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Usk Way, Newport

Preliminary Ecological Appraisal

Version 1

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This report describes work commissioned by Tai Hedyn Ltd by an instruction dated 15th December 2025. The Client's representative for the contract was Peter Page of Tai Hedyn Ltd. Hannah Webster of JBA Consulting carried out this work

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Contents

1	Introduction	1
1.1	Project Background	1
1.2	Site Location	1
1.3	Proposed Development	1
2	Methods	3
2.1	Desk-Based Assessment	3
2.2	Site Survey	3
2.3	Limitations	8
3	Results and Evaluation	9
3.1	Desk-Based Assessment	9
3.2	UKHab Survey	14
4	Conclusions and Recommendations	17
4.1	Conclusions	17
4.2	Recommendations	17
5	Summary of Recommendations	22
Appendix		23
A	Relevant Policy and Legislation	23
A.1	Planning Policy Wales (Edition 12, February 2024)	23
A.2	Natural Environment and Rural Communities (NERC) Act 2006	23
A.3	Statutory Designated Nature Conservation Sites	23
A.4	Non-Statutory Designated Sites	24
A.5	Protected Species	24

List of Figures

Figure 1-1. Site location and red line boundary.	2
Figure 1-2. Proposed Site Plan.	2
Figure 3-1. Statutory designated sites within 1km of the site.	11
Figure 3-2. Non-statutory designated sites located within 1km of the site.	12

List of Tables

Table 2-1. Guidelines for assessing the potential suitability of proposed development sites for bats (Collins, 2023).	5
Table 2-2. Guidelines for assessing the suitability of trees on proposed development sites for bats (Collins, 2023).	6
Table 3-1. Statutory designated sites within 2km of site.	9
Table 3-2. Protected Species Records within 2km of the Site.	12

Abbreviations

BCT	Bat Conservation Trust
CIEEM	Chartered Institute of Ecology and Environmental Management
EPS	European Protected Species
GIS	Geographic Information System
INNS	Invasive Non-Native Species
JNCC	Joint Nature Conservation Committee
LERC	Local Environmental Records Centre Wales
MAGIC	Multi-Agency Geographic Information for the Countryside
NGR	National Grid Reference
NRW	Natural Resources Wales
PEA	Preliminary Ecological Appraisal
PPS	Protected and Priority Species
PRF	Potential Roosting Feature
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UKHab	UK Habitat Classification
WCA	Wildlife and Countryside Act

1 Introduction

1.1 Project Background

JBA Consulting was commissioned by Tai Hedyd Ltd to carry out an updated Preliminary Ecological Appraisal (PEA) following a previous PEA completed by JBA in 2021 to support a Section 73 planning application for the redevelopment of a site at Usk Way, Newport.

The survey was commissioned to identify any likely ecological constraints to the proposed scheme. Where applicable, recommendations for further surveys, mitigation and ecological enhancements have been provided in relation to the ecological receptors likely to be impacted upon.

1.2 Site Location

The proposed development site is located at Usk Way in Newport, South Wales. The site is located to the east of the A4042 Usk Way in Newport and is 0.86ha. It comprises of brownfield land and has previously been used for temporary car parking. The site is bounded to the north by a residential building, to the east and south by the River Usk and a footpath, and to the west by the A4042 Usk Way. The site is accessed from the A4042 Usk Way to the west of the site. The site location and red line boundary are shown in Figure 1-1.

1.3 Proposed Development

Planning permission under planning reference 21/0983 was granted in 2021 for the development of 122 dwellings, two commercial units (A1 and A3 use classes), and associated works, including landscaping, sustainable drainage, and car and cycle parking. The development will comprise of five blocks, labelled A-E, as shown in Figure 1-2.

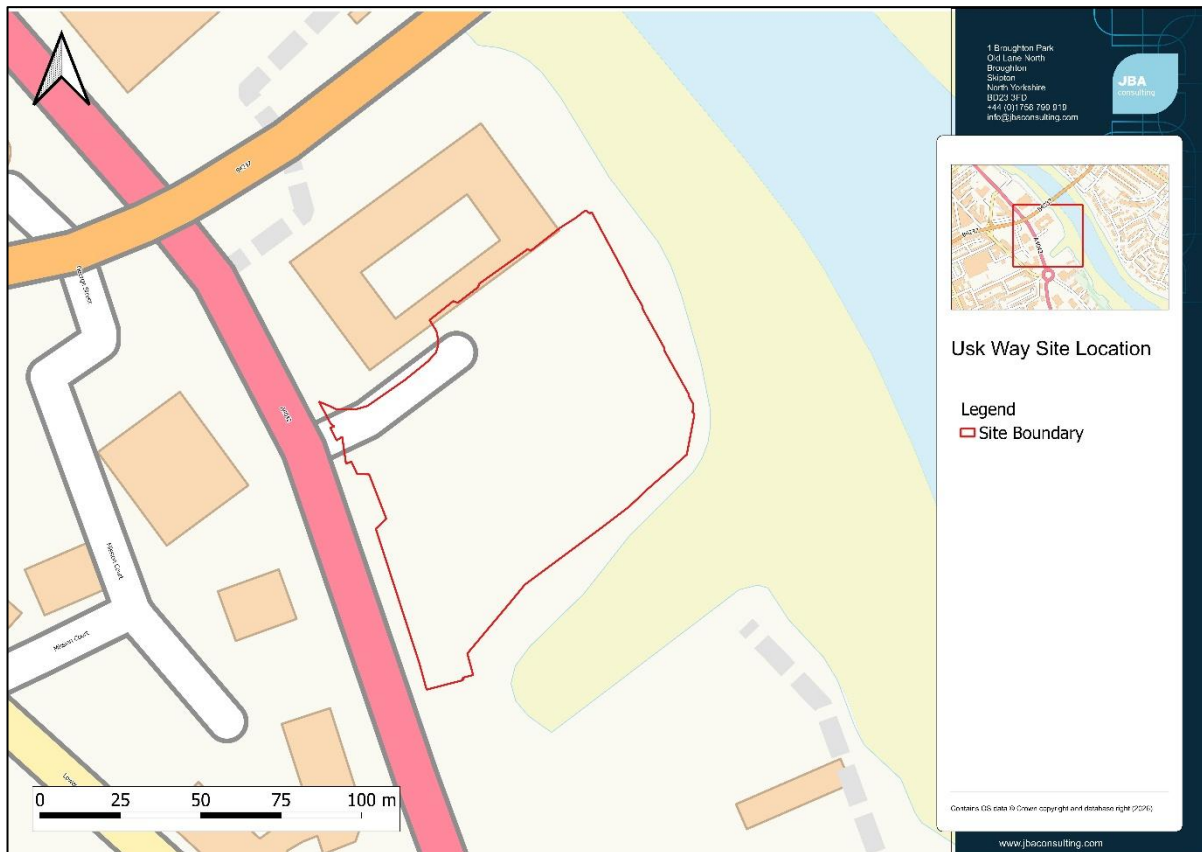


Figure 1-1. Site location and red line boundary.



