

ATKINS

Member of the SNC-Lavalin Group

Data Centre 3, NGD, Newport

Ecological Impact Assessment

October 2020



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Non-technical Summary

Report purpose	This report describes the ecological baseline and evaluates the nature conservation importance of ecological features present within the zone of influence for the Proposed Scheme. The assessment identifies impacts (both positive and negative) on important ecological features, sets out agreed avoidance, mitigation, compensation and provides details on the significance of effects for each important ecological feature.
Proposed Scheme	<p>The proposed development comprises a two-storey data centre building containing 10 data halls for the storage of data servers, support rooms and ancillary office space. The building will have a gross floor space of 25,500m². The building will be 19.6 in height, 142m in length and 100m wide. The proposals include 60 standby generators for use during a national grid failure, with 30 located along the north elevation of the building and 30 along the south. 10 flues will extend 1m above the top of the building to 20.6m. Provision is made for 40 parking spaces, sustainable drainage, onsite landscape proposals and off-site ecological compensation within a field to the north of another proposed Scheme to the north of the Site will be used to provide ecology compensation.</p> <p>A 4m security fence with CCTV cameras will be installed to the site's perimeters. The highways access at the south-west corner will include a security kiosk and security gates.</p> <p>A lighting layout plan with isolux contours has been developed prior to planning submission¹.</p> <p>The Site is currently an area of approximately 2.5 ha brownfield site located immediately to the northeast of the existing Next Generation Data (NGD) data centre. The Scheme is located in the eastern corner of Imperial Park, a business park on the western edge of Newport, near Junction 28 of the M4 motorway.</p> <p>The anticipated construction programme is as follows:</p> <ul style="list-style-type: none"> • June 2021- construction commences; • June 2022- first operation phase; • December 2022- construction completed.
Desk studies and field surveys	<ul style="list-style-type: none"> • Data from a desk-study undertaken in July 2019 was reviewed October 2020 • Review of a Habitat Suitability Index (HSI) assessment of waterbodies within 500 m for their potential to support great crested newts that was undertaken on 20th June 2019; and • Review of an environmental DNA survey that was carried out on 27th June 2019. • A walkover survey of the Site was conducted on 3rd September 2020.
Ecological features	<p>The Site has suitable habitat for foraging and hibernating reptiles within areas of scrub and vegetated derelict hardstanding, for common species of nesting birds and foraging and commuting bats within areas of mixed woodland and scrub.</p> <p>No designated sites are present within the Application Site, however, Gwent Levels - St Brides Site of Specific Scientific Interest (SSSI) is located approximately 275 m south east of the Site. Additionally, four Sites of Importance for Nature Conservation (SINC) are located within 1 km of the Site, the nearest of which is LG Duffryn Site 1 (South Lake Drive) located approximately 60 m south of the Site.</p>
Potential impacts and effects	<p>There will be a loss of scrub habitat and small area of short-term pooling water, subject to frequent drying out, with negligible ecological value within Site as a result of the Scheme.</p> <p>There is potential for the SINC located 60 m south of the Application Site to be impacted as a result of pollution during the construction phase.</p>

¹ Data Centre Three, Electrical Engineering Services Sitewide External Lighting Layout, DC3-atk-zz-zz-dr-ee-64-1001

A further three SINCs and a SSSI are located within 500 m of the Application Site; however, due to the nature of the Scheme that is confined to a red line boundary and the lack of any hydrological links or other pollution pathway risks, it is considered that these designated Sites are unlikely to be impacted by the Scheme. Cotoneaster has been found within the Application Site, the species of the genus is unidentified however it could likely be one that is listed on the Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), however further confirmation would be required if spread is considered likely.

<p>Avoidance, mitigation and compensation measures</p>	<ul style="list-style-type: none"> • General measures to avoid/alleviate negative impacts on ecological receptors include following the pollution prevention guidelines², which will also prevent impacts on the SINC located 60 m south; • A Precautionary Method of Working (PMW) in relation to common reptiles to be prepared for the duration of construction and specifically for pre-construction site clearance works to ensure that measures to avoid or alleviate impacts on common reptiles are implemented; • A PMW in relation to nesting birds to be written and followed during the construction phase of the Scheme. No trees are due to be lost as a result of the Scheme works. If the Scheme should change and tree felling/maintenance is to be required, tree felling, and vegetation clearance will be minimised and undertaken outside the core bird nesting season (the core nesting season is 1st March and 31st August). If the felling/maintenance is to be undertaken outside of this season, an ecologist is to visit the Site to check for any nesting birds no more than 24 hours ahead of any vegetation clearance/Site construction. • An Ecological Clerk of Works (ECoW) will be employed to conduct an in depth search of the Application Site ahead of the commencement of pre-construction site clearance works and to advise throughout construction to ensure that measures to avoid or alleviate impacts on nature conservation receptors are implemented; • Offsite compensation for loss of scrub habitat in area of habitat creation on local area to be developed as part of Data Centre 2, Next Generation Data scheme compensation. • The retention of trees on the Site along with a suitable lighting scheme will ensure suitable habitats for nesting birds and commuting and foraging bats are maintained within the Site.
<p>Significance of residual effects</p>	<p>No significant or residual effects are expected to result from this Scheme</p>
<p>Biodiversity enhancement measures</p>	<ul style="list-style-type: none"> • Installation of two bat boxes, four bird boxes and a log pile suitable for common species of reptile within the wooded/scrub area at the eastern margin of the Site.

Report Validity

²Pollution prevention guidelines (PPGs) Pollution Prevention Guidelines (PPGs) with particular reference to PPG1 (general guide to the prevention of water pollution), PPG3 (use and design of oil separators in surface water drainage systems), PPG5 (works near or liable to affect watercourses) and PPG6 (working at construction and demolition sites). Pollution Prevention Guidelines (PPGs) are a series of documents developed by the Environment Agency for Wales (now Natural Resources Wales). Each PPG is targeted at a particular type of business or activity and covers environmental good practice to minimise pollution. The PPGs also make reference to environmental legal obligations, but that information is currently out of date and requires updating. The PPGs are available in Wales on the NetRegs website http://www.netregs.org.uk/library_of_topics/pollution_prevention_guides.aspx.

In the event of programme changes then updates to the surveys may be required to ensure the validity of the data, as per CIEEM guidance³.

³ CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys

1. Introduction

Terms of Reference

- 1.1. Atkins, member of SNC-Lavalin Group, was commissioned by Next Generation Data to undertake an Ecological Impact Assessment (EclA) in connection with a detailed application for the construction of a new build data centre facility and associated offices, parking bays, access road and security fencing surrounding the facility (hereafter referred to as the Scheme).
- 1.2. This report presents the results of the EclA for the Proposed Scheme and considers both terrestrial and aquatic ecological receptors, which includes designated and non-designated sites, terrestrial habitats, plants and species. The assessment has been informed by reviewed desk study data, field survey data. This EclA describes the ecological baseline and evaluates the nature conservation importance of ecological features present within the zone of influence for the Proposed Scheme, characterises the impacts on important ecological features, sets out agreed avoidance, mitigation, compensation and enhancement measures, and assesses the significance of the residual effects of the Proposed Scheme on the important ecological features.
- 1.3. This EclA has been undertaken with reference to current good practice⁴ and forms part of the technical information lodged with the planning application submission, for which a planning reference will be provided on submission and publishing of this EclA.

The Application Site

- 1.4. The Application Site is a brownfield site located immediately to the east of the existing Next Generation Data (NGD) data centre, at Ordnance Survey national grid reference (OSNGR) ST284844. The Scheme is located in the eastern corner of Imperial Park, Celtic Business Park, Marshfield on the south western edge of Newport, near Junction 28 of the M4 motorway, South Wales.
- 1.5. The Application Site is shown on Figure: Data Centre Three, Site Location Plan Drawing Ref: DC3-ATK-01-Z0-DR-AR-021001 in Appendix A (as shown in the planning application).
- 1.6. The Application Site is approximately 2.5 ha and comprises a mosaic of scrub and hard standing bounded by security fencing. A small area of mixed, semi mature woodland and dense scrub is situated within the boundary of the east corner of the Application Site and there is a small central area of standing water. The Site is bounded by brownfield Sites scheduled for development, further industrial buildings and associated car parks. Immediately adjacent to the south of the Site are areas of scrub, grassland and wetland habitats.

The Proposed Scheme

- 1.7. The proposed development comprises a two-storey data centre building containing 10 data halls for the storage of data servers, support rooms and ancillary office space. The building will have a gross floor space of 25,500m². The building will be 19.6m in height, 142m in length and 100m wide. The proposals include 60 standby generators for use during a national grid failure, with 30 located along the north elevation of the building and 30 along the south. 10 flues will extend 1m above the top of the building to 20.6m. Provision is made for 40 parking spaces and sustainable drainage within onsite landscape proposals. A 4m high security fence with CCTV cameras will be installed to the site's perimeters. The highways access at the south-west corner will include a security kiosk and security gates. The development is hereafter referred to as the Proposed Scheme.
- 1.8. Sustainable drainage, onsite landscape proposals and off-site ecological compensation in the form of habitat creation within a an area to the north of DC2 (Application Site of DC2 shown as blue outline above DC3 red Application Site in Drawing: Data Centre Three, Site Location Plan Drawing Ref: DC3-ATK-01-Z0-DR-AR-021001 in Appendix A), This off-site habitat creation is addressed within the previously issued report⁵ concerning the DC2 Scheme located north of DC3.
- 1.9. The anticipated construction programme is as follows:
 - June 2021- construction commences;

⁴ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.

