

Ein cyf/Our ref: CAS-294713-K7X7
Eich cyf/Your ref: 25/1030

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 12 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Construction of a new sports and teaching facility including altered parking arrangements and associated landscaping and infrastructure

LLEOLIAD/LOCATION: Caerleon Comprehensive School, Cold Bath Road, Caerleon, Newport, NP18 1NF

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 December 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following conditions to any planning permission granted:

Condition 1: Construction Environmental Management Plan

Condition 2: Land Contamination

Please note, without the inclusion of these conditions we would object to this planning application. Further details are provided below.

We received a statutory pre application consultation notice for this proposal under Article 2D of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2012. We provided a substantive response to that consultation on 4 July 2025.

A copy of our response to the statutory pre-application consultation is attached for your information.

Protected Sites

The application site is situated approximately 150m from a watercourse which is likely to be hydrologically connected to the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) approximately 450m away.

At pre-application stage we advised:

Given the scale of the redevelopment and its proximity to the River Usk SAC/SSSI we would recommend to the local planning authority that the following condition regarding a Construction Environmental Management Plan (CEMP) is attached to any planning permission granted. In preparing a CEMP, we advise the applicant/developer should follow the best practice guidance set out in the Guidance for Pollution Prevention (GPP) documents | NetRegs | Environmental guidance.

We note the submission of a CEMP document as part of the planning application. We have concerns with the CEMP with regard to both protected sites and European protected species and therefore continue to advise that the CEMP condition as set out in our pre-application response (our reference: CAS-282251-B7D8) is attached to any planning permission granted.

We advise that the CEMP should also address the following:

1. NRW's contact number has been listed as an emergency contact. We advise that the CEMP is updated to include contacting NRW in the event of any off site impact resulting from an incident associated with the proposals. This can be included in an emergency response plan.
2. Some details on an emergency response plan are given in section 6.6; however, we do not consider this as being appropriate or fit for purpose in its current form. Further details and site specific considerations should be provided in an updated CEMP.
3. It is noted on page 32 that there will be a Surface Water Management Plan (SWMP) and Silt Containment Plan forthcoming for the development. These plans should be included within an updated CEMP.
4. We note reference to trade effluent consent on page 32 of the CEMP. We advise all trade effluent discharges intended for implementation should be sought via communication with Dŵr Cymru / Welsh Water. Any changes in discharges (i.e. to a watercourse) should not be undertaken until consultation with and approval by NRW is complete. This should be reflected in an updated CEMP.
5. We note the pollution prevention plans/guidelines intended for use (page 32). We advise site specific silt mitigation measures should be included in the SWMP.

We also advise that the CEMP should be amended in relation to European protected species. Please see below for our comments on this.

At this stage, we cannot rule out the proposal having a likely significant effect on the River Usk SAC. As such, we advise your authority that the proposal will need to be considered under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended).

Your authority is the Competent Authority for the purposes of the Conservation of Habitats and Species Regulations 2017. As such, you must not agree to any plan or project unless you are certain it will not adversely affect the integrity of a SAC.

You should carry out a test of likely significant effects (TLSE) for the River Usk SAC, which is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This test applies to impacts on the SAC from the proposed works, either alone or in combination with other plans and projects.

If the test concludes there is likely to be a significant effect(s) then an Appropriate Assessment of the impacts on the SAC from the proposed works, either alone or in combination with other plans and projects, will be required.

European Protected Species

At pre-application stage we noted ecological information ('Caerleon Comprehensive School, Newport Bat Emergence Survey Report' Issue 1, dated 5th December 2024, by Ecology Wales) identified that bats are present at the application site, in building K.

The submitted Planning Statement and Green Infrastructure Statement make reference to an updated survey of structures (October 2025) which confirms the presence of a pipistrelle bat still in building K but also evidence of bats, presumed to be low numbers of pipistrelle, in building D1. However, the updated structure inspection survey report has not been submitted with this application. We therefore advise you liaise with your Authority's ecologist as to whether more information needs to be submitted. We note that an EPS licence is required to demolish both buildings.

We also note the submission of a CEMP document. This document makes reference to bats. However, it does not reference the need for an EPS licence and only makes reference to building J being considered to be of moderate potential to support roosting bats and the need for a survey. It does not reference buildings D and K (to be demolished) which are confirmed bat roosts. The CEMP document should therefore be amended to address the above and the need for an EPS licence, and we advise liaison with your Authority's ecologist regarding the need for further survey.

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 Natural Resources Wales, 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 Local 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.

Land Contamination

We note from our historical map database that a fuel tank may be present in the north-east corner of the site. However, we consider this risk can be managed by the following planning condition being secured to any consent granted:

Condition:

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this unsuspected contamination shall be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be carried out as approved.

Justification: To ensure the risks associated with previously unsuspected contamination at the site are dealt with through a remediation strategy, to minimise the risk to both future users of the land and neighbouring land, and to ensure that the development can be carried out safely without unacceptable risks.

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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Annabelle Evans

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

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.