

Ein cyf/Our ref: CAS-295617-V9Q6  
Eich cyf/Your ref: 25/1076

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 14 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: ERECTION OF A RURAL ENTERPRISE DWELLING ASSOCIATED WITH THE EXISTING DOG KENNELS AND WIDER ENTERPRISE AT GREENMOOR NURSERIES.**

**LLEOLIAD/LOCATION: GREENMOOR FARM, ST. BRIDES WENTLOOGE, NEWPORT, NP10 8SQ.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 16 December 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 and flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.**

**We also advise that based on the information submitted to date a condition regarding protected sites should be attached to any planning permission. Without the inclusion of this condition, we would object to this planning application.**

### **Protected Sites**

The red line boundary of the application site is located within the Gwent Levels – St. Brides Site of Special Scientific Interest (SSSI).

The decision as to whether the proposed development's location within a SSSI is justified, is entirely a matter for your Authority, having followed the step-wise approach in Planning Policy Wales (PPW). Our advice provided below focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

Paragraphs 6.4.24 – 6.4.28 of PPW (edition 12) state that development should seek to avoid SSSI's as a matter of principle. PPW does allow for some exceptions to this position, where it can be demonstrated that:

- i. The development is necessary for the management of the site; or
- ii. The development represents a minor form of development necessary for a SSSI to secure its role as a living landscape; or
- iii. There are wholly exceptional circumstances and only where development is considered to be appropriate and is not likely to damage a SSSI and there is broad and clear agreement for mitigation and enhancement as part of a development plan.

If your Authority considers that the proposed development is justifiable within the SSSI, we have concerns that insufficient information has been submitted to demonstrate how likely damage to the SSSI will be avoided. Planning permission should only be granted if information is provided which demonstrates that the proposed development will not unacceptably damage the features by reason of which the SSSI is of special interest.

Paragraph 6.4.26 of *Planning Policy Wales* states that proposals must be carefully assessed to ensure that effects on those nature conservation interests which the designation is intended to protect are clearly understood; development should be refused where there are adverse impacts on the features for which a site has been designated.

The Gwent Levels SSSIs are notified for the range of aquatic plants and invertebrates associated with the reens and ditches of the drainage system.

We consider that the proposed development is likely to damage the features by reason of which the Gwent Levels SSSI is of special interest. However, the applicant has not provided sufficient information to demonstrate how the proposed development will avoid damaging the special interest features of the SSSI.

#### Permanent land take from the SSSI

Based on the submitted application form, we note that the land take from the SSSI would be 0.08 hectares.

We consider that the proposed development is not necessary for the management of the SSSI and therefore it is ultimately up to your Authority to determine whether the proposal meets 'wholly exceptional' circumstances and whether all criteria have been met.

We have considered the information submitted in support of the above planning application and, although there would be land take from the SSSI, based on the information submitted and satisfactory implementation of the proposed mitigation and enhancement measures we consider that the proposed development is not likely to damage the notified features of the Gwent Levels – St. Brides SSSI.

#### Foul Drainage

No information has been submitted in regard to the discharge point for the proposed package treatment plant and therefore we are unable to confirm if it will be hydrologically linked to the SSSI.

The special interest features of the SSSI are dependent on water quality, water quantity, and the existence of the drainage system and its continued management. Any development / operation / discharge / abstraction which has an adverse impact on any of

these factors is likely to have an adverse impact on the wildlife for which the area was notified.

The drainage plan (dated August 2025, drawing number A-120) only shows the proposed location of the Private Sewage Treatment Plant (PTP). It does not include details of the expected line of pipes connecting the house to the PTP. We expect that new pipes will need to be laid as part of the construction of the PTP. Therefore, full details of the proposed installation of the PTP and the layout of the pipes should be provided to enable us to fully assess the potential implications of the development on the SSSI.

In addition, due to the site's location within a flood risk area, details should be submitted which demonstrate that in times of flood, the treatment plant would be able to fully function without causing any adverse effects to the SSSI and the water environment. There should be provision for sealing off or shutting down the PTP during times of flood to prevent pollution. The PTP must be able to function fully during times of flood, without causing any adverse effects such as the sewage system backing up and flooding the dwelling(s).

Please note that we consider discharges to watercourses are the only viable foul drainage option within the Gwent Levels SSSI as discharges to ground are not deemed appropriate. Additionally, due to the location an environmental permit will be required to own and operate a PTP due to the proximity to the SSSI. Guidance on how this can be done can be found via the NRW website: [Natural Resources Wales / Apply for a permit to discharge domestic sewage](#).