⁵ Next Generation Data, Newport, Ecological Impact Assessment, December 2019, Atkins.

- June 2022- first operation phase; and
- December 2022- construction complete.

Scope of Assessment

1.10. This report presents ecological information obtained during the following:

- Desk-study undertaken in July 2019 was reviewed in October 2020;
- A walkover survey undertaken on 3rd September 2020;
- Review of a Habitat Suitability Index (HSI) assessment of waterbodies within 500 m for their potential to support great crested newts that was undertaken on 20th June 2019; and
- Review of an environmental DNA (eDNA) survey that was carried out on 27th June 2019.

2. Methodology

Desk Study

- 2.1. The geographical area for obtaining ecological data through desk studies has been determined using professional judgement. Baseline data has been gathered from a range of sources through data requests and using online resources as outlined below. This included data gathering in relation to statutory and non-statutory designated sites and protected and priority species. The study areas used for the data gathering are detailed in Table 2-1. The desk study was undertaken in July 2019 and the review of this data for the purpose of this report was undertaken in October 2020. For species records collected, only those within 10 years of the data collection date have been considered within the assessment.
- 2.2. The following online resources were accessed:
- Newport Local Biodiversity Action Plan;
 - Multi-Agency Geographic Information for the Countryside (MAGIC) (www.magic.gov.uk) was reviewed for the following information:
 - Designated sites of nature conservation importance (statutory sites only) within 1km of the Application Site these being Special Protection Areas (SPAs), Wetlands of International Importance (Ramsar sites) and Special Areas of Conservation (SACs) This was extended to 2 km for internationally designated sites with bat species as qualifying feature;
 - Ancient woodland within 500 m of the Site;
 - Priority habitats within 500 m of the Site, these being ‘Habitats of Principal Importance for the Conservation of Biodiversity’ included in the Environment Wales Act⁶; and
 - Woodland Trust Ancient Tree Inventory was reviewed to identify any ancient and / or veteran trees within 50 m of the Site boundary.
- 2.3. Ordnance Survey maps and the Grid Reference Finder website (<https://gridreferencefinder.com/>) were used to identify the presence of waterbodies within 500 m of the Application Site boundary, in order to establish if the land within and immediately surrounding the Application Site could be used as terrestrial habitat for great crested newt. This species typically uses suitable terrestrial habitat up to 500 m from a breeding pond. However, there is a notable decrease in great crested newt abundance beyond a distance of 250 m from a breeding pond⁷.
- 2.4. South East Wales Biodiversity Records Centre (SEWBReC) was contacted on 1st July 2019 to obtain the following ecological data:
- Records of non-statutory designated sites within 1 km of the Application Site boundary; and
 - Records of legally protected and notable species (fauna and flora) within 1 km of the Application Site boundary, including Species of Principal Importance for the Conservation of Biodiversity listed under Section 7 of the Environment (Wales) Act 2016.

Table 2-1 - Data search areas

Data type	Search area – distance from Proposed Scheme boundary
Statutory designated sites of nature conservation importance Special Protected Areas (SPAs), wetland sites of international importance (Ramsar), (Special Areas of Conservation (SACs), SSSIs, Natural Nature Reserves (NNRs).	1 km (extended to 2 km to search for SACs with bat species as a qualifying feature)
Ancient woodland (parcels)	500 m
Priority Habitats	500 m

⁶ Environment Wales Act 2016, habitats of principal importance.

⁷ Natural England (2004) An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt (ENRR576). <http://publications.naturalengland.org.uk/publication/134002>.

Ancient and / or veteran trees (individual)	50 m
Waterbodies	500 m
Non-statutory designated sites of nature conservation importance	1 km
Records of legally protected and priority species (fauna and flora). Searches for European Protected Species Licences using MAGIC	1 km

Review of Phase 2 Surveys

2.5. Assessments of four waterbodies within 500 m of the Application Site were undertaken in June 2019 for a previously proposed Site (DC2), for which the report and detailed survey methodologies can be found in the report⁸. DC2 is located within 100 m of DC3, as seen outlined in blue on Scheme plan- Data Centre Three, Site Location Plan Drawing Ref: DC3-ATK-01-Z0-DR-AR-021001. Below is an outline of the survey and findings, more information including survey methodologies can be found in the issued report⁹

- A Habitat Suitability Index (HSI) assessment of all accessible waterbodies within 500 m of the Application Site was undertaken on 20th June 2019 in relation to great crested newts; and
- Two of the four waterbodies were scoped out of further surveys as they were found to be of negligible suitability for great crested newts (GCN).
- An eDNA survey was carried out on both of the waterbodies assessed as suitable for GCN on 27th June 2019.
- Waterbody 1 was assessed as having **Average** suitability for great crested newts and Waterbody 2 was assessed as having **Below Average** suitability. Given that Waterbody 2 scored below average against HSI criteria, is 160 m north west of the Application site and is also separated from the Application site by the busy A48 dual carriageway, it was scoped out of further Phase 2 surveys because of this lack of connectivity.
- An eDNA survey of Waterbody 1 was undertaken to determine presence / likely absence of great crested newts. eDNA samples were collected from Waterbody 1 on 27th June 2019 and analysed by ADAS. The results of the sampling confirmed the likely absence of great crested newts from this waterbody. Therefore, no further survey or consideration for great crested newts is necessary.

Planning Policy Review

2.6. A review of national and local planning policy relevant to the Proposed Scheme was undertaken as part of the data gathering. The following policy documents were subject to review:

- Planning Policy Wales (Edition 10) December 2018, National planning policy in Wales is contained in Planning Policy Wales, PPW (Edition 10, December 2018). The PPW can be found here: <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf>
- Specifically captured within section 3, Strategic and Spatial Choices, 'Previously Developed Land' of this document highlights the importance of Previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development.
- Newport Local Development Plan 2011 – 2026 (adopted January 2015):

⁸ Next Generation Data, Newport, Ecological Impact Assessment, December 2019, Atkins.

⁹ Next Generation Data, Newport, Ecological Impact Assessment, December 2019, Atkins.

- Objective 6 – Conservation of the Natural Environment: To protect and enhance the quality of the natural environment, including landscape, protected habitats and species of principal importance for biodiversity in Wales (regardless of greenfield or brownfield status) and the protection of controlled waters.

2.7. A summary of relevant planning policy is provided in Appendix B.

Ecological Field Surveys

2.8. The geographical area for undertaking ecological field surveys has been determined using the current survey guidance, professional judgement and the zones of influence, which have been determined based on the nature of the impacts arising from the Proposed Scheme.

Surveyor Competencies

2.9. All the surveys were led by surveyors who have been assessed¹⁰ to be at least of capable experience following the Chartered Institute of Ecology and Environmental Management (CIEEM) competency framework¹¹.

Extended Phase 1 Habitat Survey

2.10. An ecological walkover survey of areas within and adjacent to the Application Site, including land up to 50 m from the Application Site boundary where access was allowed (the Survey Area), was undertaken on 03/09/2020 broadly following the extended Phase 1 habitat survey methodology¹². All land within and adjacent to the Application Site including land up to 50 m from the Application Site boundary (the Survey Area) was surveyed according to CIEEM guidance⁵. Plant names recorded in this survey follow Stace (2010).

2.11. The walkover survey recorded information on the habitats within the Survey Area and also included a search for evidence of the presence of, and the potential of each habitat to support, priority and protected species as recommended by CIEEM¹³. The species element of the extended Phase 1 habitat survey recorded evidence within the Application Site and land up to 50 m from the Site boundary only.

2.12. This survey method comprised the following:

- Mapping habitats present according to the JNCC Phase 1 habitat survey methodology⁶, with target notes (TNs) used to record specific details on the plant species composition of the habitats, current management and condition. TNs were also used to record features of ecological importance e.g. veteran trees;
- Assessing the potential of terrestrial and aquatic habitats to support amphibians.
- Assessing any suitability of habitats and trees for bat roost features;
- Assessing the suitability of habitats for nesting and wintering birds;
- Assessing the suitability of habitats for reptiles;
- Assessing the suitability of habitats for hazel dormouse;
- Assessing the suitability of any aquatic habitats found on Site for otter, water vole and white clawed crayfish; and
- Assessing the suitability of habitats for priority invertebrates.

2.13. In addition to the above, specific searches were made to the following:

- Potential roosting sites for bats within trees e.g. identification of suitable cracks and crevices (survey undertaken from ground only). The assessment of potential suitability of the trees for roosting sites for bats were categorised based on good practice guidance; and
- Signs of badger activity including setts, tracks, snuffle holes and latrines.

2.14. Evidence of the presence of the following invasive species was recorded where seen:

- Evidence of animal species as listed on the Invasive Alien Species (Enforcement and Permitting) Order 2019; muntjac deer and grey squirrel; and

¹⁰ Assessment undertaken by Atkins ecological technical leadership team in accordance with CIEEM competency criteria.

¹¹ <https://www.cieem.net/competency-framework>

¹² Joint Nature Conservation Committee (2010) Handbook for Phase 1 habitat survey - a technique for environmental audit.

¹³ Chartered Institute of Ecology and Environmental Management (2017) Guidelines for Preliminary Ecological Appraisal, Second Edition.

