

Site Assessment Survey

PROJECT TITLE: Proposed Construction of 2 Residential Properties

SITE ADDRESS: Land off Jessop Close, Rogerstone, Newport

DATE: 16th April 2025.

The applicant is seeking planning permission to create two detached residential properties within a parcel off land off Jessop Close. The site is located within Rogerstone, Newport and is centered at national grid reference: ST 27710 88524. It is a rectangular area of land situated within a housing estate and bordered on its south by the Monmouthshire and Brecon Canal. The site is predominantly hardstanding and grassland and surrounded on all sides by fencing. The site once housed two large steel water tanks. The tanks were removed some years ago and the site cleared to leave a large concrete base and tank support walls. An access track, parking areas and two properties are proposed for within the development site.

This report will assess the potential of the land within the site boundary to support habitats and species and the implications that any future development proposals could have on them.

Previous Ecological Survey Work

A Preliminary Ecological Assessment (PEA) survey of the site was undertaken in 2011 by Mr Richard Poole. The 2011 survey found the site to contain the hardstanding with tank support walls and grassland with a tree line along the southern boundary. The southern tree line was noted to provide dense cover along the canal to offer protection for otters. No evidence of otter presence was noted within the site but it was noted that otters could use the canal corridor for commuting purposes. The report recommended that the southern site boundary be replaced with solid timber fencing to minimise noise and light spill and to maintain dense canal-side vegetation so wildlife can continue to move along the adjacent banks.

A summary of incidental reptile findings were reported in 2011 by Mr Richard Poole. The site's concrete surfaces, grassy areas, and scattered debris such as steel sheets and timber provided ideal refuges and basking spots for these species. During each field visit, the original and newly created refugia were inspected, and walkovers were carried out, but no reptiles or amphibians were observed or found using the site. The dates and weather conditions during any site visit is not provided within the reptile report.

A bat report was produced in August 2011 authored by Mr Richard Poole. Three evening activity surveys were conducted on the 13th July, 3rd August and 18th August 2011 to study bat activity at the development site. Common and Soprano Pipistrelles were frequently observed foraging in gardens between the canal-side tree line and nearby houses. Some bats commuted along the tree line, with brief foraging at the site. Noctule bats were recorded flying high over Rogerstone, and Daubenton's bats were briefly detected over the canal, suggesting commuting rather than feeding.

The surveys concluded that the Cefn Tanks site is not significant for local bat species, with bats favouring gardens and houses for feeding. The tree line is important for bat movement and foraging, and because most of these trees are protected, commuting bats are unlikely to be affected by development.

Site Location

The site is located within the urban area of Rogerstone, Newport, South Wales. Within 500 m, land use is dominated by residential development, with housing present to the north, east and west of the site. Natural habitats within this immediate area are limited, mainly confined to private gardens, and small patches of amenity grassland associated with schools and community spaces. Overall, the immediate natural environment is highly modified, with little semi-natural habitat present. The corridor of the Monmouthshire and Brecon canal that is immediately south and housing continues further south of the canal towpath.

Within a wider radius, the land use remains largely urban to the west, south and northwest, but there is a greater presence of green spaces. North lies residential areas until Newport Golf Course grounds approximately 1.2 km north. Past the canal, to the west lies Cefn Road and Cefn Woods approximately 280 m away and Wern Industrial Estate lies further west. Highcross Road is present past the canal to the south of the site and open fields and the grounds of Rogerstone Primary School are present approximately 500 m away. Open fields are present further east and Tredegar Park Golf Course is located approximately 1 km away.

The Monmouthshire & Brecon Canal lies immediately south of the site. One small pond looks to be present on aerial mapping approximately 480 m northeast, within a small wooded area. Approximately 610 m northeast of the site lies the Ynysfro Reservoir. The River Ebbw is located approximately 1.3 km south and west and the site lies approximately 3.4 km east of the River Usk, a major tidal river that flows through Newport and into the Severn Estuary.

Woodlands within close proximity to the site include Cefn Wood that is present approximately 280 m west of the site. A small wooded area is located approximately 340 m east, around the Fourteen Locks area of the canal. Coed Y Nant Woodland is a large area along the Ynysfro Reservoir northern banks approximately 750 m north. These areas offer extensive tree cover and semi-natural habitats.

