the relative importance of the total species assemblage on a site is categorised using the following definition:

- National importance: 85+ species
- Regional importance: 70-84 species
- County importance: 50-69 species
- Local importance: 25-49 species
- Site importance: fewer than 24 (in line with CIEEM guidance for below Local)

2.3.3 Species Assessment

The conservation value of individual species was assessed in conjunction with Fuller (1980), which recommends the relative importance of a breeding population on a site is categorised using the following definition:

- International importance – 1% of international population
- National importance – 1% of national population
- County importance – 1% of county population

2.4 LIMITATIONS

There were no significant limitations during the suite of breeding bird surveys. The interior of the area used for the PFA was covered with very dense scrub. To overcome this, the surveyor stopped regularly around the perimeter of this area and cupped their ears in the direction of the centre of the scrub in order to listen for birds calling and singing in this area. Several bird species were recorded in this area using this technique. Therefore, this is not considered to be a significant limitation.

Normally six survey visits would be undertaken to assess a breeding bird assemblage of a site, four were undertaken as part of this survey and none within the early part of the nesting season. However, it is considered that a wide range of species has been revealed by the surveys and that a robust assessment has been undertaken.

Due to the complexity of avian behaviour some degree of subjectivity is inevitably involved in this assessment. However, overall, the survey is considered to offer a high degree of accuracy in assessing the range of species breeding within the site and their relative abundance.

All surveys were completed in suitable weather conditions with no limitations such as poor visibility. The survey effort applied is considered sufficient to meet the aims of the survey and this report, in accordance with the aforementioned guidelines.

3.0 BASELINE CONDITIONS

3.1 DESK STUDY

The data search returned 1229 records of birds within 2 km. Of these records, 250 were WCA Schedule 1 birds. The majority of these however, had been recorded from the RSPB Newport Wetlands reserve and are dominated by birds that use coastal and wetland environments.

A wide range of nesting and foraging bird species were recorded within wider environment).

The data search and desk study also returned a list of protected sites within 10km of the site and the sites which relate to breeding birds have been reviewed. These details are outlined in Table 2 below and Figure 3.

Table 2. Designated sites for breeding birds within 10km of the site (see Figure 30.

Site Name	Designation	Distance and direction from Site	Reasons for designation
Statutory designated sites			
Newport Wetlands	NNR	Adjacent - Southeast	The reason for the NNR designation is the bird assemblage for the following species: little egret <i>Egretta garzetta</i>, ruff <i>Philomachus pugnax</i>, whimbrel <i>Numenius phaeopus</i>, Eurasian curlew <i>N. Arquata</i>, common greenshank <i>Tringa nebularia</i>, Eurasian wigeon <i>Mareca penelope</i>, northern shoveler <i>Spatula clypeata</i>, common pochard <i>Aythya ferina</i>, water rail <i>Rallus aquaticus</i> and the spotted redshank <i>T. erythropus</i>. Additionally, certain fish species of national importance including allis shad <i>Alosa alosa</i>, twaite shad <i>A. fallax</i>, European river lamprey <i>Lampetra fluviatilis</i> and sea lamprey <i>Petromyzon marinus</i>.
Severn Estuary	SPA	c. 0.27 km-Southwest	Designated due to an internationally important population of wintering birds including Bewick's swam <i>Cygnus olumbianus bewickii</i> , greater white-fronted

			goose <i>Anser albifrons albifrons</i>, shelduck <i>Tadorna tadorna</i>, gadwall <i>Anas strepera</i>, dunlin <i>Calidris alpina</i> and redshank <i>T. totanus</i>. Additionally, the Severn Estuary supports nationally important wintering population numbers of wigeon, teal <i>A. crecca</i>, pintail <i>A. acuta</i>, pochard, tufted duck <i>Anythya fuligula</i>, ringed plover <i>Charadrius hiaticula</i>, grey plover, Eurasian curlew, whimbrel and spotted redshank. There is also a nationally important breeding population of lesser black-backed gulls <i>Larus fuscus</i> present.
Severn Estuary (Wales)	SAC	c. 0.27 km - Southwest	The primary reasons for the SAC designation of the Severn Estuary are because of the Annex I habitats present; estuaries, mudflats and sandflats not covered by seawater at low tide, Atlantic salt meadows with qualifying features of sea water covered sandbanks and reefs. The presence of Annex II species sea lamprey, river lamprey and twaite shad, was further evidence for the SAC designation of the Severn Estuary.
Severn Estuary	Ramsar	c. 0.31 km - South	This Ramsar site is an important site for the run of migratory fish between sea and river via estuary and is one of the most diverse river systems / estuarine within Britain, with over 110 species recorded. The lesser black-backed gull, ringed plover, Eurasian teal and Northern pintail <i>A. acuta</i> were found to be present.

