

Coverack Road - Preliminary Ecological Appraisal

P02

December 2024

**Prepared for:
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Document Status

Issue date	December 2024
Issued to	Newport City Homes
BIM reference	LNA-JBAU-XX-XX-RP-Z-0002-Coverack_PEA
Revision	S3-P02
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This report describes work commissioned by Landev Consulting, on behalf of Newport City Homes, by an instruction dated 15th September 2023. The Client's representative for the contract was Dafydd Cantwell of Landev Consulting. 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 Summary	1
2	Methods	2
	2.1 Desk-Based Assessment	2
	2.2 Site Survey	2
	2.3 Limitations	6
3	Results and Evaluation	7
	3.1 Desk-Based Assessment	7
	3.2 Phase 1 Habitat Survey	10
4	Assessment of Impacts and Recommendations	13
	4.1 Designated Sites	13
	4.2 Habitats	13
	4.3 Protected Species	13
	4.4 Biodiversity Net Gain and the DECCA Framework	17
	4.5 General Mitigation Measures	19
5	Summary of Recommendations	21
Appendices A-1		
A	UK Hab Map	A-1
B	Proposed Development	B-1

List of Figures

Figure 1-1. Site Location	1
Figure 3-1. Designated Sites Located within 2km of the proposed site	9

List of Tables

Table 2-1. Definition of Roost Suitability (From Colins, 2016)	4
Table 3-1. Statutory Designated Sites Within 2km of Proposed Development	7
Table 4-1. Impacts of the proposed development in relation to the DECCA Framework	18
Table 5-1. Summary of Recommendations	21

Abbreviations

BAP	Biodiversity Action Plan
BCT	The Bat Conservation Trust
CIEEM	Chartered Institute of Ecology and Environmental Management
EPS	European Protected Species
HPI	Habitats of Principal Importance
HRA	Habitat Regulations Assessment
JNCC	Joint Nature Conservation Committee
LBAP	Local Biodiversity Action Plan
LDP	Local Development Plan
MAGIC	Multi-Agency Geographic Information of the Countryside
NERC	Natural Environment and Rural Communities
NNR	National Nature Reserve
PEA	Preliminary Ecological Appraisal
PPW	Planning Policy Wales
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
UKBAP	United Kingdom Biodiversity Action Plan
WCA	Wildlife and Countryside Act

1 Introduction

1.1 Project Background

JBA Consulting (JBA) were commissioned by Newport City Homes to carry out an updated Preliminary Ecological Appraisal (PEA) following a previous PEA completed in 2020 in support of a planning application for a residential development on Coverack Road, Newport.

1.2 Site Summary

The application is for the development a 5-storey apartment block, accommodating 40 apartments, on the former Galliford's Yard site, Coverack Road, close to the city centre of Newport. The site is located at Coverack Road and runs adjacent to the River Usk, Newport at grid reference ST 31997 87759, and is approximately 0.16ha in area.

The site was previously used for light industrial use and is therefore brownfield land that has been vacant for a number of years. The site is located in a mixed residential and industrial area, with residential properties to the north and east of the site, and the River Usk to the south-west. George Street Bridge crosses above the site's north-western perimeter. Figure 1-1 below shows the site location and boundary. This constitutes a second phase of development at the site. The first phase comprises of two apartment blocks, accommodating a total of 76 apartments o the north of George Street Bridge, which was granted planning permission in 2019 (LPA Ref: 18/1169).



Figure 1-1. Site Location

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 notable habitats and species, and designated nature conservation sites in the vicinity of the proposed works.
- A site survey comprising a UKHab Survey including 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, it is considered that the zone of influence would be up to 2km radius from central grid reference ST 319877 and therefore the desk-based assessment was conducted within this search area.

