

GWENT FARMERS' COMMUNITY SOLAR PARTNERSHIP LIMITED

Company number 08591067

Prif Swyddog Cynllunio

Tîm yr Dwyrain

Adfywio a Datblygu Economaidd

Cyngor Dinas Casnewydd

Principal Planning Officer

East Team

Regeneration and Economic Development

Newport City Council

Sent by email to Geraint.roberts@newport.gov.uk

15 May 2026

Dear Geraint,

RE: Further discharge of condition 14 (ecological monitoring and contingency) of permission 18/1201 (large solar farm) in relation to year 5 monitoring

Thank you for your letter dated 22 April 2026 in response to the submitted *Ecological Monitoring Report - Year 5*, provided in support of the discharge of Condition 14.

Following receipt of Natural Resources Wales's (NRW) comments, an updated version of the Year 5 Monitoring Report (Revision 3, dated 15 May 2026) has been prepared by GE Consulting. This revision provides clarification, and additional context where requested. It further demonstrates how the monitoring evidence is being used to inform adaptive management across the site.

Our response to the key points raised are set out below.

Shrill Carder Bee (SCB) - Habitat Monitoring and Management

- We acknowledge NRW's request for clearer reporting of habitat condition and management across the mitigation fields. The updated report now includes Table 6.2, that clearly distinguishes between habitat condition, management inputs and outcomes.
- Habitat surveying was conducted following the Joint Nature Conservation Committee's Phase 1 Habitat Survey Methodology, consistent with previous years to maintain comparability of results. We will consider incorporating fixed quadrat monitoring in future surveys to provide a more robust, repeatable approach to tracking the establishment and composition of flora over time.
- NRW's observation that a proportion of foraging activity was associated with thistle and buttercup is noted. While this may indicate that the full floristic diversity envisaged in the LEMP has not yet been established, the current sward is demonstrably supporting the target species, with shrill carder bee (*Bombus sylvarum*) actively utilising available forage resources. This aligns with the primary short-term objective (≤ 5 years) of establishing late flowering grassland suitable for this qualifying species. The presence of preferred forage species, including thistle, can represent an important early-stage resource within developing grassland systems.
- The Monitoring and Contingency Plan includes a measure to re-seed where wildflower establishment falls below 60% of the sown mix composition. However, this trigger is intended to address functional failure of habitat establishment. In this case, the habitat is meeting its intended ecological function by supporting the target species and therefore does not indicate failure of establishment at this stage. Continued monitoring will be undertaken to track floristic diversification over time, with adaptive management applied as necessary to enhance species composition where appropriate.
- The missed Autumn 2024 hay cut in one field, and the need for clear reporting of both successes and shortcomings are acknowledged. As set out in the letter to NCC dated 1 August 2025, the omission of the hay cut was identified and reported. While this initially appeared to influence sward structure during the May 2025 site visit, it is noted that early-season conditions (when little is in flower) can accentuate perceptions of reduced diversity. Subsequent surveys later in the season indicated that the missed cut in this isolated field did not adversely affect ecological function within the SCB area. On the contrary, monitoring recorded

strong SCB activity and sufficient availability of key forage plants, suggesting that the absence of cutting may have maintained or enhanced resources for the species in that season. In this context, the outcome has been considered alongside the management approach set out in the LEMP. It indicates that a more varied sward structure, including areas of reduced cutting, may support important forage species such as thistle and knapweed and better reflect the ecological requirements of SCB. This will be considered further within the revised LEMP to determine whether incorporating a more mosaic-based management approach would provide additional ecological benefit.

SCB - Monitoring of Abundance

- The errors in the Invertebrate report have been noted and will be updated in due course.
- Adaptive management objectives within the solar array fields have been incorporated into the revised LEMP to support the creation and maintenance of a moderate level of plant species diversity and structural variation. The development of a mosaic sward structure is intended to maximise the ecological value of the grassland including benefit species such as the shrill carder bee.

Survey Access:

- NRW attended the first of three invertebrate survey visits undertaken in August 2025, during which access to part of the core survey area was temporarily restricted. Full access was subsequently available for the remaining two survey days, and the survey was completed with adequate spatial coverage to ensure the results remain robust and comparable. Notwithstanding this, NRW's concern regarding access constraints is acknowledged. Measures will be put in place to strengthen coordination and access arrangements with the O&M provider for future surveys, ensuring that full and timely access is secured to support comprehensive survey coverage where required.

Grazing on site:

- The report recommends that grazing and mowing are temporarily halted or reduced during peak flowering; this approach has also been incorporated into the revised LEMP.
- Under the grazing licenses currently in place, licensees must adhere to the recommendations set out in the Biodiversity Plan. Compliance will be enforced through direct communication with landowners and graziers to

ensure that management is undertaken in line with the revised LEMP. Where required, stocking levels and data can also be obtained from graziers to support monitoring.

