



Geraint N Roberts
Planning Department
Newport City Council
Civic Centre
Newport
NP20 4UR

15 April 2025

By email only to:
planning@newport.gov.uk

Your ref: CONNEX/ 25/0237

Dear Mr Roberts

Proposal: Further Partial Discharge of Condition 14 (Ecological Monitoring & Contingency) of Planning Permission 18/1201 for Erection of a Renewable Energy Hub (49.9mw) and Associated Infrastructure and Landscaping in Relation to Year 4
Site: Great Newra Farm, Chapel Road, Goldcliff, Newport, South Wales
Application Type: Discharge Conditions

Thank you for consulting RSPB Cymru regarding the above consultation on the discharge of conditions.

The applicant has produced a comprehensive monitoring and review document. However, there are major shortfalls in addressing the impacts of the solar farm development on the local breeding population of lapwing. We are most concerned about the lack of progress in establishing a functional Lapwing Mitigation Area – the scheme has not achieved the desired outcome of supporting breeding lapwing. It is vitally important the applicant takes further measures to rectify the situation.

We focus on the Lapwing Mitigation Area in our response and expand upon our concerns below with reference to relevant sections of Ecological Monitoring and Review Year 4.

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Noddwr/Patron: His Majesty The King **Llywydd/President:** Dr Amir Khan **Cyfarwyddwr, RSPB Cymru/Director, RSPB Cymru:** Alun Prichard.
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Lapwing Mitigation Area grassland condition

Section 5.2.2 *Survey Findings* summarises the condition of the grassland. It states that Management of the Lapwing Mitigation Area followed the LEMP recommendations. However, the sward height was reported to be too short in March and April, owing to overgrazing by sheep. This is unacceptable and contrary to commitments made by the applicant and should be rectified immediately.

The report identifies elements of the grazing regime which did not adhere to the LEMP recommendations, relating to stocking densities and timing of grazing. This is further expanded upon in Table 6: A review of the progress of management objectives at the end of Year 4 of Ecological Monitoring states:

".....the fields were over-stocked with ewes and lambs, not cattle as prescribed in the LEMP, resulting in the sward being too short at the beginning of the breeding season."

The above is in direct contravention of the stated aim of creating an extensively grazed pasture. Furthermore, the resultant very short sward would make any breeding attempts more vulnerable to predation due to the lack of cover.

Section 5.2.2 also considered the grassland to be too dry to support breeding lapwing.

Section 8.1.5 suggests wetting up parts of the area to address the above issue through raising the water table and thereby increasing soil invertebrate availability for lapwing to feed on, including lapwing chicks which are not able to fly in search of food at early stages.

Section 9 recommends additional measures to resolve the above issues that include a stricter regime for controlling stock densities and explorations as to how the sluice gate situated within the lapwing area could be manipulated to generate some areas of wetter ground that will favour lapwing.

We consider the above range of measures presented should be delivered as a minimum, would be helpful together with measures to exclude mammalian predators (which we will expand on below).

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Predator Fencing

We disagree with the reason/basis for not installing a predator exclusion fence as mentioned in 9 *Adaptive Management (contingencies and remedial actions)*, which states:

"..... Installing an electric fence around the Lapwing Mitigation Area as suggested in the LEMP is not considered necessary as there was no evidence of terrestrial predators preventing lapwing from using the site. The requirement for an electric fence can be reviewed once lapwing have attempted to nest."

The above reason for not installing a predator exclusion fence is highly illogical and not supported by any evidence presented in this submission. The applicant has not carried out any detailed monitoring of mammalian predators. Therefore, any conclusions that mammalian predators are not a factor are not based in fact and would need to be demonstrated with evidence if the applicant intends to deviate from their commitment to installing predator exclusion fencing as agreed in the original planning submission (detail set out below).

Evidence from other lapwing breeding sites indicates that mammalian predators are a key factor, hence why the RSPB as standard practice installs predator fencing on Lowland Wet Grassland managed on our reserves. Fenced off areas of good quality habitat have greater potential to attract/relocate breeding birds (due to presence of mammalian predators such as fox outside the fenced areas), not the other way around.

We consider the decision not to install a fence is a deviation from the LEMP and Lapwing Management Plan which stated that the fencing would be installed once initial hedgerow removal works had been completed, confirmed by the developer in *Gwent Levels Farmers' Community Solar Scheme - Ecology Address of NRW/RSPB Comments and Table of Changes to Ecological Reports December 2019* (attached).

Extract as follows:

"We have now secured a permanent electric predator fence as mentioned above which will be included in the Lapwing Management plan and LEMP Section 6.6.5 and Lapwing Management Plan Section 6. This will be erected once initial hedgerow removal works have been undertaken".

We consider the above recommendations to be essential for the lapwing mitigation plan to work, and as such we object to the application in its current form. We would be happy to discuss these issues with the applicant team.

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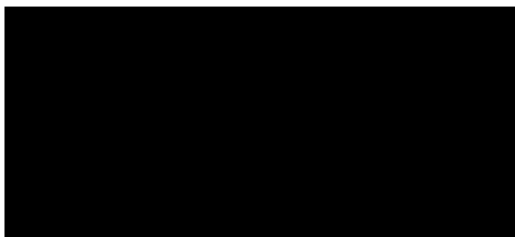


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We reserve the right to make further comments in future. If you require further information in relation to this matter, please do not hesitate to contact me.

Yours faithfully,



Simon Hugheston-Roberts
Conservation Officer (Casework)

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