Non-statutory designated sites:

Newport Wetlands	SSSI	Adjacent - Southeast	This SSSI is designated for its breeding and over-wintering birds, invertebrates, and aquatic and marginal flora. Also of special interest are the ditch habitat and reedbeds. The SSSI designation has been designated in part because of the wintering species shoveler and black-tailed godwit <i>Limosa limosa</i>. Other over -wintering species that use the site include gadwall, wigeon, shelduck, dunlin, redshank, whimbrel and curlew. During the summer, the wet grasslands, saline lagoons and reedbeds on the site support an exceptional variety of breeding birds, including nationally important breeding populations of avocet <i>Recurvirostra avosetta</i>, redshank, lapwing <i>Vanellus vanellus</i>, water rail, Cetti's warbler <i>Cettia cetti</i> and bearded tit <i>Panurus biarmicus</i>. In addition, breeding populations of ringed plover and little ringed plover <i>Charadrius dubius</i>.
River Usk (Lower Usk)	SSSI	0.25 North	The Usk system, comprising the River Usk and including its upper tributaries, represents a large,

			linear ecosystem that acts as an important wildlife corridor, an essential migration route and key breeding area for many nationally and internationally important species. The site is of special interest for its internationally important populations of otter, Atlantic salmon, bullhead, brook lamprey and river lamprey.
Severn Estuary	SSSI	c. 0.27 km-Southwest	The intertidal zone of mudflats, sand banks, rocky platforms and saltmarsh combined with the immense tidal range and funnel shaped estuary makes this one of the largest and most important in Britain. Designated for supporting populations of wintering and passage wading bird species, including curlew and redshank, and most of its nationally important ringed plover and grey plover. Additionally, the presence of overwintering populations of Tundra swan, greater white-fronted goose, common shelduck and gadwall. More specifically, the site is the single most important wintering ground for dunlin in Britain. In late winter and early spring, the important shelduck and wigeon populations can be found.
Gwent Wetland Reserve	LWS	Adjacent to the access road South	Mosaic of wet grassland reedbeds, open water, hedgerows and saline lagoon, which supports internationally important numbers of wildfowl as well as UK BAP Priority species such as water vole, great crested newt and brown hare <i>Lepus europaeus</i>.
Newport Wetlands	RSPB Reserve	0.18 km Southeast	No citation for designation.
Great Traston Meadows	Wildlife Trust Reserve	1.11 km - Northeast	No citation for designation.
Solutia Site	LWS	1.47 km Northeast	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, and invertebrates including hairy dragonfly <i>Brachyton prantense</i>.
Alpha Steel Site	LWS	1.52 km Northeast	Area of former Levels, scrub and other habitats which support a range of species including scarce moth species, birds such as Cetti's warbler, and plants including marsh helleborine, bee orchid <i>Ophrys apifera</i>, pyramidal orchid <i>Anacamptis pyramidalis</i>, <i>Dactylorhiza</i> spp.
Afon Ebbw River	LWS	1.73 km – Northwest	Associated species include bulbous foxtail <i>Alopecurus bubous</i> near confluence with Usk, kingfisher <i>Alcedo atthis</i>, sand martin, grass snake <i>Natrix helvetica</i>

No other sites designated for birds were within the search radius.

3.2 FIELD SURVEYS

A total of 36 bird species were recorded during the suite of breeding bird surveys, including:

- Seven BoCC Wales Red List species;
- Six BoCC Amber List species;
- 20 BoCC Green List species;
- One introduced species; and
- Two species listed as Schedule 1 of the W&CA and Annex 1 of the Birds Directive (both also Green Listed species).

The breeding statuses of the 16 notable and protected species recorded during the surveys was as follows:

- Three species were confirmed to be breeding;
- Six species were considered probable breeders;
- Five species were considered possible breeders; and
- Seven species were overflying / non-breeders.

Notable species, along with their breeding status and number of potential territories, are summarised below in Table 3. Please refer to Appendix C for a full bird species list. The locations of species recorded have been mapped and are shown in Figure 2.

With reference to Table 3, it should be noted that the presence of a potential territory does not indicate the total number of breeding territories / pairs, but rather the maximum number of potential breeding territories / pairs during the season when surveys were completed.