#### Construction run-off

The nearest ditch to the proposed development boundary is approximately 12m to the east of the site but there are no reens within 100m of the development site. There is potential for construction run-off to enter the nearby ditch and damage the plant and animal features of the SSSI which are dependent on appropriate water quality.

Confirmation should be provided that only water of appropriate quality and quantity would be discharged to the watercourses of the SSSI, during construction and operation. Any clean water discharged to the drainage system should be of a quality compatible with the Gwent Levels SSSIs and should not exceed greenfield run-off rates.

#### Buffer Zones

To protect the SSSI, buffer zones of a minimum 7m from works to the top of the ditch bank and 12.5m to the top of reen bank should be implemented. In this buffer there should be no physical development, no storage of materials including soil piles or fuel storage, no refuelling of machinery, and where possible no vehicle traffic. This is required to ensure that contamination of reens and impacts on the interest features of the SSSI are avoided. We note from the Ecological Appraisal (by Abbey Sanders Ecology, dated 2022-2025) that the proposed development would be located outside of these buffer zones and that these buffers will be adhered to.

#### Shrill carder bee

Shrill carder bee, a feature of the Gwent Levels SSSIs, has been recorded within 2km of the proposed development site, though the habitat within the proposed development boundary offers limited potential to support the species. We advise that if any vegetation removal is required, a check for shrill carder bee and their nests (depending on the time of year) is undertaken prior to removal.

We welcome the proposal to enhance the grassland onsite to benefit the shrill carder bee. For any seeding within the SSSI seed mixes should be of UK provenance and locally sourced. NRW's preference would be for the applicant to source wildflower seed from Great Traston Meadows Reserve from Gwent Wildlife Trust or another suitable local source.

Management recommendations for shrill carder bee focus on ensuring that plentiful flower-rich habitat with suitable forage is available from April to late September/October, in addition to providing undisturbed nesting habitat. Shrill carder bee is one of the last species of bumblebee to emerge from hibernation in the UK with queens nesting between November and May inclusive. We advise that the enhancement area should be mown once per year in late September to mid-October to leave flowers in place for Shrill carder bees to forage. All cuttings should be collected and removed.

Please advise the applicant that SSSI Consent would be required from NRW for any application of pesticides, including herbicides (weedkillers), and destruction, removal or pruning of any plant or plant remains within the SSSI.

#### Tree planting

Any landscape planting should be at sufficient distance from the watercourses to ensure that it does not shade the field ditches. For a reed to be able to support submerged aquatic flora and achieve favourable condition status, it should be open to sunlight especially from the south bank to allow more sunlight to reach the watercourse. This enables the aquatic plants and invertebrates for which the SSSI is designated to flourish. We welcome that tree species for planting will be selected from our Gwent Levels native tree list. Our preference would be for any planting to use species from the first section (natives) of the Gwent Levels tree list. Plants should be of UK native provenance (grown in British nurseries) to remove the risks of importing diseases that our plants have no resistance to and pests that have no natural predators in the UK.

#### Pollution Prevention

Given the location and sensitivity of the Gwent Levels – St. Brides SSSI we advise that a Construction Environmental Management Plan (CEMP) should be submitted to ensure all appropriate environmental considerations and protections would be in place prior to the commencement of the work. We therefore advise that the following condition should be attached to any planning permission granted for this proposal.

#### Condition 1

No 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:

- 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, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Biodiversity Management: details of tree and hedgerow protection; invasive species management; species and habitats protection, avoidance and mitigation measures.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.

- CEMP Masterplan: details of the extent and phasing of development; location of landscape and environmental resources; design proposals and objectives for integration and mitigation measures.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures; measures to control light spill and the conservation of dark skies.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities
- 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
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.

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

Justification: A CEMP should be submitted to ensure necessary management measures are agreed and implemented for the protection of the environment during construction. The guidance outlined in the following documents are seen as the best environmental practices for pollution prevention: [Guidance for Pollution Prevention \(GPP\) documents](#).

In the absence of the above information, we cannot rule out adverse impacts on the special interest features of the SSSI from the scheme.

We therefore recommend that planning permission should only be granted if information is provided which demonstrates that the proposed development will not damage features for which the SSSI is of special interest.

Should you be minded to grant permission for the above planning application in the absence of this information, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended).

## **Flood Risk**

The planning application proposes highly vulnerable development (residential). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea).

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) for advice on how you should consider this application in line with current planning policy. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

Therefore, we have reviewed the FCA undertaken by JBA Consulting, dated December 2022. Our advice to you is that the FCA fails to demonstrate that the potential risks and consequences of flooding are manageable for the reasons explained below.

The FCA was produced in 2022 and refers to the old TAN15 (2004). Therefore, we advise that the FCA should be updated to reflect the TAN15 (2025).