- Evidence of the presence of the following invasive species: Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron, Virginia creeper, variegated yellow archangel, and cotoneaster. These are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and subject to strict legal control.

Phase 2 Surveys

- 2.15. Phase 2 surveys have not been undertaken for Data Centre 3 based on the results of the extended Phase 1 habitat survey. The following Phase 2 surveys have been scoped out:
- Assessing whether any further watercourse had established since previous surveys were carried out to assess suitability for water vole, otter and white-clawed crayfish. There were no further waterbodies suitable for these species on Site except a very shallow (approximately 5 cm at deepest point, after period of rainfall), concrete based, temporary pooling of water with no established aquatic vegetation that would suggest that the waterbody was prone to drying out frequently and be unsuitable for amphibian habituation;
 - Further assessment of trees/structures for potential bat roost suitability was undertaken within the Site. One small section of trees located at the east side margin of the Site provided no suitable features for bat roosts, however the trees provide foraging and commuting suitability for bats but are not scheduled to be impacted as a result of the Scheme and so further assessment is considered unnecessary.

Survey Limitations

- 2.16. This section identifies any limitations to the surveys or assessment and provides an explanation as to the effect of these on the assessment.
- 2.17. The list of invasive plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is extensive and these plants are found in a range of different habitats, including aquatic habitats. The extended Phase 1 habitat survey checked for the presence of Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron, Virginia creeper, variegated yellow archangel, and cotoneaster species. Other invasive species, in particular those associated with aquatic habitats, may not have been recorded
- 2.18. Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. The Phase 1 Survey undertaken to support this EclA has not therefore produced a complete list of plants and animals and the absence of evidence of any particular species should not be taken as conclusive proof that the species is not present or that it will not be present in the future.
- 2.19. The above limitations have been addressed through taking the precautionary approach within the assessment. It is considered that the limitations do not significantly impact the results evaluated within this EclA.

Nature Conservation Importance

- 2.20. A number of criteria have become accepted as a means of assessing the nature conservation importance of a defined area of land which are set out in A Nature Conservation Review and include diversity, rarity and naturalness.
- 2.21. The nature conservation importance or potential importance of an ecological feature is determined within the following geographic context:
- International (e.g. Special Areas of Conservation, Special Protection Areas, Ramsar sites);
 - National (e.g. Sites of Special Scientific Interest);
 - Regional (e.g. Environment Agency regional biodiversity indicators)
 - Metropolitan, County, Vice-County or Other Local Authority-wide Area (e.g. Local Nature Reserves, Sites of Importance for Nature Conservation);
 - Local (undesignated ecological features e.g. old hedges, woodlands, waterbodies);
 - The Application Site and its immediate environs (e.g. scrub habitat); and
 - Negligible (e.g. areas of hardstanding).
- 2.22. The following documents have been reviewed to assist in the determination of importance:

- Newport Local Biodiversity Action Plan¹⁴; and
- Newport Local Development Plan 2011 – 2026 (adopted January 2015).

2.23. Features that have been identified to be of less than local importance are not considered to be important ecological features and as such have not been considered within the impact assessment. Where mitigation is required for these features for legal reasons this is detailed in Section 4.

Impact Assessment

- 2.24. The assessment of the potential effects of the Proposed Scheme takes into account both on-site impacts and those that may occur to adjacent and more distant ecological features.
- 2.25. The zone of influence is an area within which ecological features may be subject to biophysical changes as a result of the Proposed Scheme. Throughout the EclA process the zone of influence was regularly reviewed. The zone of influence for the impact assessment is typically the same as the field survey area, as the likely impacts of the Proposed Scheme were considered when establishing the field survey areas. However, this was reviewed during the impact assessment, based on further understanding of the Proposed Scheme impacts and on the results of the desk study and field surveys. Any changes to the zone of influence are explained in Section 4.
- 2.26. Where impacts have been identified, details are provided within the assessment to characterise these in terms of their extent and magnitude, duration, frequency and timing, and reversibility. Both positive and negative impacts are discussed. Impacts were also characterised in terms of how they occur, i.e. direct, indirect secondary or cumulative. Impacts can be permanent or temporary and can include:
- Direct loss and degradation of wildlife habitats;
 - Fragmentation and isolation of habitats;
 - Mortality and injury to species;
 - Disturbance to species from noise, light or other visual stimuli;
 - Changes to key habitat features; and
 - Changes to the local hydrology, water quality and/or air quality.
- 2.27. For designated sites, effects are considered significant when a project and associated activities is likely to either undermine or support the conservation objectives or condition of the site(s) and its features of interest.
- 2.28. For ecosystems, effects are considered significant when a project and associated activities is likely to result in a change in ecosystem structure and function.
- 2.29. Consideration is given to whether:
- Any processes or key characteristics will be removed or changed;
 - There will be an effect on the nature, extent, structure and function of component habitats;
 - There is an effect on the average population size and viability of component species; and
 - Functions and processes acting outside the formal boundary of a designated site has also been considered, particularly where a site falls within a wider ecosystem e.g. wetland sites.
- 2.30. Some ecosystems can tolerate a degree of minor changes, such as localised or temporary disturbance or changes in physical conditions, without such changes harming their function or importance. For this EclA, ecological effects have been considered in the light of any information available about the capacity of ecosystems to accommodate change. Significant effects have been determined as being either negative or positive.
- 2.31. The conservation importance of undesignated habitats and species within a defined geographical area (International to Local) has been used in this assessment to determine whether the effects of the proposals are likely to be significant:
- For habitats, conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area; and,

¹⁴ Newport's Local Biodiversity Action Plan- <http://www.newport.gov.uk/en/Leisure-Tourism/Countryside--Parks/Biodiversity/Biodiversity-action-plan.aspx>

- For species, conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area.

- 2.32. When assessing potential effects on conservation importance, the known or likely background trends and variations in status have been taken into account. The level of ecological resilience or likely level of ecological conditions, that would allow the population of a species or area of habitat to continue to exist at a given level or continue to increase along an existing trend or reduce a decreasing trend, has been estimated where appropriate to do so.
- 2.33. The avoidance, mitigation, compensation and/or enhancement measures described within the EclA have been incorporated into the design and operational phasing programme and taken into account in the assessment of the significance of effects. These mitigation measures include those required to achieve the minimum standard of established good practice together with additional measures to further reduce any negative impacts of the Proposed Scheme. The mitigation measures include those required to reduce or avoid the risk of committing legal offences.
- 2.34. If the design changes or the agreed mitigation cannot be implemented the effects will need to be reassessed and further surveys may be required. In this event, the conclusion of this EclA may no longer be valid.
- 2.35. In addition to measures required to ameliorate negative effects on important ecological features, further biodiversity enhancement measures have been identified and will be incorporated into the Proposed Scheme as it is progressed.
- 2.36. The impact assessment has taken account of cumulative effects. In order to identify potential projects which could have a cumulative effect a review was undertaken of Data Centre 2, Next Generation Data. This review identified the projects listed in Table 2-2.

Table 2-2 - Projects considered for cumulative effects

Project name	Summary of project	Distance from Proposed Scheme	Current status	Planning reference number	Suitable for cumulative assessment?
Data Centre 2, NGD	Data storage building facility	Approximately 100 m north of DC3	Planning application accepted; construction not yet started	20/0039	Yes

Mitigation Hierarchy

- 2.37. The principles of the mitigation hierarchy^{15/16} have been adopted and used when considering impacts and subsequent effects on important ecological features within the zone of influence.
- 2.38. The principles of the mitigation hierarchy are that in order of preference impacts on biodiversity should be subject to:
- Avoidance;
 - Mitigation;
 - Compensation; and
 - Enhancement.

¹⁵ Department for Communities and Local Development (2018) National Planning Policy Framework, Paragraph 118. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁶ CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, Paragraph 1.19. Chartered Institute of Ecology and Environmental Management, Winchester.

3. Baseline Conditions and Importance

3.1. This section provides details of the ecological baseline relevant to the Proposed Scheme recorded during the desk study and field surveys undertaken to inform this EclA.

Statutory and non-Statutory Designated Sites

3.2. Table 3-1 details the statutory and non-statutory designated sites identified through the desk study.

Table 3-1 - Designated sites within 1 km¹⁷ of the Application Site

Designated Site	Location of designated site ¹⁸	Features of interest (including qualifying features of internationally designated sites and reasons for designation for SSSIs)	Importance level
Gwent Levels-St Brides Site of Special Scientific Interest (SSSI)	Nearest point approximately 275 m to the south east	The features of interest common to all of the SSSIs within the Gwent Levels are the reed (drainage ditch) habitats, which support a varied assemblage of aquatic flora and fauna. St Brides SSSI supports a number of interesting plant species, most notably thread-leaved water crowfoot and small pondweed. This SSSI also supports rich invertebrate communities, including a number of nationally notable and notable marshland species, including the true fly <i>Chrysogaster</i> and the beetle <i>Hydaticus transversalis</i> . It is the only area on the Gwent Levels where the rare fly <i>Stenomicrocogani</i> has been recorded.	National
LG Duffryn Site 1 (South Lake Drive) Site of Importance for Nature Conservation (SINC)	Approximately 60 m south	Designated for its pond/ <i>Phragmites</i> reedbed habitat which supports the Schedule 1 of the Wildlife and Countryside Act 1981 ¹⁹ bird species, Cetti's warbler.	County
LG Duffryn Site 2 SINC	Approximately 150 m south	Large area of neutral grassland adjacent to the Gwent Levels.	County
Celtic Springs SINC	Approximately 470 m north west	Post-industrial mosaic habitat, neutral grassland and calcareous grassland.	County
Duffryn Pond SINC	Approximately 560 m east	Pond with emergent swamp vegetation, which supports a range of important invertebrate, plant, reptile, amphibian and mammal species. Species	County

¹⁷ This is the zone of influence for designated sites.