Desktop Study

A data search was undertaken via Aderyn for the proposed development site and surrounding area. A 1 km buffer around a central point of the proposed development site was searched. Protected sites returned as part of the data search include:

- There is one Local Nature Reserve (LNR) Within 1 km of the site. Allt-Yr-Yn LNR is located approximately 940 m southeast of the site.
- There are 10 Sites of Interest for Nature Conservation (SINCs) within 1 km of the site. The Monmouthshire and Brecon Canal (Crumlin Arm) SINC is located immediately to the south of the site. This is designated for its standing, open-water habitat that is associated with otters. The next closest SINC is Fourteen Locks Field located approximately 240 m east of the development site.
- There are seven areas of Plantation on Ancient Woodland within 1 km of the site boundary. The closest area is located immediately south of the site along the canal banks. These are sites which are believed to have been continuously wooded for over 400 years. They have been replanted with native or non-native species, most commonly with conifers. They currently have a canopy cover of more than 50% non-native conifer tree species. They will have varying levels of remnant features of ASNW. It should be noted that the habitat along the canal bank, adjacent to the site, is not densely vegetated and tree growth is currently scattered in this area, creating a tree line rather than a woodland habitat.
- There are seven Natural Resources Wales (NRW) Priority Woodland Areas within 1 km of the site. The closest area is immediately to the south of the site, along the banks of the canal. NRW Priority habitat areas are large scale areas which were prioritised for targeted conservation work, based on factors including the habitats within them. It should be noted that the habitat along the canal bank, adjacent to the site, is not densely vegetated and tree growth is currently scattered in this area, creating a tree line rather than a woodland habitat.
- There is one Ancient Woodland Site of Unknown Category within 1 km of the site boundary. This is located approximately 920 m north of the site. These woodland areas are predominantly in transition where the existing tree cover is described as shrubs, young trees, felled or ground prepared for planting.
- There are 11 areas of Ancient Semi Natural Woodland (ASNW) within 1 km of the site boundary. The closest area is located approximately 330 m west of the site. These are broadleaf woodlands comprising mainly native tree and shrub species which are believed to have been in existence for over 400 years. The ground vegetation will reflect the naturalness of these woodlands and will frequently feature species which provide clear indication of long and continued woodland cover. They will have been woodland for centuries and contribute substantially to our natural and cultural heritage.



Figure 1. Adjacent Designations. Red: Site Boundary. Brown: SINC, Green: Plantation on Ancient Woodland Site and Priority Woodland Area.

Protected species records of note returned within 500 m of the site include:

- Eight records of Common Frog (*Rana temporaria*) were returned within 500 m of the site- closest record being approximately 100 m to the east.
- Three records of Hedgehog (*Erinaceus europaeus*) were returned within 500 m of the site- closest record being approximately 170 m west of the site.
- Japanese Knotweed (*Fallopia japonica*)- closest record approximately 170 m south.
- Two records of Grass Snake (*Natrix helvetica*) were returned within 500 m of the site- closest record being approximately 220 m west of the site.
- Badger (*Meles meles*)- closest record being approximately 300 m south of the site, for a live sighting from 2022 within Cefn Wood.
- Two records of invertebrates were returned within 500 m of the site for Dusky Thorn (*Ennomos fuscantaria*) and September Thorn (*Ennomos erosaria*).
- 24 records of bat commuting and foraging activity were returned within 500 m of the site for species including: Soprano Pipistrelle (*Pipistrellus pygmaeus*), Common Pipistrelle (*Pipistrellus pipistrellus*) and Noctule (*Nyctalus noctula*). The closest record being for an unknown pipistrelle species approximately 90 m west of the site.

