

Ein cyf/Our ref: CAS-290091-T5P0
Eich cyf/Your ref: CONNEX/25/0808

Jacob Cooke
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 28th October 2025

Annwyl Mr Cooke/Dear Mr Cooke

**BWRIAD/PROPOSAL: S73 APPLICATION TO VARY THE STANDARD TIME
CONDITION IN RESPECT OF 19/0875 FOR THE ERECTION OF DETACHED
DWELLING.**

**LLEOLIAD/LOCATION: RED BARN, WELLFIELD ROAD, MARSHFIELD, CARDIFF,
CF3 2UB.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 9 October 2025.

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

Protected Sites - Construction Environmental Management Plan (CEMP)

The application site is located within the Gwent Levels – Rumney and Peterstone Site of Special Scientific Interest (SSSI). The SSSI is notified for its range of aquatic plants and invertebrates associated with the reens and ditches of the drainage system. In summary, the special interests of the SSSI are dependent on the water quality, water quantity, the existence of the drainage system and its continued management. Any development which has an adverse impact on any of these factors will have an adverse impact on the wildlife for which the area was notified.

Updated Planning Policy Wales 12 provides the policy position on the protection of SSSIs (6.4.25- 6.4.27). It clearly states that there is a presumption against all forms of development in a SSSI, with the exception of developments necessary for the management of a SSSI and minor developments necessary to secure the SSSI's role as a living landscape.

This consultation is small for one home and its location is at the boundary of SSSI within footprint of the village, with no adjacent field ditches and on a field that is unlikely to

support SSSI features. Therefore our view is that it is unlikely there would be adverse impacts on the qualifying or notified features of the SSSI.

However, we request the following condition should be included on any planning permission your authority is minded to grant.

Condition

No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The CEMP should include:

- General Site Management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to commencement of development and implemented for the protection of the environment during construction.

Flood Risk

The S73 application proposes to vary the standard time condition for the erection of a detached dwelling (highly vulnerable development). The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 2 and 3 Rivers, Flood Zone 3 – Sea and TAN 15 Defended Zone.

We note that the Flood Consequences Assessment (FCA) that has been submitted for this S73 application, was previously submitted as part of application 25/0023. This application was for an outline application for three dwellings where had concerns regarding flood risk and requested further information. We note that this outline application was later withdrawn.

However, for the on the initial application 19/0875, our reference CAS-104996-Z2Y8, dated 19/12/2019 we raised no objection regarding flood risk. The conclusions of the approved FCA still apply, and therefore, we have no objection to extending the time to construct Plot 1.

We would recommend that the approved 2018 FCA (the one submitted with the 19/0875 planning application) be included within the document on the decision notice rather than the 2024 FCA that was used for the outline application.

Further advice

Land Drainage

Wellfield East & West Reens and Wood Ditch Reen are located to the south and south-east of the application site. These are Internal Drainage District (IDD) maintained watercourses. Provided no run-off enters the watercourses we have no objection to the proposed development. Please note, any proposed surface water run-off into these reens requires a formal Land Drainage Consent, in accordance with Section 23 of the Land Drainage Act 1991. Further information, including application forms, are available on our website.

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

Andrew Hurst

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Ffôn/Tel: 03000 653074
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.