¹⁸ Where designated sites are situated outside of the Application Site boundary, the distance and direction is given to the closest point that the designated site is from the Application Site.

¹⁹ <https://www.bto.org/our-science/projects/ringing/taking-part/protected-birds/s1-list> (information link accessed July 2019)

recorded include common toad, common frog, European otter and grass snake.

- 3.3. The loss of any of the habitats within the Application Site is not considered to significantly impact any designated sites listed above.
- 3.4. The LG Duffryn Site 1 (South Lake Drive) SINC located 60 m south of the Application Site is of local importance. The zone of influence for this designated site is restricted to the designated site itself.
- 3.5. There is considerable distance between the remaining designated sites and the Scheme and a lack of hydrological connectivity. Therefore, it is considered appropriate to scope them out of any further assessment within this report.

Irreplaceable Habitats

No irreplaceable habitats, including areas of ancient woodland and veteran trees, have been recorded within the 1 km desk study search area.

Habitats

- 3.6. A search of the MAGIC website returned no records of priority habitats from within the 500 m search radius of the Application Site. However, several priority habitats are listed as features of the designated sites summarised in Table 3-1 above, including calcareous grassland, reedbeds and ponds. The area of priority habitat nearest to the Application Site comprises Ephemeral/short perennial open mosaic located directly outside the Application Site boundary.
- 3.7. The Application Site comprises hard standing with scattered and dense scrub covering the majority of the Application Site. A small section of wooded area with scrub understory is located at the eastern margin of the Application Site. A small area of pooled water occurs in the middle of the Application Site with a base of asphalt and sparse aquatic algal vegetation. The Application Site is bounded by metal wire fencing. Surrounding the Application Site to the west, north and east is similar habitat, roads, industrial buildings and residential areas. To the south are areas of grassland, scrub, trees and waterbodies.
- 3.8. Table 3-2 provides a summary description of each habitat, identifies those habitats which are listed on Annex 1²⁰ and/or listed as priority habitats²¹, and provides a nature conservation importance for each habitat. The table also provides details of the area of each habitat within the Application Site and the proportion of the Application Sites this makes up. Habitats are mapped on the Next Generation Data: Data Centre 3, Newport, Phase 1 habitat survey plan (Figure 1 in Appendix C) with specific features highlighted by target notes (TN) on the figure. TN descriptions and photographs are provided in Appendix C.

Table 3-2 – Habitat types within 50 m²² of the Application Site

Habitat type	Location of Habitat ²³	Area of Habitat/Distance of Linear Feature ²⁴		Annex 1 habitat y/n	Priority habitat y/n	Importance level	Rationale for valuation
		Ha/M	% of Site				
Scattered and dense scrub (mostly common pioneering vegetation)	Within Application Site	1.19	55%	n	n	Site	Low scrub with suitability for nesting birds and common species of reptiles.

²⁰ <http://jncc.defra.gov.uk/page-1523>

²¹ <http://jncc.defra.gov.uk/page-5706>

²² This is the zone of influence for habitats.

²³ Where habitats are situated outside of the Application Site boundary, the distance and direction is given to the closest point that the habitat from is the Application Site.

²⁴ The area of habitat is only provided for those habitats that fall within the Application Site.

e.g: buddleia, willowherbs, bramble, mosses, Poa grass sp.							
Bare ground	Within Application Site	1.066	28%	n	n	Site	Suitable for basking reptiles. Ground-nesting species such as lapwing, little ringed plovers and ringed plovers are considered unlikely to be present due to the lack of suitable habitat.
Wooded scrub mix	Small area within the eastern boundary of the red line boundary of Application Site. Closest area of woodland from Application Site is 20 m south east of Application Site boundary	0.095	15%	n	n	Local	Similar habitat in surrounding areas, no suitable bat roost features were found within the trees. Suitable for nesting birds and common species of reptiles and for foraging and commuting bats. Not due to be impacted by Scheme.
Shallow waterbody (pooling of water)	Within Application Site	0.0052	2%	n	n	Site	Prone to drying out, no established aquatic plants, asphalt base.
Ephemeral/ short perennial open mosaic	Directly outside Application Site boundary	0.108	n/a	n	y	Local	Not due to be impacted by Scheme.

Protected and Priority Species

- 3.9. This section provides a summary of the results of the desk study, extended Phase 1 habitat survey and review of previously conducted Phase 2 surveys, along with the nature conservation importance for each species or species group.

Badgers

- 3.10. No recent records for badger were returned from the SEWBRc data search and no evidence of badgers was recorded during the extended Phase 1 habitat survey. However, there is suitable habitat for sett construction and suitable habitat for foraging within the Application Site in the way of a small wooded area situated at the east margin of the Site and the ground around the margins of the Site as these areas have more excavatable soil whereas the hard standing and scrub are predominantly covered in very hard asphalt.

Amphibians

- 3.11. The SEWBReC data search returned recent records of smooth newt, palmate newt, common frog and common toad within 1 km of the Application Site. The closest of which was a common frog record 85 m north east of the Application Site. The SEWBReC data search returned no recent records for great crested newt within 1km of the Application Site. A search of the MAGIC website also identified no granted great crested newt European Protected Species licences within 1 km of the Site. There is a small, shallow (approximately 5 cm at deepest point after previous rainfall), asphalt based pooling of water within Application Site which has been assessed as having negligible potential for great crested newts as it is considered likely to regularly dry out and harbours only minimal aquatic algal vegetation. However, terrestrial habitats offer opportunities for foraging and hibernating amphibians. Four previously assessed waterbodies are within a 500 m radius of the Application Site. Two of which were scoped out of this assessment as they were recently found to be unsuitable for GCN. Out of the remaining two waterbodies, the closest waterbody is located approximately 60 m south of the Scheme, LG Duffryn Site 1 (South Lake Drive) SINC. The next closest waterbody being 350 m to the northwest of the Site. HSI and eDNA surveys that were undertaken on the waterbodies undertaken were found to be negative for GCN in both waterbodies. During the review of previous desk study and survey data of the two waterbodies (full details and results of which can be found in a previously issued report²⁵) current Scheme plans, no further surveys on waterbodies found within 500 m of the Application Site were deemed necessary to support this EclA. The waterbodies are also mostly surrounded by roads, housing estates and other industrial sites which act as barriers to the movement of GCN between waterbodies and the Application Site. As such, it is considered that GCN are unlikely to occur within the Application Site and are not considered further in this assessment. It is considered that any other common species of amphibians (if present) would be unlikely to utilise habitats within the Application Site, and as such they were scoped out of consideration for further surveys.

Bats

- 3.12. The SEWBReC data search returned a number of bat recent records within the 1 km search radius, the majority of which were records of foraging/commuting bats, with a small number of roost records. The following bat species were recorded:
- Noctule (including hibernation record) record 840 m north east of Application site;
 - Common pipistrelle (closest record 860m south east of Application site);
 - Nathusius' pipistrelle (one record 1 km north east of Application site);
- 3.13. The wooded and scrub habitats within the Application Site are suitable for foraging and commuting bats, although they are small in size and would be a small part of a foraging range, and likely to be subject to night-time illumination from the adjacent lighting in the surrounding business park. No suitable roosting features were found within the trees in the wooded area on Site.
- 3.14. Given these factors, the Application Site is considered to be of **Low-Moderate**²⁶ suitability for foraging and commuting bats and it is considered that only individual or small numbers of common/widespread species are likely to use the Application Site. As such, it is considered that bats are likely to forage and commute around habitats within the Site, e.g. the wooded scrub area at the east of the Site, however as this habitat is due to be retained within the Scheme and the lighting Scheme designed for the Scheme is unlikely to further impact this area considering that the Site is already prone to external lighting for the operating industrial estate. Therefore, it is considered that there are minimal limitations to bat use of this habitat and so bats are not considered further in this assessment. Therefore, bats have been scoped out of consideration for any further surveys.

Birds

- 3.15. The SEWBReC data search returned 101 records of bird species that are listed on Schedule 1²⁷ (Wildlife and Countryside Act 1981) and Birds of Conservation Concern (BoCC) as per the table below bird species within the 1 km search radius.

²⁵ Next Generation Data, Newport, Ecological Impact Assessment, December 2019, Atkins.

²⁶ Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London. See Table 4.1, p.35 of the guidelines for criteria.

