

Ein cyf/Our Ref: CAS-290564-S9F9
Eich cyf/Your Ref: CONNEX/25/0862

Catherine Aldous
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 5 November 2025

Annwyl Ms Aldous/Dear Ms Aldous

**BWRIAD/PROPOSAL: PRIOR NOTIFICATION OF DEMOLITION OF 2NO.
WAREHOUSE BUILDINGS.**

**LLEOLIAD/LOCATION: JAMAICA TERMINAL, EAST WAY ROAD, ALEXANDRA
DOCKS, NEWPORT, SOUTH WALES.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 16 October 2025.

We have no objection to the proposed application as submitted and provide the following advice.

Flood Risk

The prior notification application proposes demolition of 2no. warehouse buildings. The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 3 – Sea.

Flood Risk Elsewhere

We note that the proposed application is for prior notification of demolition of two buildings within Newport Docks. According to the information submitted the buildings to be demolished total 1970sqm.

Given the source of flooding is tidal an assessment of the impacts elsewhere would not be required in this instance.

European Protected Species – Bats

We have reviewed the following report submitted in support of the application:

- Middle Quay Warehouses - ABP Newport, Preliminary Roost Assessment (PRA) and Activity Surveys for Bats, Report No: 238-03-17.R1, Revision 1, prepared by ExCAL, dated September 2025.

We note the report has identified that the buildings to be demolished are a confirmed summer day roost for Soprano and Common Pipistrelle bats and that an EPS licence will

be required.

From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document '[Natural Resources Wales Approach to Bats and Planning \(2015\)](#)'.

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species."

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. We recommend that you discuss the need to secure any avoidance or mitigation measures with your internal ecological advisor.

We advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Pollution Prevention

We note that the buildings to be demolished are approximately 110m from the River Usk Special Area of Conservation (SAC) and River Usk Site of Special Scientific Interest (SSSI). We do not consider the proposed demolition poses a significant risk given the lack of potential pollution pathways (streams, surface water lines etc).

We advise that the applicants consult the following guidance and use them as best practice to form a pollution prevention plan [Guidance for Pollution Prevention \(GPP\) documents](#).

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 on the above, please do not hesitate to contact us.

Yn gywir/Yours faithfully

Andrew Hurst

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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.