

Our Ref: CAS-304371-Y5R6

Your Ref: 26/0217

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Date: 21 April 2026

Dear Sir/Madam,

**Proposal: Partial discharge of Conditions 2 (Arboriculturist), 3 (CEMP), 4 (Contamination risk assessment), Condition 5 (Enclosure details), 6 (Construction of phasing), 7 (Retaining wall details), 8 (ULEV infrastructure details), 9 (Crossover closure details) and 16 (Amenity space management) of planning permission 24/0756.**

**Location: Land Formerly Known As 21 Kelvedon Street, Newport.**

Thank you for consulting Natural Resources Wales (NRW) about the above, which we received on 27 March 2026.

We have **concerns** with the application as submitted. We do not recommend that your Authority discharges Condition 2 as insufficient information has been provided. We advise only the partial discharge of parts 1 and 2 of Condition 4. Additional information is required in respect of parts 3 and 4. Further details are provided below.

## **Condition 2: Construction Environment Management Plan (CEMP)**

We have reviewed the submitted CEMP by Kennedy James Griffiths dated September 2025 and advise the following additional information is provided.

### **Emergency Spill Procedures and Incident Response Plan**

A suite of comprehensive emergency spill procedures and incident response plans have not been submitted as part of the CEMP. Given the site's proximity to the River Usk Special Area of Conservation (SAC), we advise that this information should be submitted in an amended CEMP. We advise that Guidance for Pollution Prevention (GPP) document

21 and 22 should be used to inform these plans and procedures. These can be found on the NetRegs website [here](#).

NRW should be included as an emergency contact with a note to contact/self-report if an on-site incident causes an off-site impact. The phone number to use for this is 03000 653000, which should be included in the CEMP for reference.

### **Pollution Control Measures**

We advise confirmation is required on how the site will manage accumulated surface water (i.e. from rainfall). Given the site's proximity to the River Usk, details should be provided, in an amended CEMP, on where and how water will be stored and/or disposed of, so as to not cause environmental pollution. GPP documents should be used to inform these measures. These can be found on the NetRegs website [here](#).

### **Condition 4: Contamination Risk Assessment**

We have reviewed the following information:

Tier 2 & Tier 3 Geotechnical and Geoenvironmental Report Site – Land off Kelvedon Street, Newport. Terra Firma (Wales) Group, Job No: 13203, December 2025

A site investigation and a detailed quantitative risk assessment for ground water (DQRA) has been undertaken. This has identified the presence of Dense Non-Aqueous Phase Liquids (DNAPL), as the site was former use included a dry cleaners during the 1960s and 1970s, where cleaning agents would have been used and stored on site.

These cleaning agents appear to have leaked into the underlying ground and leached into the groundwater. Whilst DNAPLs are generally not mobile and are unlikely to move far horizontally, they will slowly dissolve into the groundwater and can impact upon sensitive receptors in this way.

DNAPLs therefore pose a risk to the sensitive receptor nearby i.e. River Usk Special Area of Conservation (SAC).

The DQRA has set a default compliance point at 50m downgradient from the site and calculated a low risk of contaminants getting to the default point. Notwithstanding this, we remain concerned that the dissolved phase may impact the River Usk SAC, especially if contaminants enter the more transmissive sand and gravels below the tidal flat deposits.

We therefore advise further consideration of the downgradient and offsite movement of the dissolve plume from the DNAPL.

In summary, we advise that parts 1 and 2 of Condition 4 could be partially discharged. However, parts 3 and 4 require the provision of further information.

### **Further guidance**

The remediation strategy required within part 3 of Condition 4 will need to consider the source of the DNAPL, to prevent and limit its impacts in the first instance, as well as remediating the dissolved plume impacting upon sensitive receptors. We advise remediation measures should also consider the break down products of the DNAPL, for

example from cis 1,2-Dichloroethene, Trichloroethene, and Tetrachloroethene to Vinyl Chloride which can be more impactful to controlled waters.

## 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,

**Eleanor Sullivan**

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.