

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 21 September 2026 15:51
To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>
Subject: RE: 26/0670 - Prior Notification for Demolition - Neptune Works, Newport Docks.

Hello Grant, the Applicant has submitted a preliminary roost assessment (PRA) and activity surveys for bats. I support the methodology and conclusions of these surveys, which established that there is a small population of Common Pipistrelle Bats roosting in the building. In accordance with the NRW Approach to Bats and Planning Good Practice Guide 2015, this roost constitutes a 'Low Risk Case', and so the standing advice is that we do not need to consult NRW on this bat survey report, though I note we have consulted them on the application as a whole. This is with the proviso that the recommendations of the Bat Survey Report are implemented.

This roost would inevitably be lost to the demolition, however the compensatory measures proposed are not adequate. For example, the compensation mainly takes the form of attaching bat boxes to trees retained on site, however it is not clear which trees are referred to. Our Arboricultural Officer has advised that there are no trees on site, and while some vegetation is visible on aerial images, I cannot be certain that these are suitable to attach bat boxes to.

The Demolition Environmental Management Plan states in section 8.4 in relation to Protected Species that *'We will work closely with the Project Ecologist and follow the guidance of the habitat assessment report to ensure that all aspects of the Project Environmental and Ecological Plans*

are followed. The Preliminary Ecological Appraisal Report will assess the potential impacts on:

River Usk and tributary rivers

Site of Importance for Nature Conservation (SINC)

Amphibians

Bats

Fish

Hedgehog

Nesting birds

Otter , etc.'

This section goes on to explain which surveys and assessments will be carried out, but the results of these are not provided. Furthermore, the proposed demolition will need to be subject to a Habitats Regulations Assessment in relation to the adjacent River Usk SAC, but sufficient information has not been provided in order to allow this assessment to take place. A HRA will likely focus on impacts upon Otters, which are a feature of the River Usk SAC and which may be disturbed by demolition, and upon migratory fish which can be disturbed by vibration caused by demolition.

Therefore we should require prior approval of this demolition, and to enable us to control the manner of demolition, we need to be provided with the surveys and assessments that the Applicant has referred to, together with more detailed compensatory measures for the loss of a bat roost.

Matt