

Ein cyf/Our ref: CAS-292199-T1J1  
Eich cyf/Your ref: 25/0933

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 17 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: PRIOR NOTIFICATION FOR THE PROPOSED DEMOLITION OF FORMER ENGINEERS OFFICE AND FLAT-ROOFED BUILDING AT NEWPORT DOCKS.**

**LLEOLIAD/LOCATION: 7 EAST WAY ROAD, ALEXANDRA DOCKS, NP20 2UW.**

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

**We have concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these concerns, you should seek further information from the applicant regarding protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.**

### **Protected Sites**

#### Demolition Environmental Management Plan

Due to the sites close proximity to the River Usk special area of conservation (SAC) and site of special scientific interest (SSSI) a Demolition Environmental Management Plan (DEMP) will be required; it is noted from the method statement that this DEMP will be developed by the contractor.

We advise the following be included in the DEMP:

- Demolition methods: details of materials, how waste generated will be managed
- General Site Management: details of the demolition programme including timetable, details of site clearance; details of site construction drainage, containment areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.

- Pollution Prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan. GPP5 Works and maintenance in or near water is particularly relevant for this site clearance
- Details of the persons and bodies responsible for activities associated with the DEMP and emergency contact details.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), your authority must, before deciding to give consent for a project which is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, make an appropriate assessment of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify. In the absence of that assessment, NRW cannot advise that the proposals would not result in an adverse effect upon the SAC/SPA/Ramsar site.

## **Flood Risk**

We note that the prior notification proposes the demolition of former engineers' office and flat-roofed building. The flood map for planning (FMfP) identifies the building to be at risk of flooding withing flood zone 3 (Sea).

Given the source of flooding is tidal an assessment of the impacts elsewhere would not be required.

## **Protected Species**

We note that the information submitted in support of the above application (preliminary roost assessment and activity survey for bats, by Excal, reference 238-03-19-25, dated Oct 25) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

## **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.

## **Advice for the Developer**

### Landscaping

We note the Landscape consultee response (Gill Mackley CMLI Mackley Davies Associates Ltd for Streetscene) suggests a green verge and tree planting would be

beneficial. We support having green space along the River Usk. If planting is proposed for this application, then only plants native to the area should be used and those grown in British nurseries.

These will be better able to support biodiversity on site. Plants grown in British nurseries remove the risks of importing diseases that our plants have no resistance to and spreading pests that have no natural predators in the UK. This is of particular importance near designated sites and also because of the Wales wide habitat connectivity planning work being undertaken through Resilient Ecological Networks (RENs) via NRW and partners.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

**Kirsty Murphy**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [southeastplanning@cyfoethnaturiolcymru.gov.uk](mailto: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.