

Site Name: Land at Docks Way, Newport

Report Reference: WWE26082 Land at Docks Way - Fencing Plan REV B.

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1. Introduction

Land at Docks Way, Newport (Grid reference: ST 30664 85667) is subject to planned works (under approved planning permission 23/0989) to construct a new solar development covering the north of the site.

The application site lies approximately 1.5km upstream of the confluence of the Ebbw and Usk rivers in Newport; the latter is designated a SAC for otters. With the large territories that otters occupy, the site lies well within the distance that otters using the River Usk may move, and even though Newport docks may present significant barriers to otter movement overland between the Ebbw and Usk rivers in this area, the rivers themselves don't. Otters are known to use the River Ebbw and there are a number of otter records for the river.

A previous Preliminary Ecological Appraisal (PEA) was undertaken at the site by Wildwood Ecology in 2023. This outlined that as the river Ebbw is situated approximately c.80m to the western boundary of the site, there is the potential for otters to be present on site, accessing terrestrial habitats on site, or commuting between the Usk and the Ebbw. It was determined that a targeted survey for signs of otter should be undertaken to more accurately inform the determination of the application.

A detailed otter survey was conducted in May 2024 by Wildlife Surveys. This returned no evidence of otters using the site, however highlighted good potential for commuting otters, as well as limited feeding opportunities within the pond located on-site.

European Otter (*Lutra Lutra*) is listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended), which contains provisions making it an offence to intentionally or recklessly:

- disturb an otter while it is occupying a structure or place which it uses for shelter or protection; or
- **obstruct access to such a place**

As there is currently considered to be potential for otters to commute across this site, condition 10 of the conditional planning permission states:

"Prior to the erection of the security fence, and notwithstanding the plans submitted, full details of the fence which shall be designed to allow provision for otters to move through the fence at intermittent locations shall be submitted to and agreed in writing with the Local Planning Authority. The fence shall be erected and retained in accordance with the agreed plans".

The purpose of this report, therefore, is to inform the design of the proposed security fencing bounding the site. This amended fencing plan will then need to be submitted and approved by the Local Planning Authority in order to discharge condition 10.



Figure 1: Aerial image of the site (red line shows the site boundary) in relation to the rivers Usk (To the east) and the Ebbw (to the immediate west).



Figure 2: Dense scrub and pond recorded on site October 2023; suitable terrestrial and foraging habitats for otter

2. Fencing Plan

Fencing plans have previously been submitted alongside proposals for this site (*Figure 005 – Security Fence, Gate and CCTV Camera (Version A – Issue 1)*) Dulas. See Figure 3 below. This current fencing is proposed to bound the entirety of the site. See figure 4 below. Under these current fencing proposals access for commuting mammals would be obstructed to site, thereby potentially obstructing access to otter.

It is therefore advised that alterations be made to either the fencing, or gaps be created below the proposed fencing in order to keep the site accessible to commuting mammals, while still providing security for the site.

While razor or barbed wire has not been included within the current fencing proposals, otters are skilled climbers and may attempt to access the site over the fence rather than under it. It is therefore advisable that barbed or razor wire not be implemented on any fencing, as this may harm or kill any otters attempting to access the site.

