

Ein cyf/Our ref: CAS-289168-Y6Z0  
Eich cyf/Your ref: 24/1036

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 15 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: DEMOLITION OF EXISTING COTTAGE AND CONSTRUCTION OF DWELLING AND FORMATION OF ACCESS, PARKING AND TURNING AREA**

**LLEOLIAD/LOCATION: Summerleaze Cottage, Green Street, Redwick, Newport.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 25 September 2025.

**We object to the proposed development as submitted, for the reasons explained below.**

**Flood Risk**

The planning application proposes highly vulnerable development in the form of a new dwelling. We note that the new dwelling is located within the same curtilage, but not within the same footprint, of an existing dwelling which is proposed to be demolished.

Please note, given the application's date of validation, we provide the following comments under the previous Technical Advice Note (TAN) 15: Development and Flood Risk (2004).

Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 3 for Sea and within the defended zone for Sea.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate through the submission of a Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the updated FCA undertaken by PHG Consulting Engineers, dated August 2025, Issue 5. 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.

### Technical Advice

We note from the submitted FCA that the proposed finished floor levels are 5.95 mAOD.

During the 0.5% (1 in 200 year) event plus climate change allowance (CCA), the FCA states that the building footprint and immediate surrounding areas within the site boundary will experience a maximum flood level of 10.12 mAOD. This results in a flood depth of 4.780m. This does not comply with limits set out within A1.14 of TAN 15 (2004).

During the 0.1% (1 in 1000 year) event plus CCA, the FCA states that the building footprint and immediate surrounding areas within the site boundary will experience a maximum flood level of 10.79 mAOD. This results in a flood depth of 5.560m. This exceeds the tolerable threshold set out within A1.15 of TAN 15 (2004).

We note that the site is located within the defended zone, however no breach assessment has been undertaken as part of the FCA. Notwithstanding, given the depth of flooding we consider it unlikely that this additional information would alter the compliance with TAN 15 (2004). We consider the current FCA to provide an adequate basis to inform you Authority's decision making.

We recognise that the site currently accommodates a highly vulnerable use (an existing dwelling), and therefore the proposed development, being located within its curtilage, does not change the site's existing vulnerability. We do however also note that the new dwelling is not designed to be flood free and appears unlikely that the new dwelling can be designed to be flood free. We advise you as the competent authority take this into account when considering the planning balance.

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15 (2004), we recommend you consider consulting other professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

### **Protected Sites**

The site is located within the Gwent Levels (Redwick and Llandevenny) Site of Special Scientific Interest (SSSI), as well as the Caldicot and Wentlooge Levels Internal Drainage District (IDD). With regards to this topic, we refer you to our previous advice submitted under reference: CAS-273471-B8S6, dated 4<sup>th</sup> March 2025. This is repeated below for ease of reference:

The SSSI is notified for its range of aquatic plants and invertebrates associated with the interconnected reens and ditches of the drainage system. In summary, the special interests of the SSSI are dependent on the water quality, water quantity, the existence of

the interconnected 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 was notified.

### *Foul Drainage and Internal Drainage District (IDD)*

We note the site is located outside the sewered area and that foul drainage from the proposed dwelling will therefore be dealt with via a new Package Treatment Plant (PTP). Given the location of the site within the SSSI and the potential pollution pathway from the operation of the PTP, we require further information on the proposed system to ensure the proposed development, as submitted, will not damage features of the SSSI.

We advise the following information is provided:

- Clear scale plans showing the location of the proposed PTP and discharge location;
- Discharge quantities (including calculations to prove discharge adheres to Greenfield Run-off Rates);

Where discharges to ground are proposed, the results of infiltration testing with calculations to demonstrate that the drainage field size and design is appropriate for the volume of discharge proposed and follows the relevant British Standard.

Further to the above, to avoid obstructing our IDD maintenance activities, a buffer zone of 7 meters from drainage ditches and 12.5m from main watercourses should be maintained both pre and post construction. It is not clear from the submitted information whether these buffer distances will be achieved. We therefore request further information to clarify. Please note, the buffer zone should be free from the following:

- Storage of spoil;
- Stored materials;
- Plant;
- Machinery;
- Artificial lighting associated with the development;
- Trafficking of vehicles or plant;
- Recreational routes (e.g. footpaths, cycle routes and bridleways);
- Structures or development;
- Any other built development including domestic gardens or formal landscaping.

### *Green Infrastructure*

We support the comments submitted by the LPA Ecologist regarding the precautionary approach that should be undertaken to hedgerow works, due to dormice being present across the Gwent Levels.

However, planting adjacent to reens and ditches should be avoided in order to allow for adequate sunlight which will enable aquatic flora to flourish. Therefore, whilst we welcome the native species proposed, we advise the planting locations proposed (Figure 2 and 4) are revised to avoid any detrimental impacts to the surrounding ditches.

With regards to the wildflower area, the applicant may wish to see whether natural regeneration of a ground flora habitat is successful with appropriate management, as it can prove difficult to establish wildflower seeded mixes. Notwithstanding, we request a suitably

worded condition for the prior approval of seed mixes is attached to any planning permission granted, in order to avoid the introduction of non-local species to the SSSI.

### *Construction Pollution Prevention*

To minimise the risk of construction pollution impacting the SSSI, we advise the following condition is attached to any planning permission granted:

#### Condition

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. GPP5 Works and maintenance in or near water is relevant for this development.
- 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.

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

### **European Protected Species (EPS)**

We note the submitted Bat Activity Survey Report by EcoVigour (Rev 01, dated 06/24) and we support the comments submitted by the LPA Ecologist (dated 28/01/2024) with regards to EPS and the Bat Advisory Note.

### **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 on 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.