Figure 1-2. Proposed Site Plan.

2 Methods

A PEA of the site has been undertaken in line with current best practice guidance (CIEEM, 2017) and included:

- A desk-based assessment to identify any records of protected and/or priority habitats and species, and designated nature conservation sites in the vicinity of the proposed works.
- A site survey comprising a habitat survey using the UK Habitat Classification (UKHab) and an assessment of the possible presence of protected or priority species, and (where relevant) an assessment of the likely importance of habitat features present for such species.
- An assessment of the potential impacts of the works on the habitats and species present at the site and the surrounding areas.

2.1 Desk-Based Assessment

Prior to undertaking the site survey, searches of databases containing ecological records, priority habitats, and information on statutory and non-statutory designated sites were made. The following sources were included in these searches:

- MAGIC mapping service (www.magic.gov.uk)
- Natural Resources Wales GIS data

Due to the size of the site and the nature of the works, it is considered that the zone of influence would be 1km from the central grid reference ST 31855 87534 and therefore the desk-based assessment was conducted within this search area.

2.2 Site Survey

A site survey was undertaken on the 5th of February 2026 by JBA ecologists Hannah Webster. The survey area included the site boundary as outlined in Figure 1-1 above.

The PEA was based upon a UKHab Survey, conducted using the UK Habitat classification (UKHab) system. The method was extended to identify any features suitable for use by legally protected or notable species and locate evidence for their presence or likely absence based on standard techniques.

2.2.1 Habitats

Habitats within and adjacent to the site boundary were surveyed using the UKHab classification system. The survey was undertaken within the boundary shown in Figure 1-1. Habitats were mapped to level 4 of the UK Habitat Classification scheme (UKHab Ltd 2023) implemented using the field key with reference to the relevant definitions (UKHab Ltd 2023). All habitats within the site were recorded during the site survey and a description of each habitat type collected. Botanical names follow Stace (2019).

2.2.2 Protected and Notable Species

Habitats were also assessed for their potential to support any legally protected species or species of conservation concern and any incidental faunal sightings, or field signs discovered during the survey, were recorded. The following sections provide further details on the assessments undertaken in relation to specific species. Legislative guidance relating to protected species is outlined in Appendix A, along with details of other relevant policy and legislation.

2.2.2.1 Birds

Vegetation and habitats around the site were assessed for their suitability to support nesting birds. Special consideration was given to bird species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). Furthermore, any birds seen or heard on site during the survey were recorded as incidental observations.

2.2.2.2 Badger

The survey area was searched for signs of Badgers *Meles meles*, and where evidence was found details were recorded following Harris et al. (1989). In addition to recording the presence of setts and the level of activity at them, the following signs of activity were also searched for: latrines, footprints, evidence of feeding activity and well-worn paths through vegetation. Badgers will use a number of setts throughout their territory at different times of year; any large holes with the potential to be used by Badgers, but not showing obvious signs of recent activity, were therefore also recorded.

2.2.2.3 Bats

Structures and trees likely to be impacted by the proposed scheme were inspected during a Daytime Bat Walkover (DBW) to observe, assess, and record any habitats suitable for bats to roost, commute and forage both on site and in the surrounding area using the methods specified in the Bat Conservation Trust (BCT) guidelines (Collins, 2023).

Structures, trees, and other features that could be suitable for bats to roost in and any habitats that could be suitable for bats to commute, forage or swarm in/ at were assessed for potential suitability following the below guidance provided by the BCT Guidelines:

Evidence indicating the existence of a bat roost includes bat droppings, urine staining/ dark stains running below holes or cracks, odours, feeding remains, scratch marks, and

dead/alive bats. However, roosting bats may still be present without any external evidence being recorded.

Furthermore, the suitability of habitats across the site to support commuting and foraging bats was assessed in terms of habitat type, abundance, connectivity, and distribution. These were categorised as having either 'none', 'negligible', 'low', 'moderate' or 'high' suitability for bats which was determined by applying the categories given within the BCT Guidelines (Table 2-1).

Table 2-1. Guidelines for assessing the potential suitability of proposed development sites for bats (Collins, 2023).

Suitability	Roosting habitats	Potential flightpaths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines or generate/shelter insect populations available to foraging bats).
Negligible ¹	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.

¹ Negligible - 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).

Suitability	Roosting habitats	Potential flightpaths and foraging habitats
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ² and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

The information displayed in Table 2-1 does not reflect the same classifications for trees, therefore, Table 2-2 demonstrates the appropriate classification of PRFs for trees - 'NONE', 'FAR', or 'PRF'. PRFs on trees include cracks/splits, crevices, rot cavities, fluting, loose bark, woodpecker holes and areas of Ivy *Hedera helix*.

Table 2-2. Guidelines for assessing the suitability of trees on proposed development sites for bats (Collins, 2023).

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

² e.g. in terms of temperature, humidity, height above ground level, light levels or levels of disturbance.

2.2.2.4 Otter

Watercourses and surrounding areas within the site were assessed for their potential to support Otter *Lutra lutra*, based on RSPB (1994) and Chanin (2003). This involved walking the survey section and recording any spraints (droppings), slides, feeding remains and footprints. A search was also made for possible holt and couch (resting) sites. Otters can be extremely difficult to observe, and this method provides the most effective and efficient means of investigating presence or absence.

2.2.2.5 Water Vole

The field survey assessed watercourse suitability for Water Vole *Arvicola amphibius*, based on initial habitat assessment criteria outlined in Dean *et al.* (2016). The assessment of habitat suitability for Water Vole is based on the availability and nature of dry areas above water level for burrowing/nesting (e.g. bank profile, bank substrate), vegetation (i.e. the quantity and cover of herbaceous species) and the presence of water.

Any field signs observed within the survey area, informed by Strachan *et al.* (2011), were also noted. The most important, diagnostic field sign for Water Vole is the presence of latrine sites. These are locations repeatedly used by Water Vole to deposit their droppings, often in prominent locations along the bank. Other field signs include the presence of burrows, feeding sites and footprints. Although these other signs provide indications of presence and are useful supporting evidence to latrines, they are of limited value on their own.

