

Our Ref: CAS-308873-C1X0

Your Ref: 26/0257

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 09 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Further discharge of Condition 14 (Ecological monitoring and contingency) of permission 18/1201 (large solar farm) in relation to Year 5 monitoring

Lleoliad/Location: Land at Caldicot Levels, to south of Whitson Electricity Substation, Broad Street Common, Nash, Newport, South Wales

Thank you for re-consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 18 May 2026.

We continue to have **concerns** with the application as submitted because inadequate information has been provided. We do not recommend your authority discharges condition 14 (ecological monitoring and contingency) of planning permission ref. 18/1201 at this stage. Further details are provided below.

We have reviewed the following information:

- Ecological Monitoring and Review Year 5. Llanwern Solar, Gwent Levels (Rev 03) prepared by GE Consulting Services (UK) Ltd, dated 15 May 2026.
- Letter from Gwent Farmers' Community Solar Partnership Limited to Newport City Council, dated 15 May 2026.
- Draft Landscape and Ecological Management Plan (LEMP) Years 6-10 Llanwern Solar, Gwent Levels (Rev 1) prepared by GE Consulting Services (UK) Ltd, dated 21 April 2026.

Protected Sites

Gwent Levels Site of Special Scientific Interest (SSSI)

We welcome that future measures will be in place to ensure access by surveyors, as confirmed in the letter from the Gwent Farmer's Community Solar Partnership. This will help to provide consistency between monitoring areas during each monitoring round.

A site meeting with Wise Energy, Next Energy and your authority is planned later in June 2026, with a focus on shrill carder bee mitigation. Future habitat management requirements or monitoring can be discussed at that meeting.

We welcome the inclusion of a table of grassland habitat information (Table 6.2) in the Ecological Monitoring and Review Year 5 report. However, we disagree that all fields under panels would have been classed as improved grassland in the 2017 baseline. We draw your attention to the fact that the habitat assessment, set out in the initial January 2016 monitoring report prepared by David Boyce, recorded some of the pre-construction gripped fields as semi-improved or poor semi-improved, rather than improved grassland. A breakdown of the fields in Table 6.2 would be helpful and we recommend that this should be updated in the report. To provide an example of the level of detail required, the applicant may wish to consider a summary approach per area from the baseline monitoring, for example, X out of X fields in Area X were classed as poor semi-improved, X were semi-improved and X were improved. This information for the solar panel fields and mitigation fields would be useful to inform the long-term management programme and monitoring reviews.

Clarification is required regarding the proposal for the field at the north-western end of Area 3, as shown in Appendix 3 Figure 1 Ecological Monitoring Plan. The field is coloured light green, with the key describing it as proposed new wildflower planting. We note that Figure 1 is dated 2019. It would be helpful if it could be confirmed if Figure 1 is current or whether it requires updating. The David Boyce January 2016 monitoring report referred to this field (identified as Field 7A in that report), together with Field 9E (to the south-east of Area 3 and now under panels), to be floristically rich. The report stated that,

“...they have herb-rich neutral, marshy grassland that are either known or are thought likely to be of importance for terrestrial invertebrates. These fields may be particularly significant as potential feeding areas for the shrill carder bumblebee...

A feature of particular note in field 7A is the presence of abundant common knapweed *Centaurea nigra* on the drier patches of neutral grassland that are scattered across this field...

Field 9E is relatively unimproved, with a more species-rich sward that includes much common knapweed *Centaurea nigra*.”

Protected species

Otters and water voles

We welcome the amendments to the ecological monitoring report to clarify the extent of the otter and water vole survey, plus the inclusion of Figure 5 presenting the results of the

2017 and 2025 riparian mammal surveys. We also welcome the inclusion of a Ditch Management Schedule in the draft LEMP Years 6-10.

The letter from the Gwent Farmer's Community Solar Partnership confirms that the otter holts have not been implemented to date. However, the installation of artificial otter holts is still listed in Table 7 of the Ecological Monitoring and Review Year 5 report. We recommend that Table 7 is amended. With the change in baseline conditions on site and evidence of otters in solar array Area 3, we welcome that the provision of the two artificial otter holts is now being reviewed. We advise that provision for their early installation is included in the timetable of works of the draft LEMP Years 6-10.

Dormice/Hedgerows

We welcome the inclusion of Figure 1b in the Ecological Monitoring and Review – Year 5 report, which identifies the surveyed and non-surveyed hedgerows. We note that paragraph 5.4.3 of the report has been amended to state that no further hedgerow removal is anticipated. However, at the site meeting with Wise Energy, Next Energy and Newport Council on 20 May 2026, it was noted that some hedge and scrub removal, under SSSI Consent, may be required to enable access for de-silting, de-weeding and to reduce shading of the SSSI watercourses. Clarification on this point is required.

Table 6 in the draft LEMP Years 6-10 includes management prescriptions for hedgerows. We are broadly in agreement. However, in areas away from wader mitigation and where dormice are a consideration, we advise that hedgerows on one bank of ditches are allowed to grow and are maintained at 3m high and 2m wide.

Terrestrial Ornithology

The Ecological Monitoring and Review Report indicates that lapwing were not confirmed breeding on site and that the number of pairs that may have bred is lower than the baseline. We also note that additional management, in the form of re-wetting several fields, is being undertaken. We have no further comments regarding terrestrial ornithology.

Draft Revised LEMP

A draft revised LEMP was submitted as supporting information for this application. We have made limited reference to it in respect of our comments on protected species above. However, we note that Condition 17 of planning permission ref. 18/1201 refers to the LEMP. We understand that the final LEMP will be submitted to the local planning authority for approval in due course and we would be pleased to be consulted on the final version of the LEMP at that time.

Summary

We do not recommend that condition 14 (ecological monitoring and contingency) of planning permission ref. 18/1201 is discharged. We would be pleased to advise further upon receipt of the additional information requested.

Other matters

The advice in this letter relates to matters which are included on our [consultation topics list](#). We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

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.

Advice for the developer

It would be helpful if amended reports could, in the future, be clearly annotated to indicate where changes have been made to assist in our review of updated documents. This has previously been discussed with Wise Energy at a site meeting. Consideration of how this could be addressed in future submissions would be welcomed.

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

Yn gywir / Yours faithfully,

Jessica Jones

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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.