

Ein cyf/Our ref: CAS-283618-D6C3
Eich cyf/Your ref: 24/1036

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 July 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, South Wales, NP26 3DE.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 30 June 2025.

We continue to 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 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 granted. Without the inclusion of these conditions we would object to this planning application

Flood Risk

Further to our previous response (ref: CAS-273471-B8S6, dated 4th March 2025), we have reviewed the updated Flood Consequence Assessment (FCA) by PHG Consulting Engineers (4th Issue, dated June 2025). We note that the planning application was registered on 18th December 2024. In accordance with [Welsh Government's Written Statement](#) dated 31 March 2025, our advice is based on Technical Advice Note 15 (TAN15), July 2004.

The planning application proposes highly vulnerable development (new dwelling). 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 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 an Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

We have reviewed the FCA noted above. Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

Technical Advice

We note the FCA has utilised the site specific data from the Caldicot and Wentlooge model 2016 prepared by JBA. However, no data has been provided for the 0.5% (1 in 200) year event plus climate change allowance over the lifetime of development.

We will require this information before we can provide a complete technical response in line with TAN 15 (2004).

As previously advised, the FCA states that during the 0.1% (1 in 1000 year) event plus climate change flood levels reach 5560mm (10.49mAOD). This is significantly higher than the tolerable limits of A1.15. Please note, these significant flood levels could indicate that the site may also flood during the 0.5% (1 in 200 year) event plus climate change. This should be investigated and confirmed within any revised FCA.

If no further information is submitted, or a revised FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we object to this application.

Please inform us, in accordance with paragraph 11.7 of TAN15, if you are minded to grant permission for the application contrary to our advice.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, 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

With regards to protected sites, we refer you to our previous comments and requested conditions provided under response reference: CAS-273471-B8S6, dated 4th March 2025.

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.