- Three records of bat roosts were returned within 500 m of the site for species including: Soprano Pipistrelle, Common Pipistrelle and Noctule. All of these records were returned within the site in 2011. The records are associated with the site but comments state that the records were of bats in flight from an unspecified property along Jessop Close.
- There are six records of bird species listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) within 500 m of the site including: Brambling (*Fringilla montifringilla*), Fieldfare (*Turdus pilaris*), Kingfisher (*Alcedo atthis*), Long-tailed Duck (*Clangula hyemalis*), Red Kite (*Milvus milvus*) and Redwing (*Turdus iliacus*).
- Eight bird species were listed under Section 7 of the Environment (Wales) Act 2016 (EWA 2016) within 500 m of the site. Species include: Black-headed Gull (*Chroicocephalus ridibundus*), Bullfinch (*Pyrrhula pyrrhula*), Dunnock (*Prunella modularis*), Herring Gull (*Larus argentatus*), House Sparrow (*Passer domesticus*), Lapwing (*Vanellus vanellus*), Marsh Tit (*Poecile palustris*) and Starling (*Sturnus vulgaris*).

Records of note returned for the rest of the 1 km buffer zone are detailed below:

- Palmate Newt (*Lissotriton helveticus*).
- Common Toad (*Bufo bufo*).
- Slow-worm (*Anguis fragilis*).
- Otter (*Lutra lutra*).
- 27 records of invertebrates were returned within the rest of the buffer zone. The closest 10 species records include: August Thorn (*Ennomos quercinaria*), Banded Demoiselle (*Calopteryx splendens*), Black-tailed Skimmer (*Orthetrum cancellatum*), Blood-vein (*Timandra comae*), Brindled Beauty (*Lycia hirtaria*), Buff Ermine (*Spilosoma lutea*), Cinnabar (*Tyria jacobaeae*), Grey Dagger (*Acronicta psi*), Red-eyed Damselfly (*Erythromma najas*) and Speckled Bush-cricket (*Leptophyes punctatissima*).
- 18 records of bat commuting and foraging activity were returned within the rest of the buffer zone for species including: Common Pipistrelle, Daubenton's Bat (*Myotis daubentonii*), Natterer's Bat (*Myotis nattereri*) and Soprano Pipistrelle.
- Two records of bat roosts were returned with the rest of the buffer zone for species including Noctule and an Unknown Bat Species.
- 19 bird species were listed under Schedule 1 of the Wildlife & Countryside Act 1981 (WCA1.1) within the rest of the buffer zone. The closest 10 records being for species include: Fieldfare, Firecrest (*Regulus ignicapilla*), Goshawk (*Accipiter gentilis*), Green Sandpiper (*Tringa ochropus*), Kingfisher, Little Gull (*Hydrocoloeus minutus*), Long-tailed Duck, Mediterranean Gull (*Ichthyaeetus melanocephalus*), Peregrine (*Falco peregrinus*) and Redwing.

- 20 bird species are listed under Section 7 of the Environment (Wales) Act 2016 (EWA 2016) within the rest of the buffer zone. The closest 10 species include: Black-headed Gull, Dunnock, Herring Gull (*Larus argentatus*), House Sparrow, Kestrel (*Falco tinnunculus*), Marsh Tit, Song Thrush (*Turdus philomelos*), Starling, Tree Pipit (*Anthus trivialis*) and Yellowhammer (*Emberiza citrinella*).

Site Visit

A walkover survey of the site was completed on the **3rd April 2024** by Beth Lewis of Ecological Services Ltd. The site visit was completed during April which is outside of the optimal timeframe for undertaking such surveys. However it was still possible to draw broad conclusions to the habitats present within the development site boundary. Photographs of the site can be found in Appendix 3. **This report concentrates on the land within the proposed development site boundary only.**

The site is rectangular in shape and is approximately 60 m x 25 m in area. An entrance gate is present in the northwest corner of the site and a small area of bare ground is located just inside the entrance. The eastern and western boundaries of the site are made up of **wooden, close-board, garden fencing**. The northern boundary of the site is created partially by similar fencing with a small section of well pruned Leylandii sp. **hedgerow** along part of this boundary. The north, east and west of the site border housing and garden spaces. The south boundary is created by **chain-link metal fencing**. Beyond this lies a tree line, outside of the site. This slopes steeply downwards towards the canal. Species within this tree line include: Oak sp., Sycamore, Birch sp. The understorey includes Holly, Cherry Laurel and Bramble. A small gap in the chain-link fencing is present near the eastern corner of the fencing. A small **pile of brash** is located in the southeast corner of the site.

