

Ein cyf/Our Ref: CAS-287800-C9W0
Eich cyf/Your Ref: RCONEX/25/0476

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

Dyddiad/Date: 30 September 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 5 September 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 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 Flood Consequences Assessment submitted in support of the application:

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

Consulting, dated August 2025.

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 states:

Ground levels across the site range from 7.32m to 8.40m AOD, generally falling away from the existing building. However, no finished floor levels have been provided within the FCA.

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 691mm.

This figure would not be compliant with Figure 5 of TAN15 based on the general ground levels. We note that as no Finished Floor Levels (FFL) are included within the FCA, we are unable to confirm the correct levels of any potential flood depths.

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.

As above, based on the ground levels, this figure would not be compliant with Figure 6 of TAN15 and we are unable to confirm any correct finished floor levels of any potential flood depths.

The FCA concludes that all proposed building units on the site are considered extensions to the existing site, rather than new development. Therefore, the received NRW flood modelling information, which shows flooding in a 1 in 200 years coastal flooding event with climate change (year 2115 horizon year with 95% confidence interval", should not be treated as a criterion for refusal of development in this area.

We would like to highlight 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.

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

It is recommended that that occupants evacuate via the adjacent public road, Langland Way to the north of Spytty Road, following the designated egress route, and continue to the public highway outside any NRW-designated flood zones.

It should also be noted that the existing site building is two storeys in height. If evacuation cannot be undertaken safely in time, occupants may temporarily seek refuge on the first floor of the building until it is safe to leave or assistance arrives. All unit occupiers will be expected to prepare a flood plan, setting out the precautions and actions to be taken when a flood event is anticipated, to minimise potential impacts and damage. The LPA should review any emergency plans / proposed routes to ensure that they are acceptable.

Increase in flood risk elsewhere

As required in TAN15, it should be demonstrated that the proposed development does not increase flood risk elsewhere. The effects of the reduction of existing flood storage volume and/or flood conveyance on land outside the redline boundary should be quantified (i.e. change in flood levels elsewhere, identify whether additional properties at risk, onset of flooding etc.) and appropriate mitigation and/or compensatory flood storage should be proposed.

Climate change

The FCA only provides flood depths with the higher confidence levels for a complete FCA the central and upper estimates should be provided.

At present, there is no inclusion in the FCA of a breach scenario – the flood defences only allow a standard of protection for current 200 year event and as per TAN 15 guidance, development within a TAN 15 defended zone should use the breach 1 in 200 year plus climate change event as the design event and ensure compliance with this event requirements – i.e. flood free site.

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

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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.