

**From:** Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>  
**Sent:** 28 January 2025 12:36:36 UTC+00:00  
**To:** "Hawkins, Grant (Senior Planning Officer)" <Grant.Hawkins@newport.gov.uk>  
**Subject:** RE: Planning Consultation Request for case ref: 24/1036

Hello Grant,

This site is set within the Gwent Levels - Redwick & Llandeenny SSSI, which is notified for its reed habitats and the plants and invertebrates they support. Therefore we should consult NRW on this application, if we haven't already, and have regard to their views.

NRW may consider the measures set out in section 6.5.1 of the Preliminary Ecological Appraisal (PEA) dated 2024, which relate to working near watercourses, and advise on whether they are sufficient to counteract any potential impact upon the SSSI features.

In general terms I support the methodology and conclusions of the PEA, though the document does not consider in detail the potential for impacts upon the adjacent SSSI. I support the recommendations in section 6 of the PEA, which set out a series of measures to avoid or reduce harm to a range of protected species/groups during construction. Any such measures, together with those which NRW may suggest to protect the SSSI features, should be set out in a Construction Environmental Management Plan, which the Applicant should submit and implement as part of a planning condition. In particular, in relation to dormice I don't agree with the statement in section 5.2.1 that '*It is therefore considered unlikely that they will be present on the site*'. This species is present in hedgerows and other habitats throughout the Gwent Levels landscape, and is not unlikely to be present on this site. However I recognise that the hedgerow fronting the site has been maintained as a low box-cut hedge, and so would not provide the fruit and flower resources that dormice feed on. Also, I believe the extent of hedge to be removed is relatively short, so a full survey is not justified on this occasion. Instead, mitigation measures should focus on avoidance of harm to individuals during hedge removal, for example by using a two-stage clearance method.

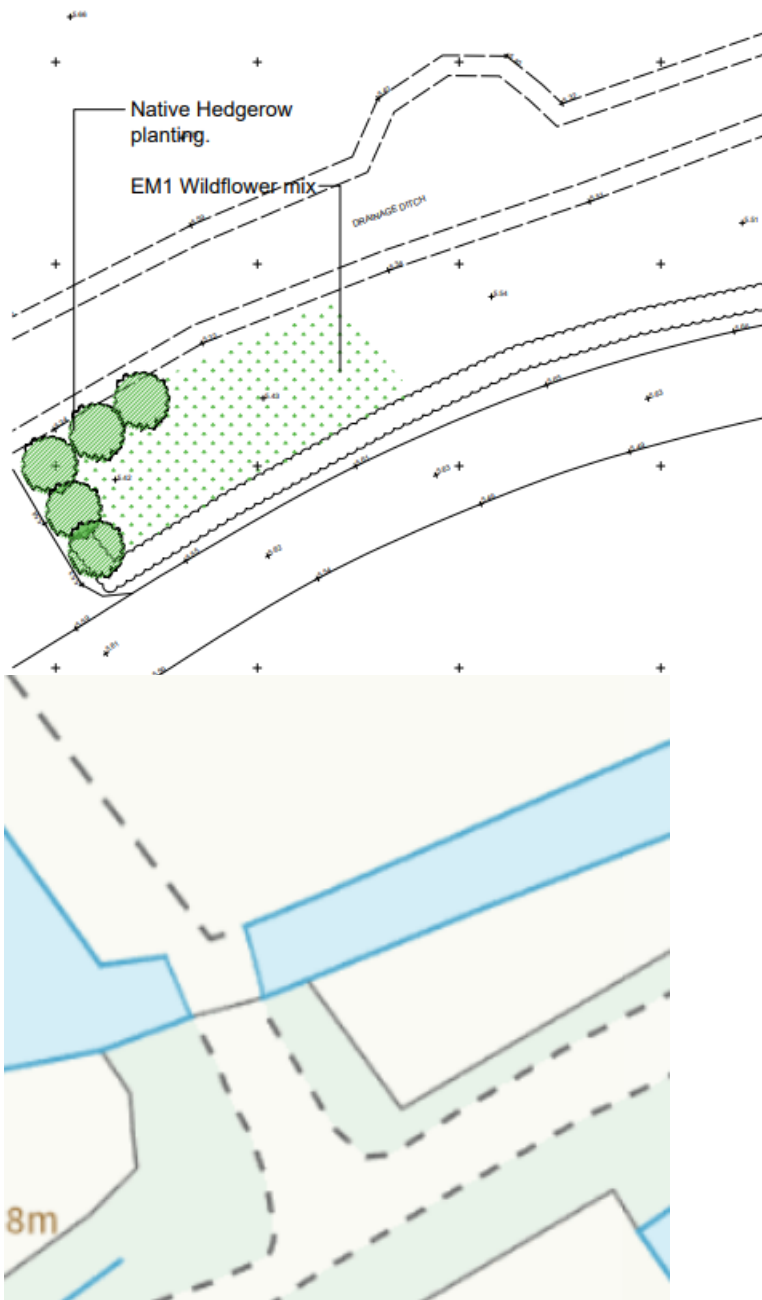
The Bat Activity Survey Report describes a preliminary roost assessment and emergence survey undertaken in 2024. I am concerned that the bat roost potential of the building may have been underestimated, as it was assessed as having 'low' bat roost potential, but looking at StreetView images showing a dilapidated building with gaps under barge-boards, fascias and ridge tiles, an assessment of 'moderate' bat roost potential may be more appropriate. However, the single emergence survey produced a negative result, and the works to the building are for renovation rather than demolition, so I would not ask that the bat survey be repeated. Instead, we should attach our Bat Advisory Note as below, to any consent granted.