Table 3. Notable species recorded

Species Name	Common Name	W&CA and BoCC Status	National Status in UK	Likely status within survey area
<i>Cettia cetti</i>	Cetti's Warbler	Schedule 1, Annex 1, Green List BoCC Wales	Local but increasing resident	Breeding resident – possibly 2 pairs
<i>Falco peregrinus</i>	Peregrine	Red List BoCC Wales, Schedule 1 W&CA 1981	Common resident	Likely nesting on nearby building
<i>Apus apus</i>	Swift	Red List BoCC Wales	Common but declining migrant	Possibly nesting on local buildings
<i>Chloris chloris</i>	Greenfinch	Red List BoCC Wales	Common but declining resident	Possibly nesting. Recoded with development area.
<i>Cuculus canorus</i>	Cuckoo	Red List BoCC Wales	Scarce or fairly common declining	Possible breeding

			breeding resident	
<i>Falco tinnunculus</i>	Kestrel	Red List BoCC Wales	Fairly common or common resident	Possibly nesting in local area
<i>Larus argentatus</i>	Herring gull	Red List BoCC, Wales	Common but declining resident	Likely nesting on nearby buildings
<i>Larus Fuscus</i>	Lesser black-backed gull	Red List BoCC Wales	Common but decreasing resident	Likely nesting on nearby buildings
<i>Sturnus vulgaris</i>	Starling	Red List BoCC Wales	Common but declining resident	Possibly nesting on nearby buildings
<i>Delichon urbicum</i>	House martin	Amber List BoCC Wales	Common but declining resident	Possibly nesting on nearby buildings. Recorded over development area
<i>Fringilla coelebs</i>	Chaffinch	Amber List BoCC Wales	Common but declining resident	Possibly breeding
<i>Larus marinus</i>	Great Black-backed gull	Amber List BoCC Wales	Common/local resident	Likely non-breeding
<i>Motacilla cinerea</i>	Grey Wagtail	Amber List BoCC Wales	Common but declining resident	Likely non-breeding
<i>Prunella modularis</i>	Dunnock	Amber List BoCC Wales	Very common resident	Probably breeding
<i>Rallus aquaticus</i>	Water rail	Amber List BoCC	Local resident	Probably breeding

The majority of the proposed development area was dominated by an area used to store PFA (Pulverised Fuel Ash). This area now covered with dense scrub dominated by bramble (*Rubus fruticosus*) with an area of semi-improved neutral grassland at its eastern extent. Very few birds were recorded in this area, species recorded included low numbers of whitethroat *Sylvia communis*, wren *Troglodytes troglodytes* and greenfinch *Chloris chloris* (Red listed). House martins *Delichon urbicum* (Amber listed) and swifts *Apus apus* (Red Listed) were also noted making foraging flights over this, and the wider area.

The water body located in the western part of the survey area (not included in the development area) supports important bird species, including Cetti's warbler *Cettia cetti* (W&CA 1981 Schedule 1), water rail *Rallus aquaticus* (Amber-listed), cuckoo *Cuculus canorus* (Red-listed), notably, one of its host species, the reed warbler *Acrocephalus scirpaceus*, was also found in the bankside reed beds. A grey wagtail *Motacilla cinerea* was recorded on one occasion. Green-listed species such as tufted duck *Aythya fuligula*, mallard

Anas platyrhynchos and little grebe *Tachybaptus ruficollis* were recorded, with the little grebe confirmed as breeding.

A number of buildings associated with Uskmouth Power Station were present to the north of the site boundary, species of conservation concern were recorded here including herring gull *Larus argentatus*, lesser black-backed gull *Larus fuscus* (Amber listed) and peregrine *Falco peregrinus* (W&CA 1981 Schedule 1). All three species are considered to be likely to be breeding on buildings in this area.

Scrub and grassland habitat to the south of the site boundary included low numbers of dunnock *Prunella vulgaris* (Amber listed), a single record of a kestrel *Falco tinunculus* (Red Listed), chaffinch *Fringilla coelebs* (Amber Listed), Cetti's warbler, cuckoo and a range of common and widespread green listed species such as whitethroat, blackbird *Turdus merula* and song thrush *Turdus philomelos*.

4.0 DISCUSSION

Following the desk study and field surveys, breeding birds have been confirmed as being present within the boundary using the entire site. Activity was spread across the survey area, but activity was low within the area use for PFA storage.

37 different species were recorded in total, with 6 species interacting directly with the proposed development area (i.e. using it to potentially breed or forage). According to Fuller (1980) the site is of **Local importance** in terms of its assemblage.

Upon review of the current proposals) there are likely to be adverse effects on breeding birds through loss of habitat, killing, injury and disturbance during the construction and operational phases if adequate mitigation is not implemented.

4.1 IMPACTS

4.1.1 Designated Sites

This lies within close proximity to a number of internationally designated sites including Severn Estuary SPA / SAC / Ramsar (c.027km). As such, a report to inform Habitats Regulations Assessment (HRA) has been undertaken (Tetra Tech 2025) to establish whether the development proposals have the potential to affect the integrity of the designated site or its qualifying species. The site is hydrologically linked to the adjacent Newport Wetlands NRR – this should also be given consideration in terms of the potential impacts of the proposals on its ornithological interest.

Within Stage 2 of the Appropriate Assessment it determined (Tetra Tech 2025b) that mitigation is required to cancel the following possible impacts: Increased disturbance from noise/ vibration:

- Visual stimuli,
- Fugitive dust;
- Decrease of water quality from construction and operational water management; including provision to retain, treat and convey water used in firefighting; and
- Invasive non-native species.