2.2.2.6 Great Crested Newt

Habitat features with the potential to support Great Crested Newt *Triturus cristatus*, and other amphibians, were recorded. Such features can include: ponds and other waterbodies with habitat suitable for breeding newts within 500m of the proposed works; piles of logs, stones or other debris; cracks in the ground; stone or rubble covered ground, and any other features that could support newts.

2.2.2.7 Reptiles

As part of the site survey, an assessment of the habitat suitability for common reptiles was made. This involved inspection of the site for key habitat features/microhabitats which may be favoured by reptiles, such as embankments, log, brash or rock piles, dry stone walls, hedgerows, open sandy areas, woodland edges and rides and interfaces between different habitat types (Sewell *et al.* 2013).

2.2.2.8 Invertebrates

An assessment of the habitat suitability for invertebrates was made, involving the identification of key habitats and features which may be favoured by invertebrates, such as flower-rich grassland, areas of early successional habitat, wetland, scrub, mature / veteran

trees, aquatic vegetation, river margins and habitat mosaics (Natural England 2005; Buglife 2015).

2.2.2.9 Fish

A preliminary assessment of habitat suitability for fish was made along the watercourses, including assessing flow rate, depth, and riverbed substrate, where possible. Any impediments to fish passage were also noted.

2.2.3 Other Priority Species and Environmental Constraints

During the site survey, any signs or sightings of other notable species were also recorded. In addition, any environmental features that might constrain the works were also recorded (e.g., access restrictions).

2.2.4 Invasive non-native species

Any Invasive Non-native Species (INNS) observed during the survey were recorded. For stand-forming plant species, the extents of such stands were noted.

2.3 Limitations

The habitats and species present in a given area are subject to change over time. A single field visit of this nature captures and reports the situation at the time of survey. As such, the advice contained within this report is considered valid for a period of 18 months before a review or an updated survey/assessment must be made by an ecologist (CIEEM 2019).

Data from biological records centres or online databases is historical information, and datasets might be incomplete, inaccurate, or missing. It is important to note that even where data is held, a lack of records for a defined geographical area does not necessarily mean that the species is absent; the area may simply be under-recorded. As such, records cannot be relied on and serve only as an indication of what might/ might not be found.

The survey was conducted in February, a suboptimal time of year to find field signs and for botanical identification. Therefore, there is potential that protected and notable species may have been overlooked and are present to a greater extent than were recorded during the survey.

3 Results and Evaluation

3.1 Desk-Based Assessment

3.1.1 Statutory and Non-Statutory Designated Sites

A search via the MAGIC database (www.magic.gov.uk) showed that there are a total of two statutory designated sites within 1km of the proposed development. These include the River Usk Special Area of Conservation (SAC) and the River Usk (Lower Usk)/ Afon Wysg Site of Special Scientific Interest (SSSI) both of which are located adjacent to the proposed development.

These statutory designated sites and their qualifying features are outlined below in Table 3-1 and are mapped in Figure 3-1

Table 3-1. Statutory designated sites within 2km of site.

Site Name	Qualifying Features	Proximity to Site
River Usk SAC	Annex I habitats; primary reason for selection: - 3260 Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation Annex II species; primary reason for selection: - 1095 Sea lamprey <i>Petromyzon marinus</i> - 1096 Brook lamprey <i>Lampetra planeri</i> - 1099 River lamprey <i>Lampetra fluviatilis</i> - 1103 Twaite shad <i>Alosa fallax</i> - 1106 Atlantic salmon <i>Salmo salar</i> - 1163 Bullhead <i>Cottus gobio</i> - 1355 Otter <i>Lutra lutra</i> Annex II species; not primary reason for selection: - 1102 Allis shad <i>Alosa alosa</i>	Adjacent to site

Site Name	Qualifying Features	Proximity to Site
River Usk (Lower Usk)/ Afon Wysg SSSI	The River Usk(Lower Usk)/Afon Wysg SSSI has been designated as it has been strongly influenced by extensive fluvio-glacial and alluvial deposits, as well as supporting a wide variety of flora. In the middle and upper reaches there is the frequent occurrence of floating and submerged plants including Common Water Crowfoot <i>Ranunculus aquatilis</i> and Water Milfoils <i>Myriophyllum spp</i>, which disappear towards the tidal reaches of the Usk near Newbridge. Riverside rocks and boulders are characterised by mosses, such as <i>Amblystegium fluviatile</i>, <i>Cinclidotus fontinalioides</i>, <i>Fontinalis antipyretica</i>, <i>Rhynchostegium riparioides</i> and <i>Thamnobryum alopecurum</i>, liverworts, such as <i>Chiloscyphus polyanthus</i>, <i>Conocephalum conicum</i>, and <i>Marchantia polymorpha</i>, the filamentous alga <i>Lemanea fluviatilis</i> and lichens of the genera <i>Verrucaria</i>. Below Newbridge, the upper mud banks are colonised by saltmarsh species such as Sea Aster <i>Aster tripolium</i>, Saltmarsh-grass <i>Puccinellia spp.</i>, and Scurvygrass <i>Cochlearia spp</i>. Otter <i>Lutra lutra</i> is widespread along the length of the river as well as tree cover providing feeding and roosting habitats for several bat species including Daubenton's bat <i>Myotis daubentonii</i>. After Newbridge, there is an increasing frequency of breeding birds such as Yellow Wagtail <i>Motacilla flava</i>, Grey Wagtail <i>M. cinerea</i>, and Dipper <i>Cinclus cinclus</i>. The river also supports a large variety of migratory and non-migratory fish with Chub <i>Leuciscus cephalus</i>, Roach <i>Rutilus rutilus</i> and Dace <i>Leuciscus leuciscus</i> being the most abundant. The lower Usk has important assemblages of Craneflies including rare and scarce species such as <i>Limonia omissinervis</i>, <i>Erioptera limbata</i> and <i>Rhabdomastix hilaris</i>, <i>Gonomyia abbreviata</i> and <i>Cheilotrichia imbuta</i>, as well as the rare Mayfly <i>Potamanthus luteus</i>.	Adjacent to site

