

Our Ref: CAS-304957-R2H7

Your Ref: 26/0257

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 22 April 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 02 April 2026.

We have **concerns** with the application as submitted. We do not recommend your Authority discharges condition 14 (ecological monitoring and contingency) of permission 18/1201 for the following reasons.

We have considered the following document, submitted to discharge condition 14 of DNS consent 3150137/ Newport Council consent 18/1201:

- Ecological Monitoring and Review – Year 5. Llanwern Solar, Gwent Levels by GE dated 11/03/2026, Revision 2.

Protected Sites – Gwent Levels Site of Special Scientific Interest (SSSI)

Shrill carder bee habitat monitoring and management

Section 5.3.3 of the above report describes some of the findings from site visits/surveys undertaken from 2023-2025. We advise a table with a description of the habitat and the management that has taken place per year for the mitigation fields in Area 1 and 2 would be more useful to clearly show changes on site. The applicant should consider undertaking quadrats when monitoring to track the success of establishment of flora suitable for shrill carder bee foraging.

During a visit to the Site by NRW and NCC in May 2025, the Wildflower Seed Mix Area associated with Array Area 1 showed a good mix of herbaceous species with flowering plants developing. Whilst this information is provided for the one mitigation field at Area 1, there is no information included in the above report regarding the larger area (4 fields at Area 2) which had a much poorer diversity and were mainly rank grassland with few forbs. At Area 2 an Autumn 2024 hay cut had been missed from 1 of the 4 fields which likely resulted in the poorer diversity.

Although the Area 2 mitigation was still found to support shrill carder bees due to presence of thistle species in the August 2025 monitoring, it is important to report clearly on the success and also the short comings of the habitat management on site to provide a clear picture in the monitoring report.

We welcome that Next Energy, Wise Energy and the landowners are working on ecological improvements on site including continued management of the shrill carder bee fields. NRW conservation officers will be meeting the applicant on site in June to discuss the next steps for management.

Monitoring of abundance of Shrill carder bee

There appear to be some errors in the report that should be corrected for clarity and to allow comparison with future monitoring that will be undertaken on site.

- The statement on p15 of the invertebrate report should be corrected to refer to area 1 LW01 not LW03: "Brown banded Carder Bumblebee numbers were similar to those in 2023, but they were significantly lower this year in LW03 than in 2023, down from 74 individuals to 28."
- In section 3.2 of the invertebrate report Tables 5-7 not Tables 3-4 should be referred to.

We note 155 shrill carder bees were found across the Llanwern solar site in the August 2025 monitoring. Only some of these areas were previously surveyed. Table 5 the report notes 63 shrill carder bee were found in areas surveyed previously compared to 50 in 2023 and 81 were found in pre development monitoring in 2017. It is positive a greater abundance of shrill carder bee was found than in 2023 and that 47 shrill carder bee and 21 brown banded bee (Section 7 species) were found in the mitigation fields in Area 2 (LW6, Table 6). However, 60% are foraging on thistle and 20% on buttercup on site as there is not a diversity in flora on the fields that the Landscape and Ecology Management Plan hoped to achieve.

NRW Conservation Officers accompanied the shrill carder bee surveyor on the first survey morning on site in August 2025. From our attendance on site, and as noted on page 5 in the report, we are concerned that "Access restrictions were a major constraint in 2025, with the surveyor being unable to access the core survey area (LW01-03) on the first and most of the second days". All future monitoring should ensure the surveyors have access to the required areas to make data directly comparable between years.

Grazing on site

In 5.1.4 of the above report it is stated “it was difficult to assess number of livestock units per hectare owing to blocked lines of sight from the panel arrays”. This has been mentioned by the applicant at previous meetings. The conclusion in the Executive summary is “Grassland habitats within the solar arrays are not currently meeting target conditions for wildflowers and diverse sward”. We therefore advise there is a more robust assessment of whether stocking levels are appropriate. We are aware there are several owners across the site but recommend accurate information is obtained from owners for stocking.

We seek clarification whether Wise and Next Energy have measures in place to implement the recommendation in 5.1.4 as follows “that grazing (and mowing) be temporarily halted or reduced during the peak flowering season”.