²⁷ <https://www.bto.org/our-science/projects/ringing/taking-part/protected-birds/s1-list> (information link accessed July 2019)

Table 3-5 Bird species recorded within 1 km search radius

Bird Species	Conservation/ Legal Status	
	Schedule 1 (Wildlife and Countryside Act 1981)	Birds of Conservation Concern (BoCC) List
Barn Owl	✓	
Bullfinch		Amber List
Cetti's Warbler	✓	
Dunnock		Amber List
Fieldfare	✓	Red List
House Sparrow		Red List
Kestrel		Amber List
Lapwing		Red List
Linnet		Red List
Little Ringed Plover	✓	
Mediterranean Gull	✓	Amber List
Peregrine	✓	
Pintail		Amber List
Redwing	✓	Red List
Ringed Plover		Red List
Skylark		Red List
Song Thrush		Red List
Spotted Flycatcher		Red List
Starling		Red List

- 3.16. The small wooded/scrub area situated at the east margin of the Site is considered suitable for common nesting birds, but unsuitable for barn owl nesting as trees are semi-mature and at the time of survey were in condition with no holes that would be suitable for barn owl nest construction.
- 3.17. Seven of the bird species that are listed on Schedule 1 of the Wildlife and Countryside Act 1981²⁸ (as amended) are known to use areas of habitat such as scrub for protection/foraging potential whilst in proximity to the nest, rather than just solely as a nesting habitat, as is the case for the other species. However, it is not considered likely that any of the Schedule 1 species listed here would be present within the Application Site, due to the lack of suitable habitat. Ground-nesting species such as lapwing, little ringed and ringed plovers are not thought likely to be present due to the lack of suitable habitat. However, barn owl may occasionally be found foraging within the Application Site as some of the short ephemeral and scrub habitats are suitable for prey species such as common reptiles, amphibians and small mammals.
- 3.18. The Site is small, industrial and relatively disturbed and other than scrub and woodland/scrub habitat areas being of some value to nesting/foraging birds, there is little in the way of supporting habitat for birds. Nonetheless, of the 10 red-listed²⁹ species recorded within the desk study search area, habitats within the Application Site may support linnet and song thrush, which may nest in the scrub habitat. House Sparrow may be found foraging for seed and invertebrates in sparsely vegetated areas of the Application Site. Fieldfare and redwing are winter visitors to the UK, therefore will not be found other than as occasional non-breeding visitors to the Application Site. Spotted flycatcher is unlikely to be present but there is a minor possibility of it being found

²⁸ <https://www.bto.org/our-science/projects/ringing/taking-part/protected-birds/s1-list> (information link accessed July 2019)

²⁹ https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf (information link accessed July 2019)

due to the presence of the small wooded/scrub habitat at the eastern margin of the Site analogous to larger, more natural woodland/woodland edge and garden habitats in which this species is more typically found. The scrub also provides suitable nesting habitats for the Amber listed species bullfinch and dunnock. The Site holds suitability for any foraging kestrel (amber list) on the open hardstanding scrub areas where small mammals/common species of reptile, however, nesting suitability for kestrel is limited. Mediterranean gull (amber list) are better suited to coastal wetland habitat areas, which are not found within 500 m of the Application Site and so it is very unlikely that they would be present within the Site. Pintail ducks are also predominantly found in sheltered estuaries/wetland areas and very rarely breed in the UK. Therefore, the Site holds very little suitability for Pintail ducks.

- 3.19. The most valuable area of the Application Site for nesting birds is therefore the scrub and wooded scrub area. Bare ground with scattered/dense scrub could provide some local source of winter seed forage and spring/summer invertebrate prey. During the walkover survey in September 2020, bird song was heard during the survey from blackbirds, blue tits and long tailed tits and so it is evident that common species of birds are frequenting the site for foraging and nesting purposes.
- 3.20. Taking a precautionary approach in the absence of detailed survey information, bird species are considered to be of local importance. Given the nature of the works and the potential for birds to use the habitats present within the Application Site, the zone of influence for birds is the Application Site plus 50 m.

Dormice

- 3.21. The SEWBRc data search returned a number of recent dormouse records within the 1 km search radius, all of which relate to habitat along the east-bound carriageway of the M4 (the opposite side of the motorway from the Application Site). Whilst scrub and woodland/scrub within the Application Site does provide suitable habitat for dormice, connectivity to larger areas of suitable woody habitat large enough to sustain viable dormouse populations, outside the Application Site is limited and there is a scarcity of dormouse records in this area south of the M4, most likely due to the proximity of the Gwent Levels, within which regular/ intermittent flooding of hedgerows and other woody vegetation would tend to preclude the presence of dormice. As such, it is considered that dormice are unlikely to occur within the Application Site and are not considered further in this assessment.

Invertebrates

- 3.22. The SEWBRc data search returned recent records for a number of species of notable invertebrates from within the 1 km search radius, including:
- Black-headed mason wasp – Nationally scarce and priority species³⁰;
 - Shrill carder bee - Principal species, Newport LBAP species;
 - Brown-banded carder bee – Principal species; and
 - Large wainscot – Principal species and identified as widespread but declining by Butterfly Conservation³¹.
- 3.23. All of these species were recorded within a 500 m radius of the Application Site and are species associated with flower-rich brownfield sites. A number of invertebrate species, including butterflies and bees, were noted during the Phase 1 habitat survey. It is considered that the Application Site is likely to support common species of invertebrate, however, as the habitats are limited to common pioneering scrub species, the floristic diversity within the Application Site is not considered suitable for the above protected and priority invertebrates. As such, it is considered that protected and priority invertebrates are unlikely to occur within the Application Site and are not considered further in this assessment.

Pine marten

- 3.24. The SEWBRc data search returned no recent records for pine marten within 1 km of the Application Site and no evidence of their presence was found during the walkover survey in September 2020. Some suitable habitat for pine marten foraging was found within the Application Site i.e. scrub and woodland/scrub suitable for nesting birds and small mammals that pine marten

³⁰ <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/uk-protected-species/invertebrates/?lang=en>

³¹ Butterfly Conservation's UK Conservation Strategy 2025.

could forage on, however, the connectivity to other areas outside of the Application Site is considered to be fragmented and low. As such, it is considered that pine marten are unlikely to occur within the Application Site and are not considered further in this assessment.

Reptiles

- 3.25. The SEWBRc data search returned a number of records of common species of reptiles within 1 km of the Application Site. Slow worm and grass snake have been recorded within 250 m of the Application Site. Habitats within the Application Site are optimal for reptiles, with plentiful opportunities for basking, foraging and hibernating and low numbers of common reptile species are likely to be present.
- 3.26. Taking a precautionary approach in the absence of detailed survey information, common species of reptile are considered to be of local importance. Given the nature of the works and the potential for common species of reptile to use the habitats present within the Application Site, the zone of influence for common species of reptiles is the Application Site plus 50 m.

Otter

- 3.27. The SEWBRc data search returned several recent records of otter within 1 km of the Application Site, specifically records were found in Duffryn Pond, located 560 m east of the Application Site. During the walkover surveys the Application Site itself contained no watercourses or habitats suitable for commuting, foraging or resting otters. The closest waterbody was a waterbody located 60 m east of the Site, LG Duffryn Site 1 (South Lake Drive) SINC, however this was not designated for otter records/suitability. Otter have been recorded in Duffryn Pond SINC located 560m east of the Application Site. Duffryn pond is connected to the Application Site via a green corridor of woodland, grassland and scrub, which provides suitable terrestrial habitat for otter. However, the waterbody within the Application Site is considered unsuitable for use by otter as it is a temporary pooling of water, no deeper than 5 cm. In addition, terrestrial habitats within the Application Site are considered suboptimal, with the exception of the woodland habitat which is to be retained. Furthermore, potential for otter to access the Application Site is reduced owing to the presence of a fence surrounding the Application Site on all aspects. Therefore, as there is limited suitability for otters within the Application Site and the nearest waterbody known to support otter is located over 500 m from the Application Site, it is unlikely that otter populations and habitats suitable for them will be impacted by the Scheme, therefore otter has been scoped out of further assessment within this report.

Water vole

- 3.28. The SEWBRc data search returned no records of water vole within 1 km of the Application Site. During the walkover surveys the Application Site itself contained no watercourses, waterbodies or habitats suitable for commuting, foraging or resting water vole. Therefore, water vole has been scoped out of further assessment within this report.

White-clawed crayfish

- 3.29. The SEWBRc data search returned no records of white-clawed crayfish within 1 km of the Application Site. During the walkover surveys the Application Site itself contained no watercourses. Therefore, white-clawed crayfish have been scoped out of further assessment within this report.

Summary of Features of Nature Conservation Importance

- 3.30. Table 3- below provides a summary of the features of nature conservation importance which are considered within the impact assessment. The table also provides details of the zone of influence for the features.
- 3.31. The following features that have been valued at less than local, being important at Application Site level; are not considered to be important ecological features and as such are not discussed further within this report:
- Bare ground;
 - Scattered scrub,
 - Dense scrub,
 - Wooded scrub area,
 - Shallow pooling of water,

3.32. The following features that have been valued at less than local are not considered to be important ecological features and as such as not discussed within the impact assessment. However due to legal considerations, mitigation is required, which is detailed in Section 4. Mitigation has therefore been developed for legal reasons for:

- Bats
- Badgers,
- Nesting birds
- Reptiles

Table 3-6 - Determination of importance of ecological features and details of their zone of influence

Ecological Feature	Summary of baseline	Maximum zone of influence ³²	Importance level	Rationale for valuation
LG Duffryn Site 1 (South Lake Drive) SINC	Off-site designation designated for its pond/Phragmites reedbed habitat which supports the Schedule 1 of the Wildlife and Countryside Act 1981 ³³ bird species, Cetti's warbler.	LG Duffryn Site 1 (South Lake Drive) SINC	County	The SINC is of county value for nature conservation, in line with its designation status. It supports habitats and species of importance for nature conservation.
Common species of reptile and amphibian	Areas of scattered and dense scrub on the hard standing within the Application Site hold suitable habitat for basking and foraging common species of reptiles	Application Site plus 50m	Local	Habitats within the Application Site provide limited suitability for common species of reptiles (common lizard, grass snake and slow worm). If these species are present, they are likely to be present in small numbers only.
Birds	The dense scrub and wooded scrub areas within the Application Site provide suitable nesting and foraging habitat for common species of birds.	Application Site plus 50m	Local	The Application Site does not contain any significant features that would suggest it would be of any special ornithological value other than areas of scrub and woodland, suitable for nesting birds. The habitats present being common and widespread in the local area.

