

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 25 August 2026 16:17
To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>
Subject: RE: 26/0410 - 8 East Wat Road, Alexandra Docks.

Hello Grant,

A Preliminary Ecological Appraisal (PEA) report dated March 2026 has been submitted in support of this application. The PEA report contains numerous errors, but I broadly support its conclusions that any vegetation clearance will need to consider impacts upon reptiles and nesting birds, and that a roost assessment is needed for bats. I have commented on the Preliminary Roost Assessment as below, and in general I support the recommendations set out in Section 6 of the PEA report. Their implementation should be secured by planning condition if consent is granted.

The concerns I have with the PEA report are as follows:

- There are frequent reference in the document to 'NERC' which is defined in the List of Abbreviations as the 'Natural Environment Research Council'. For example in Section 4.1.2, Table 2. This body has no relevance to an ecological report, so this is likely to be an error, and should instead be defined as the Natural Environment and Rural Communities Act 2006. However, the relevant section of the NERC Act 2006, which is Section 42, is repealed by Schedule 2 Part 9(3) of the Environment (Wales) Act 2016, so is no longer relevant.
- There is occasional reference to the Environment (Wales) Act 2016, but as above it is not made clear that Section 7 of this Act is the list of species and habitats which are of principal importance for the purpose of maintaining and enhancing biodiversity in Wales, and which are therefore the focus of our Section 6 Biodiversity Duty.
- References to the River Usk SSSI do not make it clear that the SSSI through Newport is the River Usk (Lower Usk) SSSI, which is separate from the Upper Usk SSSI
- Section 2.2.2 incorrectly refers to the 'Replacement Local Development Plan 2015', whereas in fact the original LDP was published in 2015, and the rLDP is currently being prepared.

- The 'Appendix D Target Notes and Phase 1 Habitat Map' is blank, and I can't see a Phase 1 habitat map in the filing. This map is a critical part of a PEA report.
- Appendix A incorrectly references PPW11, which of course has been superseded by PPW12.
- The requirement to apply the Stepwise Approach as set out in Section 6.4.11 of PPW12 has not been implemented in the PEA, and there is no reference to this in GI Statement
- The DECCA approach to ecosystem resilience as required by Section 6.4.5 of PPW12 has not been applied, nor is it referred to throughout.

The Green Infrastructure Statement is limited in that it does not explain how any sustainable drainage features have been incorporated into the green infrastructure of the site, nor does it set out how the stepwise approach has been demonstrated, in accordance with 6.2.12 of PPW12. However, provided the landscaping design is acceptable to our Landscaping Advisors, I can see that features of value for biodiversity have been included in the planting plan so would not have grounds to object to the GI Statement. Section 3.1.2 refers to a length of overmature cherry laurel hedging along the northeastern boundary, but this is a conifer hedge, possibly Leylandii, not cherry laurel. Neither of these species is of particular value for biodiversity, but retention of the outgrown hedge would at least provide shelter for birds, for example.

A Preliminary Roost Assessment for bats dated July 2025 has been submitted with this application, and I support the methodology and conclusions of that report. No bats were detected, and the buildings on site had a low to negligible bat roost potential. Therefore I agree that no further survey work is required, but a number of precautionary mitigation measures are proposed in sections 4.3.3 to 4.3.5 inclusive. The implementation of these measures should be secured by planning condition.

A shadow Habitats Regulations Assessment (sHRA) has been provided, and although there are some errors, my advice is that we adopt this sHRA as our own, for the purposes of our statutory duty under Regulation 63 of the Habitats Regulations. I broadly support the conclusion that the proposed project is not likely to have a significant effect upon the National Sites Network, and provided the Applicant adheres to standard industry-wide best practice measures and pollution prevention guidelines, then NRW support this conclusion in their response of 18th

June. As the need for an Appropriate Assessment has not been identified, there is no requirement to re-consult NRW on the HRA.

Matt