2.2 Site Survey

A site survey was undertaken on the 21st of September 2023 by Hannah Webster, an ecologist at JBA Consulting. The PEA was based upon a UKHab Survey, conducted using the UK Habitat Classification (UKHab) methodology. The method was extended to identify any features suitable for use by legally protected or notable species and to 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 UK Habitat Classification (UKHab) methodology. The survey was undertaken within the redline boundary shown in Figure 1-1. Habitats were mapped to level 4 of the UK Habitat Classification scheme (UK Habitat Classification Working Group, 2018_a) implemented using the field key (Carey & Butcher, 2018) with reference to the relevant definitions (UK Habitat Classification Working Group, 2018_b). All habitats within the site were recorded during the site survey and a description of each habitat type collected. Botanical names follow Stace (2010).

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

The suitability of habitats across the survey area to support commuting and foraging bats was assessed in terms of habitat type, abundance, connectivity and distribution. These were categorised as having either 'negligible', 'low', 'moderate' or 'high' suitability for bats which was determined by applying the categories given within the BCT Guidelines (Collins, 2016) (Table 2-1).

Table 2-1. Definition of Roost Suitability (From Colins, 2016)

Suitability	Roosting Habitats	Commuting and Foraging Habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	<p>A structure with one or more potential roost sites that could be used by individual bats opportunistically. 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 or hibernation).</p> <p>A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.</p>	<p>Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat.</p> <p>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.</p>
Moderate	A structure or tree 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 – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).	<p>Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens.</p> <p>Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.</p>

Suitability	Roosting Habitats	Commuting and Foraging Habitats
High	A structure or tree 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 and surrounding habitat.	<p>Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.</p> <p>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, treelined watercourses and grazed parkland.</p> <p>Site is close to and connected to known roosts.</p>

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 are extremely difficult to observe, and this method provides the most effective and efficient means of investigating presence or absence.

2.2.2.5 Great Crested Newts

Habitat features with the potential to support Great Crested Newt *Triturus cristatus*, and other amphibians, were recorded. Such features can include: ponds 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.

Where access was possible, any substantial waterbodies within 500m of the site, and which had ecological connectivity to the site, were assessed for their potential to support newts. This assessment was based on the Habitat Suitability Index (HSI) (Oldham *et al.*, 2000; ARG UK, 2010). This system involves assessment of ten suitability indices per waterbody and is an accepted method of assessing the likelihood for a particular pond to hold breeding Great Crested Newts.

2.2.2.6 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 (Froglife 1999).

2.2.3 Other Notable 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 on the need for an updated survey/assessment must be made by an ecologist (CIEEM 2019).

Data from 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.

3 Results and Evaluation

3.1 Desk-Based Assessment

3.1.1 Statutory Designated Sites

A search via the MAGIC database showed two statutory designated sites within 2km of the proposed development. These are part of the River Usk protected site designated as a Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). These designations and their features are detailed in Table 3-1 and mapped in Figure 3-1 below.

Table 3-1. Statutory Designated Sites Within 2km of Proposed Development

Site Name	Features of Designation	Distance From Proposed Development
Special Area of Conservation (SAC)		
River Usk/ Afon Wysg SAC	<p>Annex I habitats; not primary reason for selection:</p> <ul style="list-style-type: none"> -3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation <p>Annex II species; primary reason for selection:</p> <ul style="list-style-type: none"> -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> <p>Annex II species; not primary reason for selection:</p> <ul style="list-style-type: none"> -1102 Allis shad <i>Alosa alosa</i> 	10m

Site Name	Features of Designation	Distance From Proposed Development
Site of Special Scientific Interest (SSSI)		
River Usk (Lower Usk)/ Afon Wysg SSSI	<p>The River Usk (Lower Usk) is a rare example of a large mesotrophic lowland river which has not been subject to significant modification by man. Of particular significance to the river's morphology and biology are the extensive deposits of fluvio-glacial and alluvial material in the Usk valley between Abergavenny and Newport. The Lower Usk has developed a wide floodplain with a complex and active system of meanders, cut-off and back channels which contribute to the biological interest and diversity of the site. The invertebrate fauna is characteristic of a large lowland river. Of special interest are the crane-flies associated with silty river margins in the vicinity of Newbridge on Usk. The fish fauna is of international significance including several rare and scarce species and there is an expanding population of otters <i>Lutra lutra</i>. Several scarce higher plant species occurring along the river's tidal reaches are also of special interest. Whilst not a special feature of the site, there is a good range of breeding birds associated with riverine habitats. The SSSI incorporates adjacent areas of riparian habitat which directly support the special interest of the river. These include woodlands dominated by alder <i>Alnus glutinosa</i> and willows <i>Salix</i> spp., marshy grassland, stands of tall herb, swamp and fen vegetation, salt-marsh and coastal grassland.</p>	10m