3.33. The Application Site and its immediate surroundings are of limited biodiversity importance. Whilst the features recorded have not been assessed to be important ecological features, they are considered to provide a biodiversity benefit for the immediate locale. These features do not fall into the criteria of requiring detailed impact assessment. However, their presence has been

³² The zone of influence may be different for the construction and operational phases. The maximum zone of influence is given here. Where there are differences between the construction and operational zones of influence these are discussed within the impact assessment.

³³ <https://www.bto.org/our-science/projects/ringing/taking-part/protected-birds/s1-list> (information link accessed July 2019)

considered within the context of the site and the design has considered these features in terms of achieving no net biodiversity loss and, where possible, net gain.

Non-native Invasive Plant Species

- 3.34. The SEWBReC data search returned 41 recent records of invasive plant species including Nuttall's waterweed, Japanese rose, cotoneasters pampas grass, giant rhubarb, cherry laurel, Japanese knotweed, Himalayan balsam, orange balsam, New Zealand pigweed and rhododendron. Areas of cotoneaster sp. were found in various areas within the Application Site, the locations are TN1, TN2, TN4, TN5, TN6 & TN7 on the Next Generation Data: Data Centre 3, Newport, Phase 1 habitat survey plan (Figure 1 in Appendix C).

4. Design Features and Mitigation Measures

- 4.1. This section details the features that have been incorporated into the design which are of benefit to biodiversity and the mitigation measures which will be implemented during the construction phase to reduce ecological impacts. In developing the mitigation, the mitigation hierarchy has been following, looking to avoid, minimise or restore in the first instance.
- 4.2. Features that have been valued at less than local are not considered to be important ecological features and as such have not been considered within the impact assessment. However, if mitigation is required for these features for legal reasons it is detailed within this section.
- 4.3. The Application Site and its immediate surroundings are of limited biodiversity importance. Whilst the features recorded have not been assessed as important ecological features, they are considered to provide a biodiversity benefit for the immediate locale. These features do not fall into the criteria of requiring detailed impact assessment. However, their presence has been considered within the context of the Application Site and the design has considered these features in terms of compensatory measures to offset the loss of habitat.
- 4.4. An Ecological Management Plan (EcMP) will be produced which will detail the ecological mitigation and enhancements detailed below within the Application Site. The EcMP will be delivered as part of the construction phase of the Proposed Scheme.

Design Features

- 4.5. The following measures have been incorporated into the Proposed Scheme design:
 - The retention of trees within the woodland scrub area on the eastern boundary of the Site to continue to provide landscape screening as well as allowing nesting birds to use the Site; and
 - A lighting layout plan with isolux contours has been developed prior to planning submission³⁴. Consideration has been made in order for the lighting to be a suitable lighting Scheme that will be sympathetic to habitats surrounding the area for nesting birds and is in keeping with Bat Conservation Guideline lighting specifications³⁵ for foraging and commuting bats that could be using the Site.

Mitigation Measures

- 4.6. The following general measures will be implemented during the construction phase of the Proposed Scheme:
 - Pre-construction check of the Application Site for badgers is required to ensure no recent sett construction has occurred;
 - Prior to construction a suitably qualified Ecological Clerk of Works (ECoW) will be employed for the duration of construction of the Scheme and for pre-construction clearance works. They will be responsible for implementation of the Ecological Management Plan (Data Centre, Landscape and visual appraisal (EcMP³⁶); A Precautionary Method of Working (PMW) in relation to common reptiles will be prepared for the duration of construction and specifically for pre-construction site clearance works to ensure that measures to avoid or alleviate impacts on common reptiles are implemented;
 - Pollution prevention guidelines³⁷ will be followed and Construction Industry Research and Information Association (CIRIA) guidance on the control of water pollution from construction sites³⁸, which will prevent pollution impacts on the LG Duffryn Site 1 (South Lake Drive) SINC during construction; and

³⁴ Data Centre Three, Electrical Engineering Services Site Wide External Lighting Layout, DC3-ATK-ZZ-ZZ-DR-EE-64-1001

³⁵ Collins, J. (ed.) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London. See Table 4.1, p.35 of the guidelines for criteria.

³⁶ Data Centre, Landscape and visual appraisal – doc ref:DC3-ATK-XX-XX-RP-L-9000

³⁷ All of the pollution prevention guidelines (PPGs) are available from <https://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/> Note: the PPGs also make reference to environmental legal obligations, but that information is currently out of date and requires updating.

³⁸ The CIRIA documents are a series of publications developed by the Construction Industry Research and Information Association. Each document is targeted at a particular type of business or activity and covers environmental good practice to minimise pollution.

- During construction trees will be protected in line with guidelines provided in BS 5837 Trees in relation to Construction³⁹.

- 4.7. Where possible, vegetation clearance will be minimised and undertaken outside the core bird nesting season (1 March to 31 August, though it should be noted that variation in dates is possible, for example from geographical variations in climate, or due to a particularly mild winter) to avoid damage or destruction of occupied nests or harm to breeding birds. If this cannot be achieved, works within the core bird nesting season will require an inspection of vegetation to be cleared for breeding birds and their occupied nests by a suitably qualified ecologist no more than 24 hours prior to any works being undertaken. If any nesting birds are identified during the survey, they will be left in situ for their entire duration of nesting.
- 4.8. A specialist contractor will be engaged to ascertain the extent of the non-native invasive plant species growth and to provide advice and recommendations for the treatment, removal or isolation from the Proposed Scheme prior to works commencing at the Application Site.

5. Impact Assessment

- 5.1. This section characterises the impacts and the subsequent effects (both positive and negative) of the Proposed Scheme on the important ecological features within the zone of influence and assesses the significance of the residual effects (both positive and negative) based on the mitigation measures detailed in Section 4. The following potential impacts have been identified.

Construction Impacts

- Permanent habitat loss (e.g. loss of potential bird nesting habitat);
- Habitat degradation, including of the nearby designated site (e.g. through sediment release, pollution events and dust);
- Injury or mortality of protected and priority species; and
- Disturbance including noise and vibration to protected and priority species.

Operational Impacts

- Fragmentation (primarily as a result of habitat loss at junction locations) and severance (primarily in relation to water courses);
- Injury and mortality of protected and priority species from vehicle collisions;
- Disturbance including noise and vibration to protected and priority species emitted from generators on the top of the building to areas surrounding the building; and
- Pollution events;
- Changes in hydrological conditions;
- Increase in road traffic entering and exiting the Site (e.g. pollution).

- 5.2. Based on the impacts identified above, the operational impacts are considered to be low and the zones of influence detailed in Section 4 remain unchanged.

Residual Effects

- 5.3. A summary of the impact assessment, the proposed mitigation, the residual effects during construction and operation as well as details of proposed ecological compensation are provided below.
- 5.4. If the design changes or the agreed mitigation cannot be implemented the effects will need to be reassessed and further surveys may be required. In this event, the conclusion of this EclA may no longer be valid.

³⁹ British Standards Institute (2012) BS 5837:2012 Trees in relation to design, demolition, construction.

Construction

Designated Sites

- 5.5. Providing the mitigation measures relating to pollution prevention outlined above are adhered to, impacts on designated sites, specifically LG Duffryn Site 1 (South Lake Drive) SINC, during the construction phase are considered unlikely.

Habitats

- 5.6. The Scheme will result in no loss of habitat of local value or above so no mitigation and no residual effects are anticipated.

Species

- 5.7. Taking into account the agreed avoidance and mitigation measures detailed above, the Scheme will result in loss of habitats which are suitable to support common species of invertebrates, common species of reptiles, badger, nesting birds and also some loss of habitat which common bat species may use to commute or forage. This is considered to result in a temporary, minor negative residual affect. In addition to the mitigation there will be off-site compensation⁴⁰ and enhancement incorporated into the Scheme landscape design. The off-site compensation will be provided in a field to the north of the DC2 Scheme and will include the creation of an area of ephemeral/ short perennial habitat and the sympathetic management of existing scrub habitat to form a dense stand which will be managed on rotation. This will enhance the area by increasing seasonal floral biodiversity along with being low maintenance. The retention of trees within the wooded area of the Application Site along with the suitable lighting Scheme will enable nesting birds and any foraging/commuting bats to continue to use the Application Site.

Operation

Designated Sites

- 5.8. No impacts are anticipated to designated sites once the Scheme is in operation.

Habitats

- 5.9. No impacts are anticipated to habitat areas once the Scheme is in operation.

