

Ein cyf/Our ref: CAS-277493-Y6G8
Eich cyf/Your ref: 25/0237

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 20 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/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

LLEOLIAD/LOCATION: Great Newra Farm, Chapel Road, Goldcliff, Newport

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 25 March 2025.

We have concerns with the application as submitted. We do not recommend your Authority discharges condition 14 for the following reasons.

Condition 14 - Ecological Monitoring and Contingency

The mitigation provided for Lapwing and Shrill Carder Bee (SCB) is currently not meeting the objectives for this development. However, from a site meeting with the applicant in June 2024 and works that have been implemented following the meeting, we are aware that the applicant is working with advice from NRW to address the issues on site.

A review of progress was made at a meeting on 3 April 2025 and a site meeting on 1 May 2025. Discussions on next steps are now being undertaken with Wise and Next Energy following the meeting. Therefore, until this is received, we are unable to recommend the discharge of condition.

Ditch management

8 ditches were specified on the Ditch management plan for management in February 2025. We reviewed works at the site meeting and saw it had been undertaken to a suitable standard. At the meetings in April and May 2025, we discussed with the applicant that the sequence of ditch management may need to be altered or the number of ditches managed per year increased in order to complete the ditch management schedule sooner. It is currently specified as being over 8 years with year 8 being 2031 but a 7 year program from construction works commencing in 2020 should have enabled the Ditch management schedule to complete its first rotation in 2027.

Shrill carder bee fields/wildflower seed mix areas

8.1.1 states the SCB fields are making steady progress to achieving objectives. We do not agree with this statement, as the report states that wildflowers had established well in 2023 while in 2024 they were not evident.

At the site meeting on 1 May, it could be seen that the north three SCB fields in Area 2 were primarily grass with little wildflower growth. It was confirmed on site that the owner of the three fields had not undertaken a hay cut in September 2024 which is required for the appropriate management of the SCB fields. Wise energy is considering that after the 2025 hay cut, that the ground of the SCB fields in Area 2 is prepared again and wildflower reseeding undertaken.

We note in 5.1.2 that the thistles did not recover from the herbicide spraying undertaken without Site of Special Scientific Interest (SSSI) Consent in 2023. The loss of forage from the site and reduction in numbers of SCB is concerning. Pre construction there were 81 SCB found within the site in the pre-construction 2017 survey of which 75 were in Area 1.

The applicant has sent in notices of intent to request SSSI Consent for herbicide works within the site in 2025 which we have reviewed. We have requested further information from the applicant so we can assess the application fully.

5.3.2 states 'The Wildflower Seed Mix Area to the north-east of Array Area 2, was harrowed and over-seeded in late summer 2021 and had established well in 2023 with six species of grass and fifteen species of forbs identified in the sward, however during the 2024 surveys, it was reported that this area had been overgrazed and objectives are not been fully met due to the short sward and lack of species diversity within managed buffers.'

We seek clarification on what stock have been in the SCB fields in Area 1 and 2 recently in Autumn 2024/Spring 2025. We have not been able to establish why in 2023 it was reported 'north-east of Array Area 2, had established well in 2023 with six species of grass and fifteen species of forbs identified in the sward', but in June 2024 the SCB fields were dominated by grassland with no flowers evident. Information on when stock were grazing the SCB fields in Area 1 and 2 in 2023-2025 would also provide information for comparisons to be made.

The establishment of wildflowers in the SCB fields in Area 1 and 2 must be reviewed by the applicant in summer 2025. If wildflowers are not establishing at the mitigation fields, then this will trigger a need for contingency measures to be implemented to establish habitat for pollinators including the rare SCB feature in the Gwent Levels. We have previously advised the applicant, NRW's Grassland specialist reviewed the soil nutrient testing that was undertaken in the fields and advised phosphorus was high in the mitigation field in Area 1 so that field less likely to establish the wildflower seed without management to reduce nutrients. However, that was the area that was reseeded in Autumn 2024.

As stated in the 3 April meeting, NRW want to be made aware of when hay cutting of the SCB fields is proposed. In the meeting, the applicant specified balancing the conservation benefit of cutting later and benefit of the hay as animal feed when cut earlier. Delaying a hay cut until late September would support SCB provided flowering species have established in the mitigation fields in 2025.

Stock numbers on panelled fields

In 5.1.2 it is stated 'it was difficult to assess number of livestock units per hectare owing to blocked lines of sight from the panel arrays.' This was mentioned by the applicant at the 3 April meeting and also difficulty in the review of ewes and how many lambs in addition. In particular due to reduced SCB numbers at the site, assessing more robustly whether stocking levels are appropriate would be welcome.

Lapwing

We note that no stock will be present on the Lapwing fields in March-July. This was stated at the meeting on 3 April in order to give lapwing the best chance of breeding success.

We note in table 6, p15 that rush is being managed at 10-30%. The proposal to re wet the fields which is currently being explored will be challenging as it may lead to more rush growth. We advise that an SSSI consent request will be required for any herbicide works on rushes.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Gemma James

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.