

Ein cyf/Our ref: CAS-275977-K8W1
Eich cyf/Your ref: 25/0150

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 25 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: S73 APPLICATION TO VARY CONDITION 2 (APPROVED PLANS) OF 23/1058 OUTLINE APPLICATION FOR A RURAL ENTERPRISE WORKER'S DWELLING (ALL MATTERS RESERVED). AMENDMENTS INCLUDE UPDATED FCA AND LEVELS

LLEOLIAD/LOCATION: Llanfair Farm, Church Lane, Marshfield, Newport, CF3 2UF

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 04 March 2025.

We previously provided advice (CAS-251347-FOS8), dated 09 April 2024. This advice remains relevant in relation to protected sites, foul drainage and pollution prevention.

We have no objection to the variation of conditions application as submitted provided the following document is adhered to.

- **Flood Consequence Assessment, prepared by Vale Consultancy, dated 28 January 2025**

Flood Risk

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 2 and 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 a Flood Consequences Assessment (FCA) that the potential consequences of flooding can be managed to an acceptable level.

For this development, the data that has been used within the FCA has been obtained under licence from NRW using the UKCP18 extreme sea levels

We have reviewed the Flood Consequence Assessment, prepared by Vale Consultancy, dated 28 January 2025, and provide the following comments based on this information.

A1.14 Criteria

Section 2.3 indicates the proposed dwelling is to be located at a site level ranging between 9.34–9.51 metres (m) Above Ordnance Datum (AOD).

Section 2.3 indicates ground levels from/off Church Road range between 8.80–10.80m AOD.

Section 5.1 indicates Finished Floor Levels (FFL) should be set at 9.64m AOD.

Section 4.2 indicates the following sea levels:

- 0.5% (1 in 200 year) Annual Exceedance Probability (AEP) tidal flood level is 8.11 m AOD
- 0.5% (1 in 200 year) AEP plus climate change (70% percentile) is 9.24 m AOD
- 0.5% (1 in 200 year) AEP plus climate change (95% percentile) is 9.64 m AOD

The FCA has concluded that due to the coastal sea defences (Peterstone embankment) has a crest level of 10.20m AOD, which is 0.22m above the 0.1% (1 in 1000 year) AEP plus Climate Change (CC) (95th Percentile) extreme sea level, and can therefore demonstrate the site would be protected and could be deemed compliant from tidal risk.

The FCA has discussed the potential breach of the defences and has indicated that the site would remain flood free up to and including the 0.1% (1 in 1000 year) AEP plus CC (70th Percentile) event with a freeboard of approximately 0.22m. This has been deduced from a comparison of the DFLs and the recorded spot levels from the LiDAR extract at the siting of the new dwelling. In addition to this, there is a significant distance between the coast and site.

Therefore the development is compliant with the A1.14 criteria of TAN15.

A1.15 Criteria

Flood depths

Section 4.2 indicates the following sea levels:

- 0.1% (1 in 1000 year) AEP plus CC (70th Percentile) is 9.58 m AOD
- 0.1% (1 in 1000 year) AEP plus CC (95th Percentile) is 9.98 m AOD

Therefore, based on the ground levels the site could flood up to 0.64m but the likelihood of this site experiencing these depths are low due to the presence of the coastal defences. In a potential breach during a T1000 (1 in 1000 year) plus CC (95P) event, the site would flood between 0.47 - 0.64 m.

Flood Velocity

There is no assessment of flood velocity within the FCA.

Rate of rise/speed inundation

There is no assessment of rate of rise or speed inundation within the FCA.

Therefore, the proposed development does not comply with the A1.15 criteria of TAN15.

A1.12 Criteria

Flooding elsewhere

Section 5.3 indicates the dwelling would not be expected to impact flood risk elsewhere. Due to the size and extent of flood cell and rural nature of the landscape, any impact resulting from the development would be negligible.

Flood alerts and warnings

Section 5.1 indicates site owners should register for NRW's flood alerts and warning system.

Safe access/egress

Section 5.2 and Figure 2 indicates safe access and egress is provided by travelling North West from the site to an area outside the extreme flood extents.

All other A1.12 criteria is generally covered in the FCA.

Further 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 that you consider consulting other professional advisors on the acceptability of the developer's proposals, on matters that we cannot advise you on such as emergency plans, procedures, and measures to address structural damage that may result from flooding.

We refer you to the above information and the FCA to aid these considerations.

Please note, we do not normally comment on or approve the adequacy of flood emergency response 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.

Advice to the Applicant

Flood Warning Service

The availability of a flood warning service to the development location should be confirmed by visiting the [NRW website](#). NRW provides warnings where it is technically possible, but this service must not be relied on to guarantee the timely and safe evacuation of occupants. Where available, the flood warning service can be a useful means of alerting occupants who have voluntarily signed up to receive Flood Alerts and Flood Warning, enabling them to take action in advance of a flood event. Protection measures should not be wholly dependent on the flood warning service and should be implemented to manage risks and impacts of flooding.

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.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Gemma James

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: 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.