

From: [Harris, Matthew \(Ecology Officer\)](#)
To: [Sanders, Francesca \(Senior Planning Officer\)](#)
Subject: RE: Planning Consultation Request for case ref: 25/0310
Date: 14 May 2025 15:52:17

Hello Francesca,

The Ecological Impact Assessment (EcIA) submitted with this application notes that Water Vole, a species protected under the Wildlife & Countryside Act 1981 (as amended), is present on site. The proposed works will need a licence issued by Natural Resources Wales to allow clearance of Water Vole burrows. Therefore we should consult NRW, if we haven't done so already, to gain their views on whether the mitigation measures proposed in Appendix D of the EcIA are acceptable such that they would be likely to grant a WCA licence for these works.

My concern is that the mitigation measures propose only relate to avoidance of harm to individuals, and no compensation for loss of burrows (a structure or place used for shelter or protection) is proposed. Furthermore, no real net benefit for biodiversity is proposed, other than in section 5.8 of the EcIA which states that marginal and bankside vegetation should be left unmanaged, or only managed occasionally if there is an overriding need, such as highway maintenance, to enhance habitat for water voles and other wildlife, i.e., provide more cover and foraging opportunities. Of course, Water Vole are already present so whatever vegetation management is currently taking place is allowing them to persist, and no evidence is provided that this change in management will increase the carrying capacity of the retained habitat to compensate for that lost to the culvert, let alone to result in a net gain.

In addition, NRW may have concerns over the impact of the proposed development upon the Gwent Levels - Nash & Goldcliff SSSI about 1Km to the south. The reed which would be culverted as a result of this development is connected to the SSSI network, so NRW may have a view on any potential significant downstream impacts.

Until we hear from NRW, I would object to this application on the basis that no compensation for loss of Water Vole habitat is provided, nor is there a realistic prospect of achieving net benefit for biodiversity. The submission and implementation of a biodiversity net benefit scheme could be required by planning condition, but I would need to be assured that this scheme would work in principle before planning consent is granted, taking advice from NRW.

Matt

-----Original Message-----

From: planning@newport.gov.uk <planning@newport.gov.uk>
Sent: 13 May 2025 11:22
To: Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>
Subject: Planning Consultation Request for case ref: 25/0310

Dear Head Of City Services

Please find attached correspondence from Newport Council with regards to the above planning application submitted on 25 April 2025.

Your sincerely
Development Management