4.1.2 Loss of Habitats

The scrub and grassland habitat within the development area will be lost as a result of the proposals and thus some common and widespread species such as wren and whitethroat will lose potential foraging and nesting habitat. The loss of this habitat is likely to have an impact on the species assemblage during its construction and operational phases.

Any vegetation clearance during the breeding season could result in disturbance, destruction, injury or killing of birds nesting within the vegetation. Without mitigation this could result in an offence under the wildlife and countryside act 1981 (as amended).

Further surveys to assess the site's value as wintering bird habitat are not considered necessary as species assemblages within the adjacent designated sites are well documented and providing measures outlined within the HRA and a CEMP impacts to wintering birds are not expected.

4.1.3 Construction-phase Disturbance

During the construction phase, increased noise and activity levels in close proximity to adjacent habitats could result in disturbance to breeding birds such as Cetti's warbler which was located in close proximity to the survey area and protected from disturbance under the W&CA 1981. Additionally, the clearance of vegetation to make way for the proposed development will result in disturbance to habitat being used by breeding birds. Increased lighting, noise accidental damage and storage of equipment could all impact upon breeding birds in adjacent habitats.

Without mitigation, these activities could have a negative impact on breeding birds using the site. Mitigation measures will be detailed within a CEMP and detail measures to reduce noise, and visual disturbance by using acoustic barriers/hoarding around the perimeter of the working area.

4.1.4 Operational-phase Disturbance

During the operational phase, breeding birds could be negatively impacted by increased predation and disturbance from as a result of noise, visual disturbance and increased lighting on the site (The Mammal Society, 1997).

4.2 MITIGATION

Planning Policy Wales (Welsh Government, 2023) and the Newport Local Development Plan (2015) require that impacts on nature and biodiversity are considered in all development proposals. New proposals must avoid adverse impacts on biodiversity or, where these cannot be avoided, ensure that they are appropriately mitigated or compensated to address any loss of biodiversity within the site. Local Plan Policy CE7/SP9 further reinforces that measures to protect protected species must be incorporated into development schemes where such species are present or nearby, to ensure they are not adversely affected by the development.

In accordance with Planning Policy Wales and the Local Development Plan, mitigation must be implemented to protect, conserve, and enhance biodiversity by ensuring that any potential impacts on birds and other protected species are avoided where possible, or otherwise appropriately mitigated and compensated.

The mitigation hierarchy principles (CIEEM, 2024) should also be applied as follows:

- **Avoidance:** Avoid adverse effects as far as possible by designing out impacts or using preventative measures during the construction process, aiming for an environmental effect of neutral significance.
- **Reduction:** Minimise adverse effects as far as possible.
- **Compensation:** Implement measures of equivalent biodiversity value to offset any unavoidable impacts.
- **Enhancement:** Improve management of existing ecological features or provide new ecological features beyond those required for mitigation and compensation, to deliver net environmental gains.

4.2.1 Loss of Habitat

Policy SP9 of Newport Local Plan (2015) specifies that measures must be incorporated into schemes where protected species are present or nearby to ensure that these species are not lost as a result of development. A Landscape and Ecology Management Plan will detail mitigation and enhancement requirements during the construction, operational, and decommissioning phases, and a management framework during the operational phase. Mitigation measures will include native planting schemes and landscaping that will provide habitat and food resources for birds and screen the proposed battery energy storage system from adjacent habitats and sensitive designated sites.

To avoid recklessly disturbing or destroying bird nests during the works, it is recommended that any necessary vegetation removal is undertaken outside of the nesting season where possible (March-September inclusive).

If there is no alternative but to undertake vegetation removal during the nesting season, this must only be undertaken subject to a thorough nest check immediately before works are undertaken by a suitably experienced ecologist to identify any active nests present. Where active nests are found to be present, a buffer zone dependent on the species and habitat type will be recommended in which no disturbance will be permitted until all young have fledged and no longer return to the nest(s). Following a clear pre-works check all vegetation clearance should be supervised under an Ecological Clerk of Works until deemed unsuitable.

4.2.2 Construction-phase disturbance

Many of the issues relating to the construction phase are associated with vegetation clearance and disturbance as detailed in the above section (section 4.1.3).

Other mitigation measures during the construction phase should include:

- During the breeding season (March – September inclusive) any areas of retained habitat on site must be protected as much as possible throughout the construction phase and any temporary lighting if any, must be directed to avoid the retained vegetation.
- Information on breeding birds and their legal status is recommended to be included in the sites induction material; this should also include information on avoidance and protection of suitable habitat for supporting breeding birds;

4.2.3 Operational-phase disturbance

During the operational phase impacts are considered to be low – potential disturbance will be mitigated by through mitigation and enhancement measures detailed within the LEMP (Tir Collective Landscape Architects 2025).

