

Ein cyf/Our ref: CAS-316787-F7B3
Eich cyf/Your ref: 26/0257

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 September 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 consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 17 August 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:

- Draft Landscape and Ecological Management Plan Years 6-10 Llanwern Solar, Gwent Levels (ref. 0419-LEMP-HS Rev. 2), dated 30 July 2026 by GE Consulting Services (UK) Ltd.
- Ecological Monitoring and Review – Year 5 Llanwern Solar, Gwent Levels (ref. 0419-EMR-HS. Rev. 3), dated 31 July 2026 by GE Consulting Services (UK) Ltd.

Draft landscape and ecological management plan

Our comments of the Draft Landscape and Ecological Management Plan (LEMP) are as follows:

Section 5.2 Designated sites

Fine leaved pondweed (*Potamogeton natans*) as referenced in the Gwent Levels Nash and Goldcliff and Gwent Levels Whitson Site of Special Scientific Interest (SSSI) citations should be included in this section. This feature is found across the SSSIs and provides submerged habitat for invertebrates in the watercourses. We advise that this section should be updated and we refer you to the citations, which are available on our website: [Natural Resources Wales / Find protected areas of land and sea](#)

Section 5.3 Fauna

Table 1 Baseline fauna at Llanwern

Common knapweed (*Centaurea nigra*) could be added as one of the shrill carder bee forage plants. At the site meeting in July 2026, it was noted as being abundant in the southernmost mitigation field in Area 2.

Section 6 Summary of habitats to be managed

Table 2 Features to be managed

Reens and ditches

We advise that the ditch schedule is amended to 7-8 years, rather than 8 years. We are aware that the Notice of Intent for Consent for Autumn 2026 works, refers to an 8 year schedule, as shown in Appendix 4. Ditching works for 2026 are shown as Year 4 (orange) on the ditching schedule plan provided in Appendix 4. There was a delay to a good standard of ditching works at this site. A ditching schedule over 7 years would allow the ditches, which were first managed in the schedule, to be managed earlier to maintain and enhance the features within the ditches. The appropriateness of a 7 or 8 year schedule can be reviewed in 2027 and at subsequent annual site meetings.

Shrill carder bee mitigation area

At the July 2026 site meeting, we visited the Area 2 shrill carder bee mitigation area and noted that the northernmost and smallest of the 4 fields had less thistle. The contractors at site suggested that this could be due to its more sheltered position from seed dispersal. The next field to the south had a dominance of grasses, but some species for pollinators. This is the field proposed for a trial approach. It will provide a good comparison, as it is not directly adjacent to the field with an abundance of knapweed.

We had understood from the July 2026 meeting that a trial of 2 annual cuts of the whole field, to reduce nutrient load and the dominance of rank grasses, would be considered by Wise Energy. However, the current proposal refers to cutting strips. We advise that the entire field shown in Figure 5a should be cut twice (in May to early June and then again in September), rather than cutting strips.

The field to the south was very similar, with grasses dominating the field. The most southerly of the four mitigation fields had an abundance of stands of knapweed across the field.

We welcome there will be a buffer of habitat around the edge of the field along the ditches and hedge, which can be left uncut.

Section 7 Adaptive works following Year 5 monitoring

Herbicide use is detailed in Section 8. For clarity, we advise that the following sentence is added to the bullet point on the control of important shrill carder bee foodplants:

- “...and only if SSSI consent has been issued by NRW.”

Section 8 Habitat management schedule

Section 8.1.1 Timing

We advise that the following items are amended with regard to management timing:

- Hedgerow and native shrub management should be undertaken between mid-September and February inclusive.
- Ditch management (casting/desilting/deweeding), where scrub and hedge removal is not required beforehand as the banks are open, can be undertaken between 1 September and the end of February inclusive.

Starting works earlier can be beneficial, before ground conditions become less suitable, particularly if there is a wet Autumn.

Table 4 Management schedule for lapwing mitigation fields

Grassland within the lapwing mitigation area

We advise that Row 8 of this category should be amended as follows:

- Herbicides should only be applied to control noxious weeds by spot treatments if deemed absolutely necessary and only if a SSSI consent has been issued for the works. No herbicide applications to be undertaken from 1 April to 31 August.

Table 6 Management schedule for hedgerows

Clarification is required regarding the inclusion of the following text:

“Hedgerows growing alongside ditches within the Solar Array Areas are permitted to grow and be maintained at a height of 3m and width of 2m.”

