

Ein cyf/Our ref: CAS-318063-L5T5
Eich cyf/Your ref: 26/0651

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 11 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Partial discharge of Condition 27 (Verification Plan) (Phase 5E2 only) of 06/0471 Redevelopment of the site to create a mixed use urban extension

Lleoliad/Location: Phase 5E2 Glan Llyn Development Site, Queensway, Llanwern Newport, South Wales

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 02 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 **land contamination**. If this information is not provided, we would object to this planning application. We are unable to advise that Condition 27 (Verification Plan) is partially discharged at this time. Further details are provided below.

We have reviewed the following documents:

- Desk Study and Phase 2 Geo-Environmental Report, Glan Llyn, Newport, Phase 5E2, prepared by Rodgers Leask Ltd, dated August 2026
- Technical Note, Phase 5E2 Controlled Waters Detailed Quantitative Risk Assessment Addendum, prepared by Rodgers Leask Ltd, dated August 2026
- Glan Llyn, Phase 5E2 Remediation Strategy, prepared by Rodgers Leask Ltd, dated August 2026
- Glan Llyn Human Health and Controlled Waters Validation Plan, prepared by Rodgers Leask, dated May 2026

Desk Study and Phase 2 Geo-Environmental Report

Reference is made to a surface water feature, Drain 4, throughout the reports. However, it is not included on the site location plan. It is unclear where Drain 4 is in relation to the Phase 5E2 site boundary. Confirmation of the location of Drain 4 is required, as it will have implications for validation and the future discharge of condition 28.

There is no evidence of visual or olfactory contamination documented in the ground investigation reporting. However, the concentrations of hydrocarbon ranges encountered in Phase 5E2 are, in some cases, orders of magnitude greater than those used in the Controlled Waters Risk Assessment (CWRA).

We note that BTEX parameters were recorded at Limits of Detection (LOD), which have skewed the results in some cases. For future reference, the use of differing LOD should be discussed for quality assurance purposes.

Section 8.1.4 of the ground investigation report states that no samples of perched or groundwater were taken as part of the exploratory investigation. There are, however, some laboratory certificates for water sample results dated May 2022 and November 2021 by europhin sample ID D2-S. Confirmation of what these samples are is required.

Controlled Waters Risk Assessment Addendum

The objectives and scope in Section 1.3 are described as,

“assess the soil chemical testing results obtained during previous ground investigations, within the Site, against the soil re-use criteria presented in H F Consulting’s Soils Validation Strategy.”

Our understanding was that, for Phases 4 onwards, a CWRA Addendum is required to assess CWRA input parameters in relation to phase specific site investigation data, to determine whether the CWRA is representative and remains appropriate.

Section 3.2 suggests data used in the CWRA has utilised ground investigation taken from within the site. This is not the case as it was not collected until 2020/2021, after the CWRA was completed. For the avoidance of doubt, we advise that this should be revised.

Section 4.2 reports a number of contaminants of concern that do not appear to be representative of the CWRA, in particular Cyanide, Pyrene and some Aliphatic and Aromatic Hydrocarbon ranges. We note the commentary regarding the differences in data size impacting the 95th percentile figures. However, the majority of the data compared are exceeding maximum and average concentrations and are therefore not considered comparable. Further assessment as to how this impacts the CWRA re-use criteria is required to ensure that they are still applicable, prior to the partial discharge of condition 27.

Section 4.3 demonstrates a relatively high number of exceedances for Cyanide and Benzo(b)fluoranthene and a few exceedances of other PAHs and hydrocarbon ranges. Management of these will be assessed as part of condition 28. We advise that the above

concerns with regard to the CWRA inputs need to be addressed prior to this, as the results of Section 4.3 could change.

Remediation Strategy

Section 5.0 suggests data used in the CWRA has utilised ground investigation taken from within the site. This is not the case as it was not collected until 2020/2021 after the CWRA was completed. For the avoidance of doubt, we advise that this should be revised.

With regard to Appendix A, Drawing No 18669RLL-22-XX-DR-O-0277, we note a number of areas where material fails re-use criteria; some areas that exceed reuse criteria of metals and or cyanide; and some areas that have no data, which we understand to be areas that were not possible to trial pit, due to the presence of onsite obstructions, such as stockpiles. We will review this information in greater detail as part of the future discharge of condition 28.

Validation Plan

We have no detailed comments regarding the Validation Plan documentation.

Summary

In summary, further information is required to address our concerns. We are unable to recommend that condition 27 for Phase 5E2 is partially discharged at this time.

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

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.