

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 23 May 2022 20:01
To: Parkhouse, Gail (Principal Planning Officer) <Gail.Parkhouse@newport.gov.uk>
Cc: Carle, Shona (Trees and Woodlands Officer) <Shona.Carle@newport.gov.uk>
Subject: RE: Planning consultation 22/0341 The Long House, Coedkernew

Hello Gail,

This outline application is supported by a Preliminary Ecological Appraisal (PEA), and I support the methodology and conclusions of that document.

My understanding from the documents provided is that none of the trees surrounding the site are to be affected by the proposed development, and that the only tree to be removed is a small pear tree (T2). Thus being the case, I would have no concerns about impacts of the proposed scheme upon protected species which use these trees, such as bats, nesting birds or dormice.

Similarly, I accept that the 'garden' habitats on site are likely to be of low ecological value, so would not advocate further surveys.

I accept that the structures and part of the building which are to be removed have negligible bat roost potential, so I agree that further bat surveys are not justified on this occasion. We should attach the Bat Advisory Note as below to any consent granted, in order to take account of any low potential that bats may be present.

Any Sustainable Drainage System (SuDS) should confirm to the Statutory Standards for Wales, and one of the six standards is the protection and enhancement of biodiversity. Therefore any SuDS system should demonstrate how this has been achieved.

Enhancements

A statutory duty as set out in section 6 of the Environment (Wales) Act 2016 has been introduced which requires public bodies such as Newport Council to seek to maintain and enhance biodiversity, and in doing so to promote the resilience of ecosystems, in the exercise of their functions.

In his letter to Heads of Planning of 23/10/19, the Chief Planner emphasised this point with the following:-

'Planning Policy Wales (PPW) 10 sets out that "planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity" (para 6.4.5 refers).'

Any application should demonstrate how this will be the case, and section 5.5 / Appendix V of the PEA make reference to this.

In terms of specific enhancement features, nesting or roosting opportunities for birds and bats should be incorporated into new build in accordance with the advice given in 'Designing for Biodiversity: A Technical Guide for New and Existing Buildings, Second Edition. RIBA Publishing, London. Gunnell, K. et al., 2013', or most recent subsequent edition thereof. More specific details of appropriate levels of provision of nesting/roosting opportunities are given in the TCPA's 'Biodiversity Positive: Eco-towns

Biodiversity Worksheet 2009'. With these documents in mind, I would say that an appropriate level of enhancement provision across the whole of this development would be:-

- 2 x bat boxes for crevice-dwelling bats, and
- 2x Swift / Universal nest boxes.

The applicant's ecologist can advise on the make and model and suitable positioning of these features. Bat / bird boxes such as these are readily available commercially, are inexpensive, and can be tailored to the style and colour of the finish of the buildings. Features which are integrated into the buildings rather than attached to the outside are preferable as they are more secure in the long-term and less prone to interference by the public.

The implementation of these measures should be secured by planning condition along with a series of other mitigation measures set out in the PEA, for example in relation to nesting birds (5.7), Hedgehogs (5.11) and lighting (5.15 and Appendix VI).

Matt Harris
Ecology Officer

Bat Advisory Note

Bats often roost in houses and other buildings, and work on these buildings may disturb a bat roost. All bats and their roosts are protected against disturbance under UK and European legislation. If works are planned on a building in which bats are roosting, Natural Resources Wales (NRW) must be contacted for advice.

If work has already commenced and bats are found, or if any evidence that bats are using the site as a roost is found, work should cease and NRW should be contacted immediately.

Where there is a likelihood that bats are present, or where bats are found to be present, a suitably qualified and experienced ecological consultant should be contracted to provide an assessment of the impact of the proposed works, and undertake bat surveys if necessary.

Where bats or their roosts are present, no works of site clearance, demolition or construction should take place unless a licence to disturb these species and/or their roosts has been granted in accordance with the relevant legislation. Otherwise, a prosecution may result in a fine and/or imprisonment.

NRW can be contacted at:-
Natural Resources Wales, Tŷ Cambria, 29 Newport Road, Newport CF24 0TP, 0300 065 3000

Bat Conservation Trust can be contacted at:-
5th Floor, Quadrant House, 250 Kennington Lane, London, SE11 5DR, 0845 1300228