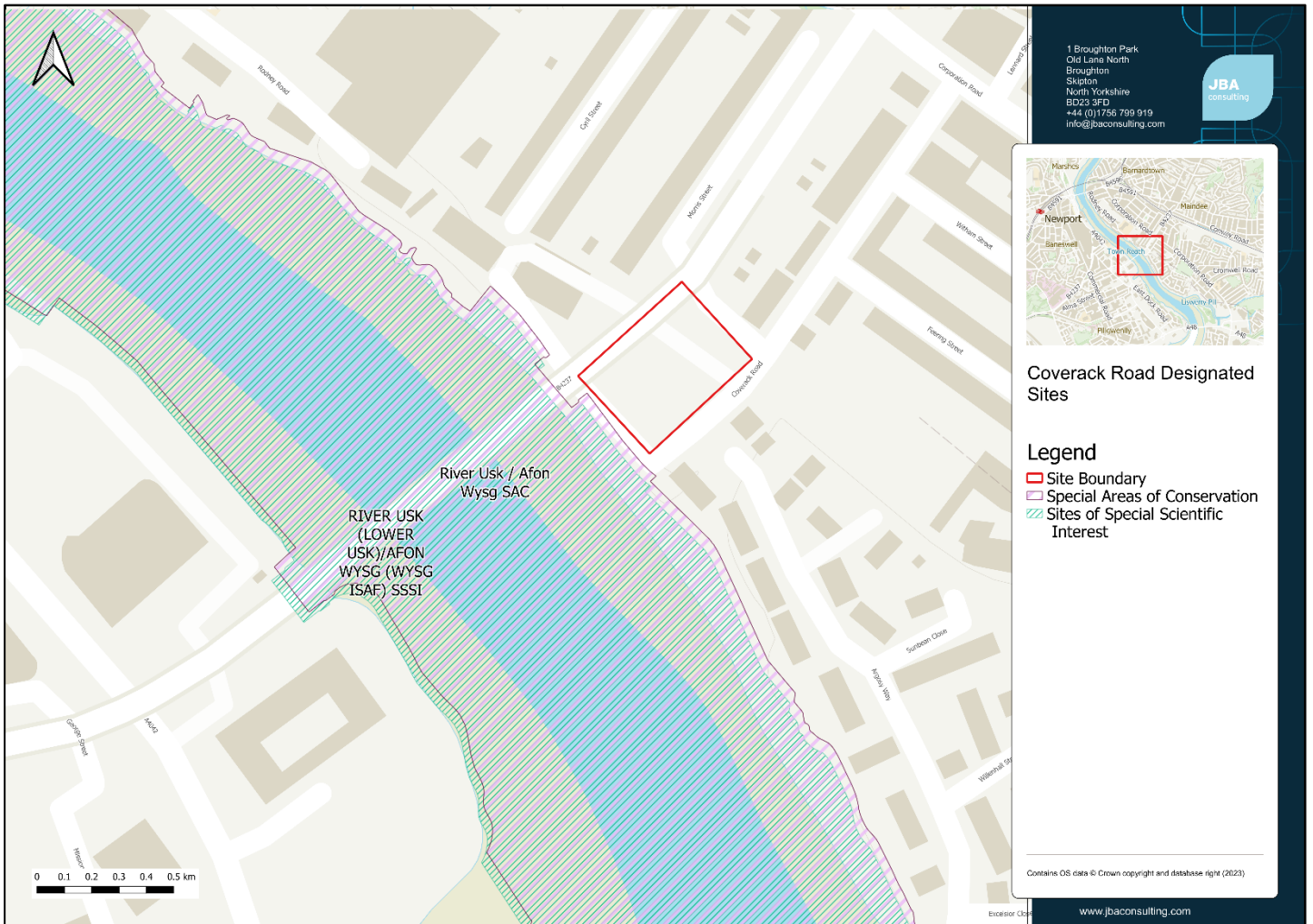


Figure 3-1. Designated Sites Located within 2km of the proposed site

3.1.2 Non-Statutory Designated Sites

There are no additional non-statutory designated sites located within 2km of the proposed scheme.

3.2 Phase 1 Habitat Survey

The results of the extended UKHab survey are described in the following sections below and mapped in Appendix B.

3.2.1 Habitats

3.2.1.1 u1b Developed land; Sealed surface

The majority of the site consists of hardstanding with large areas of bare concrete and gravels.

3.2.1.2 u1a Open mosaic habitat on previously developed land

Various areas of the site have become vegetated, with vegetation well 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* Weld *Reseda luteola*. A small number of grass species are also present in small quantities including False Oat grass *Arrhenatherum elatius* Horsetail *Equisetum sp.*

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*, Broad-leaved Dock *Rumex obtusifolius*, Creeping Thistle *Cirsium arvense*, Dogwood *Cornus sanguinea* and Common Nettle *Urtica dioica*.

A line of dense scrub separates the development site and existing footpath from the River Usk. Species present are a mixture of native and planted exotic species however Buddleia and Bramble dominate.

3.2.2 Assessment for Protected and Notable Species

3.2.2.1 Birds

The desk study completed as part of the previous PEA completed in 2020 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 mixed scrub habitat present onsite provides opportunities for common and widespread nesting bird species.

3.2.2.2 Bats

No buildings or trees suitable for roosting bats were identified during the survey however George Street Bridge crossing over the site was identified as having low potential to support roosting bats. Gaps were recorded where the bridge supports meet the underside of the bridge. From the ground it could not be ascertained how far these gaps penetrated and therefore whether they provide suitable roosting locations for bats. Whilst no evidence of bats (e.g. droppings, feeding remains, scratch marks or urine staining) was identified during the survey the potential bat roosting features could not be fully inspected. The site provides a limited potential for foraging bats. However, the River Usk provides a commuting and foraging corridor for bat species.

