

Ein cyf/Our ref: CAS-318134-H0G4
Eich cyf/Your ref: CONNEX/26/0670

Grant Hawkins
Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 22 September 2026

Annwyl Mr Hawkins/Dear Mr Hawkins

Bwriad/Proposal: Prior notification of demolition for Neptune Works.

Lleoliad/Location: Neptune Works, Usk Way, Newport, South Wales.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 3 September 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 **pollution prevention**. If this information is not provided, we would object to this planning application. Further details are provided below.

We have reviewed the following information submitted in support of the application and provide the following comments.

- Demolition Environmental Management Plan, Neptune Works, Usk Way, Newport NP20 2SS, Rev No. 0.0, prepared by Walters, dated 26.08.2026.

Protected sites

We note that the proposed development site is adjacent to the River Usk Special Area of Conservation (SAC), Site of Special Scientific Interest (SSSI) and protected sites of the Severn Estuary.

We have concerns that a likely significant effect from the proposed development on the SAC/SPA/Ramsar site cannot be ruled out. We advise that further information is required to adequately consider the potential impacts on the features of protected site(s) and in particular to enable your Authority to carry out a Habitats Regulations Assessment under Regulation 63 of The Conservation of Habitats and Species Regulations 2017 (as

amended). Further information on the Demolition Environmental Management Plan (DEMP) is required, as detailed below.

We also advise measures are undertaken to prevent otters from entering the area of works. We note heras fencing is proposed and covering of any excavations during demolition.

We note from the submitted application form and covering letter dated 26 August 2026 that the buildings identified as Berthing Jetty Structure 3 and Structure B do not form part of this current prior notification application and will be subject to a separate marine license application. We have no comments regarding these structures, but remind the applicant that it is their responsibility to ensure they secure all other permits/consents/licences relevant to any development.

Pollution prevention

We have reviewed the submitted DEMP. We advise that the following issues should be addressed in a revised DEMP using the following Guidance for Pollution Prevention (GPP) as best practice: <https://www.netregs.org.uk/tools/guidance-for-pollution-prevention-gpp-documents/>

Wheel washing

- Should be undertaken on an impermeable surface and 10m from a watercourse.
- Details on how runoff will be captured and stored/disposed of should be included.
- Direct discharge to storm drainage (even with silt socks) would be a breach of Environmental Permitting Regulations (EPR) 2016 regulations without a permit. Confirmation should be submitted that direct discharge is not taking place or the relevant permit will need to be applied for.
- Clarification provided on how the mitigation measures associated with wheel washing will be managed to ensure continued effective operation.

Invasive Species

- We refer you to NRW's guidance for management and requirements related to invasive non-native species: <https://naturalresources.wales/permits-and-permissions/species-licensing/invasive-alien-species/invasive-alien-species-regulations/?lang=en>.

Dust Management

- Clarification on how site runoff (water and mud) will be avoided, managed and achieved.
- Dust suppression via wetting down is acceptable, but clarification is required on how runoff will be avoided or /captured. Dust management and a dust strategy need to be clearly defined.

Surface Water

- General surface water management plans for this phase of the development should be prepared and submitted. This should be site specific, identifying sensitive receptors and the appropriate mitigation measures for implementation.

Contaminants

- We advise establishing a dedicated re-fueling area for the site, which should be on an impermeable surface and at least 10m from any drain or watercourse.
- The procedure for cleaning up spillages is required. We advise a spill/incident response plan is prepared. This should include a note to contact NRW (via the incident line telephone number: 0300 065 3000) for any off-site impact.
- No burning of waste for any reason should take place on site.

European protected species

Bats

We have reviewed the following information:

- Preliminary Roost Assessment (Pra) and Activity Surveys for Bats, Neptune Works Warehouses – ABP Newport, Project Ref: 238-03-32-25, prepared by ExCAL, Revision 1, dated 29th July 2026.

We note that the report has found that the building to be demolished is a confirmed summer day roost for two common pipistrelle bats and that an EPS licence will be needed. From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document [Natural Resources Wales Approach to Bats and Planning \(2015\)](#).

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by NRW, having satisfied the three tests set out in the Regulations (please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to “demonstration of no detriment to the maintenance of the favourable conservation status of European protected species.”

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. We recommend that you discuss the need to secure any avoidance or mitigation measures with your internal ecological advisor.

We advise that the works are carried out under licence. We refer you to the Chief Planning Officer’s letter, dated 1 March 2018, which advises planning authorities to attach an informative regarding licence requirements to all consents and notices where European protected species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Flood risk

The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 3 - Sea. We confirm we have no concerns regarding flood risk with the proposed demolition.

Flood Risk Activity Permit

The proposal site is adjacent to the River Usk. Works in, over, under, or near a main river or flood defence, or within a flood plain, may require a Flood Risk Activity Permit from us. Further advice is available on our website: [Natural Resources Wales / Check if you need a flood risk activity permit \(FRAP\)](#).

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.

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

Yn gywir/Yours faithfully,

Andrew Hurst

Cynghorydd - Cynllunio Datblygu/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.