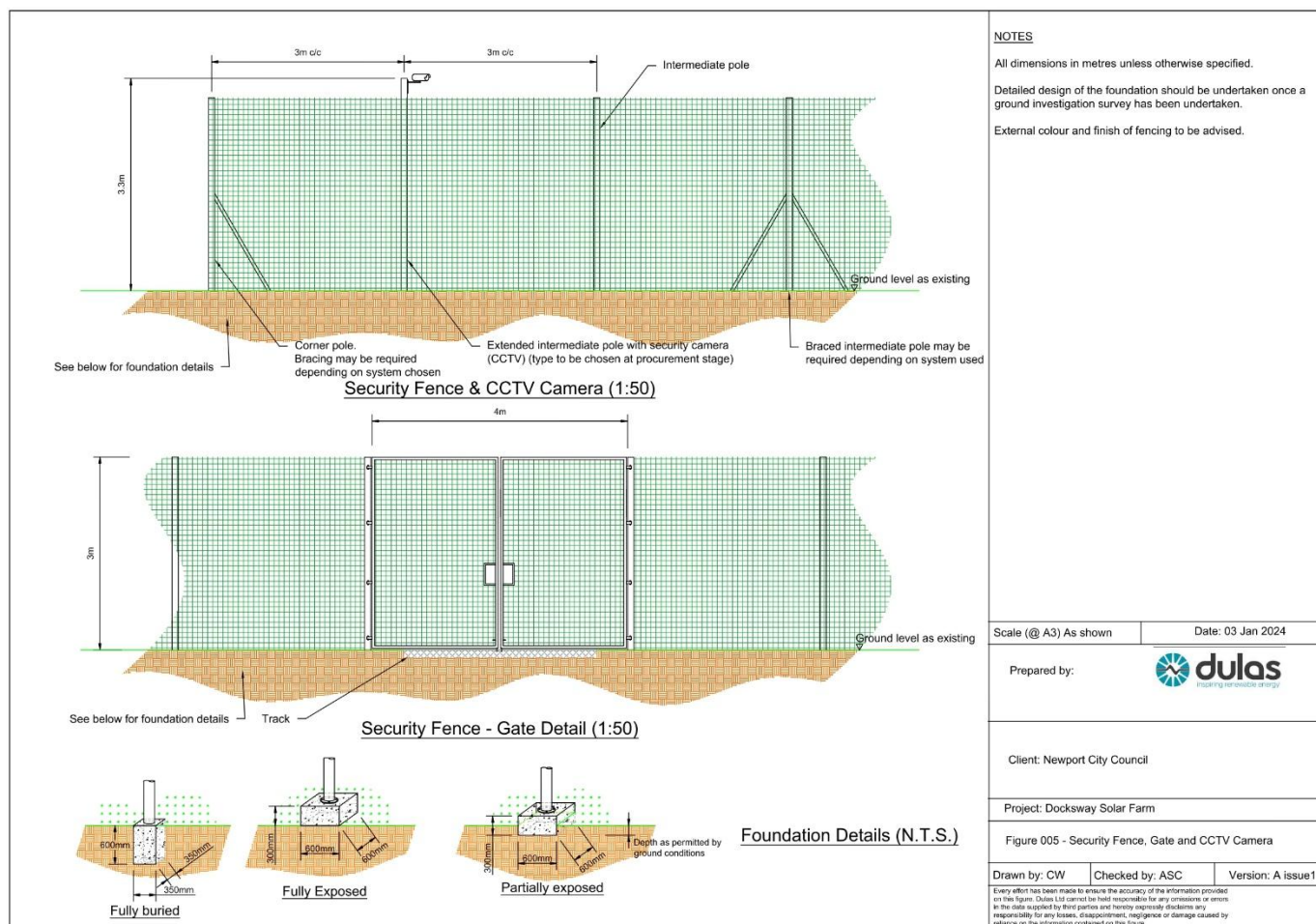


Figure 2:

***Security Fence, Gate and CCTV Camera (Version A – Issue 1)* Dulas Fencing plan submitted 04/01/2024**

Option 1:

The current proposed fence could have intermittent gaps created after their installation, or during their fabrication. These gaps should be approximately 20 x 20cm to allow adult otters, as well as other commuting mammals (i.e. hedgehogs, badgers), to access the site. The gaps should be created at the base of the fence, so it is easily accessible for commuting mammals. If these gaps are cut into the fence after installation, care must be taken to ensure that no sharp or jagged edges are left that may injure wildlife passing through.

See Figure 3 below for the approximate size of a 20 x 20cm gap in relation to the current fencing proposals.