Species

- 5.10. No impacts on common species of reptiles, badger, nesting birds or commuting and foraging bat species are anticipated once the Scheme is in operation.
- 5.11. An Air Quality Assessment Statement⁴¹ has been produced assessing the operational impacts of this Scheme, the penultimate findings were as follows:
- 5.12. Newport City Council has published Development Management Air Quality Supplementary Planning Guidance (2018) which focuses predominantly on the potential for traffic impacts from new development. On that basis, it is not considered that air quality is of significance to the current planning application since:
- It will not result in a significant increase in traffic volumes
 - It will not generate more than 10 HGV movements per week once operational
 - It is over two kilometres from the nearest air quality management area (AQMA)
- 5.13. However, in recognition of the potential for air quality impacts, including construction dust, an air quality statement has been prepared. This can be found within the report referenced above.
- 5.14. Therefore, it is considered that the operational disturbance of the building will be of low impact and not impact the surrounding designated sites or the species they are designated for. As the surrounding area is already a functioning industrial estate traffic is already a known disturbance, however the increase in traffic will be notable however unlikely to inflict a significant increased disturbance to local flora/fauna.
- 5.15. At the time of writing, the draft lighting layout plan with isolux contours has been developed prior to planning submission. The lighting design has been designed in line with guidance from the Bat

⁴⁰ Data Centre, Landscape and visual appraisal – doc ref:DC3-ATK-XX-XX-RP-L-9000

⁴¹ Air Quality Statement, Atkins, October 2020- 5197938-NGD-DC3-AQ-Statement_V0.3

Conservation Trust and Institute of Lighting Professionals (2018)⁴² and all light will be directed away from the retained suitable foraging and commuting habitat for bats.

- 5.16. If the design changes or the agreed mitigation cannot be implemented the effects will need to be reassessed and further surveys may be required. In this event, the conclusion of this EclA may no longer be valid.

Cumulative Impacts

- 5.17. No further cumulative impacts are likely to occur as a result of the construction and operation of the Scheme.

Biodiversity Enhancements

- 5.18. To enhance the biodiversity within the Application Site two bat boxes will be installed together with four bird boxes, on existing trees. Furthermore, a log pile will be created that is suitable for common species of reptile within the retained wooded/scrub area at the eastern margin of the Site.

Ecological Management and Monitoring Plan

- 5.19. A detailed monitoring plan will be produced, in summary this monitoring plan will include:
- A detailed landscape plan for the compensatory site that will be enhanced to compensate for the loss of scrub habitat within the Application site; and
 - The monitoring and maintenance of the compensation site detailing maintenance schedules and activities to sustain the compensation area.

⁴² Bat Conservation Trust, BCT & Institute of Lighting Professionals, ILP (2018) Bats and Artificial Lighting in the UK: Bats in the Built Environment series. Guidance Note 08/18.

6. Conclusion

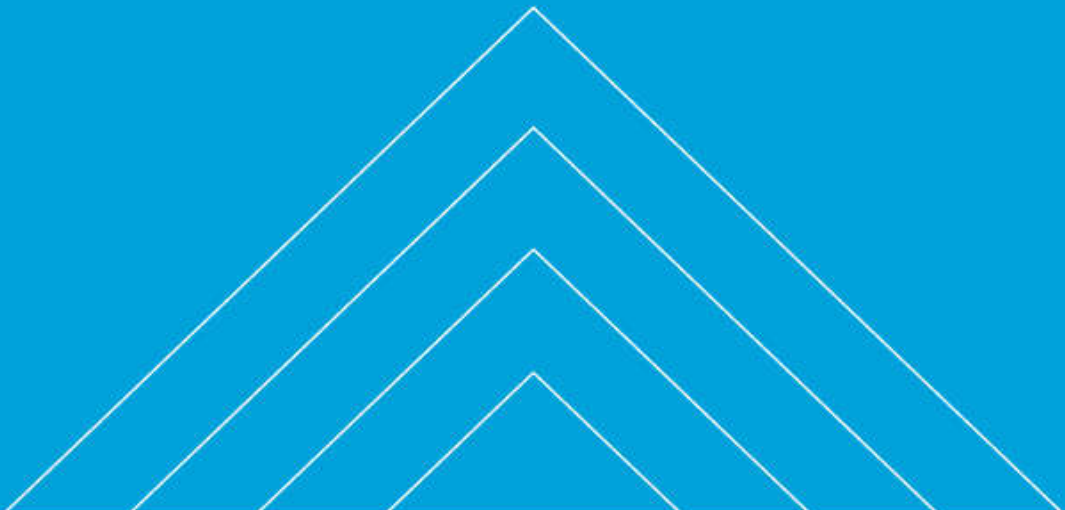
- 6.1. This EclA is based on reviewed desk study data and ecological surveys undertaken between June and July 2019 as well as an update ecological walkover survey conducted in September 2020. The scope of the surveys was based on the initial EZol of the Scheme and included an extended Phase 1 habitat survey alongside previously conducted HSI assessments and an eDNA survey on two waterbodies within 500 m of the Application Site. The habitats present within the Survey Area are shown in Next Generation Data Centre 3 Newport Phase 1 Habitat Survey Plan in Appendix C. Once all relevant available information was obtained, the final EZol of the Scheme was determined and the significance of impacts and subsequent effects (both positive and negative) on important ecological features was assessed.
- 6.2. The Applicant has agreed that the avoidance and mitigation measures identified in Section 5.1 above will be incorporated into the detailed design proposals for the Scheme and implemented as part of the overall development of the Application Site. The permanent loss of scrub habitat with its associated species is to be compensated for in an off-site area which is part of the DC2 Site just north of DC3. The off-site compensation will include the creation of an area of ephemeral/ short-perennial habitat and the management of existing scrub habitat to encourage a dense stand.
- 6.3. The retention of trees within the Application Site along with the suitable lighting scheme will ensure continuity of habitat suitability for nesting birds and any foraging/commuting bats.
- 6.4. Implementation of standard pollution prevention measures will ensure there are no adverse impacts on LG Duffryn Site 1 (South Lake Drive) SINC during development. Potential air pollution arising from the Scheme during operation is not anticipated to adversely affect the integrity and conservation objectives of Gwent Levels-St Brides SSSI, Celtic Springs SINC, LG Duffryn Site 1 (South Lake Drive) SINC, LG Duffryn Site 2 SINC and Duffryn Pond SINC, owing to the spatial distance between the Application Site and these designated sites.
- 6.5. Taking avoidance and mitigation measures into account, the Scheme conforms in respect of biodiversity to the Planning Policy Wales, Chapter 6 – Distinctive and Natural Places (6.4 – Biodiversity and Ecological Networks).

Report Validity

- 6.6. In the event of programme changes then updates to the surveys may be required to ensure the validity of the data, as per CIEEM guidance⁴³.

⁴³ CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys

Appendices



Appendix A. Site Location Plan and Scheme Figures

Figure 1- Site Location Plan-DC3-ATK-01-Z0-DR-AR-021001

Appendix B. Planning Policy

B.1 Planning Policy Wales (Edition 10) December 2018

National planning policy in Wales is contained in Planning Policy Wales, PPW (Edition 10, December 2018).

The PPW can be found here:

<https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf>

Specifically captured within Section 6 of this document is the importance of biodiversity and ecological networks within environments. Sections 6.4 for example, highlights planning systems roles in reversing the increasing decline of biodiversity. The scrub habitat due to be lost as a direct result of the Scheme is otherwise abundant in surrounding areas and is not considered suitable for protected/notable species is therefore of limited ecological concern. However, the proposed off-site compensation will lead to an increase in the biodiversity enrichment of an area and will be a significant addition to the planning design of the Scheme to uphold the PPW.

The Newport Local Development Plan 2011 – 2026 (adopted January 2015)⁴⁴, highlights the necessity for the re-development of brownfield Sites with a consideration towards increasing ecological biodiversity within the planning proposal.

B.1.1 Strategy & Objectives

Objective 6 – Conservation of the Natural Environment

To protect and enhance the quality of the natural environment, including landscape, protected habitats and species of principal importance for biodiversity in Wales (regardless of greenfield or brownfield status) and the protection of controlled waters.

B.1.2 Strategic Policies

SP9 Conservation of the Natural, Historic and Built Environment

The conservation, enhancement and management of Recognised sites within the natural, historic and built Environment will be sought in all proposals.

B.1.3 General Policies

GP5 General Development Principles – Natural Environment

Development will be permitted where, as applicable:

- i) The proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the UK, Welsh and/or Newport biodiversity action plans;
- ii) The proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, Welsh section 42⁴⁵ and local protected habitats and species, and protecting features of importance for ecology;
- iii) The proposal will not result in an unacceptable impact on water quality;
- iv) The proposal should not result in the loss or reduction in quality of high-quality agricultural land (grades 1, 2 and 3a);
- v) There would be no unacceptable impact on landscape quality; and
- vi) The proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;

The proposal includes appropriate tree planting or retention where appropriate and does not result in the unacceptable loss of or harm to trees, woodland or hedgerows that have wildlife or amenity value.

⁴⁴ <http://www.newport.gov.uk/en/Planning-Housing/Planning/Planning-policy/Local-Development-Plan/Local-Development-Plan.aspx>

⁴⁵ Defined under the Natural Environment and Rural Communities Act, available at <http://www.legislation.gov.uk/ukpga/2006/16/contents>

B.2 The Natural Environment

CE8 Locally Designated Nature Conservation and Geological Sites

Proposals affecting locally designated sites will only be permitted where:

- i) There would be no overall loss of the nature conservation resource for which the site has been designated;
- ii) There would be no significant adverse effect on the geological interest of the site; and
- iii) Appropriate mitigation or compensatory measures can be achieved.