3.2.2.3 Badger

There are no records of Badger within 2km of the proposed work area. The proposed site does not provide foraging potential and it is not suitable for Badger to excavate setts. The isolated nature of the site also reduces the potential for Badger to be utilising the site.

3.2.2.4 Otter

Otter have been recorded within 2km of the scheme area and are known to be present within the River Usk and are a feature of the SAC and SSSI designation. The site runs adjacent to the River Usk with only a boundary of dense scrub separating the site from the riverbank. There is some potential that the dense scrub and riverbank support commuting and foraging Otter within the River Usk.

3.2.2.5 Amphibians and 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.

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*.

3.2.2.6 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.

3.2.2.7 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 is bound by the river to the southwest and is separated by fencing and a public footpath. There are no water bodies on site.

3.2.2.8 Invasive Non-Native Species

No invasive non-native species were recorded within the site during the survey, however, a number of cases of Japanese Knotweed have been recorded within a 2km radius of the site.

4 Assessment of Impacts and Recommendations

4.1 Designated Sites

The site area runs adjacent to the River Usk/Afon Wysg SSSI and SAC with only a stretch of dense scrub and footpath separating the site boundary from the riverbank. Whilst none of the proposed works are set within the SSSI and SAC, a Habitat Regulation Assessment (HRA) Screening Assessment should be carried out to assess potential impacts on the interest features of the site. Due to the proximity of the proposed site to the River Usk/Afon Wysg SSSI and SAC there is potential that pollution events during the construction phase could directly impact the designated sites and their features. Mitigation measures to manage pollution events are outlined in Section 4.4.3.

4.2 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.

4.3 Protected Species

4.3.1 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.

