

Ein cyf/Our ref: CAS-273471-B8S6  
Eich cyf/Your ref: 24/1036

Grant Hawkins  
Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 04 March 2025

Annwyl Grant /Dear Grant,

**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 27 January 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 and protected sites. 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**

We understand that the planning application proposes highly vulnerable development (new dwelling) with the demolition of the existing property.

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 undertaken by PHG Consulting Engineers (Ref: 2580, dated 11 December 2024). We note the FCA references a previous proposal description.

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.

We note within the FCA that finished floor levels are to remain unchanged, however no details have been provided of current finished floor levels of the existing property to be demolished, or proposed finished floor levels of the new property. We are therefore unable to fully assess the impacts on TAN15 and advise that any revised FCA should include this detail.

In addition, we also require flood levels for the 0.5% (1 in 200 year) event plus climate change. This will allow us to provide a complete technical flood risk response in line with TAN 15.

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.

With regards to A1.12, the FCA states that, given the small scale of the development, the displaced volume of flooding would be minimal. Furthermore, the land topography means that flooding impacts elsewhere would be negligible. We are in agreement with this and do not require further information with regards to flood risk elsewhere.

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**

The site is located within the Gwent Levels (Redwick and Llandeenny) Site of Special Scientific Interest (SSSI), as well as the Caldicot and Wentlooge Levels Internal Drainage District (IDD).

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**

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 to Developer**

### *Internal Drainage District (IDD)*

Given the site's location within the IDD, the applicant should be aware that any discharge of surface water to the adjacent reën will require a formal Land Drainage Consent (LDC) from the IDD, in accordance with Section 23 of the Land Drainage Act 1991.

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.