4.3 ENHANCEMENTS

It is a requirement of PPW (Appendix B), policies CE3, CE7 and SP9 of the Newport Local Plan 2015 (Appendix B) and the mitigation hierarchy (CIEEM, 2024) to provide enhancements for biodiversity as part of development. The following enhancement measures should be incorporated into the design scheme to enhance the site for breeding birds:

-
- Provision of further appropriate bird boxes (including swift boxes) within the site and its adjacent areas that are suitable (such as mature trees and buildings).
 - Planting of further native trees, scrub, shrubs and grassland within the landscaping scheme specified in the LEMP; this will provide foraging and nesting habitat for a range of bird species, including those recorded on site.

5.0 CONCLUSIONS

The site is considered to be of Local importance for its species assemblage, with mostly common species recorded during the breeding bird surveys. A low number of species was recorded within the proposed development area.

Measures to protect and enhance breeding and wintering birds are detailed within a CEMP (Tetra Tech 2025b) and LEMP (Tir Collective Landscape Architects 2025).

With the recommended mitigation outlined in Section 4.2, the proposed works can be carried out to the legal requirements for the protection of birds and should not have a significant negative impact upon breeding species found within the site as well as on the wider bird population.

The recommended enhancements within this report will aim to meet the requirements of the PPW and the Newport Local Development Plan 2011-26 (Newport City Council, 2015) which require the plans to provide enhancements of biodiversity within any site.

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FIGURES

Figure 1 – Site Location Plan

Figure 2 – Bird Survey Results

Figure 3 – International Sites within 10 km



Site Location Plan

Uskmouth AW2



AW2 Energy Storage Ltd

Legend

Survey areas

Notes:

Drawn by: hannah.hamilton

Checked by: Fraser McCarter

Figure No. 1

Revision No. A

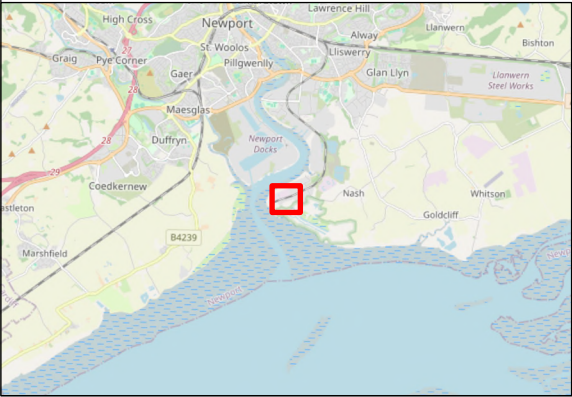
11 June 2025

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Scale 1:2,500 @A3

British National Grid

NGR: 332547E 183534N

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3 Sovereign Square
Sovereign Street
Leeds
United Kingdom
LS1 4ER

Tetra Tech Limited.
Registered in England
number: 01959704



Breeding Birds Results

Uskmouth AW2



AW2 Energy Storage Ltd

Legend

- Site boundary
- Breeding bird

BTO Codes

CH - Chaffinch (1)	HM - House martin (8)
CK - Cuckoo (2)	K. - Kestrel (1)
CW - Cetti's warbler (2)	LB - Lesser black-backed gull (17)
D. - Dunnock (3)	PE - Peregrine (3)
GB - Great black-backed gull (2)	SG - Starling (1)
GL - Grey wagtail (1)	SI - Swift (2)
GR - Greenfinch (1)	WA - Water rail (1)
HG - Herring gull (9)	

Label colour denotes BOCC Status (Red/Amber/Green)

- Annex 1
- Schedule 1

Notes:

