

Ein cyf/Our Ref: CAS-290150-D9G4  
Eich cyf/Your Ref: RCONEX/25/0476

Vicky Quinn  
Newport City Council  
Regeneration, Investment & Housing  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 28 October 2025

Annwyl Ms Quinn/Dear Ms Quinn

**BWRIAD/PROPOSAL: EXTENSION TO EXISTING BUILDING WITH AN OPEN CANOPY AND THE ERECTION OF A SINGLE STOREY PORTAL FRAME BUILDING FOR THE PROVISION OF WAREHOUSE STORAGE (USE CLASS B8).**

**LLEOLIAD/LOCATION: CELTIC KILNCARE LTD, LANGLAND WAY, NEWPORT, NP19 4PT.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, with additional information which we received on 10 October 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.**

### **Flood Risk**

The planning application proposes extension of an existing building with an open canopy and single storey building for provision of warehouse storage (less vulnerable development). The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 3 – Sea and TAN15 Defended Zone.

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 following additional information submitted in support of the application:

- Flood Consequences Assessment, Celtic House, Langland Way, prepared by Bear

Consulting Ltd, dated October 2025.

Our advice to you is that the additional information fails to demonstrate that the potential risks and consequences of flooding are manageable for the reasons explained below.

The FCA states:

- Ground levels across the site range from 7.32m to 8.40m AOD, generally falling away from the existing building.
- Given the relationship to the existing buildings, the proposed units are considered to be extensions to the existing site use rather than new stand-alone developments.
- The FFL of all 4 of the proposed units shall be set as 8.370 mAOD to match the existing building FFL.

#### Figure 5 TAN15

During a 0.5% (1 in 200 year) plus climate change allowance (2115) flood event the development is predicted to flood to a depth of 628mm. We note that the actual flood level figure has not been submitted and only the potential flood depth. Therefore, we are unable to confirm and compare the flood levels against the Finished Floor Levels (FFL's).

We note that the FFL's have been confirmed as 8.370m AOD. The FCA concludes the FFL's are above any 1 in 200 year flood event, including breach. It does suggest that site specific assessment has not been made of the data. There is no information in the FCA regarding the parameters of the breach assessment to know if this is a sufficient assessment.

#### Figure 6 TAN15

During a 0.1% (1 in 1000 year) plus climate change allowance (2115) flood event the development is predicted to flood to a depth of 2152mm and flood velocities of 0.94m/s.

We note that the actual flood level figure has not been submitted and only the potential flood depth. Therefore, we are unable to confirm and compare the flood levels against the Finished Floor Levels (FFL's).

This depth of flooding would not be compliant with Figure 6 of TAN15.

The FCA concludes that all proposed building units on the site are considered extensions to the existing site use. We continue to advise that the proposed units are stand-alone units and should be designed to be flood free in this event as per TAN 15. Given that they are not constrained to adjoining existing units' levels, there may be scope to set the units higher. We would deem the proposals an extension to the existing site *use* rather than an extension to the *units* on site. We advise that this is for you as the competent authority to determine.

The FCA correctly establishes that the main source of flooding is tidal and used the Caldicot and Wentlooge Coastal Model to assess the flood risk. It does not identify any

tidal flood risk associated with the River Usk, which is tidally influenced at this location, and given the much closer proximity to this source of flooding than the open coast, we would expect flood data from this source to be included. All sources of flooding should be reviewed. The Riverside Defences on the River Usk should also be assessed and breach information from this source provided.

Given the large tidal flood cell associated with the Coastal model, and the distance of the site from the open channel flood levels may be reduced compared to the tidal River Usk events which will be restricted to a smaller flood cell.

In summary, the FCA is lacking clarity. Flood levels should be submitted for the 1 in 200 year/1 in 1000 year plus climate change event (75 year allowance 2100) from the River Usk (Tidal model available from NRW) and the Coastal Model. We also require breach information from both sources for the 1 in 200 year plus climate change event. This information should include the following (but not limited too) details on the scale of the breach, how many tidal cycles were assessed, the crest level of the defences and the standard protection offered. Further information on breach and FCA can be found on the following link – [Natural Resources Wales / Modelling for Flood Consequence Assessments](#).

Paragraph 15.4 of TAN15 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.

### **Further advice**

#### Access/Egress

The LPA should review any emergency plans/proposed routes to ensure that they are acceptable.

#### Increase in flood risk elsewhere

We agree that flood compensation is not required given the scale of the development and tidal nature of the flood source.

### **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

**Andrew Hurst**

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Ffôn/Tel: 03000 653074

E-bost/E-mail: [southeastplanning@cyfoethnaturiolcymru.gov.uk](mailto:southeastplanning@cyfoethnaturiolcymru.gov.uk)

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.