

Ein cyf/Our ref: CAS-284790-R0F9
Eich cyf/Your ref: 25/0549

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 (CONTAMINATION)
(PHASE 4B & 5D ONLY) OF PLANNING PERMISSION O6/0471 FOR THE
REDEVELOPMENT OF THE 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, which we received on 17 July 2025.

We have concerns with the application as submitted. We do not recommend your Authority discharges condition 27 for the following reasons.

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

- Glan Llyn Phase 4B and 5D, Desk Study and Phase 2 Geo-environmental Interpretive Report. Rodgers Leask. Report Ref: 18669-RLL-22-XX-RP-O-0328-P03, dated: June 2025
- Glan Llyn, Newport, Phase 4B & 5D, Remediation Strategy. Rodgers Leask. Report Ref: 18669-RLL024-XX-RP-O-0587-P02, dated: June 2025
- Phase 4B & 5D Controlled Waters Detailed Quantitative Risk Assessment Addendum. Rodgers Leask. Document Ref: 18669-RLL-24-XX-RP-O-0592, dated: June 2025
- 1&2: Desk Study & Phase 2 Geo-Environmental Report

We note that the investigation locations have good coverage over the central, southern and eastern area of the Site, however the north and western areas of the phase have no investigation.

We also note perched water was encountered in 24 locations; however no water samples were recovered. We do note that a DQRA is recommended to assess risks to Controlled Waters and will therefore assess the relevance and appropriateness of this within the review of the DQRA, which may incorporate additional site investigation data.

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) be uploaded to the LPA planning portal for completeness as this remains a key document for this discharge of condition application: '*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 note a number of contaminants, predominantly BTEX, phenol, aromatic hydrocarbons and pyrene, have higher concentrations in Phase 4B & 5D when compared to the input dataset of the DQRA. We do note that the proposed remedial works includes full turnover of the phase including management of identified contaminated material, and as such it is anticipated that these concentrations will be managed via that process; this will be confirmed through verification sampling and reporting.

Section 4.3 states ground investigation results have been compared against HFCL agreed soil re-use values for residential end-use, however the included table is titled "Summary of exceedances of H Frase Consulting Reuse Criteria for a Commercial End Use" – screenshot from the report below:

Screenshot 1:

Summary of Exceedances of H Fraser Consulting Reuse Criteria for a Commercial End Use				
Contaminant	No. of Exceedances	Location of Exceedances (Depth in m)	Concentration Range (mg/kg)	Screening Value (mg/kg)
Cyanide (Total)	7	P14-2 (1.80), Q14-1 (0.50), Q17-1 (0.30), U16-1 (1.00), V10-2 (1.50), V12-2 (1.60), V18-1 (0.50)	2.35 – 20.90	2.02
Manganese	2	P15-2 (2.20), P16-1 (1.30)	34400.00 – 93900.00	33300.00
Phenanthrene	2	Q17-2 (0.30), T10-1 (0.30)	44400 – 60800.00	27000.00
Fluoranthene	7	P15-2 (2.20), Q14-1 (0.50), Q17-2 (1.50), R15-2 (1.20), T10-1 (0.30), T10-3 (2.90), V10-1 (0.30)	7750.00 – 58300.00	6640.00

From review of the screening criteria within reporting, despite the title of the table, the screening values are for the residential phase (this should be corrected within the re-submission). The full table is included below as Screenshot 2, 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 2:

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

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.

In addition, the screening values presented in Screenshot 1 for PAH (phenanthrene, fluoranthene, benzo(b)fluoranthene and benzo(k)fluoranthene) are three orders of magnitude greater than those presented in Screenshot 2. This must be reviewed and the tables updated accordingly.

Despite the above, 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-0751. 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 also note that visual and olfactory evidence of contamination was identified in a number of locations during the investigations; the narrative states that the presence of significant gross contamination unsuitable for retention in the wider development as being unlikely – the management of this material will need to be assessed and discussed under the verification reporting.

At this stage, given the above outstanding query regarding screening values, we are unable to recommend discharge of Condition 27 part c.

We have reviewed the remediation strategy and have no further comments to make at this stage; this position will be reviewed when further information is submitted in response to the DQRA query raised.

4: Verification Plan

We have reviewed the verification plan and have no further comments to make at this stage; this position will be reviewed when further information is submitted in response to the DQRA query raised.

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

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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.