

Ein cyf/Our ref: CAS-310378-G4J5

Eich cyf/Your ref: 26/0410

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 18 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**Bwriad/Proposal: Demolition of existing buildings and structures and the construction of an electricity substation compound, including switch room building with associated equipment, access, drainage, infrastructure and engineering works**

**Lleoliad/Location: Land south west to 8 East Way Road, Alexandra Docks, Newport South Wales**

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 04 June 2026.

We have **concerns** with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding **flood risk**. If this information is not provided, we would object to this planning application. Further details are provided below.

We also advise that based on the information submitted to date, **conditions** regarding **land contamination** should be attached to any planning permission. Without the inclusion of these conditions we would object to this planning application.

## Protected sites

The application is located approximately 100m from the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).

From the information submitted, we consider that provided that the developer adheres to standard industry-wide best practice measures and pollution prevention guidelines (which would be applied on site independently of the Habitat Regulations Assessment process), the proposal would not result in a likely significant or adverse effect on the SAC and is not likely to damage the notified features of the SSSI. Further information on standard

pollution prevention guidelines is provided under the advice for the developer section below.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

## Flood risk

The planning application proposes highly vulnerable development. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 Sea.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

We have reviewed the FCA undertaken by Wallingford HydroSolutions Ltd ref. WHS10278, dated May 2026. Our advice to you is that the FCA is incomplete. The advice in paragraph 10.24 of TAN15 is clear,

“In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.

Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request the following information.

The FCA states that the flood levels are based on levels in the 2011 Coastal design/extreme sea level dataset. It is not clear if the latest sea level rise figures published in April 2026, derived from the UKCP18 2100 dataset, have been used to estimate a flood level on site. The recent datasets may be slightly higher, but they are different. As such, clarification is required to ensure that the correct figures have been used, before providing a technical flood risk response. We also advise that the FCA should also include a 1 in 1000 year plus climate change flood levels/depth comparison, as required by Figure 2 of TAN15.

Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would object to the application.

TAN15 advises that the FCA should be proportionate to the nature and scale of the proposal. Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal. Further guidance is also available on our [website](#).

## Land contamination

We have reviewed the Geo-environmental Desk Top Study Report, ref. 784-B069008, prepared by Tetra Tech Limited, dated April 2025 and the Ground Investigation Report, ref. 784-B075403, prepared by Tetra Tech Limited, dated January 2026.

The Geo-environmental Desk Top Study Report has identified a number of potential contaminants of concern associated with the site's historic land use, including polychlorinated biphenyls (PCBs) and per- and polyfluoroalkyl substances (PFAS). The report also recommended the need for the intrusive ground investigation to assess the presence of such contaminants. Given the site's location, historical land use and subsequent potential for contamination, we would have expected targeted laboratory testing to be undertaken during the ground investigation in order to determine the presence and concentrations of these contaminants and to further assess the risks to controlled waters, including possible mobility towards the River Usk.

Based on the information provided, we recommend that the following conditions are imposed on any permission granted:

### **Condition: preliminary risk assessment**

No development shall commence until the following components of a scheme to deal with the risks associated with contamination at the site, has been submitted to and approved in writing by the Local Planning Authority.

1. A preliminary risk assessment which has identified:
  - all previous uses
  - potential contaminants associated with those uses
  - a conceptual model of the site indicating sources, pathways and receptors
  - potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The remediation strategy and its relevant components shall be carried out in accordance with the approved details.

**Justification:**

To ensure the risks associated with contamination at the site have been fully considered prior to commencement of development as controlled waters are of high environmental sensitivity; and where necessary remediation measures and long-term monitoring are implemented to prevent unacceptable risks from contamination.

**Condition: verification report**

Prior to the occupation or operation of the development a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved in writing by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include a long-term monitoring and maintenance plan for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be carried out in accordance with the approved details.

**Justification:**

To ensure the methods identified in the verification plan have been implemented and completed, and the risk associated with the contamination at the site has been remediated prior to occupation or operation. To prevent unacceptable risks to controlled waters and ecological systems.

**Condition: long term monitoring plan**

Prior to the occupation or operation of the development, a long term monitoring plan for land contamination shall be submitted and approved in writing by the local planning authority. The long term monitoring plan should include:

- Details of the methods and triggers for action to be undertaken
- Timescales for the long term monitoring and curtailment mechanisms e.g. a scheme of monitoring for 3 years unless the monitoring reports indicate that subsequent monitoring is or is not required
- Timescales for submission of monitoring reports to the local planning authority e.g. annually
- Details of any necessary contingency and remedial actions and timescales for actions
- Details confirming that the contingency and remedial actions have been carried out

The monitoring plan shall be carried out in accordance with the approved details, within the agreed timescales.

**Justification:**

A land contamination long term monitoring plan should be submitted prior to occupation or operation, to ensure necessary monitoring measures are approved to manage any potential adverse impacts as a result of development on water quality.

## Protected Species

We note that the information submitted in support of the above application (Alexandra Docks, Newport, Preliminary Roost Assessment, prepared by TACP (UK) Ltd ref. 61271, dated July 2025) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures or avoidance measures with your internal ecological advisor.

## Construction Environmental Management Plan

We have reviewed the Construction Environmental Management Plan ref. 51021-00 P2, dated 23.03.2026, prepared by Burroughs and have no comments to make on the document.

## 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.

## Advice for the developer

### Pollution prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the [NetRegs website](#).

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

**Jessica Jones**

Cynghorydd - Cynllunio Datblygu/Senior Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

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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.