For this development, the data used within the FCA has been obtained under licence from NRW using the Extreme sea levels. At the time of the model completion by NRW (2018), the best available data was used.

However, since its completion there may have been material changes that could impact the results of this model. This may include topography/survey data, updates to the methodology for calculating hydrological flows and updates to hydraulic modelling software. We are unable to confirm the validity of the data presented in the FCA, as it is unclear if the data has been checked and verified as suitable for use. On receipt of the data supplied under licence, the consultant was advised of these constraints and the need to verify the data before use.

#### Acceptability Criteria - Frequency thresholds

Section 2.2 of the FCA indicates the site is generally flat with an average level of 5.85m Above Ordnance Datum (AOD).

The FCA recommends the Finished Floor Level (FFL) should be raised above the 0.1% Annual Exceedance Probability plus climate change (AEP + CC) flood level, however, no specific level has been provided.

#### Tidal risk:

Section 5.2 of the FCA indicates the 0.5% AEP + CC (2122) tidal flood level is 9.23m AOD. The tidal risk assessment does not include the full allowance of climate change (100 years) - extreme sea level data should be provided for 2126. The most up to date figures should therefore be included for completeness to reflect the full 100-year lifetime.

The FCA has concluded that because the crest level of the coastal defences (9.36m AOD) is higher than the 0.5% AEP + CC design flood level (9.23m AOD), the proposed site would remain flood free during the Frequency threshold event. However, we note that the flood level is only 130mm lower than the crest level of the defence, which would mean it is within the freeboard limit of the scheme. As a result, an assessment of potential overtopping and/or breach of the defences should be undertaken for the frequency threshold design event.

We therefore cannot verify compliance with Figure 5 of TAN15 (2025).

#### Tolerable Conditions

Section 5.2 of the FCA indicates the tidal flood level is 9.57m AOD for the 0.1% AEP + CC (2122) event, which would equate to the site flooding up to 210mm.

However, this just appears to be the difference between the crest level and the extreme event flood level as opposed to the actual predicted flood level/depth that would reach the proposed site.

We reiterate that the tidal risk assessment does not include the full allowance for climate change (100 years); extreme sea level data should be provided for 2126.

No flood velocities or corresponding hazard rating have been provided.

We therefore cannot verify compliance with Figure 6 of TAN15 (2025).

#### Increase in flood risk elsewhere

Section 6 indicates the proposal will not increase flooding elsewhere due to the extensive floodplain at this location. We would agree with this assessment.

#### Climate change

It appears that only the Central allowances have been assessed and not the Upper End, which is now recommended as per paragraph 4.3 of TAN15 (2025).

#### Overtopping and/or breach assessment

The site is in an area which benefits from flood defences. Therefore, as per paragraph 6.8 of TAN15 (2025) an assessment of breach and/or overtopping should be undertaken.

Table 5-4 of the FCA states that the lowest defence crest level is 9.36m AOD and this was used to demonstrate that the site would only be susceptible to flooding during a 0.1% AEP + CC (2122) event, to a depth of 210mm if overtopping were to occur. However, this just appears to be the difference between the crest level and the design flood level as opposed to the actual predicted flood level/depth that would reach the site over the tidal flood cycle.

No breach assessment has been undertaken.

Both the 0.5% AEP + CC and 0.1% AEP + CC flood levels presented in the FCA either exceed the crest level of the coastal defences or are within the freeboard limit of the scheme. Therefore, an overtopping and/or breach assessment should be undertaken.

#### Proposed access to the site

Section 5.4 indicates that due to the tidal nature of the flooding at the site significant flood warning lead time (> 24 hours) can be assumed and hence future residents of the development should have evacuated long before flood water enters the site. In the unlikely event that persons should still be on site during a flood event, external flood water is expected to be no deeper than 200mm and safe access and egress to the site is still possible.

As highlighted above, the 200mm depth specified just appears to be the difference between the crest level and the design flood level as opposed to the actual predicted flood level/depth that would reach the site over the tidal flood cycle.

#### Summary

Based on the advice above we advise that an updated FCA is submitted which includes the following information:

- The updated FCA should consider TAN15 (2025)
- Confirmed Finished Floor Levels
- A tidal risk assessment which includes the full allowance for climate change (100 years); extreme sea level data should be provided for 2126.
- Flood velocities or corresponding hazard ratings.

- Upper End climate change allowances
- An assessment of potential overtopping and/or breach of the defences for the frequency threshold design event.

Paragraph 15.4 of TAN15 (2025) is clear that where insufficient information is provided, the planning authority should use its powers to request further information. Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow reasonable time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to **object** to the application.

### **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,

### **K Murphy**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
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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.