



**Cyfoeth  
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Wales

Ein cyf/Our ref: SE/2014/118833/01-L01  
Eich cyf/Your ref: CONEX/15/0257

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24<sup>th</sup> April 2015

Annwyl Mr Millinship / Dear Mr Millinship

**PARTIAL DISCHARGE OF CONDITION 16 (WORKING METHOD STATEMENT AND CODE OF CONSTRUCTION PRACTICE) OF PLANNING PERMISSION 00/0768 FOR A REPLACEMENT PRIMARY SCHOOL AND RESIDENTIAL DEVELOPMENT AT LAND TO SOUTH OF AND INCLUDING GLEBELANDS STADIUM, BANK STREET, NEWPORT**

Thank you for consulting us on the aforementioned partial discharge of condition application, which we received on 12 March 2015.

Four separate documents are provided produced by Greenhill, labeled as/entitled:

- Construction Method Statement, March 2014, Rev A
- Project Environmental Impact Assessment, dated 06/08/13
- Appendix A, a Traffic Management Plan, undated
- Project Risk Assessment, March 2014, Rev A

We do not support the partial discharge of this condition as the details provided are insufficiently clear on the measures that will be implemented to ensure that the re-en on the development site and the River Usk SAC will be protected from pollution derived from works.

## Detailed Comments

Our comments in this letter are provided only in relation to the requirements of Condition 16 of planning permission 00/0768.

The details provided appear to address risks associated with land raising only. Whilst a range of measures are outlined in the documents provided that can act to safeguard against pollution, it is not clear if all, or exactly what will be implemented. The project Risk Assessment documents States (Page 24):

*“Greenhill Construction to work in line with appropriate actions as detailed in the ecology Reports prepared by Sturgess ecology in respect of the River Usk and the Reen. No other significant ecological features have been identified on the site. A summary is included below.*

*Measures must ensure protection of the SSSI, SINC sites, protected species and key habitats. Mitigation measures should seek to: i. avoid damage to ecological interests within and without the proposed development boundary; ii. mitigate any unavoidable damage; The method statement should include a monitoring programme covering the natural heritage interests through construction and operational phases of the development. Monitoring should trigger the implementation of the relevant contingency measures identified in Environmental Management Plans (EMPs). “*

The specific “ stress Ecology” report referred to is not clear, neither are the specific actions that will be implemented. The Environmental Management Plans referred to are also not clearly referenced. The section of text that follows the above, starting on page 24 and continuing on page 25 starts with:

*Possible measures to avoid adverse impacts on the River Usk Special Area Of Conservation (SAC) include: .....*”

To serve the purpose of the condition the documentation should be clear what will be implemented. We therefore consider that the documents are not currently adequate to be accepted for partial discharge of the condition.

We note the references to a possible 10 metre buffer strip against the River Usk. To control against the potential for polluted/sediment laden run-off, we would recommend that this should be provided and that it is appropriate to fence-off both the buffer strip and the river bank from construction or other activities. Similarly we would recommend that the reen and a suitable buffer strip should also be provided and fenced off as part of the measures that would be implemented.

In summary, we do not support the partial discharge of this condition as the details provided are insufficiently clear on the measures that will be implemented to ensure that the re-en on the development site and the River Usk SAC

I trust that these comments clarify our position.

Yn ddiffuant/Yours sincerely

S.A.J. Reid

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**Gwefan / Website:** [www.cyfoethnaturiolcymru.gov.uk](http://www.cyfoethnaturiolcymru.gov.uk) /  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

Ein pwrpas yw sicrhau fod adnoddau naturiol Cymru yn cael eu cynnal, gwella a'u defnyddio yn gynaliadwy, yn awr ac i'r dyfodol / Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.