4.3.2 Bats

George Street Bridge crossing over the site was identified as having low potential to support roosting bats. No proposed works will be undertaken on George Street bridge and therefore any potential roosts within the bridge structure will not be directly impacted as part of the proposed works. Due to the proximity of the bridge structure to the proposed site there is the potential for indirect impacts to any bats roosting in the bridge due to

disturbance, therefore night work should be avoided where possible and directional cowls on lights should be used to reduce light spill under the bridge structure. Any lighting installed under the bridge should be low level and directional to ensure no additional increases in light levels of the structure. No additional lighting under the bridge has been proposed as part of the development. It is recommended that once developed, the lighting strategy for the site should be approved by a suitably qualified ecologist. If increased illumination of the flyover cannot be avoided, further bat surveys will be required to determine presence/absence of bats within the structure and identify appropriate mitigation measures where appropriate.

Bats are likely to use the River Usk corridor for foraging and commuting. Therefore, the development should aim to limit the impact of light pollution through the careful use of lighting in critical areas only and at low level with minimum spillage. Any lighting, either temporary or permanent, should be fitted with a directional cowl to avoid light-spill onto the river.

Site enhancements for bats should be incorporated into the development, this could include the use of bat blocks that are integrated into the block or brickwork of the new development. Bat blocks should be positioned at least 4m from ground level and away from artificial light sources. Bat boxes could also be utilised on the proposed building structures to offer further potential for bat roosting species.

4.3.3 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.

4.3.4 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.

4.3.5 Amphibians and 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. 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.

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.

4.3.6 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.

4.3.7 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 carrying out the steps outlined in section 4.4.3.

4.3.8 Invasive Non-Native Species

No invasive non-native species were recorded within the site itself. However, Japanese Knotweed has been recorded within close proximity to the site. It is therefore recommended that a walkover survey is carried out immediately prior to site clearances to ensure that Japanese Knotweed has not spread to the site. Good biosecurity practices should be followed as a precaution as outlined in 4.4.2.

4.4 Biodiversity Net Gain and the DECCA Framework

4.4.1 Biodiversity Net Gain

National Planning Policy in Wales requires that every development delivers a net benefit for biodiversity. It states that 'development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems.' (from Planning Policy Wales 12, 2024).

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. As the site currently holds little ecological value due to being predominantly made up of hardstanding and scattered scrub in poor condition the proposed development as is currently understood would provide a net benefit in biodiversity provided the inclusion of the proposed habitat creation, including tree and hedgerow planting around the boundary of the site.

Site enhancements for bats and birds may also be incorporated into the development, this could include the use of bat blocks that are integrated into the block or brickwork of the new development. Bat blocks should be positioned at least 4m from ground level and away from artificial light sources. Bat and bird boxes could also be utilised on the proposed building structures and trees proposed for planting to offer further potential for bat roosting species and nesting birds.

4.4.2 The DECCA Framework

Welsh planning policy also emphasises the need to promote ecosystem resilience. This reflects the Section 6 Biodiversity Duty which requires public bodies (including local planning authorities) to 'maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.' (from the Environment (Wales) Act 2016). Natural Resources Wales (NRW) has developed a framework for evaluating ecosystem resilience based on five attributes and properties specified in the Environment (Wales) Act. This is referred to as DECCA: Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience.

Table 4-1 below outlines the impacts of the proposed development in relation to the DECCA Framework.

Table 4-1. Impacts of the proposed development in relation to the DECCA Framework