The interior of the site has a large rectangular area of **concrete hardstanding**. **Concrete slab walls** are standing on this area. Bramble and moss cover much of the ground over the concrete hardstanding. The remainder of the interior of the site is made up of **semi-improved grassland** with species including: Bluebell, Bramble, Broad-leaved Dock, Chickweed, Cleavers, Clover Sp., Common Bent, Common Dandelion, Greater Willowherb, Ground Ivy, Hedge Woundwort, Herbrobert, Hogweed, Lesser Celendine, Lords-and-Ladies, Meadow Buttercup, Primrose, Ribwort Plantain, Sorrel, Spear Thistle, Vetch Sp., Welsh Poppy and Yorkshire Fog. **Bramble scrub** is present along the east of the site and is low-lying along the ground.

Legislation

Birds

All breeding birds are protected under schedule 1 of the Wildlife and Countryside Act (1981) as amended. Under this Act it is an offence to:

- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built.
- Intentionally take or destroy the egg of any wild bird.

Enhanced protection is afforded to species listed on Schedule 1 of the Act, this additional protection makes it an offence to:

- Intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Dormouse

The Dormouse (*Muscardinus avellanarius*) is a European protected species and is protected under the Conservation of Habitats and Species Regulations 2017. In summary, they are protected from:

- Deliberate capture, killing and injuring,
- Deliberate disturbance of a breeding site or resting place,
- Damage or destruction of a breeding site or resting place.

Dormouse is listed on schedule 5 of The Wildlife & Countryside Act 1981 which protects them from intentional or reckless disturbance or obstruction when using a structure or place for shelter and / or protection. It is also an offence to sell, offer or expose for sale a native dormouse. Dormouse is listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

Badger

Badgers (*Meles meles*) are protected under the Protection of Badgers Act 1992. In summary they are protected from:

- Taking, killing or injuring;
- Cruelty;
- Interfering with a badger sett;
- The selling and possession of badgers;

- Marking or ringing.

Badgers are also listed on schedule 6 of the Wildlife and Countryside Act 1981 as amended.

Badgers tend to have a variety of setts with different uses and functions within the territory for the family unit. In general there is usually a main sett which the family will use the most. There are then annex, subsidiary and or outlier setts which depending on family structures and environmental pressures may be used at different times of the year. As female badgers tend to have their cubs over winter the disturbance and damage of badger setts is prohibited between December and June inclusive. NRW are the licensing body for any actions which may contravene the above legislation. Badgers favour a dry sloping site for digging their setts preferably within woodland or even under a large hedgerow bank. Badgers are creatures of habit and tend to follow regular pathways between their setts and foraging grounds.

Otter

The Otter (*Lutra lutra*) is a European protected species and is protected under the Conservation of Habitats and Species Regulations 2017. In summary, they are protected from:

- Deliberate capture, killing and injuring,
- Deliberate disturbance of a breeding site or resting place,
- Damage or destruction of a breeding site or resting place.

Otter are listed on schedule 5 of The Wildlife & Countryside Act 1981 which protects them from intentional or reckless disturbance or obstruction when using a structure or place for shelter and / or protection. It is also an offence to sell, offer or expose for sale an otter. Otter is listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

Bats

All British bats are a European protected species and are protected under the Conservation of Habitats and Species Regulations 2017. In summary, they are protected from:

- Deliberate capture, killing and injuring,
- Deliberate disturbance of a breeding site or resting place,
- Damage or destruction of a breeding site or resting place.

Schedule 5 of The Wildlife and Countryside Act (1981) also protects all species of British bat and their roosting locations. British bats are protected from intentional or reckless disturbance and or obstruction of their roosting places. Barbastelle Bat (*Barbastella barbastellus*), Bechstein Bat (*Myotis bechsteinii*), Noctule Bat (*Nyctalus noctula*), Brown Long-eared Bat (*Plecotus auritus*),

Common Pipistrelle (*Pipistrellus pipistrellus*), Soprano Pipistrelle (*Pipistrellus pygmaeus*), Greater Horseshoe Bat (*Rhinolophus ferrumequinum*) and Lesser Horseshoe Bats (*Rhinolophus hipposideros*) are also listed in section 7 of the Environment (Wales) Act 2016 which makes them a key species to sustain and improve biodiversity.