Ditch management

In the first two years, ditch management works were delayed and the works undertaken were sub-standard. Some management was undertaken to remove shading along ditches, however, ditches were seen choked with flailed vegetation, which did not enable connectivity of habitat and flood attenuation.

It is positive to see that currently the ditches are being managed appropriately by local contractors with experience of farming and ditch management on the Gwent Levels. We comment further on ditch management below under the section titled Protected species.

Aquatic Invertebrate Monitoring

We have no concerns regarding the aquatic invertebrate monitoring and data. It is positive to see the Invertebrate surveyor has reported on an improvement in habitat for ditches surveyed that had recent management.

Terrestrial ornithology

The report highlights that the mitigation area continues to fail to attract breeding lapwing, and overall the number of lapwing remain below pre-development levels. We welcome that that additional action will be take 2026 in an attempt to remedy this including seeking consent for grip restoration on lapwing fields to make these them more suitable for lapwing.

We advise the report should be amended to address the following:

Section 4.4 Breeding Bird Methods and 5.12.2 Survey Findings – clarity is needed in relation to statements referring to “species listed in Section 41/7 (Wales) of the NERC Act 2006”. The NERC Act 2006 was superseded by the Environment (Wales Act) 2016. The report should be amended to ensure correct legislation is referenced.

For future surveys we recommended that these surveys should be in line with industry best practice (see [Bird Survey Guidelines](#)).

Protected species

Otters and water voles

We welcome that update surveys of the site for otter and water vole took place in June 2025 and note that evidence of both species was recorded on site (water voles in solar array areas 2 and 3, otters in solar array area 3). We note the survey considered both banks of ditches and reens “where accessible”. We seek further information clarifying the location and extent of areas covered by the survey and those not accessible.

The report indicates that survey results are reported in Figure 4 and Appendix 4. Both Figure 4 and Appendix 4 relate to Breeding Bird Survey Results. There is no Appendix relating to riparian mammal survey information. We therefore seek clarification whether this information is to be submitted as an appendix.

The report confirms that water voles were recorded at up to six locations in the 2017 pre-application surveys and that Figure 4 maps comparison between the 2017 and 2025 surveys. Figure 5 relates to water voles survey results and appears to show only the 2025 survey results, not the 2017 results; we advise that this is addressed.

In terms of the works to open up the reens and ditches across the site from overshadowing scrub, we seek further information in plan form to clarify those that have been worked so far, where these lie in relation to the positive records for water vole, which sides of reens/ditches have been worked, and the plan (phased as appropriate and colour coded) for works going forwards.

Table 7 confirms the installation of artificial otter holts; we seek a map to clarify where these are located.

Dormice/hedgerows

We note that not all hedgerows within the array area could be surveyed; we seek clarification on the location and extent of hedgerows that have not been monitored.

We note that the hedgerows are being generally allowed to grow tall, with the exception of those in array area 1. We seek clarification of where this is and whether the hedgerow management has been informed by dormouse surveys and if so a plan showing the location of positive records.

We advise that if dormice are present the Landscape and Ecology Management Plan (LEMP) will need to include appropriate prescriptions for the timing of works, the long-term management of the hedgerows including rotational management, indicators of favourable condition which will be used for long-term monitoring of the habitat, and proposals for long-term hedgerow monitoring.

Revision to LEMP

We note and welcome that monitoring from the first five years will inform a forthcoming revision to the LEMP.

We advise that the LEMP is revised to include targets with measurable attributes to define favourable condition of the reens and ditches, having regard to the SSSI notified features and water voles.

The ditch and reen management works have the potential to affects water voles and their habitat, where present. We therefore advise that these works proceed with the benefit of a water vole conservation licence.

Summary

Having regard to the above, we do not advise that the above document is satisfactory to discharge condition 14. We would be pleased to advise further upon receipt of a revised document which addresses the above.

Therefore, we do not recommend your Authority discharges condition 14 (ecological monitoring and contingency) of permission 18/1201.

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,

Annabelle Evans

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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.