DECCA Attribute	Definition	Impact
Diversity	Maintaining and enhancing diversity at every scale, including genetic, structural, habitat and between-habitat levels. This supports the complexity of ecosystem functions and interactions that deliver services and benefits.	The site currently holds little ecological value and is predominantly made up of hardstanding and scattered scrub in poor condition. As part of the proposed development tree and hedgerow planting has been proposed, this would provide a net benefit in biodiversity for the site.
Extent	incorporating measures which maintain and increase the area of semi-natural habitat/features and linkages between habitats. In general, smaller ecosystems have reduced capacity to adapt, recover or resist disturbance.	As part of the proposed development tree and hedgerow planting has been proposed, this would increase the area of semi-natural habitat features present within the site boundary.
Condition	The condition of an ecosystem is affected by multiple and complex pressures acting both as short term and longer term types of disturbance. Both direct and wider impacts should be considered, for example avoiding or mitigating pressures such as climate change, pollution, invasive species, land management neglect etc.	Habitats currently at the site were recorded as being in poor condition. As part of the proposed development tree and hedgerow planting has been proposed. As part of the proposal and management and maintenance plan for the created habitats would be put in place, ensuring that they are maintained in good condition. As part of the construction phase mitigation measures as outlined in this report will be put in place to ensure the condition of the site and surrounding habitats.
Connectivity	This refers to the links between and within habitats, which may take the form of physical corridors, stepping stones in the landscape, or patches of the same or related vegetation types that together create a network that enables the flow or movement of genes, species and natural resources. Developments should take opportunities to develop functional habitat and ecological networks within and between ecosystems, building on existing connectivity.	As part of the proposed development tree and hedgerow planting has been proposed around the boundary of the site. This will help restore the connectivity of the site to the surrounding habitats and create a vegetated corridor along the River Usk.

Adaptability	Aspects of ecosystem resilience (adaptability, recovery and resistance): ecosystem resilience is a product of the above four attributes. Adaptability, recovery and resistance to/from a disturbance are defining features of ecosystem resilience.	As outlined above the proposed development will help improve the sites ecosystem resilience through the proposed tree and hedgerow planting resulting in a net benefit in biodiversity.
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4.5 General Mitigation Measures

4.5.1 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 potential presence of bats and Otters 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 the 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;
- 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.

4.5.2 Biosecurity

Measures will should 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.

4.5.3 Pollution Prevention Measures

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

- Following relevant pollution prevention measures e.g. CIRIA Guidance:
- Control of water pollution from construction sites. Guidance for consultants and contractors (C532D) (Masters-Williams, 2001). Information useful for Toolbox Talks on working near water and pollution prevention can be found at: https://www.ciria.org/Resources/All_toolbox_talks/Env_toolbox_talks/Working_on_or_near_watercourses.aspx [site accessed 27/11/2023].
- Minimising the impacts of oil and fuel leaks can be achieved by the following actions:
 - Any chemical, fuel and oil stores should be located on impervious bases within a secured bund with a storage capacity 110% of the stored volume.
 - Biodegradable oils and fuels should be used where possible.
 - Drip trays should be placed underneath any standing machinery to prevent pollution by oil/fuel leaks. Where practicable, refuelling of vehicles and machinery should be carried out on an impermeable surface in one designated area well away from any watercourse or drainage (at least 10m).
 - Emergency spill kits should be available on site and staff trained in their use.
 - Operators should check their vehicles on a daily basis before starting work to confirm the absence of leakages. Any leakages should be reported immediately.
 - Daily checks should be carried out and records kept on a weekly basis and any items that have been repaired/replaced/rejected noted and recorded. Any items of plant machinery found to be defective should be removed from site immediately or positioned in a place of safety until such time that it can be removed.