Reptiles and Amphibians

Reptiles such as the Slow-worm, Common lizard, Adder and Grass snake are protected under the Wildlife and Countryside Act 1981 (as amended). They are protected from killing, injuring and sale. They are protected from killing, injuring and sale. They are also listed in section 6 of The Environment (Wales) Act 2016.

The four widespread species of amphibian i.e. the Smooth and Palmate newts, Common frog and Common toad, are protected under the Wildlife and Countryside Act 1981 (as amended) by Section 9(5) of the Wildlife and Countryside Act 1981. This section prohibits sale of these species. Common toad is listed in section 6 of The Environment (Wales) Act 2016.

Potential Development Impacts

Plans for the proposed development include an access road, parking areas and two residential properties along with associated garden spaces. The tree line, just outside of the site, to the south, will be retained but a small amount of pruning of overhanging branches may be required. The loss of the majority of grassland within the site is expected.

- The trees along the southern boundary are considered likely to be suitable for used by **nesting birds**. Any pruning or work immediately adjacent to trees and woody scrub understorey has potential to disturb nesting birds during the bird nesting season of March to August inclusive. All wild birds, their nests and eggs are protected under the Wildlife and Countryside Act 1981 (as amended).
- The trees along the southern boundary were subject to a cursory ground level assessment during the site visit to assess the potential presence of **bat roosting** features. Visibility into the canopy from their northern elevations was good. The trees' southern elevation were assessed from the canal towpath which was compromised due to the distance from the trees and canopy foliage partially obscuring the view of the southern elevation. The optimum time for such surveys is during the winter months when trees have lost their foliage. All trees were assessed as having **NONE** bat roost potential from ground-level. No potential roost features were identified during the site visit. Although the trees are not being removed, branches on their northern elevation may be pruned. No branches overhanging the site had any potential bat roost features (PRFs).
- The trees that line the southern boundary of the site provides a suitable **commuting line for bats** to move across the environment. Previous survey efforts in 2011 identified that bats were utilising the canal corridor and tree line along the banks. No tree removal is proposed for the development and therefore bat commuting lines will be maintained, allowing bats to continue to move unhindered, through sheltered, dark areas of the canal corridor.
- The scrub, grassland and adjacent tree line is good habitat to support low numbers of **reptiles** for commuting and foraging purposes. The brash pile within the site provides good shelter habitat. The concrete slabs and hardstanding provide good shade and basking areas for reptile species. Five records of Grass snake and one record of Slow-worm were returned the data search with the closest record being for Grass snake approximately 220 m west of the site. Local pets within the housing estate were noted with a cat on site during the survey. This could reduce the likelihood that reptiles may be present within the central, open areas of the site. The clearance of grassland, brash and small scrub areas have the potential to impact on common reptile species.

- The development site is suitable for use by reptile species. The proposals seek to retain a 2 m buffer of grassland along the southern boundary of the site during and post development works. Given the small size of the development site it is likely that a low population of reptiles exists. As the proposals will retain habitat during construction works and the likely low population density within the site boundary, it is suggested that the presence of reptiles be assumed in this instance.
- No ponds are present on site and there is no network of waterbodies within close proximity to the site. The small areas of scrub and adjacent tree line along the canal corridor provide good habitat for amphibians to utilise for shelter and commuting purposes. 16 records of amphibians were returned in the data search for Common frog, Common toad and Palmate newt. Although unlikely, amphibian presence within the site, during their terrestrial life stage, cannot be ruled out completely. Local pets present on site could reduce the likelihood that amphibians may be present within the central, open areas of the site. Ground works undertaken could impact common amphibian species that may be present within the site.
- The adjacent canal corridor and bankings immediately adjacent to the south of the site provide good commuting and shelter corridors for otter and badger. The majority of the site was well fenced with no gaps to allow larger mammals passage into the site. There was a small gap under the fence in the southeast corner of the site with bare ground present showing a potential entry and exit route for small mammals into and out of the site. It is expected that cats use this gap to access through the site as no otter or badger field signs were noted in the site or near to this fence gap.
- Two records of badger and five records of otter were returned in the data search. The closest record being for a badger live sighting within Cefn Wood south of the site. The otter records are associated with the Monmouthshire and Brecon canal to the east, the Ynysfro Reservoir to the northeast and the River Ebbw to the south and west. The site provides little shelter habitat for these species to utilise and more suitable habitat is present in the wider landscape. The tree line along the southern boundary of the site was surveyed from the canal towpath and there was no evidence of a otter holt, otter resting places or badger setts along the canal bankings, adjacent to the site.
- The site sits immediately adjacent to the Monmouthshire and Brecon Canal (Crumlin Arm) SINC which is location to the south. This is designated for its standing open-water habitat that is associated with otters. Pollution measures must be put in place to avoid any impacts to the SINC habitat, and in-turn, any species that may use it.

