



MEMO

TO	Newport City Council
FROM	Environmental Resources Management Ltd
DATE	24/04/2025
REFERENCE	24/0006
SUBJECT	S73 - Ecology / Biodiversity Net Gain (BNG) Update

RE: 24/0006 | DEMOLITION OF REMAINDER OF EXISTING PRINCIPAL BUILDING AND REMAINING STRUCTURES AND CONSTRUCTION OF NEW DATACENTRE (USE CLASS B8) ACROSS TWO MAIN BUILDINGS PLUS ANCILLARY STRUCTURES AND OTHER ASSOCIATED WORKS | QUINN RADIATORS CELTIC WAY CELTIC LAKES NEWPORT NP10 8FS

A Biodiversity Net Gain (BNG) Report was undertaken for the planning application 24/0006, submitted January 2024, and granted with conditions July 2024. This report was based on the findings of an Extended Phase 1 Habitat Survey undertaken in May 2023 and plans submitted by the developer, outlining the proposed post-development habitat creation at the site. It illustrated how the Proposed Development can achieve Net Benefits for Biodiversity (NBB).

Following completion of a SAB (SuDS, Sustainable Drainage, Approval Body) application, minor modifications have been made necessary to the landscaping in terms of onsite infiltration and drainage design. The updated plans include a revised Landscape Planting Plan (LPP) and Landscape Materialisation Plan (LMP). Using these plans, biodiversity units were re-calculated to reflect the updated post-development habitat creation.

TABLE 1 QUANTIFIABLE CHANGE IN BIODIVERSITY UNITS ACHIEVED BY THE DEVELOPMENT

Biodiversity Units	Baseline Value	Post-Development Value (2023 Plans)	Post-Development Value (Updated 2025 Plans)	Change in Units from Baseline (2025 Update)	Overall Outcome
Area-based Habitat Units	12.20	42.69	37.01	+24.81	204.04%
Hedgerow Units	0.40	2.88	4.22	+3.82	953.78%

Table 1 illustrates how the latest revisions to the landscape planning and planting schedules have impacted the overall post-development biodiversity units on the site. In 2023, post-development area-based habitat units had been calculated to be 42.69, representing a 250.61% increase on the baseline units. Based on the revised 2025 plans, this figure has fallen to 37.01 which nonetheless represents a 204.04% increase on the baseline. This change in post-development units can be attributed to a slight increase in hardstanding surfaces, as well as slight decreases to grassland, woodland and scrub habitat areas when compared to the 2023 plans. 2023 post-development hedgerow units were calculated to be 2.88, representing a

620.86% increase on the baseline units. Additional hedgerow planting highlighted in the revised 2025 plans means this figure has increased to 4.22, representing a 953.78% increase on the baseline.

Planning Policy Wales instructs planning authorities to take account of and promote ecosystem resilience, particularly the five attributes of ecosystem services (DECCA): Diversity, Extent, Condition, Connectivity and Aspects of ecosystem resilience (adaptability, recovery and resistance).

The BNG figures stated above have been calculated using the Natural England metric¹ which is not used under existing Welsh legislation. However, it is nonetheless a useful tool to quantify gains in biodiversity and therefore help illustrate how the Proposed Development can achieve NBB and the minor changes in the landscaping plan. The updated BNG figures illustrate that the design of the Proposed Development continues to adhere closely to Section 6 of the Environmental (Wales) Act 2016, seeking to both “*maintain and enhance biodiversity*” and “*promote the resilience of ecosystems*”². Furthermore, the Proposed Development continues to meet the biodiversity objectives set out by The Future Wales National Plan³, The Nature Recovery Action Plan for Wales 2020-2021⁴, and Newport City Council⁵.

The proposed planting of hedgerows, scrub, trees, and grassland will provide wildlife corridors between the areas of habitat adjacent to the site and create a buffer between the site and the surrounding commercial developments.

The SAB approval process has led to a significant increase in the area onsite devoted to SuDS, through wet swales on the southern and western boundaries. While this is necessary to secure sufficient infiltration and drainage, it also greatly benefits local biodiversity through connection to the surrounding landscape, particularly the Gwent Levels SSSI, designated for its water habitats. This ensures a larger area of unfragmented habitat for various species. Sustainable drainage creates additional diversity through aquatic environments, creating an ecologically diverse landscape and maximising biodiversity value.

ERM’s 2023 Biodiversity Net Gain Report summarised “the Proposed Development will secure measurable biodiversity net gain, providing greater ecological value and species diversity across the whole of the Site, which broadly accords with national planning policy as set out in Section 6 of the Environment (Wales) Act 2016 and local planning policy”. It is our professional opinion that this statement is applicable to the 2025 plans.

The Landscape and Ecological Management Plan (LEMP) submitted as part of the conditions for the Application, provides operational guidance for the management and maintenance of the landscape and ecological mitigation proposed and ensures that ecological enhancements and BNG commitments are achieved.

¹ <https://publications.naturalengland.org.uk/publication/6049804846366720>

² CIEEM (2022). Welsh Government’s Approach to Net Benefits for Biodiversity and the DECCA Framework in the Terrestrial Planning System, Available online at: <https://cieem.net/wp-content/uploads/2022/08/Net-Benefits-briefing.pdf>

³ Welsh Government (2021) Future Wales: The National Plan 2040. Available online at: <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

⁴ Welsh Government (2020) The Nature Recovery Action Plan for Wales 2020-2021. Available online at: <https://www.gov.wales/sites/default/files/publications/2020-10/nature-recovery-action-plan-wales-2020-2021.pdf>

⁵ Newport City Council (2023) Biodiversity action plan. Available online at: <https://www.newport.gov.uk/en/Leisure-Tourism/Countryside--Parks/Biodiversity/Biodiversity-action-plan.aspx>