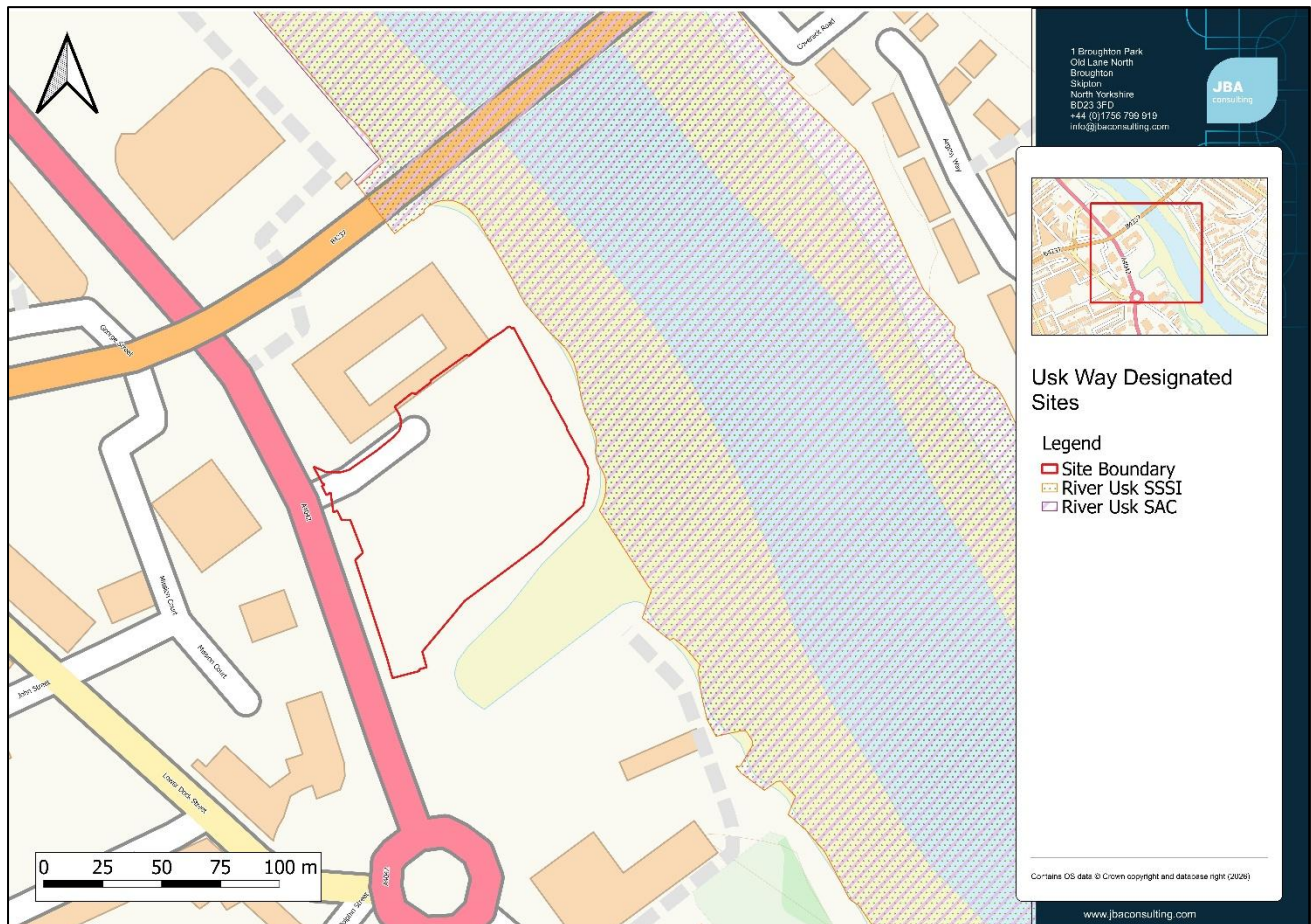


Figure 3-1. Statutory designated sites within 1km of the site.

3.1.2 Non-Statutory Designated Sites

Located approximately 700m to the south of the proposed site is the Monkey Island SINC. This is designated due to its mosaic post-industrial grassland. Non-statutory designated sites within 1km of the proposed site area can be seen in Figure 3-2.

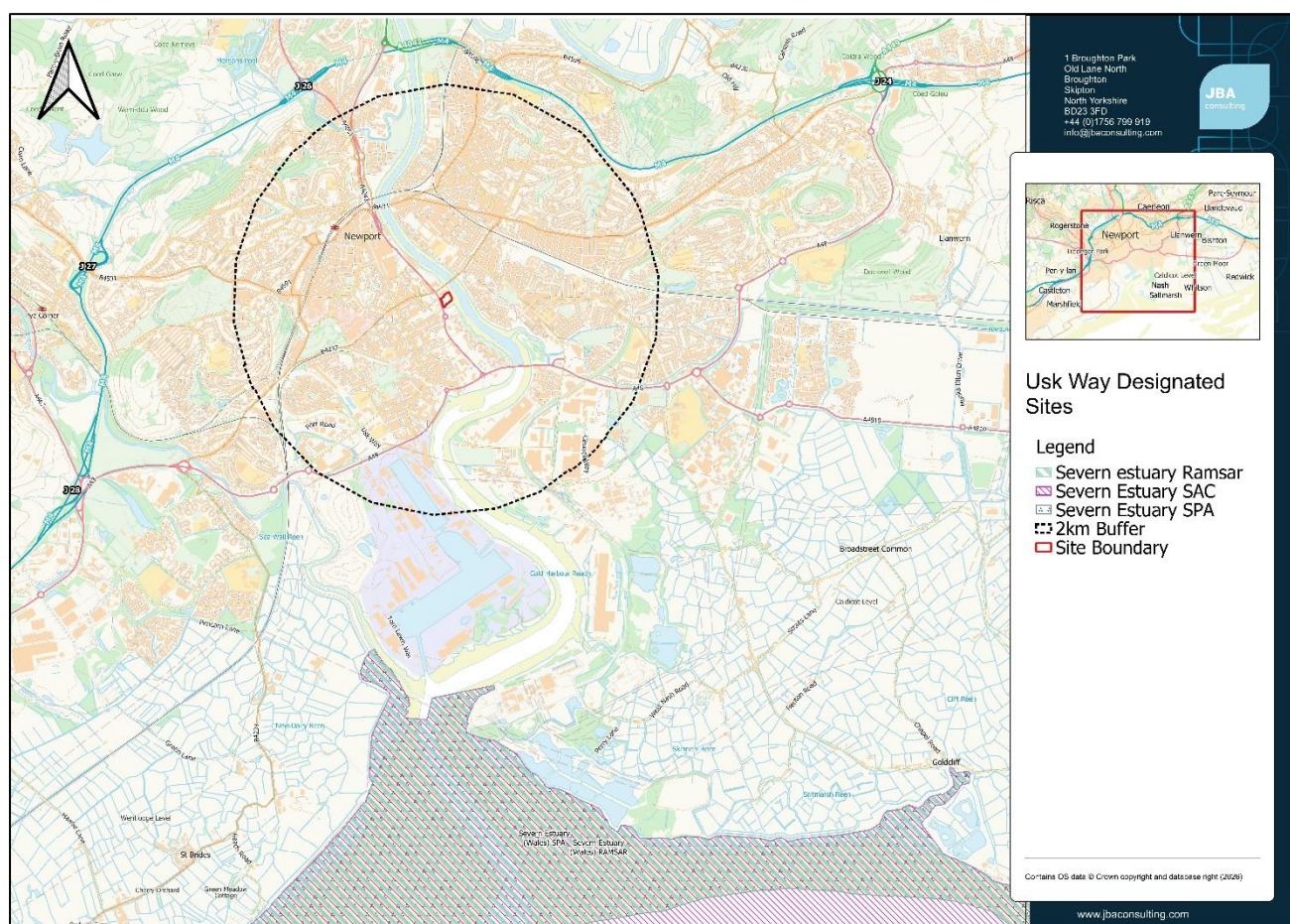


Figure 3-2. Non-statutory designated sites located within 1km of the site.