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Checked by: John Simper

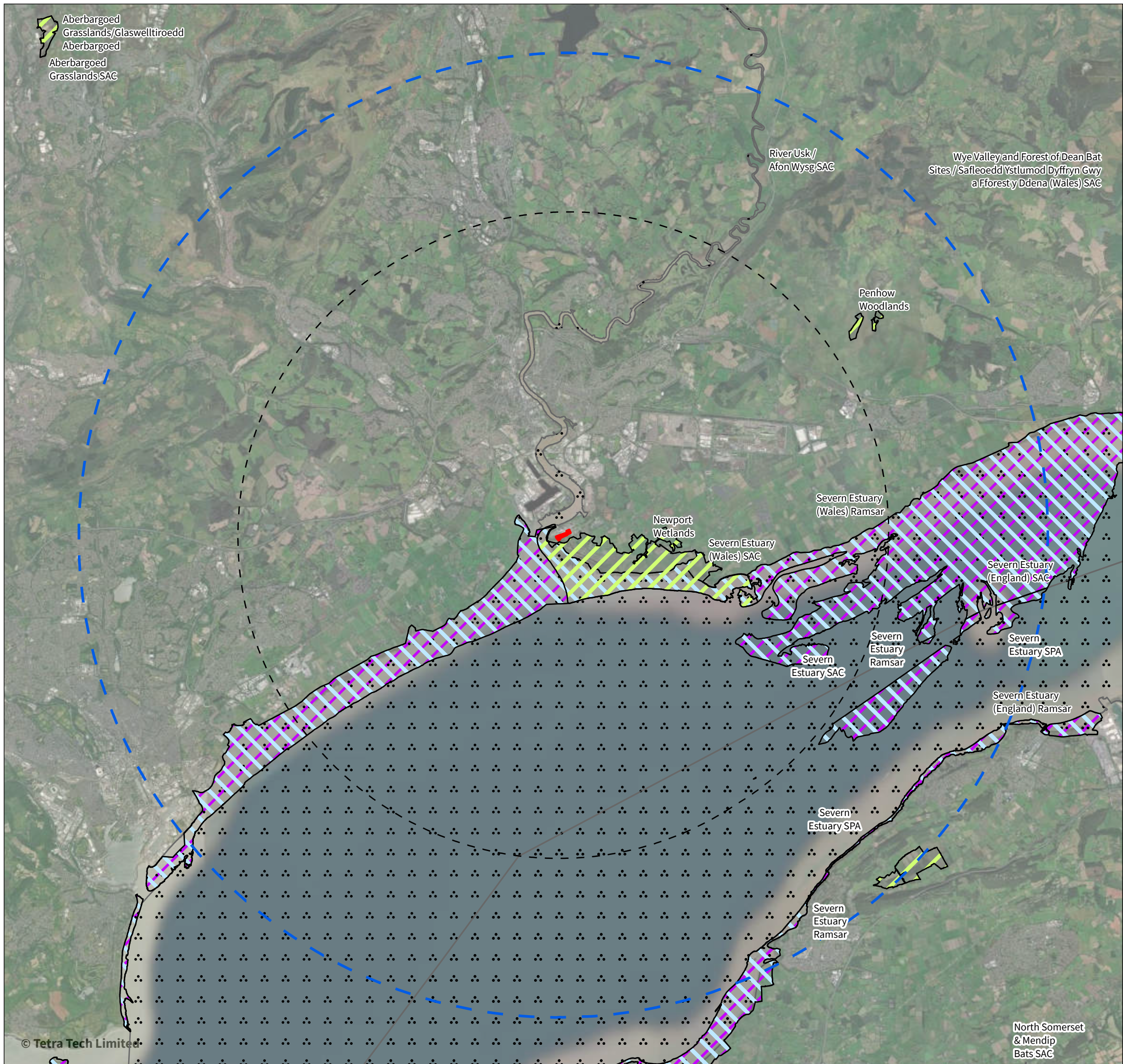
Figure No. 2
Revision No. A
11 July 2025

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British National Grid
NGR: 332594E 183615N

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Habitat sites within 15km

Uskmouth AW2

**AW2 Energy Storage Ltd**

Legend

-
- Legend:
- Proposed development
 - Zone of Influence (10 km)
 - Zone of Influence (15 km)
 - Special Areas of Conservation (SAC)
 - Ramsar
 - Special Protection Areas (SPA)
 - National Nature Reserves

Data Sources:

National Nature Reserves
Ramsar
Special Areas of Conservation
Special Protection Areas

Notes:

Symbolism similar to that used within the MAGIC Application

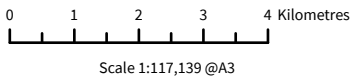
Drawn by: DYLAN.GUSSMAN

Figure No. 3

Checked by: Danny de la Hey

Revision No. A

30 June 2025



British National Grid

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TETRA TECH

Sovereign Square
Sovereign Street
Leeds
United Kingdom
LS1 4ER

Tetra Tech Limited.
Registered in England
Number: 01959704

APPENDICES

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APPENDIX A: REPORT CONDITIONS

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The report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections'. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The “shelf life” of the Report will be determined by a number of factors including; its original purpose, the Client’s instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accept no liability for issues with performance arising from such factors.

APPENDIX B: LEGISLATION AND POLICY

Habitats Directive

The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora, or the 'Habitats Directive', is a European Union directive adopted in 1992 in response to the Bern Convention. Its aims are to protect approximately 220 habitats and 1,000 species listed in its several Annexes.

In the UK, the Habitats Directive is transposed into national law via the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales, and via the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) in Northern Ireland.

