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Sent: 15 September 2025 14:40

To: Davidson, Joanne (East Area Development Manager) <Joanne.Davidson@newport.gov.uk>

Cc: Brinkworth, Emma (Planning Officer) <Emma.Brinkworth@newport.gov.uk>

Subject: RE: 25/0407 - BESS Uskmouth

Hello Joanne, looking at the queries that NRW have made in their response of 09/09/25 in relation to the shadow HRA, I agree that if we are going to adopt this document as our own HRA, then we should ask the Applicant's Agent to address NRW's concerns in a revised Report to Inform an Appropriate Assessment. We would then need to reconsult NRW on the final Appropriate Assessment. My only query would be whether the existing NRW Discharge Consent (Ref: 20151223_SUP_LP3131SW_Var002 signed) has itself been subject to a HRA when the discharge consent was granted? If so, and the applicant intends to make use of this existing consent, then they could incorporate that HRA or at least its conclusions into the current Report to Inform an HRA.

In general, I support the methodology and conclusions of the Preliminary Ecological Appraisal dated December 2024. However I note that the habitat of the main area of the site is indicated as 'Cultivated/disturbed land, Ephemeral/short perennial' in the Phase 1 Habitat Plan, and I do not see that any attempt has been made to assess whether this habitat constitutes Open Mosaic Habitat on Previously Developed Land (OMHPDL), which is listed as a Priority Habitat under Section 7 of the Environment (Wales) Act. Looking at older aerial images it is clear that the habitat on the pulverised fuel ash has developed relatively recently, and that the PFA will eventually need to be removed at some point, so I am not concerned that a permanent resource of OMHPDL will be lost. Nevertheless, if the presence of this habitat had been established in the PEA, then this could have influenced the Green Infrastructure Statement (GIS).

As it stands, the GIS sets out a series of avoidance, retention and mitigation measures, but does not explain how these would achieve a net benefit for biodiversity, such that the site will support greater biodiversity and ecosystem resilience value after development compared to the present baseline. Although the GIS states that 'The proposals would result in habitat enhancement and creation that will increase diversity across a range of species groups', no evidence is provided that the loss of extent, diversity, connectivity and condition of the ecosystem would be compensated for to the extent that these attributes are greater after development than before.

Therefore we should use a planning condition to require the submission and implementation of a biodiversity enhancement scheme which sets out in detail how a net gain in biodiversity and ecosystem resilience will be achieved.

Matt