

Ein cyf/Our ref: CAS-292091-Z2V3
Eich cyf/Your ref: 25/0220

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 19 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: 26 AFFORDABLE DWELLINGS, NEW ACCESS WORKS,
LANDSCAPE PLANTING, A NEW PUMPING STATION AND ASSOCIATED WORKS**

LLEOLIAD/LOCATION: LAND AT TRASTON LANE, NEWPORT, SOUTH WALES

Thank you for reconsulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 31 October 2025.

We understand the development site benefits from extant planning permission, your reference 05/0287, which was granted permission with conditions in August 2012.

We continue to have concerns with the application as submitted. However, we are satisfied these concerns can be overcome by including the document identified in the approved plans and documents condition on the decision notice. Without the inclusion of this document we would object to this planning application.

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 is within Flood Zone 2 and 3 (Sea) and the TAN 15 Defended Zone.

We refer you to Section 10 of Technical Advice Note (TAN) 15: Development, flooding and coastal erosion (2025) 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 by JBA Consulting (September 2025). Our advice to you is that whilst the FCA does not fully demonstrate the potential risks and consequences of flooding are manageable for the reason explained below, if your Authority is satisfied the predicted flooding consequences, as outlined below, are acceptable, and in consideration of the extant planning permission at the site, we advise the FCA be included in the list of

approved plans and documents on the decision notice. This will secure the proposed finished floor levels and ground levels.

The FCA recognises flooding can occur through two separate but associated flood mechanisms - tidal flooding of the open coast and tidal flooding of the River Usk. We have separately modelled these two mechanisms. Both models have been inspected to identify which model provides the worst-case scenario. It is concluded the main source of tidal flooding is from the coast, as predicted by the Caldicot and Wentlooge Coastal Modelling Study. To facilitate a detailed assessment of flood risk, our 2016 flood model has been updated to support this FCA. We are satisfied with the methodology used to update the model and its findings.

Site levels range from 5.9-6.11 metres above ordnance datum (m AOD). It is proposed to raise the finished floor levels (FFLs) of the dwellings to 7.43m AOD. It is proposed to raise the ground levels at the front of the properties to 7.23m AOD, and at the rear of the properties to 7.28m AOD. The access road through the site will vary in elevation between 6.2-7.2m AOD.

Frequency Thresholds (Figure 5 of TAN 15)

Based on the proposed FFLs and ground levels, the FCA shows:

- During the 0.5% (1 in 200 year) plus climate change to 2123 annual probability tidal flood event, the proposed dwellings and the residential curtilage are predicted to be flood free. This is compliant with Figure 5 of TAN 15;
- During the 0.5% (1 in 200 year) plus climate change to 2123 annual probability tidal flood event, the proposed access road is predicted to flood to a depth of 0.89m where it joins the existing highway. This does not comply with Figure 5 of TAN 15.

The FCA considers the predicted flooding of the proposed access road where it joins the existing highway is unavoidable as level access to the highway and surrounding infrastructure is required. Whilst this is not in line with the requirement of Figure 5 of TAN 15, we recognise the ground level cannot be raised at this location without compromising essential access, and it is unlikely the entire site could be designed to be flood free in this event. Ultimately it is for your Authority to be satisfied the predicted flooding consequences, as outlined, are acceptable. This includes considering whether mitigation measures, such as raising ground levels, are practical and achievable.

Tolerable Conditions (Figure 6 of TAN 15)

Based on the proposed FFLs and ground levels, the FCA shows:

- During the 0.1% (1 in 1000 year) plus climate change to 2123 annual probability tidal flood event, the proposed dwellings are predicted to be flood free and the residential curtilage is predicted to flood to a depth of 0.16m. This flood depth is within the tolerable conditions in Figure 6 of TAN 15;
- During the 0.1% (1 in 1000 year) plus climate change to 2123 annual probability tidal flood event, the proposed access road through the site is predicted to flood to a depth of 1.19m. This flood depth exceeds the tolerable conditions in Figure 6 of TAN 15.

Breach Assessment

Breach modelling has been undertaken. We are satisfied with the methodology used. The FCA advises 'The breach scenarios show negligible change in flood levels compared to the baseline results... The breach assessment shows that due to the massive overtopping of the coastal flood defences, a failure of the flood defence will have little to no impact on the flood risk at the site.' We are satisfied with this assessment and consider it meets the requirement of section 10.26 of TAN 15.

Flood Risk Elsewhere

The FCA concludes 'Given the small scale development, the small total footprint of the proposed buildings, and the tidal nature of the flooding event, the displaced volume of flooding and the impact of displaced water are expected to be negligible.' We are satisfied with this conclusion and consider it meets the requirement of no increase in flooding elsewhere in section 11.4 of TAN 15.

Upper End Climate Change Estimates

Based on the proposed FFLs and ground levels, the FCA shows:

- During the 0.5% (1 in 200 year) plus climate change to 2123 annual probability tidal flood event, the proposed dwellings are predicted to be flood free;
- During the 0.5% (1 in 200 year) plus climate change to 2123 annual probability tidal flood event, the proposed residential curtilage is predicted to flood to a depth of 0.18m, and the proposed access road through the site is predicted to flood to a depth of 1.21m.

Current Welsh Government guidance on [climate change allowances for planning purposes](#) states upper end climate change estimate information should be used to inform mitigation measures that help to ensure the long term resilience of the development. Please note, it is not our role to comment on the acceptability long-term resilience of individual developments. As such, it is a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors.

Flood Resistance and Resilience Measures

The FCA proposes the management of flood risk by recommending residents sign up to receive flood warnings from us, and the production of a Flood Response Plan.

The FCA advises '...the residential dwellings are predicted to be flood-free in all design events, with the FFLs raised above the extreme tidal flood level. Consequently, the application of PFR [Property Flood Resilience] measures is not recommended for this development.'

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15, 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.

Conclusion

The FFL of the proposed dwellings in this application (7.43m AOD) provides betterment in flood risk terms compared to the FFL of the consented dwellings in planning permission 05/0287 (6.8m AOD).

If your Authority is satisfied the predicted flooding consequences, as outlined above, are acceptable, and in consideration of the extant planning permission at the site, we advise the FCA be included in the list of approved plans and documents on the decision notice. This will secure the proposed finished floor levels and ground levels.

European Protected Species

The Preliminary Ecological Appraisal by Ecological Services Ltd. (October 2025) has identified a Ground Based Visual Roost Assessment of all trees proposed for removal and bat activity transect surveys are recommended for the site to gain an understanding of the sites usage by bat species. We note the results of the subsequent Bat Survey Report by Ecological Services Ltd. (October 2025), which involved bat activity transect surveys.

We recommend you seek the advice of your Authority's internal ecological advisor about the requirement for further information to be submitted in support of the application, the need for further bespoke surveys (including Ground Based Visual Roost Assessment), the scope of further information where required, and the need to secure further measures / avoidance measures.

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

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please refer to 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](#).

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.