

Ein cyf/Our ref: CAS-280623-J3G2
Eich cyf/Your ref: 25/0310

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 30 May 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: NEW VEHICLE ACCESS ONTO THE PUBLIC HIGHWAY TO PROVIDE A SECONDARY ACCESS FACILITY TO THE EXISTING GD ENVIRONMENTAL YARD AND EXISTING HAULAGE BUSINESS OPERATIONS

LLEOLIAD/LOCATION: GD ENVIRONMENTAL, NASH ROAD, NEWPORT, NP18 2BS

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 May 2025.

We have concerns with the application as submitted. However, we are satisfied these concerns can be overcome by attaching the following condition to any planning permission granted and including the documents identified in the approved plans and documents condition on the decision notice.

Please note, without the inclusion of this condition and these documents we would object to this planning application. Further details are provided below.

Protected Sites

The proposed development is located approximately 1km from the Gwent Levels: Nash and Goldcliff Site of Special Scientific Interest (SSSI). The proposal involves culverting a drainage ditch which is connected to the SSSI (the submission refers to the drainage ditch as a reen - for clarity, we advise our mapping indicates it is a drainage ditch). Furthermore, Great Spytty Reen, which is also connected to the SSSI, is located approximately 10m from the application site boundary.

The Gwent Levels SSSIs are notified for the range of aquatic plants and invertebrates associated with the reens and ditches of the drainage system. The special interests of the SSSI are dependent on the water quality, water quantity, the existence of the drainage system and its continued management. Any development which has an adverse impact on any of these factors will have an adverse impact on the wildlife for which the area is notified.

We have concerns the proposed development as submitted, will damage the features for which the SSSI is of special interest. We therefore recommend planning permission should

only be granted if appropriate planning conditions are included to avoid damage to the special interest features of the SSSI.

Paragraph 6.4.26 of *Planning Policy Wales* states development should be refused where there are adverse impacts on the features for which a site has been designated.

The Ecological Impact Assessment (EclA) by Richard Green Ecology (14/02/2024) advises pollution prevention and control measures should be put in place during construction to avoid any drainage of run-off into the ditch. Based on the information submitted, we consider the proposed scheme will, subject to the inclusion of condition advised below, avoid damaging the features for which the SSSI is of special interest.

We therefore advise the following condition should be attached to any permission granted:

Condition: Construction Environmental Management Plan

No development or phase of development, including site clearance, shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include the below:

- Construction methods: details of materials, how waste generated will be managed;
- General Site Management: details of the construction 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;
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Reason: A CEMP should be submitted to ensure necessary management measures are agreed prior to construction and implemented for the protection of the environment.

We advise the applicant Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the [NetRegs website](#), are particularly relevant for this development;

Should you be minded to grant permission for the above planning application without attaching such conditions as described above to the permission, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended).

European Protected Species

The EclA confirms water vole presence along the drainage ditch. The proposal will result in the loss of up to 8m of bankside vegetation on each bank to facilitate the proposed access. We have considered the water vole displacement proposals within the EclA. We consider

EclA provides an adequate basis upon which to consider the potential impacts of the scheme on this species and inform the decision-making process.

We consider the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range provided the measures set out in the EclA are implemented. Therefore, we advise the following documents are included in the approved plans and documents condition on the decision notice:

- Ecological Impact Assessment by Richard Green Ecology (14/02/2024);
- Proposed Access Road at Nash Road Depot Newport drawing, Drawing No. AR01 – 01, by GD Environmental (Jan 2024).

We advise the proposed works require a licence under the Wildlife and Countryside Act 1981 before works commence. We may offer further advice at the licence application stage. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Based on the information in the EclA, we have no comments to make in relation to Great Crested Newt or Otter.

Flood Risk

The planning application proposes less vulnerable development. The Flood Map for Planning identifies the application site to be at risk of flooding and is within Flood Zone 2 and 3 (Sea) and a TAN15 Defended Zone.

Given the nature and scale of the proposed development (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences.

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.

Advice for the Developer

The application site is within the Caldicot and Wentlooge Levels Internal Drainage District (IDD). No run-off is permitted to enter the IDD without Land Drainage Consent under the terms of the Land Drainage Act 1991 and the Flood and Water Management Act 2010.

Further guidance is available on our website: [Natural Resources Wales / Apply for land drainage consent](#).

If you have any queries about 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

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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.