5 Summary of Recommendations

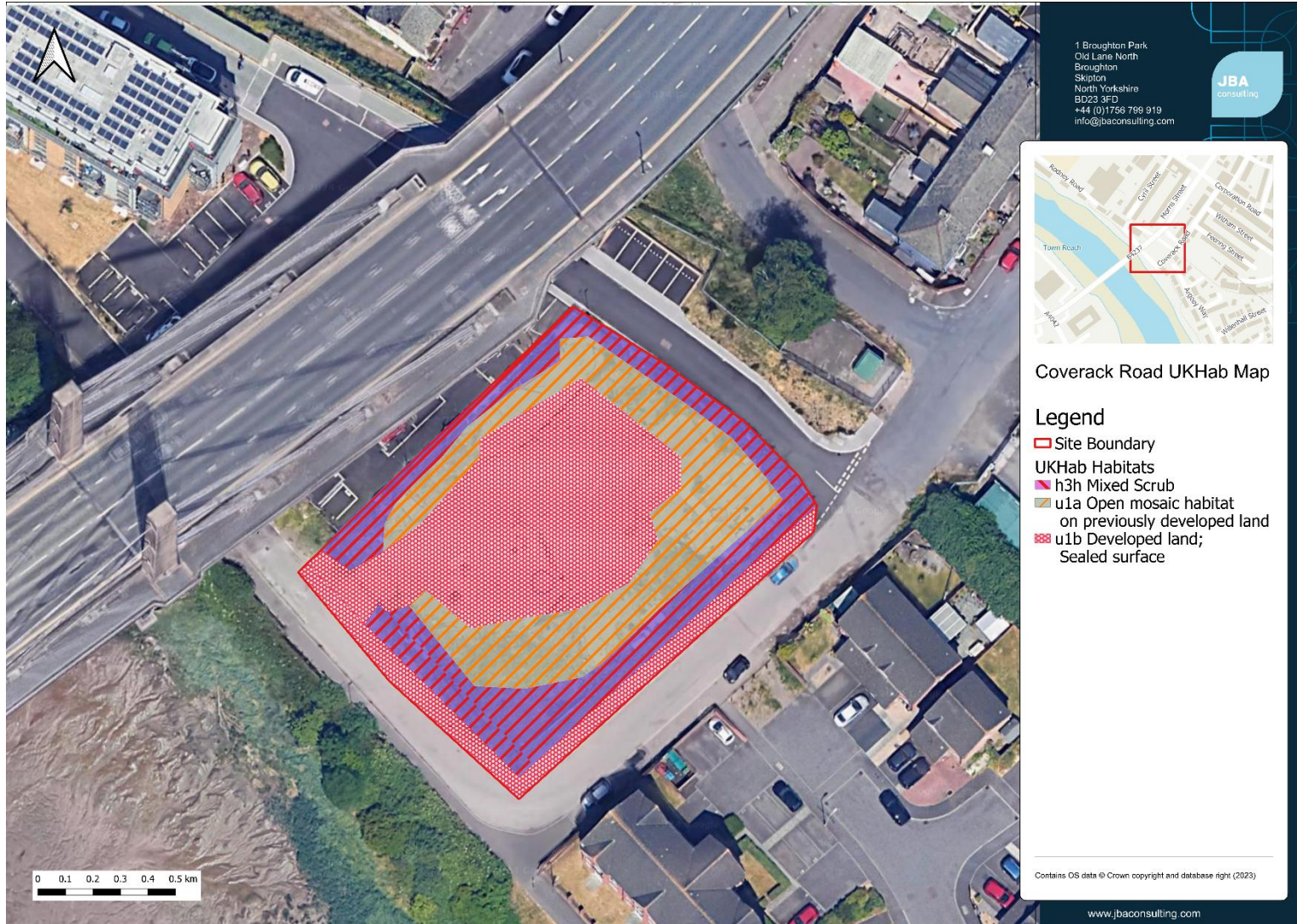
A summary of recommendations is presented in Table 5-1 below. These are based on the proposed development as understood at the time of writing. These recommendations should be reviewed and updated once a works methodology has been produced. The requirement for further surveys and mitigation depends on the location, timing and methodology of proposed works activities.

