

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 18 June 2025 11:15
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0333

Hello Geraint,

I note the Preliminary Ecological Assessment and draft Habitats Regulations Assessment submitted with this application, and in general I support the methodology and conclusions of those documents. I note also that NRW have accepted the findings of the draft HRA, subject to imposition of a CEMP condition, so we should adopt the draft HRA as our own for the purposes of our duties under section 63(1) of the Habitats Regulations.

The only remaining concern I have is that very little is proposed in terms of net benefit for biodiversity. There are references to the use of soft landscaping to provide new habitat, but Section 4.4.1 of the PEA states '*Site enhancements for bats and birds may also be incorporated into the development, this could include the use of bat blocks that are integrated into the block or brickwork of the new development. Bat blocks should be positioned at least 4m from ground level and away from artificial light sources. Bat and bird boxes could also be utilised on the proposed building structures and trees proposed for planting to offer further potential for bat roosting species and nesting birds.*'

This vague reference is not sufficient to demonstrate a measurable gain in the value of the site for biodiversity. I would not object to the use of bat boxes or bat bricks *per se*, but in this location swift bricks are more likely to be successful in supporting protected species. Swift populations in Britain declined by 66% between 1995 and 2022, and large urban centres such as Newport, where Swifts return to breed every year, are important breeding sites for this species.

Therefore in order to support this priority species for Newport, and to demonstrate net benefit for biodiversity in accordance with PPW12, Swift Bricks should be incorporated into the design of the development in suitable locations. My preference is for the [Universal Swift Brick](#) situated in locations where there is no window immediately below. A reasonable provision would be a total of eight such bricks spread between the northeastern and northwestern elevations of this building.

Matt

-----Original Message-----

From: planning@newport.gov.uk <planning@newport.gov.uk>
Sent: 06 May 2025 10:47
To: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Subject: Planning Consultation Request for case ref: 25/0333

Dear Head Of City Services

Please find attached correspondence from Newport Council with regards to the above planning application submitted on 30 April 2025.

Your sincerely
Development Management