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Sent: 09 October 2026 16:47
To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 26/0776

Hello Grant, .

I see that the bat survey report hasn't been submitted yet, and the Bat Covering Letter October 2026 states that a *'second dusk emergence survey will be required to further categorise the roost, with this being undertaken within the coming week or two, and the information gained from both surveys will be used to support an EPS application to be submitted to NRW which will be required to facilitate the demolition.... A full PRA and Activity Survey report outlining the above in further detail will also be issued upon completion of the second dusk emergence survey.'*

I would be happy to comment on this activity survey report when it is submitted. However I do have a concern in that the first dusk emergence survey took place in September 2026. The covering letter was dated 2nd October, so if a second emergence survey were to take place, it might well be outside the normal bat survey season. The problem with this is that I have had cases where previously-known maternity roosts have not been detected during emergence surveys in September, because they young had weaned and the roost had broken up by then. Therefore, if emergence surveys produced a negative result in September / October, it casts doubt on any conclusion that the buildings did not support a maternity roost in the May to August breeding season. I can advise further on this when the report is provided.

The Demolition Management Statement from October 2026 lists the potential impacts upon the nearby River Usk SAC. It goes on to set out a series of mitigation measures to counteract these potential impacts. The issue is that as part of a Habitats Regulations Assessment in relation to the National Sites Network, mitigation measures can only be considered at the second, Appropriate Assessment stage. This involves producing a formal AA, and we are obliged to consult NRW allowing them reasonable time to respond.

In my view, the proposed demolition is not likely to have a significant effect on the River Usk SAC because any noise, vibration, dust or surface-water run-off caused by the demolition will be insignificant compared to the existing heavy industrial land use

and active port. Therefore these mitigation measures, which are generic environmental protection measures that we would expect to be implemented anyway, are not necessary for the HRA. If we record a 'no likely significant effect' conclusion, we are not obliged to consult NRW.

Matt