In general I support the Green Infrastructure Statement, and subject to my comments below and a consultation response from NRW, implementation of the measures set out in a final version of this document should be secured by planning condition.

I am concerned at the proposals to introduce a wildflower seed mix on one part of the site, and also to introduce hedgerow planting. As above, the Gwent Levels SSSI is adjacent to this site, and as the SSSI is notified for sensitive habitats, it is not appropriate to introduce a commercial seed mix with plant species that are not of local provenance. In addition, a wildflower seed mix will not succeed unless it is

managed appropriately by a suitable mowing regime. A better approach would be to either allow natural habitats to develop, or to introduce habitat management which promotes diversity of local species, such as a twice-yearly cut and allowing native species to flower and set seed in between.

In order to preserve the SSSI features in the reens on the Gwent Levels, NRW are seeking to reduce shading of reens by woody species, for example by removing trees and hedgerows. They may have a view on the proposal to plant native hedgerow to the south of the reen which runs along the north of the site, as this may result in excessive shading of that reen. I do not have concerns over the hedgerow species proposed to be planted, but the location of any planting in relation to the reens adjacent to the site needs to be considered carefully.



Finally any SuDS features must adhere to the six SuDS standards, one of which is that they provide a benefit for biodiversity. Any planting in SuDS planters should not introduce invasive non-native species to the aquatic environment.

I will provide further comment when we receive a consultation response from NRW.

Matt Harris  
Ecology Officer

### **Bat Advisory Note**

Bats often roost in houses and other buildings, and work on these buildings may disturb a bat roost. All bats and their roosts are protected against disturbance under UK and European legislation. If works are planned on a building in which bats are roosting, Natural Resources Wales (NRW) must be contacted for advice.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and NRW should be contacted immediately.

Where there is a likelihood that bats are present, or where bats are found to be present, a suitably qualified and experienced ecological consultant should be contracted to provide an assessment of the impact of the proposed works, and undertake bat surveys if necessary.

Where bats or their roosts are present, no works of site clearance, demolition or construction should take place unless a licence to disturb these species and/or their roosts has been granted in accordance with the relevant legislation. Otherwise, a prosecution may result in a fine and/or imprisonment.

NRW can be contacted at:-  
Natural Resources Wales, Tŷ Cambria, 29 Newport Road, Cardiff CF24 0TP, 0300 065 3000

Bat Conservation Trust can be contacted at:-  
5th Floor, Quadrant House, 250 Kennington Lane, London, SE11 5DR, 0845 1300228

-----Original Message-----

From: [planning@newport.gov.uk](mailto:planning@newport.gov.uk) <[planning@newport.gov.uk](mailto:planning@newport.gov.uk)>  
Sent: 27 January 2025 15:18  
To: Harris, Matthew (Ecology Officer) <[Matthew.Harris@newport.gov.uk](mailto:Matthew.Harris@newport.gov.uk)>  
Subject: Planning Consultation Request for case ref: 24/1036

Dear Head Of City Services

Please find attached correspondence from Newport Council with regards to the above planning application submitted on 18 December 2024.

Your sincerely  
Development Management