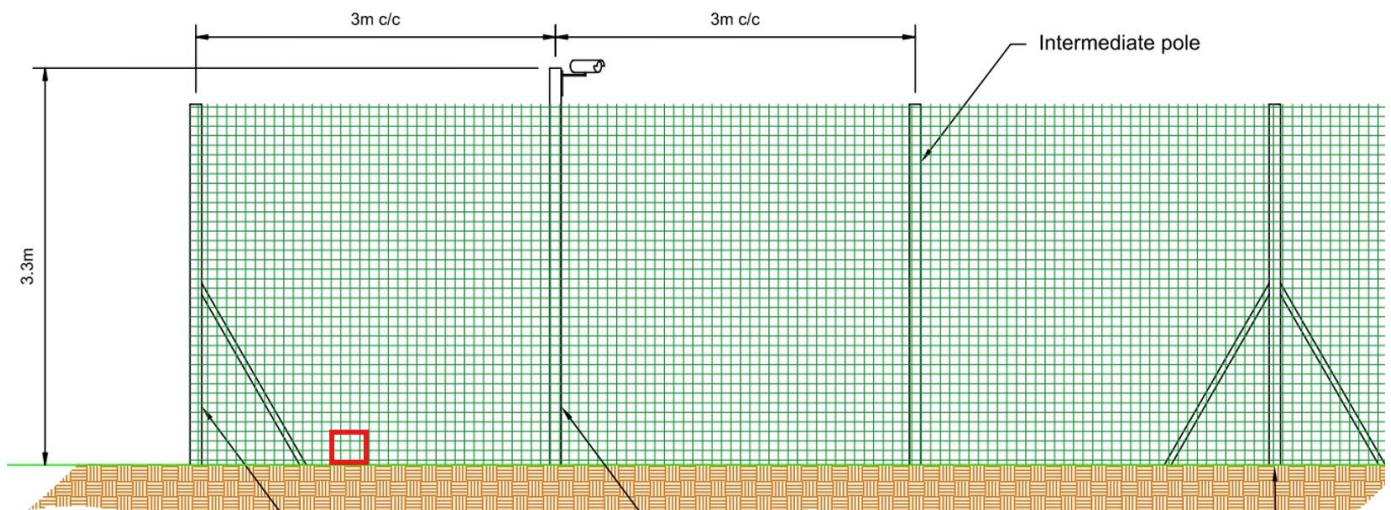
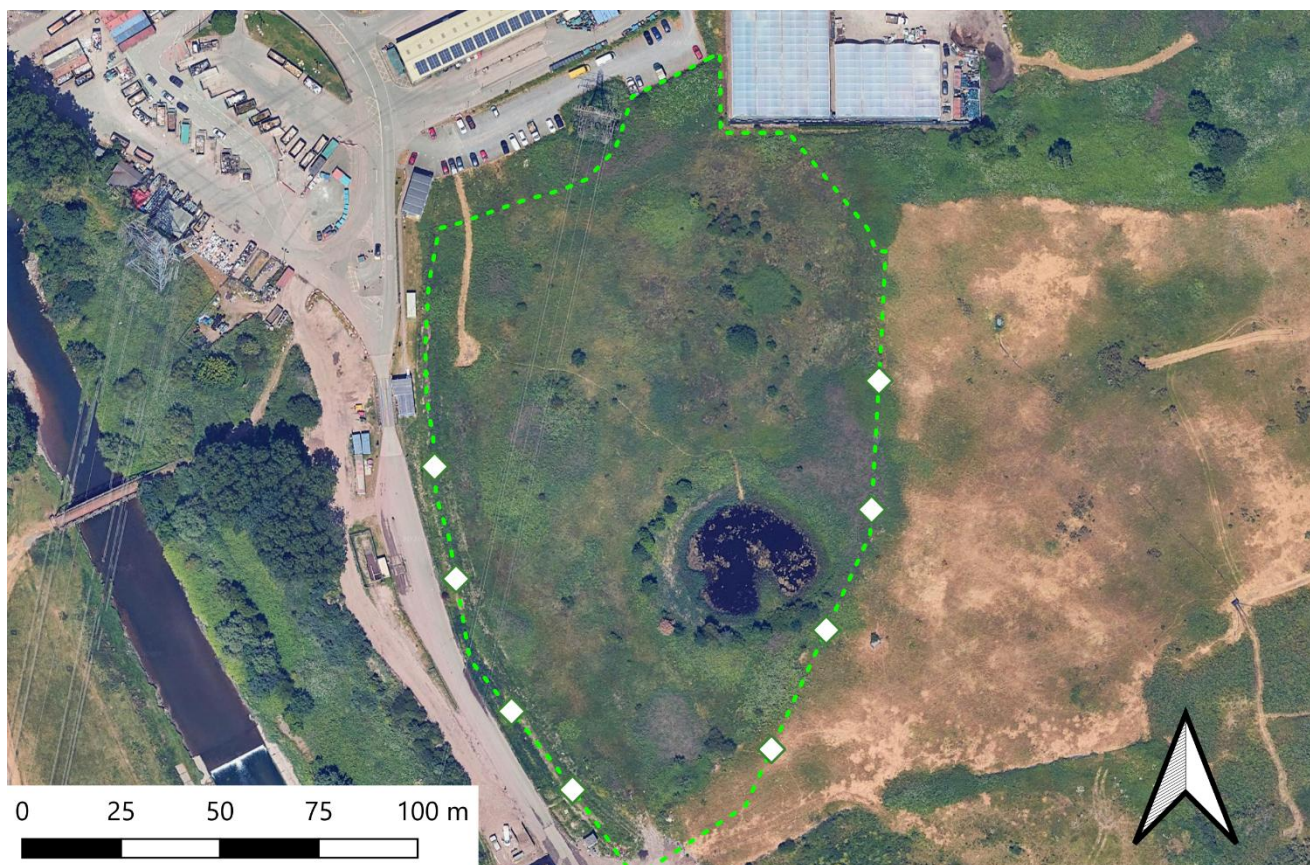