Biodiversity Enhancements & Green Infrastructure Considerations

Chapter 6 of *Planning Policy Wales (version 12)*, paragraph 6.2.5 requires Green Infrastructure considerations to be included with all planning applications. Development proposals must detail how green infrastructure considerations which are proportionate to the scale and nature of the plans are being provided.

Green infrastructure features currently found within the site boundary are semi-improved grassland and scrub. The tree line along the southern boundary of the site forms a wooded corridor along the Monmouthshire and Brecon canal. This provides good habitat connectivity east to west through the wider landscape.

The proposed development plans will retain the tree line along the southern boundary of the site. This will help reduce light and noise spill onto the adjacent canal. It will also help to maintain habitat connectivity along the canal and into the wider landscape for a range of different species. A chain-link fence will be installed along the southern boundary of the development site, at least 2 m from the tree line. The fencing will help protect the tree line and also retain some of the current grassland habitat within the site boundary during and post development.

Sensitive lighting to prevent light spill into adjacent natural habitat. Light spill could affect how wildlife move through habitat within and also the habitats adjacent to the site. Careful consideration must be given to the use of lighting within the development site, as this can adversely affect the activity of a variety of fauna, particularly foraging bats, nesting birds, otter, badger and invertebrates. Light spillage into adjacent semi-natural habitats must be avoided and brightness kept to the lowest permissible level in the areas adjacent to such habitats. All lighting must meet recommendations in the BCT Guidance Note 08/23 Bats and Artificial Lighting at Night.

All fencing across the site must be hedgehog friendly in design. A friendly design is considered to allow passage of small animals across the site. Close board or mesh fencing should provide either a continuous gap between the bottom of the fence and ground of approximately 13 cm or 13 cm by 13 cm gaps cut every 3 m along fencing.

The proposed plans indicate the provision of garden space for each new residential plot and some limited tree planting. In order to increase the biodiversity value of the proposed soft landscaping it is suggested that any turf used has a diverse native species mix and that any tree or shrub planting must use native species. It will be important to ensure all planting avoids aggressive, non-native species planting which can escape into the adjacent canal.

Conclusions and Recommendations

The development proposes to create an access track, parking area and two residential properties, along with associated garden spaces within the site boundary. The majority of the grassland within the site is expected to require clearance.

