

**From:** Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>  
**Sent:** 12 February 2026 11:36  
**To:** Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>  
**Subject:** RE: 25/0220 Traston Lane

Grant, I have the following updated comments on this application, which are made without prejudice to any further comments that I may make in the light of any new information or of alterations to the plans as submitted. Where I have not made comment on a particular section of the Preliminary Ecological Appraisal, Green Infrastructure Statement or other ecological reports submitted, it should be assumed that I am in agreement with the text of that particular section.

In general I support the methodology and conclusions of the Preliminary Ecological Appraisal v2.0, but have the following observations.

- Some species are listed in the botanical survey, but an NVC Phase 2 survey would have been useful to assess the value of the marshy grassland habitats. This would enable a better understanding of the impact of the proposed scheme and the mitigation / compensation required.
- I do not agree that the presence of dormice on this site is unlikely. However, as I stated in my previous comments of 22/05/25, 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.
- I support the mitigation measures set out in the Reptile Survey Report, the Bats & Trees Survey Report, and the Bat Transect Survey. Subject to my comments below, the implementation of these measures together with those in the PEA v2.0 should be secured by planning condition should consent be granted.

I accept that residential development at this site has previously been granted consent by 05/0287, but in the meantime there have been material changes both in the site itself and in the policy and legislation relating to the natural environment. The site has developed a mosaic of habitats including marshy

grassland, tall ruderals and scrub, which mean that the potential impacts upon protected species is greater than was previously the case. Since 2005 the Environment (Wales) Act has been introduced in 2016 and new guidance on the application of this legislation to the planning system has been set out in PPW 12. For example paragraph 6.2.12 of PPW12 advises that a Green Infrastructure Statement should be used to demonstrate how the stepwise approach in paragraph 6.4.15. That stepwise approach should be used to secure net benefit to biodiversity and ecosystem resilience. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site.

In this instance I do not see that the development will leave biodiversity and the resilience of ecosystems in a significantly better state than before, For example I see that 40 tree/groups will be lost, but will be replaced by 41 new trees. Notwithstanding my view that the addition of 1 tree does not constitute 'significant' net benefit, nor that newly-planted trees will take decades before they provide the ecosystem services of the mature trees that have been lost, it is still clear that the requirement in paragraph 6.4.42 of PPW12 for minimum ratio of at least 3 trees of a similar type and compensatory size planted for every 1 lost will not be met with this development. This is acknowledged in section 5 of the PEA.

I accept that many of the trees are afflicted by Ash Die-back and Dutch Elm Disease, and have therefore been listed as U-categorised trees. However this is an arboricultural term which does not reflect the trees' value for biodiversity or ecosystem resilience. Unless they are immediately dangerous to the public or property, I do not see that they 'need' to be removed as is stated in the Covering Letter of 16<sup>th</sup> Jan. Standing and fallen deadwood, together with trees that have rot holes and cavities caused by disease, can be important habitats for bats, birds, dormice, invertebrates and fungi

In respect of other habitats on site, it is clear that there will be an overall net loss of marshy grassland, tall ruderals and scrub on site. There are proposals to introduce wildflower seed mixes, shrubs and other planting in bio-retention features, but these will not compensate for the habitats lost. Looking at the DECCA framework referred to in paragraph 6.4.5 of PPW 12, one could argue that the seed mixes and planting will increase the diversity of the site, but there would inevitably be a loss in extent and condition, as the semi-natural habitats currently covering the site will be reduced in area and replaced by commercially-sourced seeds and plants not local to this

area. The Green Infrastructure Statement updated January 2026 concedes that it will not be possible to mitigate damage to the existing marshy grassland, as it will be removed to accommodate the proposals.

The GI Statement frequently describes the site as being of 'limited' value for connectivity. I do not agree with these statements, and the site in my view forms an important link between the Solutia SINC to the southeast and the landscaping associated with the NISV and Southern Distributor Road to the northwest. Section 5 of the PEA describes features which '*...provide important connectivity to the wider landscape*'. Furthermore, the focus of the GI Statement is very much upon connectivity, whereas it should instead focus on how arboriculture, biodiversity, sustainable drainage and amenity have all been considered in an integrated and comprehensive way to generate a net benefit for biodiversity and ecosystem resilience.

Therefore my advice is that the application has failed to demonstrate that the stepwise approach has been correctly applied, and that net benefit for biodiversity and ecosystem resilience would not be achieved based on the plans as currently submitted.

Matt Harris

Ecology Officer