

10th October 2025

RammSanderson Ecology Ltd

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Richard Hunt
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RE: 7345B - NEWPORT HARBOUR (LANDSIDE): WEBS DATA AND REVIEW

Further to your request for clarification on the potential for construction activity to disturb wetland birds associated with the Severn Estuary and the Ebbw Mouth, we provide the following note setting out the location of works, location of birds and the separation and screening that ensures birds are beyond disturbance distances.

The application site lies within Newport Docklands on previously developed, industrial land. Works comprise foundations, installation of plant/silos and associated infrastructure; piling will be undertaken using auger cast (CFA) piling, a low-noise/low-vibration technique. The HRA records that the site is approximately 200 m north of the River Usk SAC/SSSI and approximately 400 m from the Severn Estuary SPA/Ramsar/SAC, with intervening dock infrastructure between the site and tidal habitats.

Qualifying SPA/Ramsar waterbirds (e.g., ringed plover, redshank, dunlin, shelduck, white fronted goose, etc.) are associated with the intertidal mudflats, sandflats and salt marsh of the Severn, not with hardstanding or enclosed dock basins. The HRA confirms the on-site habitats are bare ground/hardstanding and buildings, which are not suitable for the Ramsar birds and are not functionally linked to the designated sites.

We will append the WeBS synopses (Ebbw Mouth and Severn Estuary) to provide the standard baseline context for bird distribution on the open intertidal areas of the estuary complex.

The nearest tidal habitats of the Usk/Severn system are approximately 200 to 400 m from the works, as set out in the HRA. Substantial dock infrastructure lies between the site and the estuary, providing visual and acoustic screening that further reduces any potential stimulus to birds on the mudflats/saltmarsh.

CFA piling is explicitly identified in the HRA as low-noise/low-vibration, avoiding impulsive hammer noise; this reduces the risk of disturbance.

Taken together, the separation distance and existing screening exceed the precautionary buffers commonly applied for non-breeding shorebirds on open mudflats, particularly in an already industrialised, high-baseline noise environment such as the docks (as described in the HRA).

To summarise, the works are confined to enclosed, industrial hardstanding within Newport Docks; qualifying SPA/Ramsar birds utilise the intertidal habitats of the Severn/Ebbw system, not the dock platform; and those habitats are separated from the works by approximately 200 to 400 m and by substantial screening infrastructure. With CFA piling and the existing industrial context, the risk of visual or acoustic disturbance to birds on the mudflats is negligible, and no likely significant effects are anticipated, consistent with the submitted HRA.

We trust this provides the necessary clarity. We will submit the WeBS synopsis extracts alongside this letter for completeness.

Yours sincerely,
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For and on behalf of RammSanderson Ecology Ltd.

