

From: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Sent: 02 February 2026 17:36
To: Hawkins, Grant (Principal Planning Officer) <Grant.Hawkins@newport.gov.uk>
Cc: Baron, Richard (Arboricultural Officer) <Richard.Baron@newport.gov.uk>
Subject: RE: 25/1071

Hello Grant, I have comments on this application which are made without prejudice to any further comments that I may make in the light of any new information or of alterations to the plans as submitted. Where I have not made comment on a particular section of the Preliminary Ecological Appraisal (PEA) report, it should be assumed that I am in agreement with the text of that particular section.

The proposal entails clearance of scrub and construction of a trench along the western edge of the current highway. Firstly, I would ask what options have been explored for the cable route in this location? In accordance with the stepwise approach to ecosystem resilience, section 6.4.15 states that *'The first priority for planning authorities is to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning. Where there may be harmful environmental effects, planning authorities will need to be satisfied that any reasonable alternative sites (including alternative siting and design options) that would result in less harm, no harm or benefit have been fully considered.'* Do we have a rationale for why the cable route is set to the west of the highway and not further east where it would have less impact upon the scrub along the western edge?

Secondly, it is unclear whether the existing cabling route would impact on the trees or the root protection areas of the trees along the western edge of the highway. If our Tree Team advise that impacts upon the trees planted as a shelterbelt along this route are likely, then the planned ecological mitigation in respect of dormice, bats and nesting birds may need to be amended to take account of additional tree loss.

Section 4.1.3 of the PEA states that *'To avoid direct impacts, it is recommended that the cable trench above the culvert (of the Nant y Mor Reen) should be shallower, with cables laid laterally rather than stacked'*. I do not see that this is the case on the Imperial Park Cable Layout and Section Plan - 0596-BPS-XX-XX-DR-CBL-2001-S2-P03, as the nearest cross sections show the cables to be stacked. Therefore the recommendation in PEA section 4.1.3 should be reflected in the plans for the site.

Section 5.2.2 refers to the planting of hazel scrub in compensation for loss of scrub habitat. I would prefer to see a mixture of woodland edge or understorey species included in a mixed planting scheme, rather than a monoculture of hazel. Either way, the Applicant should provide assurance that this planting is compatible with any long-term aspirations that our Highways Team have for this road. For example, if the highway is brought back into use for the Celtic Lakes development, then will it be acceptable to have hazel and other woody vegetation planted right up to the edge of the kerb? If not, the strategy for compensation and enhancement will need to be amended.

In their response of 20th January, NRW have advised in relation to the SSSI that *'Some areas proposed for planting within the SSSI fall within marshy grassland and neutral grassland (as highlighted in figure 3 in the PEA). The shrill carder bee, a feature of the Gwent Levels SSSIs, has been recorded in these areas. We therefore advise that planting hazel within these habitats is avoided.'* I support the principle that compensatory planting for loss of scrub should not take place on existing grassland habitats. However, looking at the PEA and the figures submitted I cannot see any indication, including on Figures 3 and 4.3, that hazel planting is proposed for any grassland area. In my view, all compensatory planting is planned for areas where existing scrub habitats need to be cleared. Therefore I accept the mitigation measures that are proposed in relation to the Gwent Levels SSSI.

NRW have also acknowledged that a Dormouse Conservation Strategy has been prepared for this site. We should be assured that at least the principles of this strategy are acceptable to NRW before granting consent. One of the recommendations in this strategy is that vegetation is cleared between May and September, during the dormouse active season. However this also coincides with the main breeding season for dormice, so a nest with juveniles may well be encountered. Similarly, the clearance is scheduled to take place during the bird nesting season, and the PEA advises that site clearance should take place outside the late February to August nesting period. Whilst I accept that the exact clearance and construction timetable is not yet known, there is currently a conflict in the proposed timing of clearance to avoid harm to either dormice or nesting birds.

A better solution would be to clear above-ground vegetation in winter, when birds are not nesting and when dormice are hibernating at ground level, and then clear roots and stumps in spring when dormice have awoken from hibernation and made their way to retained vegetation nearby. This would reduce likelihood of encountering either nesting birds or breeding dormice which could lead to substantial delays in the construction schedule.

As NRW have highlighted, section 5.2.9 of the PEA states that final biodiversity enhancement measures must be agreed and discussed with the local planning authority's ecologist and set out in a detailed Biodiversity Strategy (or Landscape and Ecological Management Plan (LEMP)) and that long term implementation will be secured as a condition of successful planning consent. NRW agree with this approach and advise that this is secured via a condition. In commenting on a LEMP or Biodiversity Strategy, particularly where it relates to land owned by NCC outside the SSSI, I would take advice from the Friends of Road to Nature (FoRTN) group, who have actively been managing habitats in this area. Looking at the PAC Report submitted with this application, it does not appear that the Friends of Road To Nature were consulted on the PAC, nor that adjoining landowners/occupiers, members of the general public, Coedkernew Community Council, and the relevant Councillors for Tredegar Park and Marshfield, responded to the PAC during the consultation period. Therefore in the absence of a Local Nature Recovery Action Plan for Newport, I will take into account any advice or opinions of the local community, including FoRTN, on the LEMP.

Matt Harris

Ecology Officer