3.1.3 Protected Species

Details of the relevant protected species records held by LERC within 2km of the proposed site are outlined below in Table 3-2. Only the bird species protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) (WCA1.1) have been presented. Reptile, amphibian and mammal species protected under Annex V of the Habitats Directive and under the Wildlife Countryside Act 1981 (as amended) have also been included. Only records submitted after 2000 are considered. Where multiple records exist the closest to the site is included.

Table 3-2. Protected Species Records within 2km of the Site.

Scientific Name	Common Name	Legal Protection	Distance From Site (m)
Birds			
<i>Falco peregrinus</i>	Peregrine	Birds Directive, WCA1.1	100
<i>Turdus iliacus</i>	Redwing	Birds Directive, WCA1.1	354

Scientific Name	Common Name	Legal Protection	Distance From Site (m)
<i>Turdus pilaris</i>	Fieldfare	Birds Directive, WCA1.1	652
<i>Tringa nebularia</i>	Greenshank	Birds Directive, WCA1.1	949
<i>Tyto alba</i>	Western Barn Owl	WCA1.1	1030
<i>Phoenicurus ochruros</i>	Black Redstart	WCA1.1	1651
<i>Ichthyaetus melanocephalus</i>	Mediterranean Gull	Birds Directive, WCA1.1	1651
<i>Falco subbuteo</i>	Hobby	WCA1.1	1651
<i>Circus cyaneus</i>	Hen Harrier	Birds Directive, WCA1.1	1651
<i>Falco columbarius</i>	Merlin	Birds Directive, WCA1.1	1651
<i>Alcedo atthis</i>	Kingfisher	Birds Directive, WCA1.1	1651
Mammals			
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	WCA5	224
<i>Lutra lutra</i>	European Otter	WCA5	316
<i>Phocoena phocoena</i>	Common Porpoise	WCA5	652
<i>Pipistrellus nathusii</i>	Nathusius's Pipistrelle	WCA5	707
<i>Plecotus auritus</i>	Brown Long-eared Bat	WCA5	854
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	WCA5	1019
<i>Myotis mystacinus</i>	Whiskered Bat	WCA5	1139
<i>Arvicola amphibius</i>	European Water Vole	WCA5	1518
Vascular Plants			
<i>Hyacinthoides non-scripta</i>	Bluebell	WCA8	1235

3.2 UKHab Survey

3.2.1 Habitats

The results of the extended UKHab survey are described in the following sections below with a description of each habitat type recorded on site found in the following text.

3.2.1.1 u1b - Developed land; sealed surface

The majority of the site consists of hardstanding with large areas of bare concrete, gravels and building aggregate. The site has previously been used as a temporary carpark.

3.2.1.2 u1a - Open mosaic habitat on previously developed land

Areas of the site have become sparsely vegetated, with vegetation established within some of the larger cracks in the concrete, predominantly with Buddleia *Buddleia davidii* and other ephemeral species and mosses. Other species present include Thyme-leaved Sanwort *Arenaria serpyllifoli*, Common centaury *Centaureum erythraea*, and Weld *Reseda luteola*. A small number of grass species are also present in small quantities. Perennial Rye Grass *Lolium perenne* is dominant with False Oat grass *Arrhenatherum elatius* also present. Other species recorded across the site included Clover *Trifolium spp.*, Dogwood *Cornus sanguinea*, Valerian *Centranthus ruber*, Kidney Vetch *Anthyllis vulneraria*, Meadow Vetchling *Lathyrus pratensis*, Hawk's-beard *Crepis spp.*, Ox-eye Daisy *Leucanthemum vulgare* and Purple Toadflax *Linaria purpurea*.

3.2.1.3 h3h - Mixed scrub

Around the perimeter of the site and along the fence line scrub species have begun to establish. The scrub is dominated by stands of Buddleia with frequent Bramble *Rubus fruticosus agg.*, Maple *Acer campestre*, Broad-leaved Dock *Rumex obtusifolius*, Creeping Thistle *Cirsium arvense*, Dog Rose *Rosa Canina* and Common Nettle *Urtica dioica*. It appears that some vegetation clearance has been carried out since the previous PEA was conducted in 2021, with scrub noted as being less abundant and dense.

3.2.2 Protected and Notable Species

The following section summarises any observation of protected and/or notable species, or the potential for these to occur in the habitats observed on site during the site visit.

3.2.2.1 Birds

The desk study completed as part of the previous PEA returned over 90 species records for birds within 2km of the proposed site. These included records for the Schedule 1 species Fieldfare *Turdus pilaris*, Kingfisher *Alcedo atthis* and Redwing *Turdus iliacus*. The scrub habitat present onsite provides opportunities for common and widespread nesting bird species.

3.2.2.2 Badger

There are no records of Badger within 2km of the proposed works. The proposed site does not provide foraging potential and given the isolated nature of the site it is considered unlikely that Badger would excavate setts.

3.2.2.3 Bats

No buildings or trees suitable for roosting bats were identified within the site area. The site provides limited potential for foraging bats and it is not considered that the loss of this of this area will have a significant impact upon bat species. The River Usk that runs adjacent to the site provides a commuting and foraging corridor for bat species.

3.2.2.4 Otter

Otter have been recorded within 2km of the scheme area, the closest being approximately 360m from site, and are known to be present within the River Usk as a feature of the SAC and SSSI. The proposed site, however, does not provide habitat suitable for Otter holts or resting sites. The separation of the site from the River Usk by fencing and a well-used public footpath further decreases the potential for Otter to be encountered.

3.2.2.5 Water Vole

The desk study returned one record of a Water Vole *Arvicola amphibius* approximately 1.5km to the east of the site, on the opposite side of the River Usk. The site does not provide suitable habitat for Water Vole and there are considered to be likely absent from the immediate area of the proposed works. Therefore, Water Vole will not be discussed further in this report.

