

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 13 May 2025 13:44:09 UTC+01:00
To: "Foote, Adam (Principal Planning Officer)" <Adam.Foote@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0328

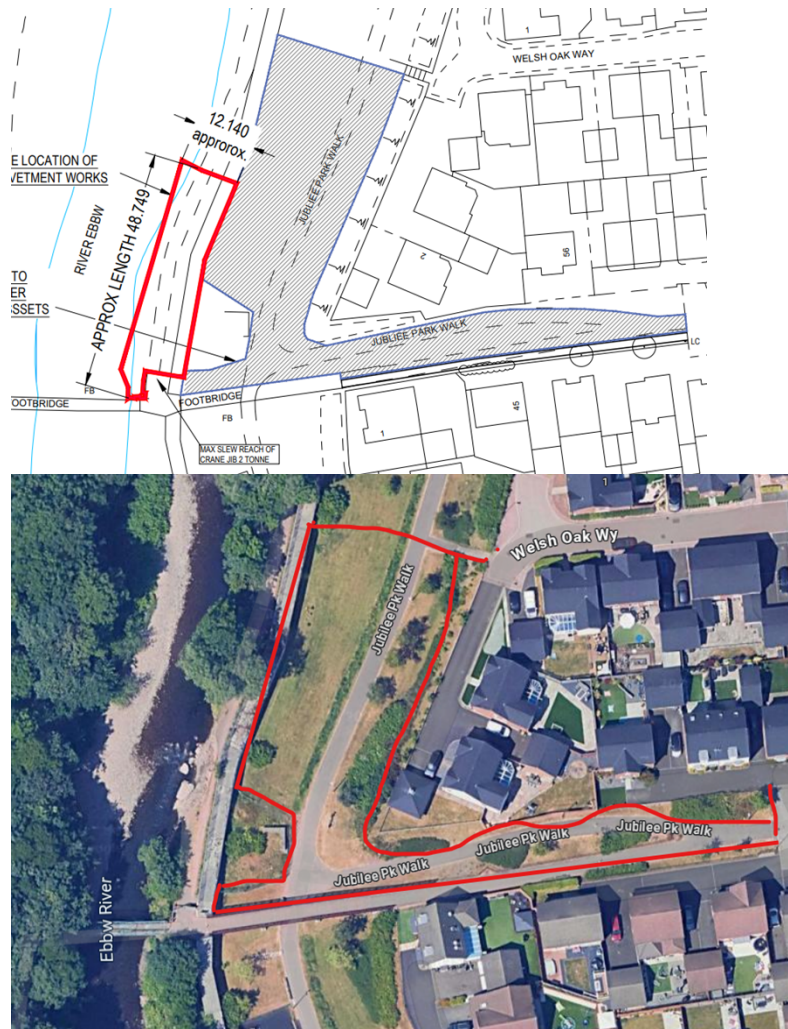
Hello Adam,

In general I support the PEA and Green Infrastructure Statement submitted with this application, but I have some concerns over the access to the site, the laying-down area, the habitats surveyed, and the ecological enhancement measures.

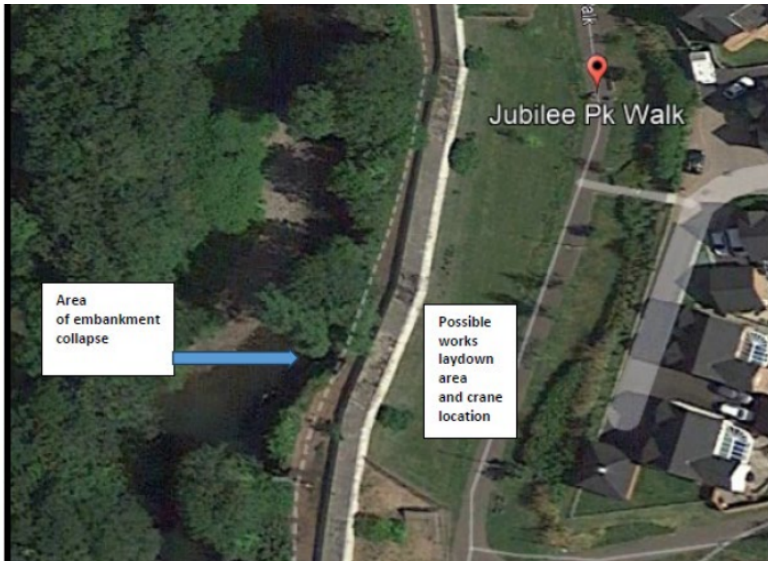
The Planning Statement advises that 2-tonne Aquarock bags will be filled on site and deposited in the eroded area. This will involve use of heavy plant, and I am not satisfied that the implications of access for this plant and materials has been adequately considered in terms of its impact upon the natural environment. For example, Section 6.1 Pre-construction Works of the Outline Method Statement refers to *'Use of existing access tracks where possible'*. Section 3.19 of the Planning Statement also sets out that *'Access to the site area will be via Jubilee Park Walk with possible limited access for plant via the welfare ground.'* Section 5.0 of the Preliminary Ecological Appraisal explains that the works will include: *'Access of vehicles, machinery, equipment and materials via either the footpath from the recreation grounds to the north or via the housing estate to the east.'*

Therefore it is clear that we do not have a defined access route, nor do we know whether the access will result in lost of habitat or need for works to trees to allow cranes etc to access the site.

