

Technical Note

Project:	P18-669 Glan Llyn, Newport
Subject:	Phase 5D & 4B PC28-1 response to NRW comments, March 2026
Date:	27 March 2026
Document Reference:	18669-RLL-26-XX-RP-O-0872
Planning Reference:	26/0149
Prepared by	Chris Wilson Principal Geo-Environmental Consultant, Rodgers Leask Limited
3rd party Review	Joe Gomme Associate Director, H Fraser Consulting Ltd

Documentation relating to Planning Condition 28 (Part 1) of outline planning approval 06/0471 for Phase 4B and 5D within the Glan Llyn Development was submitted by Revantage Real Estate (RRE) in February 2026. The application included documentation from Rodgers Leask Limited (RLL) and H Fraser Consulting Limited (HFC).

On the 12th of March 2026 a request was made for further information by Natural Resources Wales (NRW) relating to the HFC Soil Quality Verification Report, as follows:

We have reviewed the Glan Llyn, Llanwern: Soil Quality Verification Report, Phase 4B 5D (H Fraser Consulting dated 07.02.2026 Ref. 31040 R2 Phases 4B 5D). Further information is required.

The full request for further information (CAS-302002-Y6D5) is presented in **Appendix A**, The following presents NRW clarification points and our responses in **purple**:

Confirmation is required that the minimum distance of 12.5m from controlled waters is applicable to the placement of materials within these phases. This is not stated in the report and it is not clear from Figure 3.1 Backfill Zones.

The nearest waters within the Glan Llyn surface water network to the two phases is the lake in the centre of the Glan Llyn development. This lake is approximately 10 m minimum from materials placed in Phase 4B and 50 m from materials placed in Phase 5D. Note that all of the recorded exceedances of 95th percentiles and of UCLmean values for Contaminants of Concern (CoC) are in the fill for Phase 5D. Therefore the distance from any materials found to have relatively high concentrations of CoC is a minimum of 50 m from the surface water network.

Clarification is also required on whether the assessment, set out in Section 4.4 and Table 4.6 of the Soil Quality Verification Report, is an assessment of the Upper Confidence Limit (UCL) mean concentration of each backfill zone and with the Soil Re-Use Values (SRVs).

The assessment follows the methodology that has been developed in consultation with NRW and agreed through NRW's approval of H Fraser's 2024 report titled "Glan Llyn: Soils validation strategy for protection of controlled waters", reference 30937 R2. Section 3 of that report explains that distance-specific reference values were derived using the RTM

spreadsheet; the reference values were set to ensure that the modelled contaminants did not reach relevant receptors at or above the SRV. They indicate whether values that may exceed the SRV in individual backfill areas or samples can be expected to cause a breach of the SRV at the modelled distances. The SRV are therefore the basis for determining the reference values in Table 4.4 of the report on Phases 4B & 5D.

The assessment indicates that for the remaining contaminants of concern, the modelled contaminants are not expected to reach a distance of 12.5m over a 1000 year period. It is unclear, however, why this is shown for the UCL mean concentration, but not when assessing the 95 percentile, as this is usually determined by contaminant properties, as opposed to concentrations. Further explanation of this assessment is required.

The reference values are independent of both the UCLmean and the 95th percentile. As noted above, they simply present the minimum concentrations that are predicted to lead to exceedances of the SRV at the given distances. The modelling indicates that even very high concentrations of the contaminants of concern would cause no significant impact, due to the significant attenuation that the contaminants are subject to during transport in the Glan Llyn environment.

Appendix A - NRW Request for Further Information

Ein cyf/Our ref: CAS-302002-Y6D5
Eich cyf/Your ref: 26/0149

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 12 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: PARTIAL DISCHARGE OF CONDITION 28 (VERIFICATION)
(PART 1 ONLY) OF 06/0471 REDEVELOPMENT OF THE SITE TO CREATE A MIXED
USE URBAN EXTENSION (IN RELATION TO PHASE 4B/5D ONLY)**

**LLEOLIAD/LOCATION: GLAN LLYN, PHASE 4B AND 5D, QUEENSWAY, LLANWERN,
NEWPORT**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 27 February 2026.

We have concerns with the application as submitted. We do not recommend your Authority partially discharges Condition 28 (Part 1) for Phase 4B and 5D for the following reasons.

Land Contamination

We have reviewed the Glan Llyn, Llanwern: Soil Quality Verification Report, Phase 4B 5D (H Fraser Consulting dated 07.02.2026 Ref. 31040 R2 Phases 4B 5D). Further information is required.

Confirmation is required that the minimum distance of 12.5m from controlled waters is applicable to the placement of materials within these phases. This is not stated in the report and it is not clear from Figure 3.1 Backfill Zones. Clarification is also required on whether the assessment, set out in Section 4.4 and Table 4.6 of the Soil Quality Verification Report, is an assessment of the Upper Confidence Limit (UCL) mean concentration of each backfill zone and with the Soil Re-Use Values (SRVs).

The assessment indicates that for the remaining contaminants of concern, the modelled contaminants are not expected to reach a distance of 12.5m over a 1000 year period. It is unclear, however, why this is shown for the UCL mean concentration, but not when

assessing the 95 percentile, as this is usually determined by contaminant properties, as opposed to concentrations. Further explanation of this assessment is required.

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

Yn gywir / Yours faithfully,

Jessica Jones

Jessica Jones

Cynghorydd - Cynllunio Datblygu/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.