3.2.2.6 Amphibians including Great Crested Newt

No records for Great Crested Newt were provided for within 2km of the proposed scheme. It is not considered that this area is suitable for breeding Great Crested Newts, with the lack of suitable breeding ponds locally and the isolated nature of the site making it unlikely that Great Crested Newts would have colonised the area. No records for more common amphibian species were provided and the site provides limited habitats for species such as Common Frog *Rana temporaria* and Common Toad *Bufo bufo*.

3.2.2.7 Reptiles

There are no records of reptiles within 2km of the site area. However, the open mosaic habitats on site provide potentially suitable habitat for reptile species with bare ground or short vegetation in sunny, sheltered positions for basking, immediately adjacent to taller dense vegetation in which to retreat from predators, and dry protected sites for hibernation. Rubbish and rubble piles provide potential for refuge. However, the lack of connecting habitat lowers the value of this habitat and the potential for finding reptiles. The denser vegetation recorded in the previous PEA has since been cleared reducing the sites suitability to support reptiles.

3.2.2.8 Invertebrates

The site contains habitats for a range of invertebrate species, with the mosaic of habitats providing conditions for species that require different habitats throughout their lifecycle, although it should be noted that no freshwater was recorded within the site.

3.2.2.9 Fish

The River Usk SAC/SSSI is designated for a range of migratory and non-migratory fish species, a number of these are for migratory species that are known to spawn further upriver. The site runs adjacent to the river and is separated by fencing and a public footpath. There are no water bodies on site.

3.2.2.10 Invasive Non-Native Species

Two stands of Japanese Knotweed were recorded during the previous PEA conducted in 2021 however it appears these stands have been treated and were not recorded during the most recent survey. It should however be noted that the survey was conducted in February, a suboptimal time for recording INNS, when a number of species can be inconspicuous or have died back and therefore may be present to a greater extent than were recorded during the survey.

The desk study returned a number of invasive species records within 1km of the proposed scheme area including; *Cotoneaster horizontalis*, Cherry Laurel *Prunus laurocerasus*, Giant Hogweed *Heracleum mantegazzianum*, False Virginia-creeper *Parthenocissus inserta* and Pampas-grass *Cortaderia selloan*.

4 Conclusions and Recommendations

4.1 Conclusions

Habitats present on or adjacent to the site have the potential to support a number of protected and notable species such as breeding and foraging bird populations, bats, Otter, reptiles, terrestrial invertebrates and fish species.

Recommendations for mitigation and further surveys are made below; these have only been recommended where there are gaps in the existing data on the site. The surveys will need to be completed before a full assessment of the preferred option for the scheme can be undertaken. Where further surveys have not been recommended for particular species or species groups known to be present within or adjacent to the site there is sufficient existing information to be able to fully assess the impacts on these species, or it is considered that the likely options would not result in impacts.

4.2 Recommendations

The following recommendations are made in order to avoid and/or mitigate against the potential ecological impacts of the proposed works.

4.2.1 Designated Sites

The proposed site is bound to the south and east by the River Usk which is a designated SAC and SSSI and is separated by fencing and a public footpath. Given the proximity of the River Usk protected sites it will be necessary to carry out a Habitat Regulations Assessment (HRA) screening as a minimum for the site. Appropriate control measures including Method Statements and a CEMP will be required to manage any potential risks. The scheme will need to demonstrate no adverse effect on the nature conservation interest of the sites or would be required to provide adequate compensatory measures to preserve its wildlife value.

Monkey Island SINC is located approximately 700m south of the proposed site and is designated due to its mosaic post-industrial grassland. When working in or near watercourses there is a risk of introducing pollutants into the watercourse, which may then impact sites downstream. Given the distance from this non-statutorily designated site, it is not considered that there will be any significant impact to the designated site or its features provided appropriate pollution mitigation measures are followed.

4.2.2 Habitats

The proposed development will result in the small-scale loss of open mosaic habitats on previously developed land and mixed scrub. As these habitats are sparse and are in poor condition it is not considered that the loss of these habitats will have a significant impact. There is the opportunity for some small-scale habitat creation as part of the proposed development with tree and hedgerow planting currently proposed around the boundary of

the site. There is the potential to indirectly impact upon habitats associated with the River Usk. The potential for this should be informed by the HRA and a CEMP should be developed to ensure that there are no impacts during the construction phase.

4.2.3 Protected and Notable Species

4.2.3.1 Birds

Where possible, all vegetation clearance should be undertaken outside the main bird breeding and nesting season (i.e. March to August inclusively). Where this is not possible, all vegetation clearance should be supervised by an experienced ecologist. Any identified nests will be safeguarded until the chicks have fledged to ensure there are no direct impacts upon nesting birds.

4.2.3.2 Badger

There were no signs of Badger recorded during the survey and it is considered unlikely that Badgers will be impacted as the result of any proposed development.

4.2.3.3 Bats

No trees or buildings suitable for roosting bats were identified during the survey. The site provides a limited potential for foraging bats and it is not considered that the loss of this of this area will have a significant impact upon bat species. The River Usk provides a commuting and foraging corridor for bat species and therefore, where possible, works should be carried out in daylight hours between late March and October. If works must be carried out during this period at night, any artificial worksite lighting should be minimised. Any floodlights should be fitted with a directional cowl to avoid light-spill onto the river.

4.2.3.4 Otter

Otter are known to be present in the River Usk and are a feature of the SAC and SSSI designation. The site does not provide habitat suitable for Otter holts or resting Otter, however the section of the River Usk directly adjacent to the proposed site area may have the potential to be used for commuting and foraging Otters. Works near the watercourse should not be undertaken at night and watercourses should not be illuminated by lighting, such as security lights, during works. Any excavations within 30m of the water's edge should be either covered or ramps of no greater than 45 degrees provided over night to allow suitable egress for otters or other mammals and ensure they do not become trapped. Any open pipework with an outside diameter greater than 150mm must be blocked off at the end of each workday to prevent animals entering and becoming trapped. Should an Otter be encountered on site during the works, all works should cease immediately, and advice be obtained from an experienced ecologist.

4.2.3.5 Reptiles

The site and surrounding area provides a small amount of habitat suitable for reptiles in the form of scrub along with rubble and rubbish piles suitable as potential refuge.

Following the previous PEA a reptile presence / absence survey of the site was completed in 2022. No reptiles were recorded during the survey. Since the survey was completed some vegetation clearance has been completed on the site with scrub previously providing suitable habitat for reptiles removed or thinned.