In May 2026, we advised on site that hedge and scrub alongside ditches needs to be managed to allow sunlight to enter the watercourse and to enable access for ditch desilting. We note that removal and hedgerow management is referenced in Table 7 Reens and Ditches and in Section 5.4.2 of the Ecological Monitoring and Review – Year 5 Report (Year 5 Report). Hedgerows alongside ditches can be enhanced and maintained on one bank, but on the opposite bank they should be minimal to enable sunlight to enter the ditches.

Table 7 Management schedule for reens and ditches

To align with section 5.4.2 of the Year 5 report, we advise that the following text is added to Table 7:

- Some hedgerow removal may be required in the future to facilitate ditch maintenance works and prevent shading of watercourses.

As advised at the July 2026 site meeting and previous site visits, some of the ditch desilting and casting proposed in the Ditch Management Schedule is not possible without further management of scrub and sections of hedge at some ditches across the site.

Section 9 Management objectives and adaptive actions

Table 10 Management objectives and adaptive actions for the site

Crane fields

Clarification is required regarding the creation of small scrapes. This may require SSSI Consent. For your information, consent for the forthcoming grip reinstatement in the lapwing fields for September/October 2026 has been issued.

Hedgerows

Any proposed planting in hedgerows would need SSSI Consent. This should be referenced in the table.

Ecological monitoring and review – year 5 report

Our comments of the Ecological Monitoring and Review – Year 5 Report are as follows:

Section 5.4.2 EMCP objectives

We welcome the additional text in section 5.4.2. As referenced above and as advised at the July 2026 site meeting, some of the ditch desilting and casting proposed in the Ditch Management Schedule of the LEMP is not possible without further management of scrub and sections of hedge at some ditches. At the site meeting, the contractors for Wise Energy indicated that they would provide a plan illustrating where further scrub and hedge removal is needed to facilitate ditch management.

Table 6.2 Habitat monitoring of shrill carder bee survey areas

We note that Table 6.2 remains unchanged and does not address the comments made in our previous letter dated 9 June 2026 (ref CAS-308873-C1X0). 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. We advise that the baseline surveys undertaken before the development was granted permission are used to amend this table.

The table suggests that the entire site (solar fields and mitigation land) was improved grassland and that the mitigation areas have now been enhanced to be good semi-improved fields. Fields that are now mitigation land or solar panelled fields were a mix of improved and semi-improved at the 2017 baseline. The mitigation fields are currently at different stages, with some having greater abundance of nectar sources and others are dominated by grasses.

As advised previously, a breakdown of the fields in Table 6.2 would be helpful and we advise that this is 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 presented for the solar panel fields and mitigation fields would be useful to inform the long-term management programme and monitoring reviews.

Appendices

In our letter dated 2 September 2026 (ref. CAS-308873-C1X0), we referred to plans in Appendix 3 that were dated 2019. We note that the appendices have been updated and the plans removed.

Protected species

The updated documents have addressed the matters that we have previously raised in respect of otter and hedgerows. We have no further protected species comments.

Terrestrial ornithology

Additional monitoring data has been submitted regarding ongoing lapwing presence at the site post-development. Monitoring data indicates that lapwing numbers have declined at the site compared to the baseline recorded pre-development. The report indicates that prolonged dry weather may be limiting the amount of suitable habitat within the mitigation area. The monitoring report confirms that adaptive management measures will be progressed as outlined in the Monitoring and Contingency Plan. This will involve improving water retention and creating areas of wetter ground conditions across the mitigation areas. We agree with the approach and have no further comments regarding terrestrial ornithology.

Further advice

Herbicide use

We note that SSSI consent is specified for herbicide use in Section 8 of the LEMP. For your reference, two short-term consents for selective and non-selective herbicide were issued for Autumn 2025 for herbicide use at the site.

For the avoidance of doubt, we advise that where herbicide is referenced in other parts of documents, the need for SSSI consent should be specified, rather than a reference to a licence. This should be addressed throughout the document and notably in Tables 4, 8 and 10 of the LEMP.

Document revisions

We welcome the provision of track changes and issue versions of the reports. This has been very helpful in identifying updates and amendments. We would like to suggest that future reports are submitted in a similar format to assist with monitoring and review.

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.

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

Yn gywir / Yours faithfully,

Jessica Jones

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.