Terrestrial Ornithology:

- Additional actions are proposed for 2026, including grip reinstatement works. Applications for SSSI and Land Drainage Consents in the lapwing mitigation area were submitted on 05 May 2026.
- The report has been amended to update the legislative references in line with The Environment (Principles, Governance and Biodiversity Targets) (Wales) Act 2026 in section 4.4 and 5.12 and Appendix 4.
- Survey methods have been addressed by clarifying that the methodology used remains consistent with previous years, supporting comparability of results over time, and continues to represent a valid and widely accepted method for the purpose of monitoring trends on site. Whilst newer guidance exists, the method used remains valid and accepted. The report has been updated in section 4.4. to provide appropriate justification for the continued use of this method, including its limitations and suitability. Future surveys will be kept under review to ensure alignment with evolving best practice, with methodological updates incorporated where they would provide demonstrable benefit to data quality and interpretation.

Reens, Otters and Water Voles:

- Survey coverage has been clarified through amendments to the riparian mammal mapping. Figure 5 has been updated to clearly distinguish surveyed and non-surveyed reens and ditches, including baseline (2017) and 2025 water vole data.
- A Ditch Management Schedule has been included in the revised LEMP, sent to Newport City Council on 31 March 2026.
- NRW's observation regarding early delays and condition of reen management is acknowledged. Initial timing of casting works was influenced by the programme for construction completion, which delayed the ability to mobilise coordinated ditch management across the site. Throughout 2023, there was extensive correspondence with NRW to agree an appropriate and practicable management approach, reflecting both site constraints and the ecological sensitivity of the Gwent Levels reen network. Following this engagement, a structured management schedule was agreed, including an 8-year rotational programme. Implementation commenced in 2024 with the first rotation of works. Delivery has

since progressed in accordance with this agreed approach, with works in 2025 including de-silting of reens (1–12 December 2025), bank and buffer clearance (15–19 September 2025), and cultivation of arisings (7–19 September 2025), with all operations recorded. Monitoring indicates that this managed approach is delivering positive outcomes, with reens now in improved condition, supporting well-developed submerged, floating and emergent vegetation, alongside a diverse aquatic invertebrate assemblage. Notably, surveys recorded a strong breeding population of great silver water beetle, and four of the six key invertebrate species present prior to works were recorded again in 2025. In this context, while early challenges were encountered during the transition from construction to operational management, ditch management is now established, fully agreed and aligned with NRW through an agreed long-term programme, and demonstrably delivering the intended ecological function within this nationally important wetland system.

- With regard to the artificial otter holts, these have not been implemented to date. It is acknowledged that the original LEMP recommended two artificial otter holts as a biodiversity enhancement measure; however, at the time of LEMP approval and subsequent site assessments, no suitable locations were identified and there was limited evidence of otter activity on site to support a meaningful enhancement. Monitoring in 2025 has since recorded increased otter activity, including confirmation of spraint within Solar Array Area 3, indicating a change in baseline conditions. This is likely to reflect, at least in part, the continued management and improvement of the reen network across the site, enhancing its suitability for otter use. In light of this, the provision of artificial holts is now being reviewed to ensure delivery of a targeted and ecologically meaningful enhancement.

Protected Species – Dormice and Hedgerows:

- The report has been updated to include a new hedgerow figure (Figure 1b) which clearly identifies surveyed and non-surveyed sections of hedgerows.
- Hedgerow removal was completed prior to monitoring, and it is anticipated that no further removal will take place. This has been clarified within section 5.4.3. Current management is to rotationally cut hedges to maintain height and shape, outside of the bird nesting season.
- The revised LEMP will be updated to refine hedgerow management prescriptions to account for breeding birds and dormice.

LEMP Revision:

- Monitoring data collected from the first five years has been used to inform the revised LEMP, introducing clear, more targeted and measurable management and adaptive triggers.
- Reen management works are recognised as having the potential to affect water vole, a fully protected species under the Wildlife and Countryside Act 1981 (as amended), including protection of individuals and their places of shelter or protection. Works are therefore undertaken in accordance with Best Practice Guidance (BPG) and a precautionary approach, incorporating pre-works checks, ecological supervision where appropriate, and adherence to seasonal constraints to avoid sensitive periods such as breeding. Measures are applied to avoid disturbance, displacement, or damage to burrows, including maintaining refuge areas, phased working, and limiting the extent and timing of vegetation clearance. Through the application of these safeguards, works are designed to avoid effects that would otherwise trigger the need for licensed activities. This approach aligns with established good practice for managing drainage features within ecologically sensitive landscapes such as the Gwent Levels.

The updated Year 5 Monitoring Report provides a clearer, evidence based and professionally interpreted account of the ecological outcomes at Llanwern Solar Farm. The data in the report demonstrates positive and improving trends under the adaptive management.

We trust that the revisions address and clarify NRW's points and we welcome further discussion during our site meetings to agree a way towards the discharge of Condition 14.

Yours sincerely,

DocuSigned by:



Enrico Corazza

SPV Director