As no reptiles have been recorded using the site and habitats now provide limited suitability for reptiles it is recommended that impacts to reptiles can be managed through precautionary working practices. This should include the dismantling by hand of any rubble piles identified as suitable for reptiles. Vegetation clearance should be conducted in a sensitive manner to avoid direct harm to reptiles. Two-staged vegetation clearance should be conducted under a watching brief by an Ecological Clerk of Works (ECoW) between April and September to avoid the reptile hibernation period (which takes place October - March). The first cut should bring the vegetation down to between approximately 15cm. The second stage is to be undertaken later the same day (more than two hours) or the following day (weather and ground condition dependent - to allow reptiles and amphibians the chance to move away into adjacent areas) and will bring the vegetation down to ground level. All cleared vegetation will be moved to areas outside of the construction footprint to encourage reptiles to move away. Vegetation in working areas will be maintained short for the duration of the project to reduce the likelihood of disturbing reptiles. Small mammal burrows will be destructively searched under supervision of an ECoW to search for any reptiles and amphibians using these as a refuge and move them away from working areas.

4.2.3.6 Amphibians

The limited potential terrestrial habitat and the lack of suitable breeding ponds located within close proximity of the survey area decreases the likelihood of amphibians being present within the proposed site. There are no further considerations for amphibians needed. In the unlikely event that Great Crested Newt or large numbers of more common amphibian species are encountered works should stop and a suitably qualified ecologist sought.

4.2.3.7 Invertebrates

The removal of vegetation from site will result in the loss of habitat for a number of invertebrate species. Therefore, compensatory habitat and ecological enhancements should be considered and built into the scheme where possible, for example by encouraging native landscape planting or by creating small log piles.

4.2.3.8 Fish

No works directly within the River Usk channel are proposed, therefore, direct impacts to fish species associated with the river are not anticipated. Potential impacts to fish species are therefore limited to pollution events arising from uncontrolled pollution events. This can be effectively managed by implementing appropriate industry standard pollution mitigation measures.

4.2.3.9 Invasive Non-Native Species

No INNS were recorded during the survey however the survey was completed February, a suboptimal time for recording INNS, and as such the presence of INNS on site may have been under recorded. Japanese Knotweed has been recorded previously on site, and a number of other INNS have been recorded in close proximity. The presence of workers and machinery on site could introduce or spread INNS and as such an Invasive Species Management Plan should be produced once the works extents and methodology are decided. This will provide information on how works can be undertaken without causing the further spread of invasive species, including following clean check dry protocols. It may be necessary to survey and map extents of invasive species to inform the Management Plan if the works will cover a larger area than the proposed scheme currently stands. This should be done in summer, when invasive plant species are at their most visible.

4.2.4 General Avoidance Measures

General avoidance measures that should be incorporated within the scheme include:

- Limit the hours of working to daylight hours, to limit disturbance to nocturnal and crepuscular animals;
- Due to the likely presence of Bats and Otter the use of lighting at night should be avoided. If the use of lighting is essential, then a directional cowl should be fitted to all lights to prevent light spill and to be directed away from watercourses.
- Contractors must ensure that no harm comes to wildlife by maintaining the site efficiently and clearing away materials which are not in use, such as wire or bags in which animals can become entangled; and
- Any pipes should be capped when not in use (especially at night) to prevent animals becoming trapped. Any excavations should be covered overnight to prevent animals from falling and getting trapped. If that is not possible, a strategically placed plank should be placed to allow animals to escape.

4.2.5 Biosecurity

Measures will need to be put in place to ensure that there is no spread of invasive non-native species or diseases. The Check-Clean-Dry approach should be followed, ensuring that all PPE and equipment is cleaned before leaving site. For more information go to: www.nonnativespecies.org/checkcleandry.

4.2.6 Pollution Prevention Measures

Appropriate mitigation measures should be implemented prior to the construction phase to ensure that water quality is not adversely affected through pollution incidents and the release of contaminants from the site.

5 Summary of Recommendations

A summary of recommendations is presented below. These are based on the proposed development as understood at the time of writing. These recommendations should be reviewed and updated once a works methodology has been produced. The requirement for further surveys and mitigation depends on the location, timing and methodology of proposed works activities.

- A HRA screening assessment should be carried out prior to the works commencing to determine the potential for likely significant effects on the designated nature conservation sites. Natural Resources Wales (NRW) assent will be required for works that may impact the River Usk SSSI.
- Precautionary measures for vegetation clearance to safeguard nesting birds should be put in place. Vegetation clearance should be undertaken outside the main breeding season (i.e. between October and February). If this is not possible a breeding bird survey should be completed to highlight areas used by ground nesting birds in order to establish exclusion zones for the proposed works and access tracks. Any vegetation clearance being undertaken within the main breeding season should be conducted under a watching brief by an experienced Ecological Clerk of Works (ECoW). Any identified nests will be safeguarded until the chicks have fledged to ensure there are no direct impacts upon nesting birds.
- Precautionary measures should be put in place for potential bat species foraging and commuting in the area, including limitations on night working.
- Precautionary measures should be put in place for Otter foraging and commuting in the area.
- Precautionary measures for vegetation clearance to safeguard reptiles should be put in place.
- Biosecurity measures to be followed during works and an Invasive Species Management Plan is required.

Appendix

A Relevant Policy and Legislation

The legislation discussed below is intended as a guide only and does not replace formal legal advice.

A.1 Planning Policy Wales (Edition 12, February 2024)

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales. PPW, the TANs, MTANs and policy clarification letters comprise national planning policy.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty. A well-functioning planning system is fundamental for sustainable development and achieving sustainable places.

A.2 Natural Environment and Rural Communities (NERC) Act 2006

The Natural Environment and Rural Communities Act (NERC) requires all public authorities, including planning authorities to have regard to the purpose of conserving biodiversity whilst carrying out their normal functions. The NERC Act includes lists of Habitats and Species of Principal Importance (HPIs and SPIs) to the conservation of biodiversity (Section 42) which should be considered in the implementation of duties under the NERC Act. In line with government circular 06/2005 (ODPM, 2005) which provides supplementary guidance, the presence of a Priority species may be a material consideration when a planning authority is considering a development proposal. The HPI and SPI listed under the NERC Act are largely also UK BAP Priority habitats and species. The UK Post-2010 Biodiversity Framework succeeds the UK BAP partnership; though its list of Priority species and habitats agreed under the UK BAP still form the basis of much biodiversity work in the UK. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed under the UK BAP still remain important and valuable reference sources for background information on Priority species under the UK Post-2020 Biodiversity Framework.

