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Sent: 28 August 2025 16:41
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Subject: RE: Planning Consultation Request for case ref: 25/0652

Hello Geraint, taking into account the current existing and surrounding land uses, I see no cause to object to this application. The site itself does not appear to support any semi-natural habitats as it is used for storage. The scrubby vegetation on the railway embankment to the north is likely to be of ecological value, but I assume this is trackside vegetation associated with the rail line and therefore under management of Network Rail. If there is any additional lighting proposed as part of this scheme, then we should seek confirmation via a lighting plan or similar, to demonstrate that there would be no additional light spillage onto the rail corridor above the current light levels.

The Marshall's Site of Importance for Nature Conservation is nearby, but I do not believe the current proposal would be likely to affect it significantly. However, the question arises as to whether the proposed development would need a Habitats Regulations Assessment to consider the impacts upon the River Usk SAC and SSSI, which is about 300m to the south / west. I see that there is a dock about 30m to the south of the red line boundary which leads directly into the River Usk, so it is reasonable to ask what containment measures are in place in the event of a leak or spillage to prevent fuel etc from entering the river via this dock. I imagine any such leaks or catastrophic failure of storage tanks would result in the biomethane immediately evaporating into gaseous form, but there could also be fuels for generators on site which we should be sure would be contained.

Any such containment measures, or any other mitigation to prevent an adverse effect on the integrity of the SAC, need to be included in an Appropriate Assessment. This being the case, we should refer to provisions 75 to 78 inclusive of the Conservation of Habitats and Species Regulations 2017 (as amended), and consult NRW for their views on whether the proposals would have a relevant effect.

Matt