

From: Rob Booth <rob.booth@dwd-ltd.co.uk>

Sent: 18 March 2026 09:30

To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>

Subject: RE: 25/1071 - Land in the vicinity of Dyffryn Lane (Major) V2 - NRW
Response NRW:06552743

Hi Grant,

As discussed, please see bullet point responses in relation to Natural Resources Wales' ecology comments made to Newport City Council, with reference CAS-298001-N0G2.

Response to Natural Resources Wales' Ecology Comments

Vegetation Clearance

- *It is acknowledged that vegetation clearance would not be licenced between June and August.*
- *The anticipated approach would be for a single stage (i.e. clearance undertaken in the active season), two phased cut (i.e. cut once, fingertip searched, then cut to ground) whilst under strict ecological supervision by an Ecological Clerk of Works. We note that this an advised / accepted approach by Natural Resources Wales*

Compensation Planting

- *Final locations of scrub planting and associated planting palette would be discussed with and agreed to by Matthew Harris, following confirmation from the Newport City Council highways team.*

Habitat Creation Proposals

- *Given the scale and nature of the proposed development (linear infrastructure within a relatively disturbed environment) and the type and condition of habitats to be permanently lost (bramble dominated scrub growing over made ground), it is considered that the proposed habitat creation measures are sufficient. At present, 0.24 ha of new scrub would be planted, 0.02 ha of recently felled woodland would be restored, and 0.42 ha of restored scattered and dense scrub has been proposed to compensate for the permanent loss of 0.31 ha.*
- *Given that bramble is a rapid coloniser, it is predicted that it will recolonise areas alongside the woodland and within HDD areas in the short-term (i.e. less than 2 years). Whilst its growth would be managed to enable the success of proposed new scrub planting (specifically woodland tree / shrub species), its recolonisation would provide a mosaic to newly planted woodland tree species.*

- *There is currently no national or local policy that states compensatory habitat for hazel dormouse must be delivered at a 2:1 ratio. As per the Dormouse Mitigation Guidelines, at least an equivalent area of planting compared to habitat lost is recommended to demonstrate no detriment to Favourable Conservation Status (FCS) of the population. Given that the proposed measures would deliver a net increase in optimal habitat in the medium to long-term (0.68 ha), it is predicted that the current proposals would maintain the FCS of the local hazel dormouse population, with carrying capacity increased in the long-term. It should also be noted that the predicted loss is an estimated worst case, with actual clearance likely to be less than estimated.*
- *To re-iterate, scrub habitat along the edge of the highway and wider Imperial Park (within the application boundary) has been assessed as being in unfavourable condition. The sections of scrub habitat further south/south east (beyond the woodland) have been subject to anthropogenic disturbance and smothered by invasive non-native species (Virginia creeper, Cotoneaster sp.). The scrub in this area is relatively species-poor and is fragmented. The enhancement would seek to reconnect the scrub from the edge of the highway into the woodland, improving structural and species diversity through interplanting and control of undesirable species (specifically invasives and other non-native species). Additionally, tall herbs such as dense stands of rosebay willowherb (not typically associated with the nesting preferences of hazel dormouse) would be controlled, and selected native tree species (to be agreed as part of a finalised planting palette) would be introduced and managed accordingly. The increase in connectivity and enhancement in condition and species diversity would therefore increase the carrying capacity of the habitat (as per criteria in the Dormouse Mitigation Guidelines)*

Dormouse Conservation Strategy

- *The Dormouse Conservation Strategy was intended to be an outline document, with elements anticipated to undergo changes following consultation with stakeholders. On this basis, the language used in the document was appropriate to the stage in the planning application process. A final version of the Dormouse Conservation Strategy will be prepared either as a standalone document following successful planning consent (secured by a condition) or embedded in a detailed Landscape and Ecological Management Plan, Biodiversity Strategy or similar (to be confirmed by Newport City Council). In any case, a licence application issued to Natural Resources Wales will be completed with an appropriate method statement and will include the necessary (and agreed) measures to be enforced during construction works.*

Please let me know if you have any queries or questions.

Kind regards,

Rob

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