

Our Ref: MW/13203/NRW Response

Your Ref: CAS-304371-Y5R6

Contact: Michael Watkins

21st May 2026

MVR Solutions Limited
Unit 4, A&B
Mariner Way
Felhex Industrial Estate
Newport
NP19 4PQ

For the attention of Mr Jon Moore

Dear Jon,

PLANNING PERMISSION 24/0756: PROPOSED DEVELOPMENT AT LAND OFF KELVEDON STREET, NEWPORT

Further to comments raised in NRW's letter (Ref. CAS-304371-Y5R6) and the subsequent meeting held with NRW on 13 May 2026, Terra Firma (TFW Group Limited) has updated the Tier 2 and Tier 3 Geoenvironmental Assessment Report to provide further detail and clarity.

The points below are intended to direct the reader to the relevant sections of the updated report (Ref. T2&T3GGR-210526-13203-03). Where appropriate, comments made by NRW are quoted in bold and responded to directly.

1. **'We remain concerned that dissolved phase may impact the River Usk SAC, especially if contaminants enter the more transmissive sand and gravels below the tidal flat deposits':**
The detailed groundwater risk assessment has been modelled using the highest recorded contaminant concentrations within the more transmissive deposits beneath the tidal flat deposits (*Section 7.2*). As discussed during the meeting with NRW, a sensitivity analysis has been carried out using significantly more conservative input parameters to assess potential worst-case outcomes (*Section 7.6*).
2. **'We therefore advise further consideration of the downgradient and offsite movement of the dissolve plume from the DNAPL'.** A piling risk assessment will be undertaken, as detailed in *Section 10*. This is anticipated to comprise an initial desk-based assessment, followed by additional groundwater monitoring before, during, and after the piling works. Groundwater sampling and testing of samples will be taken from eight wells, including three new wells installed on the downslope side of the site. The proposed and existing monitoring points are presented on **Drawing 03**.
3. **Remediation Strategy.** An Options Appraisal and Remediation Strategy will be prepared for the site and developed in accordance with the final development proposals. A Verification Plan for the proposed vapour mitigation measures will also be prepared. At this stage, the remediation strategy will be limited to the protection of human health and will not include active remediation

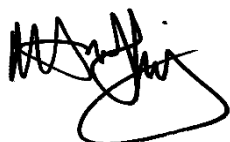
of the DNAPL 'plume'. Based on the current assessment the breakdown of the existing contaminants into vinyl chloride is not considered a significant risk in the absence of direct remediation of the 'plume' itself.

4. A method statement for the next phase of assessment is outlined below:
 - a. Preparation of an Options Appraisal and Remediation Strategy for remediation measures required to protect human health from the identified contamination. At this stage this does not include remediation of the DNAPL 'plume'.
 - b. Completion of a desk-based piling risk assessment.
 - c. Installation of additional groundwater monitoring wells to supplement the existing three deep monitoring wells. Response zones are to be installed at the base of the gravelly deposits beneath the tidal flat deposits.
 - d. Completion of two rounds of groundwater monitoring and VOC testing before piling works. The objective of this monitoring is to establish a baseline dataset for comparison with groundwater test results obtained during and after piling activities.
 - e. Groundwater monitoring and VOC testing to be carried out on a fortnightly basis during piling works.
 - f. Groundwater monitoring and VOC testing to continue on a fortnightly basis following the completion of piling works.
 - g. A review of the monitoring data and, if necessary an updated assessment will be reported following the monitoring programme.
 - h. Any monitoring results indicating a deterioration of groundwater quality during the piling works will be communicated to the client at the earliest opportunity.

We trust that the above is to your satisfaction, however, if you have any queries or require any further information, please do not hesitate to contact us.

Yours sincerely

for: Terra Firma

A handwritten signature in black ink, appearing to read 'Michael Watkins', with a large, sweeping loop at the end.

Michael Watkins

Principal Engineering Geologist, MEng, CEng, FGS