- **A reptile mitigation strategy will be required to inform development proposals.** Vegetation clearance must be undertaken in two stages as outlined below and during the summer months of April to September inclusive to ensure reptiles are active. The reptile mitigation strategy should include but not be limited to:
 - First Stage Cut - All vegetation including scrub, grasses and flowers are to be cut no shorter than 150 mm. Once the cuttings have been collected and removed from site the site must then be left for 24 hours.
 - Second Stage Cut - Once all steps within the first stage cut have been undertaken the remaining vegetation can be cut to 50 mm high or shorter. Cutting will look to push any resident reptiles into adjacent habitats beyond the site boundary, that are not proposed to be disturbed. All cuttings must be collected and removed from site.
 - Vegetation cutting will be directional working north to south, naturally pushing reptiles into the retained buffer zone along the southern boundary.
 - The machinery to be used for cutting vegetation depends on the ground conditions and contractors. Owing to the small scale of the site ideally hand held trimmers and/or brush cutters may be suitable and the tailings hand raked and removed from site.
 - Enhancement measures will be required within any future development proposals. Measures can include the creation of habitat connectivity, reptile hibernacula and compost areas.
- The trees within the development site have the potential to be used by nesting birds. Tree pruning and scrub removal, ideally should be completed outside of the bird nesting season of March to August inclusive. If this is not achievable an ecologist must inspect any trees with the potential for birds to be present for active birds' nests prior to works beginning. If an active nest is identified a buffer zone of at least 5 m around the nest must be observed until the chicks have fledged. Only then can the vegetation be removed. Greater buffer zones around nests may be required depending on the species and habitat the nest is within.
- A root protection zone (RPZ) must be implemented around any retained trees which lie adjacent to the boundary of the proposed development site. British Standard BS 5837, *Trees in relation to design, demolition and construction - Recommendations* will be followed. Measures will include clear marking of the RPZ to guarantee no machinery is

used or digging carried out in that area. This will ensure that there is no detrimental impact to the trees and the flora or fauna it supports.

- Pollution measures must be put in place to avoid any impacts to the SINC river habitat to the east. All machinery used during any on-site works must be stored in an agreed location away from the south of the site. Spill kits must be kept on site at all times to deal with any fuel, oil or material spills. All machinery will be kept in a bunded, water-tight storage compound to prevent spills. The storage compound must be kept away from bankings that slope towards the watercourses to the south of the site.
- Ideally all excavations within the site will be securely covered over if left unattended. Any excavations that have a depth in excess of 0.5 m and that are left open overnight will have a means of escape let for any mammals (e.g. hedgehog) that may fall into them. A wooden board or equivalent will be left from the bottom to the top of the hole at an angle no steeper than 45 °. This will allow any mammal to escape and avoid increased stress from being trapped.

The Environment Act (Wales) 2016 places a duty on competent authorities such as Newport Council to conserve and enhance biodiversity. The below bullet points are some simple measures that could be achieved to enhance the biodiversity of the site. At least two of the below features will be implemented to ensure an overall biodiversity gain is secured.

- The provision of 2 x bird boxes will be placed within trees within or along the boundary of the site.
- The provision of 2 x bat boxes. 1 x external, wall mounted bat box on eastern elevation of Plot 1. 1 x external, wall-mounted bat box on western elevation of Plot 2.
- Woody shrub or hedgerow planting along the boundaries of the site provide additional habitat within the site boundary. Supplementary planting will strengthen the current tree line, improving habitat connectivity through the site.

Best Wishes

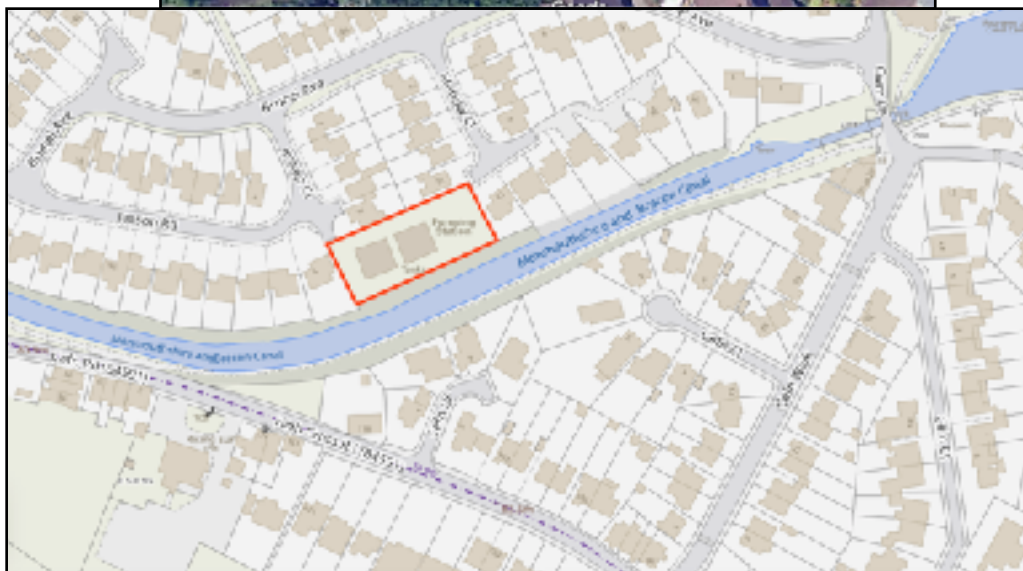
Beth Lewis
Ecologist
Ecological Services Ltd