Figure 3: Approximate size of created gap within fencing plan

Option 2:

Alternatively, it may be easier to create gaps below the fencing, if the fencing panels cannot be altered. This gap should also be a minimum of 20 x 20cm in size. A short length of pipe could be installed into a gap dug below the fencing, and then back-filled to secure it. This would then act as a tunnel into and out of site. The diameter of these tunnels should be 20cm. This approach would avoid risk of wildlife being harmed by any jagged edges of modified fence panels, however care must be taken that any tunnels installed do not become filled with water or plant material. Therefore, ongoing maintenance may be required to ensure they do not become blocked.



Key

- Proposed fencing
- ◇ Approximate recommended locations of mammal gaps

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Figure 4: Proposed fencing and recommended location of mammal gaps

It is recommended that created mammal gaps are made intermittently, at least one every 30 metres along the fence line. These will likely be most effective at the south of the site closest to pond and dense scrub habitats. At both eastern and western sides to allow access/ egress for any otters travelling from the river Ebbw to the west of the site and the River Usk to the east of the site. The north of the site is the most developed landscape surrounding the site, and includes car parks. Therefore, it would not be ideal to encourage mammals to enter or leave the site from this direction.

3. Conclusion

Gaps must be created either within or below proposed fencing in order to allow otters access to, and across, the site. These gaps must be at least 20 x 20cm, and not have sharp or jagged edges that may injure any animals passing through them. Gaps should ideally be positioned at the eastern and western boundaries of the site, to allow access to the river Usk and the river Ebbw. Gaps should not be created at the northern boundary of the site, as this may encourage otters leaving the site to travel through car parking areas.

Barbed wire or razor wire should not be installed at the top of fencing.

Provided the above recommendations are followed, it is considered that otters will still have potential to commute across the site and utilise the onsite pond for foraging
