From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 22 May 2025 11:59
To: Hawkins, Grant (Senior Planning Officer) <Grant.Hawkins@newport.gov.uk>
Subject: RE: 25/0220 - Traston Lane.

Hello Grant,

I have considered the Preliminary Ecological Assessment V1.0 dated December 2024, and have a number of concerns.

Section 3.2 states that A herptile mitigation strategy will be required which includes two-stage vegetation cutting, ecological supervision and measures to be implemented should GCN be found during vegetation clearance work. Assuming this relates also to reptiles, the habitats on site lend themselves to supporting reptile species especially Grass Snakes *Natrix helvetica*, so a survey should have been carried out for this and other reptile species. Indeed, section 3.8 subsequently advises that reptile surveys are recommended to support any planning application for the proposed development site boundary if retention of a portion of the site cannot be achieved. In my view, we should have the results of this survey to inform any planning decision.

I do not accept the logic that because the suitable habitat within the development site is fairly small in overall size, and 2.2ha of suitable habitat are required to support a pair of Dormouse, that the presence of Dormouse within the site boundary is considered unlikely. This species occurs naturally at low density compared to other similar mammals, but this does not mean that the area of suitable habitat on site is any less important to this species. In fact, it may form part of a larger territory which is necessary to sustain Dormice in terms of foraging and nesting opportunities, and this habitat were lost to development, then the areas of that territory may be reduced to an unsustainable level. However, I do agree that a full Dormouse survey is not justified on this occasion, but instead their presence should be assumed and precautionary mitigation measures put in place to avoid harm to individuals during site clearance and to result a net increase in the extent and/or quality of remaining habitat.

As acknowledged in section 3.4, some trees on site could be suitable for roosting bats, but no detailed inspection or emergence survey has taken place, partly due to the inaccessibility of many of the trees. This section of the PEA advises that '*A*

Ground Based Visual Roost Assessment (GBVRA) of all trees proposed for removal is recommended. Any tree categorised as having PRF-i bat roosting potential may require further bat survey work.' Given the number of trees to be removed and the maturity of some of them, my advice is that we need the results of these surveys prior to determination, in order to fully understand the impact of the proposed scheme upon these European protected species.

Further on in this section, the PEA advises that '*Bat activity transect surveys are recommended for the site to gain an understanding of the sites usage by bat species'*. Again, due to the extensive wooded corridors along the boundaries of this site, and the impact upon foraging, commuting and ecological connectivity that removal of many of these trees would entail, we need to see the results of these surveys prior to determination.

Section 3.5 deals with Otters, also a European protected species, and advises that '*The site is considered sub optimal for otter holt or resting sites. However, the potential presence of otter within the site boundary cannot be ruled out. Further survey work for otter is not recommended, 13 V1.0 Preliminary Ecological Assessment Ecological Services Ltd Traston Road, Newport however a visual inspection of scrub, trees and tall ruderal vegetation immediately prior to any vegetation clearance is recommended.'* In general I agree with this advice as it is recognised earlier in this section that roadkill Otters have been noted on the SDR immediately to the north of this site. The dense vegetation around the outside of this site associated with the ditches may well support Otter lying-up areas, though I agree that an Otter holt is unlikely. Therefore a pre-clearance check of this vegetation is appropriate, but if any lying-up areas or couches are detected, then an EPS licence from NRW may be needed.

Section 3.9 refers to other mammal species including Hedgehog, and should planning consent be granted my advice is that we should use a planning condition to require the submission and implementation of a Hedgehog Movement Plan, to demonstrate how Hedgehogs are able to move freely throughout gardens within and outwith the site.

Subject to my comments above, in general I support the measures set out in section 5 'Recommendation and mitigation', and section 6 'Biodiversity enhancements and green infrastructure', but these sections again refer to further ecological survey work, and we need the results of these surveys before granting planning consent.

The Green Infrastructure Statement is set out in the Design & Access Statement, but there are a number of concerns here. Firstly, the DAS doesn't make explicit reference to the stepwise approach set out in PPW, which requires that avoidance of harm is the primary approach to maintaining biodiversity and promoting the resilience of ecosystems. Where avoidance is not possible, then subsequent priorities relate to minimisation of harm, mitigation and compensation for residual adverse effects. At each stage, measures to secure net benefit for biodiversity should be proposed. In this instance, there has been no attempt that I can see to follow the stepwise approach nor to relate is to the ecological baseline conditions on site and in the surrounding area. Secondly, plans such as the Proposed Site Layout refer to a '…5m ecological buffer and tree buffer zone from face of trees (sic) canopies'. In many cases, this ecological buffer includes buildings and domestic gardens, so there can be no assurance that these areas will be used, or will function, as an ecological buffer zone. Thirdly, in accordance with 6.4.42 of PPW12, Replacement planting shall be at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably onsite, or immediately adjacent to the site, and at a minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost. The DAS should have set out how this policy will be addressed by replacement tree planting at this site.

A key element of avoidance of harm in the stepwise approach is the retention of trees especially mature trees. Given the number of trees which are proposed to be removed, and potential impacts upon retained trees as raised as a concern by the Tree Protection Officer, I do not see that every effort has been made to avoid harm as a primary approach.

Matt