

Ein cyf/Our ref: CAS-278187-K7Y4
Eich cyf/Your ref: 25/0254

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 22 April 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PARTIAL DISCHARGE OF CONDITIONS 2 (CYCLE PARKING), 3 (EVACUATION PLAN), 4 (LANDSCAPING), 5 (MATERIALS) 6 (CEMP) AND 9 (SITE INVESTIGATION) OF 24/0633 DEMOLITION OF EXISTING CONTAINER OFFICES AND CONSTRUCTION OF NEW PORTAKABIN OFFICES AND ASSOCIATED WORKS

LLEOLIAD/LOCATION: LAND WEST OF TOM LEWIS WAY, ALEXANDRA DOCKS, NEWPORT, NP20 2WF

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 03 April 2025.

We have concerns with the application as submitted. We do not recommend your Authority discharges conditions 6 and 9 for the following reasons.

Condition 6 (CEMP)

The Construction Environmental Management Plan (CEMP) by Wardell Armstrong (February 2025) refers to Invasive Non-Native Species (INNS) in sections 5.6.2 and 5.6.3. However, the CEMP does not include details regarding biosecurity measures which will be in place to avoid the spread of INNS. For example, measures including but not limited to, ensuring all vehicles, equipment, and Personal Protective Equipment are thoroughly cleaned and dried prior to arrival on site. Given the hydrological links at the site to the Severn Estuary European Marine Site, we advise these measures should be included.

Furthermore, the CEMP does not include our incident hotline number. Any pollution incidents, including fuel or oil spills, must be reported to NRW via 0300 065 3000, which operates 24 hours a day. We advise this information should be included.

In the absence of the above, we do not recommend your Authority discharges condition 6.

Condition 9 (Site Investigation)

We agree with the recommendations in the Desk Study and Preliminary Risk Assessment Report by Wardell Armstrong (March 2025) to complete further site investigation to

determine the presence of any contaminants which may pose a risk to controlled waters receptors.

In the Ground Investigation Report by Wardell Armstrong (February 2025), groundwater and surface water have been identified as a receptor. Groundwater monitoring infrastructure was installed in the three windowless sample locations and groundwater was encountered in all three wells during the monitoring events.

However, no groundwater samples were collected for analysis and no rationale is presented for why these were not considered necessary to determine concentrations of any contaminants of concern within groundwater to assess whether potential risks are posed to these receptors.

There are concentrations of some potential contaminants of concern recorded within soils. Whilst we note soil concentrations are not at levels/concentrations which exceed the Generic Assessment Criteria, these criteria are human health driven and not controlled waters. Some qualitative information is included within the Qualitative Environment Risk Assessment Table, however there is limited discussion on potential risks posed to controlled waters receptors.

We advise appropriate investigation of groundwater, and a subsequent assessment of potential risks is required. In the absence of this information, we do not recommend your Authority discharges condition 9.

We have no comments to make in relation to the discharge of conditions 2, 3, 4, and 5 of 24/0633.

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,

Sarah Lund

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.