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Sent: 10 February 2026 13:43

To: Davidson, Joanne (East Area Development Manager)

<Joanne.Davidson@newport.gov.uk>

Subject: RE: 25/1030 - Caerleon Comp

Hello Joanne,

As the proposed development entails demolition of some buildings, a concern with this proposal is the impact upon roosting bats, which are European protected species. The bat survey information in support of this application is set out in two reports, the Bat Emergence Survey report dated 5th December 2024, and the Green Infrastructure Assessment from November 2025.

Bats were detected in building K in the 2024 emergence survey, and in buildings K and D1 of this site during a site visit in October 2025 to inform the GI Statement. As a result of these surveys, I accept the conclusion that this represents a low-risk case in accordance with the NRW Approach to Bats and Planning Good Practice Guide 2015. NRW confirmed their agreement of this in their letter of 12th January 2026

Therefore there is no need to obtain further advice from NRW, provided we secure the mitigation measures set out in a suitable bat survey report. In general the submitted reports are satisfactory in my view, and the 2024 emergence survey report recommends compensation for loss of the roost in building K in the form of 4 No. Beaumaris Woodstone Bat Boxes or similar.

However the 2025 GI Statement survey detected two bat roosts but also recommended that four integrated bat boxes are included within the new buildings. The rationale is that two boxes are compensation for the two roosts lost to demolition, and the other two boxes represent a biodiversity enhancement.

In principle, I agree that four bat boxes is adequate compensation and enhancement for the loss of two very small roosts of relatively common bat species. These boxes should be erected initially on nearby trees at a height of 3 metres, and then ideally on the south east elevation of new buildings at a height of no less than 3m, just under the eaves. As recommended in the Bat Emergence Survey report, these

should consist of 4 No. Beaumaris Woodstone Bat Box or similar specification such as Schwegler 1FF.

All of the mitigation measures as set out in section 6 of the Bat Emergence Survey report and section 7 of the GI Statement should be secured by planning condition.

In their letter of 12th January 2026 NRW have invited us to carry out a test of likely significant effects (TLSE) for the River Usk SAC, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This test applies to impacts on the SAC from the proposed works, either alone or in combination with other plans and projects. If the test concludes there is likely to be a significant effect(s) then an Appropriate Assessment of the impacts on the SAC from the proposed works, either alone or in combination with other plans and projects, will be required.

In this instance, the nearest watercourse which flows directly into the River Usk is about 350m to the northwest. I find it very unlikely that any dust, waste, materials, surface-water run-off, contamination or mobilised ground contaminants arising from construction will be able to migrate to this watercourse over this distance. Migratory fish are features of the River Usk SAC and these are sensitive to disturbance caused by vibration during construction. However NRW have advised that such disturbance effects only occur within less than 30 metres of the river, and the proposed development is very much further from the River Usk than 30 m.

Otters are also a feature of the River Usk SAC, but the site of the proposed construction is already developed land, and does not support any habitats that otters could use for breeding or resting. There are formal hedges and tree-lines nearby, but these do not connect the River Usk with any other suitable otter habitats, so I think disturbance during construction is unlikely.

Therefore my advice is that the proposed project is not likely to have a significant effect, either alone or in combination with any other developments, upon the features of the River Usk SAC or any other site in the National Sites Network. This being the case, we do not need to undertake an 'Appropriate Assessment', nor re-consult NRW. Section 4.4.1 of the GI Statement agrees that due to the scope of the works, the River Usk and connecting habitats will not be impacted by the proposals.

The CEMP condition proposed by NRW includes generic measures to avoid contamination of the natural environment during construction, which I support. However, applying this planning condition is not essential to the conclusion of no likely significant effect upon the River Usk SAC.

As some buildings are to be demolished and trees removed, the Applicant should be reminded to avoid disturbance to nesting birds which are protected under the Wildlife and Countryside Act 1981: Part 1, 1(1)(b), whereby it is an offence to intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built.

In all other respects, the GI Statement is acceptable.

Matt Harris

Ecology Officer