Signed: Beth Lewis Date: April 2025

Appendix 1 - Plant Species List

Common Name	Scientific Name
Bluebell	<i>Hyacinthoides sp.</i>
Bramble	<i>Rubus fruticosus sp</i>
Broad-leaved Dock	<i>Rumex obtusifolius</i>
Chickweed	<i>Stellaria media</i>
Cleavers	<i>Galium aparine</i>
Clover sp.	<i>Trifolium sp.</i>
Common Bent	<i>Agrostis capillaris</i>
Common Dandelion	<i>Taraxacum lacistophyllum</i>
Greater Willowherb	<i>Epilobium hirstum</i>
Ground Ivy	<i>Glechoma hederacea</i>
Hedge Woundwort	<i>Stachys sylvatica</i>
Herb-robert	<i>Geranium robertianum</i>
Hogweed	<i>Heracleum sphondylium</i>
Lesser Celendine	<i>Ficaria verna</i>
Lords and Ladies	<i>Arum maculatum</i>
Meadow Buttercup	<i>Ranunculus acris</i>
Primrose	<i>Primula vulgaris</i>
Ribwort Plantain	<i>Plantago lanceolata</i>
Sorrel	<i>Rumex acetosa</i>
Spear Thistle	<i>Cirsium vulgare</i>
Vetch Sp.	<i>Vicia sp.</i>
Welsh Poppy	<i>Meconopsis cambrica</i>
Yorkshire Fog	<i>Holcus lanatus</i>

V.1



Appendix 3- Site Photographs



Photo 1. Southeast corner boundary.



Photo 2. Northeast corner. Fencing and low lying scrub along east boundary/



Photo 3. Northern boundary with grassland and scrub.



Photo 4. View of northern area of site. Grassland/hardstanding interface.



Photo 5. View of southern tree line of site.



Photo 6. Southern tree and fence line.



Photo 7. Gap under southern fencing.



Photo 8. Southeast corner of site bramble scrub and brash pile.



Photo 9. Concrete slabs with moss and bramble growth along hardstanding.



Photo 10. Concrete slabs in centre of site.



Photo 11. View of tree line and canal basing from adjacent southern towpath.



Photo 12. View of adjacent canal and towpath.

Appendix 4 - Legislation

The Habitats Directive (Directive 92/43/EEC) aims to *'contribute towards ensuring biodiversity through the conservation of natural habitats and of wild fauna and flora in the European territory of the Member States'*. The Directive requires the establishment and conservation of a network of sites within each member state which protect the rarest flora and fauna found across Europe. A number of species and habitats are listed in Annex 2 of the directive for which areas can be designated as a SAC. The aims of the Habitats Directive are transposed into British Law through the Conservation of Habitats and Species Regulations 2017.

The Wildlife and Countryside Act (1981) as amended provide the legislation framework and protection for SSSI. A SSSI is designated by a statutory nature conservation body such as Natural Resources Wales (NRW) for its make up of flora, fauna, geological and / or physiographical features. Each SSSI should have a citation which describes the site and its special features.

The Environment (Wales) Act 2016 is a wide reaching piece of legislation which seeks help improve the management of Wales' natural resources into the future. The Act sets out a Wales wide approach to planning and managing its natural resources at a national and local level in a sustainable manner. One main requirement for all public bodies, such as local councils, is to maintain and enhance biodiversity where possible within their duties.

The Well-Being of Future Generations (Wales) Act 2015 places a duty upon public bodies to produce well-being objectives that contribute to achieving a set of overarching well-being goals. The Resilient Wales goal is the key goal that biodiversity and geodiversity conservation, as part of the planning process, will contribute towards delivering.