Conservation of Habitats and Species Regulations 2017 (as amended)

The 2018 amendments mainly related to the impact of the *People Over Wind* decision and some implications arising for neighbourhood plan development and a range of other planning tools including Local Development Orders and Permission in Principle – see here for full details:

<https://www.legislation.gov.uk/uksi/2018/1307/note/made>

The 2019 amendments related to the EU exit. Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant. The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. – see here for full details:

<https://www.legislation.gov.uk/ukdsi/2019/9780111176573>

Wildlife & Countryside Act 1981 (as amended)

All wild birds in the UK are protected under Section 1 of the W&CA which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy the nest (whilst being built or in use) or its eggs. Bird species listed in Schedule 1 of the W&CA receive further protection which makes it an offence to intentionally or recklessly disturb these species while building a nest or in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird

Natural Environment and Rural Communities Act 2006

Section 41 (S41) of this Act requires the Secretary of State to publish a list (in consultation with Natural England) of Habitats and Species which are of Principal Importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers such as public bodies including local and regional authorities, in implementing their duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal (e.g. planning) functions. The S41 list includes 65 Habitats of Principal Importance and 1,150 Species of Principal Importance.

Forty-nine bird species are listed as 'species of principal importance for the conservation of biological diversity in England' under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Planning Policy Wales

Planning Policy Wales (Welsh Government, 2023) sets out the national planning policy framework for Wales. It is supported by key guidance such as Technical Advice Note (TAN) 5: Nature Conservation and Planning, which provides detailed advice on biodiversity and geological conservation within the planning system.

Under PPW and TAN 5, the presence of protected species is a material consideration in the planning process. The policy establishes that:

- a) If significant harm to biodiversity resulting from a development cannot be avoided (for example, by locating the development on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) Development whose primary objective is to conserve or enhance biodiversity should be supported; and opportunities to incorporate biodiversity improvements in and around developments should be encouraged, particularly where these can secure measurable net gains for biodiversity.

This approach aligns with Welsh statutory obligations under the Environment (Wales) Act 2016 and the Conservation of Habitats and Species Regulations 2017 (as amended), reinforcing the protection and enhancement of biodiversity through the planning system in Wales.

Birds of Conservation Concern

The conservation status of all regularly occurring British birds has been analysed in co-operation with the leading governmental and non-governmental conservation organisations, including the Royal Society for the Protection of Birds (RSPB), British Trust for Ornithology (BTO) and Birdlife International Birds of Conservation Concern Wales 4 (Johnstone *et al.*, 2022). The basis of species ongoing population trends are assigned to one of three lists of Conservation Concern. These are the UK Red, Amber and Green list.

The criteria for birds being included in the lists is as follows:

1.0 Red List

- 2.0 Globally threatened.
- 3.0 Historical population decline in UK during 1800–1995.

4.0 Severe (at least 50%) decline in UK breeding population over last 25 years, or longer-term period (the entire period used for assessments since the first BoCC review, starting in 1969). Severe (at least 50%) contraction of UK breeding range over last 25 years, or the longer-term period.

5.0 Amber List

6.0 Species with unfavourable conservation status in Europe (SPEC = Species of European Conservation Concern).

7.0 Historical population decline during 1800–1995, but recovering; population size has more than doubled over last 25 years.

8.0 Moderate (25–49%) decline in UK breeding population over last 25 years, or since 1969.

9.0 Moderate (25–49%) contraction of UK breeding range over last 25 years, or since 1969.

10.0 Moderate (25–49%) decline in UK non-breeding population over last 25 years, or since 1969.

11.0 Rare breeder; 1–300 breeding pairs in UK.

12.0 Rare non-breeders; less than 900 individuals.

13.0 Localised; at least 50% of UK breeding or non-breeding population in 10 or fewer sites, but not applied to rare breeders or non-breeders.

14.0 Internationally important; at least 20% of European breeding or non-breeding population in UK (NW European and East Atlantic Flyway populations used for non-breeding wildfowl and waders respectively).

15.0 Green List

16.0 Species that occur regularly in the UK but do not qualify under any of the above criteria.

Although the lists confer no legal status in themselves, they are useful in evaluating the conservation significance of bird assemblages, and for assessing the potential significance of impacts and informing appropriate levels of mitigation with respect to bird populations.

Local Planning Policy

Local Biodiversity Action Plans (LBAP) identify habitat and species conservation priorities at a local level (typically at the County level) and are usually drawn up by a consortium of local Government organisations and conservation charities.

Some LBAP's may also include Habitat Action Plans (HAP) and/or Species Action Plans (SAP), which are used to guide and inform the local decision-making process.