The Laying-down Area is illustrated in diagram 17957/100 r07, and equates roughly to the red line I have sketched on an aerial image of the site below.

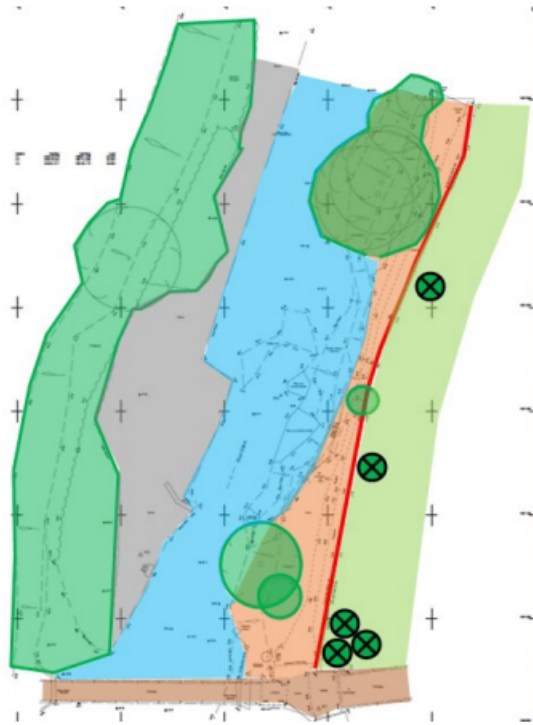


It is clear that this area supports some vegetation, but I am not satisfied that the PEA has adequately considered the impacts on the habitats in this laydown area. The vegetation may consist of formal, recently-planted ornamental plants associated with the Jubilee Park development, but this is not evident from the PEA. For example, although the Introduction to the PEA makes broad reference to the laydown area, its habitats are not mapped in the Survey Results Plan. The aerial image from the Introduction, and the Survey Results Plan, are shown below.



Survey Results Plan:

See numbered habitat descriptions above.

**KEY**

-  Open water
-  Bank top, footpath and collapsed bank
-  Broadleaved woodland and trees with stands of Japanese Knotweed
-  Pebble beach
-  Bridge and access
-  Amenity grassland
-  Scrub and rough grassland
-  Flood protection wall

Therefore I am not satisfied that the impact of the laying-down area upon the existing habitats has been properly considered.

An assessment of the impacts of plant access and the laying-down area, along with that of the works to the embankment itself, will guide the mitigation, compensation and ecological enhancement that is required. In terms of what is proposed already in the PEA, notwithstanding my comments above, in general I support the mitigation, compensation and enhancement measures proposed. The only concern I have is that more effort could have been made to relate the enhancement measures to the riverine habitats that are affected by the proposed works. For example, could the bird nest boxes be

tailored to support dippers or kingfishers which use this section of the river, or is there scope to incorporate an artificial otter holt or some dense thorny planting to provide an otter laying-up area on a site which will eventually be accessed by dog walkers? The proposed tree planting, bird and bat boxes, and wildflower seed mix are all to be welcomed but these are generic measures which do not relate to the river corridor habitats affected.

Therefore we should ask for a revised PEA which considers the impacts of the likely access route for plant, the impact on the habitats in the laying-down area, and which relates the ecological enhancement more closely to the habitats affected by all of the works proposed.

Matt Harris
Ecology Officer

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

From: Foote, Adam (Principal Planning Officer) <Adam.Foote@newport.gov.uk>
Sent: 08 May 2025 12:50
To: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0328

Hi Matt

There is a PEA on file for this application - if you cant access it please let me know and I can send it over to you.

Thanks

Adam

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

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 08 May 2025 12:38
To: Foote, Adam (Principal Planning Officer) <Adam.Foote@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0328

Hello Adam, this application should be supported by a Preliminary Ecological Appraisal to assess the habitats on site, the protected species they may support, and indicate any further ecological surveys needed. It is likely that the PEA will need to consider impacts upon Otters, a European Protected Species which is known to inhabit this area, as well as fish in the River Ebbw SINC and nesting birds, including riverine species such as Kingfishers and Sand Martins.

I would be happy to comment on a PEA report in due course.

Matt

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

From: planning@newport.gov.uk <planning@newport.gov.uk>
Sent: 06 May 2025 17:01
To: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>

Subject: Planning Consultation Request for case ref: 25/0328

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