Table 5-1. Summary of Recommendations

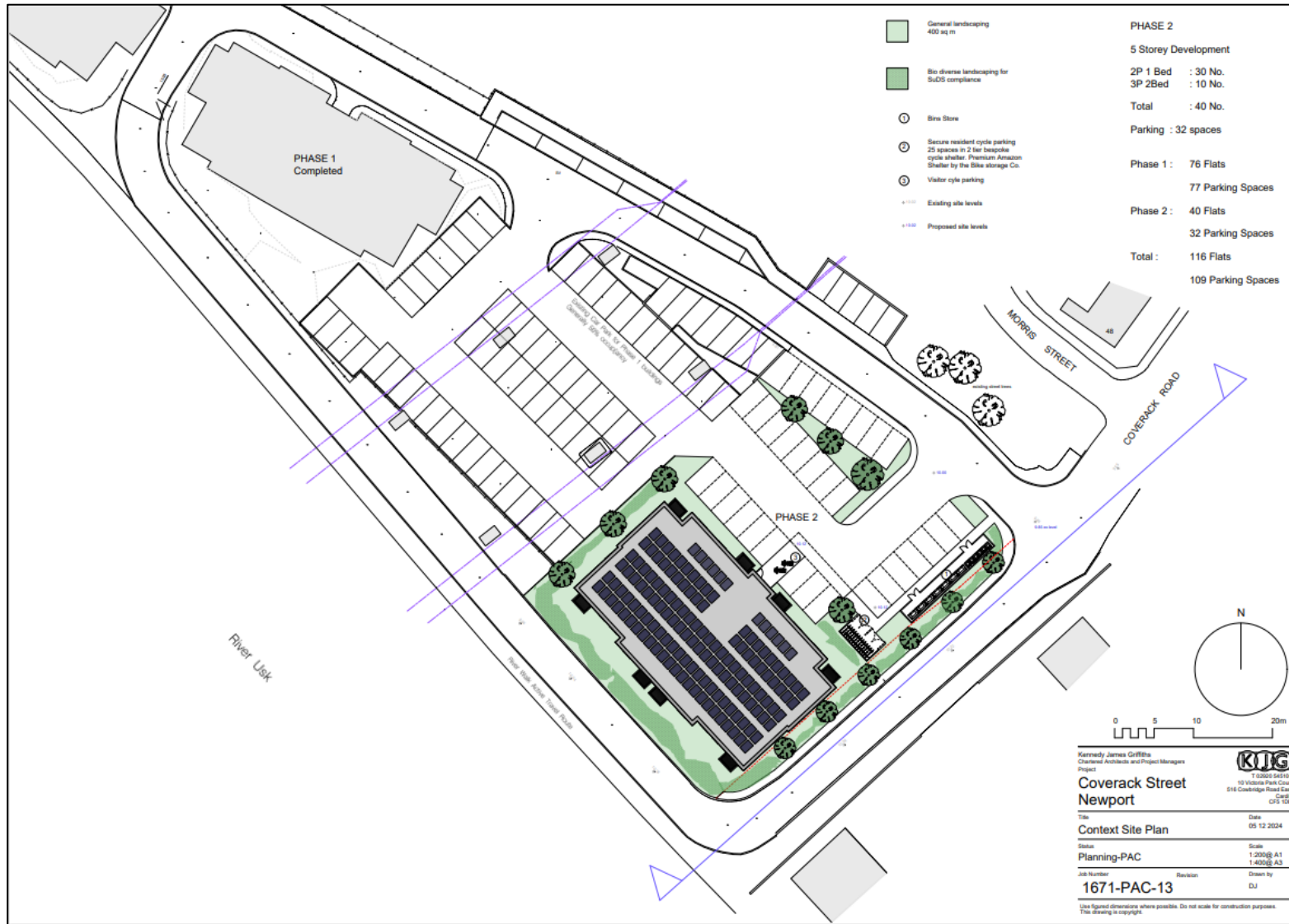
Receptor	Recommendation
SAC and SSSI	A HRA screening assessment should be carried out prior to the works commencing. Natural Resources Wales (NRW) assent will be required for works that may impact the River Usk SSSI.
Otters	Precautionary measures in all working areas.
Birds	Precautionary measures for vegetation clearance to safeguard nesting birds.
Bats	Once developed, the lighting strategy for the site should be approved by a suitably qualified ecologist. If increased illumination of the flyover cannot be avoided, further bat surveys will be required to determine presence/absence of bats within the structure and identify appropriate mitigation measures where appropriate.
INNS	Biosecurity measures to be followed during works and an Invasive Species Management Plan is required.

Appendices

A UK Hab Map



B Proposed Development



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