Newport Local Development Plan 2011-26 (Newport City Council, 2015)

Policy CE3: Environmental Spaces and Corridors	4.7 Environmental Spaces and corridors form a valuable part of Newport's green infrastructure provision. They provide a network of connected, accessible, multi-functional sites including parks, woodland, informal open spaces, amenity areas, footpaths and bridleways, hedgerows, commons and village greens, and nature reserves as well as linkages such as river corridors, wildlife corridors and the Monmouthshire & Brecon Canal, that can bring about multiple social, health, economic and environmental benefits to the area. The sites are multi-functional in that apart from their ecological value they can be used for various purposes, for example, leisure activities and promoting tourism with associated benefits in terms of health and the economy.
Policy CE7: Conservation Areas	4.35 Newport has a rich and unique natural environment which this Plan seeks to protect and enhance. Areas such as the Gwent Levels, have been specifically recognised by the Wales Spatial Plan. Proposed developments will be required to avoid the loss of such a finite resource. The Plan has been subject to a Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment both of which consider the effect that the Plan has on the environment. These assessments have been undertaken alongside the Plan's development. 4.36 The strategy of the Plan clearly promotes a brownfield preference to development. This seeks to assist in the protection of sensitive areas including those of nature conservation. It is important to recognise the nature conservation value of brownfield sites which will need to be considered as part of any proposal.
Policy SP9: Conservation of the Natural, Historic and Built Environment	2.33 Newport has a rich diversity of natural and historic sites which are recognised at the international, national and local level. Those habitats and species of nature conservation interest represent important environmental resources, and the Council has a duty under various legislation including the Natural Environment and Rural Communities Act (2006)¹⁴, or as amended, Conservation of Habitats and Species Regulations (2010)¹⁵, Countryside and Rights of Way Act (2000)¹⁶, or as amended, and the Town and Country Planning Act (Environmental Impact Assessment) (England and Wales) Regulations (1999)¹⁷, or as amended, to ensure that they are protected from inappropriate or damaging development. National guidance sets out a clear requirement for the planning system to improve as well as protect the environment. Planning Policy Wales¹⁸ and Technical Advice Note 5: Nature Conservation and Planning (2009)¹⁹ set out this framework identifying nature conservation as an integral part of planning for sustainable development. Local advice will be set out in the Supplementary Planning Guidance on Wildlife and Development. Available at: Strategic-Environmental-Assessment-and-Habitat-Regulations-Assessment-Screening-Report_draft-SPG (newport.gov.uk)

APPENDIX C: FULL LIST OF BIRD SPECIES RECORDED

Species Name	Common Name	W&CA and BoCC Status
<i>Acrocephalus scirpaceus</i>	Reed warbler	Green List BoCC Wales
<i>Anas platyrhynchos</i>	Mallard	Green List BoCC Wales
<i>Apus apus</i>	Swift	Red List BoCC Wales
<i>Aythya fuligula</i>	Tufted duck	Green List BoCC Wales
<i>Carduelis carduelis</i>	Goldfinch	Green List BoCC Wales
<i>Cettia cetti</i>	Cetti's warbler	Green List BoCC Wales, Sched 1 W&CA 1981
<i>Columba palumbus</i>	Woodpigeon	Green List BoCC Wales
<i>Cyanistes caeruleus</i>	Blue Tit	Green List BoCC Wales
<i>Delichon urbica</i>	House martin	Amber List Wales BoCC
<i>Dendrocopos major</i>	Great spotted woodpecker	Green List BoCC Wales
<i>Erithacus rebecula</i>	Robin	Green List BoCC Wales
<i>Falco peregrinus</i>	Peregrine	Green List BoCC Wales, Sched 1 W&CA 1981
<i>Falco tinnunculus</i>	Kestrel	Red List BoCC Wales
<i>Fringilla coelebs</i>	Chaffinch	Amber List BoCC Wales
<i>Gallinula chloropus</i>	Moorhen	Green List BoCC Wales
<i>Hirundo rustica</i>	Swallow	Green List BoCC Wales
<i>Larus argentatus</i>	Herring gull	Red List BoCC Wales
<i>Larus fuscus</i>	Lesser black-backed gull	Green List BoCC Wales
<i>Larus marinus</i>	Great black-backed gull	Amber List BoCC Wales
<i>Motacilla alba</i>	Pied wagtail	Green List BoCC Wales
<i>Parus major</i>	Great tit	Green List BoCC Wales
<i>Phasianus colchicus</i>	Pheasant	Introduced
<i>Phylloscopus collybita</i>	Chiffchaff	Green List BoCC Wales
<i>Pica pica</i>	Magpie	Green List BoCC Wales
<i>Prunella modularis</i>	Dunnock	Amber List BoCC Wales
<i>Rallus aquaticus</i>	Water rail	Amber List BoCC Wales
<i>Sylvia atricapilla</i>	Long-tailed tit	Green List BoCC Wales
<i>Sylvia communis</i>	Common whitethroat	Green List BoCC Wales

<i>Tachybaptus ruficollis</i>	Little grebe	Green List BoCC Wales
<i>Troglodytes troglodytes</i>	Wren	Green List BoCC Wales
<i>Turdus merula</i>	Blackbird	Green List BoCC Wales
<i>Turdus philomelos</i>	Song thrush	Green List BoCC Wales