

Ein cyf/Our ref: CAS-284806-N3D7
Eich cyf/Your ref: 25/0570

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 12 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PARTIAL DISCHARGE OF CONDITION 27 (SITE INVESTIGATION FOR PHASE 4G ONLY) OF PLANNING PERMISSION 06/0471 FOR REDEVELOPMENT OF SITE TO CREATE A MIXED USE URBAN EXTENSION

LLEOLIAD/LOCATION: Llanwern Works Queensway Llanwern Newport NP19 4QZ

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above.

We have no objection to the proposed development as submitted and provide the following advice.

We have reviewed the following documentation made available on the planning portal linked above:

- Glan Llyn Phase 4G, Desk Study and Phase 2 Geo-environmental Interpretive Report. Rodgers Leask. Report Ref: 18669-RLL-25-XX-RP-O-0753-P01, dated: July 2025
- Glan Llyn, Newport, Phase 4G, Remediation Strategy. Rodgers Leask. Report Ref: 18669-RLL-25-XX-RP-O-0757-P01, dated: July 2025
- Phase 4G Controlled Waters Detailed Quantitative Risk Assessment Addendum. Rodgers Leask. Document Ref: 18669-RLL-25-XX-RP-O-0763, dated: July 2025
- Application Form
- Covering Letter
- Site Location Plan

1&2: Desk Study & Phase 2 Geo-Environmental Report

- We note that within the proposed development plan, the northern boundary and the top half of both the eastern and western boundaries will be adjacent to proposed surface water courses Central Lake and East Lake. This will need to be considered within the DQRA.

- We note that the investigation locations generally have good coverage over the phase, although there is an absence of locations within the central and north-eastern phase area.
- We also note perched water was encountered in 37 locations; however no water samples were recovered. We do note that a DQRA is recommended to assess risks to Controlled Waters, and I will therefore assess the relevance and appropriateness of this within my review of the DQRA, which may incorporate additional site investigation data.
- We also note visual and olfactory evidence of contamination in the form of hydrocarbon odour and small spots of tar were observed in 2 locations. It is expected that the management of this material will be captured within the remediation strategy.

We have no objection to the discharge of Condition 27 part 1 & 2 (PRA and Site Investigation)

3: Controlled Waters Detailed Quantitative Risk Assessment & Remediation Strategy

- We note the main DQRA document has not been uploaded to the planning portal for review. We acknowledge that this has, in general, been accepted as a suitable document across the Site, however it does have to be supplemented with a phase specific assessment of the Site Investigation data against the derived DQRA targets to identify any material which may pose an unacceptable risk to controlled waters receptors; we note this technical supplementary document has been submitted. We do, however, recommend that the full DQRA (referenced below) be uploaded to the LPA planning portal for completeness as this remains a key document for this discharge of condition application.
 - o *RLL, Updated Controlled Waters Detailed Quantitative Risk Assessment, Glan Llyn, ref. 18669-RLE-19-RP-O-0006, dated June 2022*
- We welcome the inclusion of a comparison of Site Data against the DQRA dataset. We agree that, in general, concentrations of contaminants within Phase 4G are broadly similar to those utilised within the CWDQRA.
- Section 4.3 references "*H F Consulting agreed soil re-use values for a residential end use as outlined in the Soils Validation Strategy for the Protection of Controlled Waters*". The full table is included below as Screenshot 1, taken directly from the HFCL Soil Validation Strategy included as Appendix E of the Remediation Strategy, and the supporting narrative confirms these are the "*Agreed soil re-use values (SRVs)*" from the Rodgers Leask (2019-2022) DQRA report.

Screenshot 1:

Table 2.1 Agreed soil re-use values (SRVs)

Determinand	Soil re-use values (mg/kg)	
	Commercial area	Residential area ¹
Inorganic Metals and Metalloids		
Arsenic	1.15E+4	2533
Cadmium	331	73.0
Chromium	4.27E+4	9431
Copper	2042	451
Iron	1.38E+6	3.05E+5
Lead	7.12E+4	1.57E+4
Manganese	1.51E+5	3.33E+4
Mercury	596	132
Nickel	5.21E+4	1.15E+4
Selenium	3178	702
Vanadium	7271	1606
Zinc	6.23E+5	1.38E+5
Other Inorganics		
Ammoniacal Nitrogen	699	154
Cyanide	9.14	2.02
Organics		
Benzene	17.2	3.80
Toluene	582	128
Ethylbenzene	364	80.0
Xylene	336	74.0
Phenol	13.8	3.05
TPH Criteria Working Group		
Aliphatics >C5-C6	331	73.0
Aliphatics >C6-C8	1626	359
Aliphatics >C8-C10	1.29E+4	2841
Aliphatics >C10-C12	1.02E+5	2.25E+4
Aliphatics >C12-C16	2.04E+6	4.50E+5
Aliphatics >C16-C21	2.56E+8	5.66E+7
Aliphatics >C21-C35	2.56E+8	5.66E+7
Aliphatics >C35-C44	2.56E+8	5.66E+7
Aromatics >EC5-EC7	38.5	8.51
Aromatics >EC7-EC8	802	177
Aromatics >EC8-EC10	650	144
Aromatics >EC10-EC12	1027	227
Aromatics >EC12-EC16	2043	451
Aromatics >EC16-EC21	6447	1424
Aromatics >EC21-EC35	5.12E+4	1.13E+4
Aromatics >EC35-EC44	5.12E+4	1.13E+4
Aromatics >EC40-EC44	5.12E+4	1.13E+4
Polyaromatic Hydrocarbons		
Acenaphthylene	75.7	16.7

Determinand	Soil re-use values (mg/kg)	
	Commercial area	Residential area ¹
Acenaphthene	135	30.0
Anthracene	155	34.0
Benz(a)anthracene	2748	607
Benzo(a)pyrene	156	34.0
Benzo(b)fluoranthene	15.5	3.42
Benzo(k)fluoranthene	22.9	5.05
Benzo(g,h,i)perylene	60.2	13.0
Chrysene	2812	621
Dibenzo(a,h)anthracene	3793	838
Indeno(1,2,3-cd)pyrene	115	25.0
Fluoranthene	30.1	6.64
Fluorene	123	27.0
Naphthalene	124	27.0
Phenanthrene	123	27.0
Pyrene	346	76.0

- It is recommended that it be clarified within the DQRA technical note that these are the RL derived SRVs and not the HFCL re-use criteria; HCFL have derived re-use criteria but these are to be used as part of the verification works under Condition 28.
- We note a number of exceedances of the DQRA target values have been identified; the locations of these are presented on drawing 18669-RLL-25-XX-DR-O-0762. It is clear there are some hotspots of material which are unsuitable for retention; the report states this material is to be managed via the remediation strategy and subsequently verified. We expect the management of this material to be addressed with subsequent verification reporting. This position may be reviewed following revision of the exceedances table as per the above comment.
- We have no further comments to make on the remediation strategy.

We have no objection to the discharge of Condition 27 part 3 (DQRA)

4. Verification Plan

- We note this is included in Section 9.0 of the Remediation Strategy
- We note that “the re-use of materials in relation to controlled waters should be validation in accordance with the H F Consulting Soils Validation Strategy, contained as Appendix E. This verification strategy has generally been agreed for the Site previously.

We have no objection to the discharge of Condition 27 part 4 (Verification Plan)

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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,

Lindy Marshall
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.