A.3 Statutory Designated Nature Conservation Sites

Sites with statutory designations receive varying degrees of legal protection under UK statute and European Directives. There are several statutory designations used for sites of high nature conservation value in the UK, which are applied depending upon the importance of the site in a local, regional, national or international context. This includes:

- Ramsar Sites (International designation);
- SAC and SPA (European designations);
- National Nature Reserves (NNR) and SSSI (National designations);
- Local Nature Reserves (LNR) (Local designation).

A.4 Non-Statutory Designated Sites

Non-statutory sites are afforded no statutory legal protection but are normally recognised by local planning authorities and statutory agencies as being of local nature conservation value. The protection afforded to such sites is usually discretionary, through Local Plan policies. Non-statutory sites are designated by the local authority, usually in partnership with the County Wildlife Trust (or equivalent).

A.5 Protected Species

Several species are protected under UK and international legislation. In the UK, primary protection is provided under the Wildlife and Countryside Act 1981 (as amended). Species of European importance receive additional protection in Wales under the Conservation of Habitats and Species Regulations 2017 (as amended); others may receive protection through specific legislation. Further details on specific species and their levels of protection are provided below.

A.5.1 Birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:

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

Certain species, such as the Barn Owl *Tyto alba*, receive additional protection under Schedule 1, which makes it an offence to intentionally or recklessly disturb birds and also their young at, on or near an active nest.

A.5.2 Badger

Badgers *Meles meles* are protected by the Protection of Badgers Act 1992 and the Wildlife and Countryside Act 1981 (as amended), Schedule 6. Under the Protection of Badgers Act, it is illegal to intentionally kill, capture, injure or ill-treat any Badger. It is also an offence to obstruct, destroy or damage a Badger sett or disturb Badgers within a sett. Disturbance is defined, for development purposes, as any activity that could damage a sett or be greater than what Badgers commonly tolerate.

A.5.3 Bats

All UK bat species are European Protected Species (EPS), protected under Section 9 of the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitat and Species Regulations 2017 (as amended). This makes it an offence to:

- Deliberately capture, injure or kill a bat
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Intentionally or recklessly obstruct access to a bat roost.

A.5.4 Otter

The European Otter *Lutra lutra* is an EPS protected under the Conservation of Habitats and Species Regulations 2017 (as amended), making it an offence to:

- Deliberately capture, injure or kill an Otter;
- Deliberately disturb an Otter such as to affect local populations or breeding success;
- Damage or destroy an Otter holt, possess or transport an Otter or any part of an Otter;
- Sell or exchange an Otter.

Otters also receive protection under the Wildlife and Countryside Act 1981 (as amended), this makes it an offence to:

- Intentionally or recklessly disturb any Otter whilst within a holt;
- Intentionally or recklessly obstruct access to a holt.

A.5.5 Water Vole

The Water Vole *Arvicola amphibius* is protected under the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:

- Intentionally kill, injure or capture a Water Vole;
- Possess or control a Water Vole, living or dead, or any part of a Water Vole;
- Intentionally or recklessly damage, destroy or obstruct access to any place of shelter, or disturb a Water Vole within such a place;
- Sell or offer for sale a Water Vole living or dead, or part of a Water Vole.

A.5.6 Great Crested Newt

The Great Crested Newt *Triturus cristatus* is an EPS under the Conservation of Habitats and Species Regulations 2017 (as amended). This makes it an offence to:

- Kill, capture or disturb a Great Crested Newt;
- Take or destroy the eggs of a Great Crested Newt;

- Damage or destroy the breeding or resting places of Great Crested Newt.

It also receives additional protection under the Wildlife and Countryside Act 1981 (as amended) making it illegal to possess or control any Great Crested Newt, living or dead.

A.5.7 Reptiles and Other Amphibians

Legal protection varies considerably for different species. Smooth Snake *Coronella austriaca*, Sand Lizard *Lacerta agilis* and Natterjack Toad *Epidalea calamita* are EPS, and it is an offence to:

- Deliberately kill, capture or disturb these species;
- Deliberately take or destroy the eggs of these species;
- Damage or destroy the breeding or resting places of these species.

Under the Wildlife and Countryside Act 1981 (as amended) Adder *Vipera berus*, Grass Snake *Natrix natrix*, Common Lizard *Zootoca vivipara* and Slow Worm *Anguis fragilis* are protected from intentional killing or injuring, additionally Common Frog *Rana temporaria*, Common Toad *Bufo bufo* and other newt species are prohibited from sale.

A.5.8 Fish

The Salmon and Freshwater Fisheries Act (1975) affords protection to fish and to the spawning grounds of fish. Section 2(5) makes it an offence to wilfully disturb spawning fish or the spawn of fish. Section 4(1) makes it an offence to knowingly permit the introduction of material to a watercourse such that it becomes injurious to fish, the spawn of fish or the spawning grounds of fish.

A.5.9 Invertebrates

Numerous invertebrate species receive international protection under the following legislation:

- The Conservation of Habitats and Species Regulations 2017 (as amended); Annex IIa, Annex Iva and Annex Va;
- Council of Europe Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) Appendix II and III;
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- EU CITES Regulations.

Approximately 70 species of invertebrate species receive legal protection through Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). There are various levels of protection according to the rarity of the species. Offences include combinations of the following:

- Sale, or offering / exposing for sale;
- Possession;
- Intentional taking, killing or injuring;

- Intentionally / recklessly damaging or destroying its place of shelter / protection;
 - Intentionally / recklessly disturbing it whilst occupying its place of shelter / protection;
 - Intentionally / recklessly obstructing access to its place of shelter / protection
- Species with full protection under the Act include the Marsh Fritillary *Euphydryas aurinia*, Southern Damselfly *Coenagrion mercuriale* and Violet Click Beetle *Limoniscus violaceus*.

There are also over 400 invertebrate species listed under Section 41 of the Natural Environment and Rural Communities Act for England and under Section 7 of the Environment (Wales) Act 2016.

A.5.10 Invasive Non-Native Species

Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) lists plant species, groups of plants and animal species for which it is illegal to plant, release, allow to escape or cause to spread into the wild. Examples of species listed on Schedule 9, which are most likely to be encountered, include Japanese Knotweed *Fallopia japonica*, Himalayan Balsam *Impatiens glandulifera*, Giant Hogweed *Heracleum mantegazzanum* and Signal Crayfish *Pacifastacus leniusculus*. Some species are also classed as 'controlled waste' under the Environmental Protection Act 1990 and must be disposed of properly (i.e. Japanese Knotweed and Giant Hogweed). These provisions mean that, if these species occur on a site proposed for development or other work which may disturb the ground, control of these species is likely to be required.

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