B.3 Newport's Local Biodiversity Action Plan

B.3.1 Priority habitats

The most relevant Priority Habitat included within Newport's LBAP⁴⁶ is priority habitats that may occur within urban and brownfield landscapes within the Brownfield and Urban Action Plan. This includes; Open mosaic habitats on previously developed land, and can be described as:

'Brownfield sites can often remain unused for many years and recolonisation by plants and animals on these undisturbed areas can lead to the development of a diverse flora and fauna with a complex succession of habitats forming a mosaic (patchwork), from bare ground to grassland, scrub and woodland. These areas often provide alternative habitats for many species that have declined due to loss of their native habitats in the wider countryside. Often the biodiversity value of these areas is underestimated and can be important for many species...'

Vision statement and objectives (for brownfield and urban habitats)

The overall vision for this plan is to maintain and enhance the wildlife value and potential of brownfield habitats, gardens and other urban open spaces in Newport. Any action will seek to meet the following objectives:

- To ensure there is the right amount of appropriate quality open space in the right places in Newport to provide for biodiversity and people's need to have contact with it (the accessible natural green space project);
- To maintain the extent of brownfield habitats in Newport that support BAP/S42 habitats and species;
- To secure appropriate management for biodiversity of significant areas of public open space/brownfield sites within the county;
- To raise awareness of brownfield sites and the benefits they bring us; and
- To raise awareness of the benefits of wildlife friendly gardening and allotments, and ultimately to increase the number of wildlife-friendly features in gardens and allotments in the county.

B.3.2 Priority Species

Priority species included within Newport's LBAP include:

- Dormouse;
- Bats;
- Otter;
- Water vole;
- Fungi;
- Small ranunculus moth; and
- Shrill carder bee.

⁴⁶ Newport's Local Biodiversity Action Plan- <http://www.newport.gov.uk/en/Leisure-Tourism/Countryside--Parks/Biodiversity/Biodiversity-action-plan.aspx>

Appendix C. Extended Phase 1 Habitat Survey Plan and Target Notes

Figure 1- Next Generation Data: Data Centre 3, NGD, Newport
Phase 1 Habitat Survey Plan

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Appendix D Summary of Relevant Ecological Legislation in Wales

Species	Legislation	Offences	Licensing procedures and guidance
Bats <i>European protected species</i>	Conservation of Habitats and Species Regulations 2017 (as amended) Reg 43	Deliberately ⁴⁷ capture, injure or kill a bat; deliberate disturbance ⁴⁸ of bats; or damage or destroy a breeding site or resting place used by a bat. [The protection of bat roosts is considered to apply regardless of whether bats are present.]	A licence in respect of development is required from Natural Resources Wales (NRW). Guidance documents: <i>Bat Mitigation Guidelines</i> (English Nature 2004) <i>Bat Workers Manual</i> (JNCC 2004)
	Wildlife and Countryside Act 1981 (as amended) S.9	Intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb ⁴⁹ a bat in such a place.	Licence from NRW is required for surveys (scientific purposes) that would involve disturbance of bats or entering a known or suspected roost site.
Badger	Protection of Badgers Act 1992	Wilfully kill, injure or take a badger; or intentionally or recklessly damage, destroy or obstruct access to a badger sett or disturb a badger in its sett. [It is not illegal to carry out disturbance activities in the vicinity of setts that are not occupied.]	Where required, licences for development activities involving disturbance or sett interference or closure are issued by the Welsh Government and Natural Resources Wales. Licences for activities involving watercourse maintenance, drainage works or flood defences are issued under a separate process. Licences are normally not granted from December to June inclusive because cubs may be present within setts.

⁴⁷ Deliberate capture or killing is taken to include “accepting the possibility” of such capture or killing

⁴⁸ Deliberate disturbance of animals includes in particular any disturbance which is likely a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of hibernating or migratory species, to hibernate or migrate; or b) to affect significantly the local distribution or abundance of the species to which they belong.

⁴⁹ Lower levels of disturbance not covered by the Conservation of Habitats and Species Regulations 2017 (as amended) remain an offence under the Wildlife and Countryside Act 1981 (as amended) although a defence is available where such actions are the incidental result of a lawful activity that could not reasonably be avoided.




Species	Legislation	Offences	Licensing procedures and guidance
Birds	Wildlife and Countryside Act 1981 (as amended) S.1	<p>Intentionally kill, injure or take any wild bird; intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built; intentionally take or destroy the nest or eggs of any wild bird.</p> <p>Intentionally or recklessly disturb a Schedule 1 species while it is building a nest or is in, on or near a nest containing eggs or young; intentionally or recklessly disturb dependent young of such a species [e.g. most birds of prey, kingfisher, barn owl, black redstart, little ringed plover].</p>	<p>No licences are available to disturb any birds in regard to development.</p> <p>Licences are available in certain circumstances to damage or destroy nests, but these only apply to the list of licensable activities in the Act and do not cover development.</p> <p>General licences are available in respect of 'pest species' but only for certain very specific purposes e.g. public health, public safety, air safety.</p>
Rabbits, foxes and other wild mammals	Wild Mammals (Protection) Act 1996	Intentionally inflict unnecessary suffering to any wild mammal.	Lawful and humane pest control of these species is permitted.
Plants <i>Invasive species e.g.</i> Japanese knotweed, hybrid knotweed, giant knotweed, giant hogweed, rhododendron, Himalayan balsam	Wildlife and Countryside Act 1981 (as amended) S.14	It is illegal to plant or otherwise cause these species to grow in the wild.	<p>Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with section 34 of the Environmental Protection Act 1990.</p> <p>Guidance documents: <i>The Knotweed Code of Practice</i> (Environment Agency, 2013 version 3) <i>Managing Invasive Non-native Plants</i> (Environment Agency 2010)</p>



Site Designation	Legislation	Protection	Guidance
Site of Special Scientific Interest (SSSI)	Wildlife and Countryside Act 1981 (as amended)	It is an offence to carry out or permit to be carried out any potentially damaging operation. SSSIs are given protection through policies in the Local Development Plan.	Owners, occupiers, public bodies and statutory undertakers must give notice and obtain the appropriate consent under S.28 before undertaking operations likely to damage a SSSI. S.28G places a duty on all public bodies to further the conservation and enhancement of SSSIs. Guidance documents: Technical Advice Note 5, Nature Conservation and Planning (WAG 2009).
Local Sites (e.g. County Wildlife Sites, Sites of Importance for Nature Conservation)	There is no statutory designation for local sites.	Local sites are given protection through policies in the Local Development Plan.	Development proposals that would potentially affect a local site would need to provide a detailed justification for the work, an assessment of likely impacts, together with proposals for mitigation and restoration of habitats lost or damaged. Guidance documents: Technical Advice Note 5, Nature Conservation and Planning (WAG 2009).

Habitats & Species	Legislation	Guidance
Species and Habitats of Principal Importance for the Conservation of Biodiversity	Environment (Wales) Act 2016 Natural Environment & Rural Communities Act 2006 S.42	S.6 places a duty on public authorities to ' <i>seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales</i> '. In so doing, public authorities must have regard to habitats and species listed in accordance with S.7 of the Act, which requires Welsh Ministers to publish and maintain lists of species and habitats in Wales that are regarded as being of 'principal importance' for the purpose of maintaining and enhancing its biodiversity. Until the Welsh Ministers have published this list, defer to the list published in accordance with S.42 of the NERC Act 2006. This list can be found on the Wales Biodiversity Partnership website. Ecological impact assessments should include an assessment of the likely impacts to these S.7/S.42 habitats and species.
Ecosystems	Environment (Wales) Act 2016	In meeting their obligation to seek to maintain and enhance biodiversity, S.6. also places a duty on public authorities to ' <i>promote the resilience of ecosystems</i> '. In complying with this duty, public authorities must consider ecosystem diversity, connectivity, scale, condition and adaptability. Public authorities must also have regard to the State of Natural Resources Report (published under S.8 of the Act) and any area statement published under S.11.
Biodiversity Action Plan (BAP) Habitats & Species	No specific legislation, unless it is also a species or habitat of principal importance as described above.	The UK Biodiversity Action Plan (BAP) is the UK's initiative to maintain and enhance biodiversity in response to the Convention on Biological Diversity signed in 1992. The UK BAP, as updated by the UK Biodiversity Partnership in 2007, was used to draw up the 'Section 42 List for Wales'. The UK BAP has been succeeded by the UK Post-2010 Biodiversity Framework in 2012, due to a change in government strategy by all UK countries, focussing on managing the environment as a whole rather than dealing with different aspects of biodiversity and environment separately (JNCC& Defra 2012). However, the UK BAP list of priority habitats and species continue to be regarded as conservation priorities in the UK Post-2010 Biodiversity Framework.

Appendix E Target Notes and Photographs

Table 0-1 - Target notes and photographs

Target Note	Description	Photograph
TN1	Cotoneaster found on scattered scrub area on bare ground within Application Site	
TN2	Cotoneaster found on scattered scrub area on bare ground within Application Site	
TN3	Shallow, prone to drying, asphalt base waterbody. Minor established aquatic vegetation, mostly algae. Negligible suitability for GCN.	
TN4	Cotoneaster	N/A
TN5	Cotoneaster	N/A

TN6	Cotoneaster	N/A
TN7	Cotoneaster	N/A
Covering majority of Application Site.	Bare/sparsely vegetated ground/hard standing within Application Site. Suitability for foraging and basking common species of reptiles.	
Covering majority of Application Site.	Areas of densely vegetated scrub covering large areas of Application Site. Suitable for nesting birds and common species of reptile	

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