

Ein cyf/Our ref: CAS- 317172-Q5B7
Eich cyf/Your ref: 26/0185

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 21 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: New industrial building to house pallet manufacturing and repair facilities together with external materials and pallet storage areas including storage shelter and associated facilities

Lleoliad/Location: Site B16, West Way Road, Alexandra Docks, Newport, South Wales

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 20 August 2026.

We have **no objection** to the proposed development as submitted and provide the following advice.

Foul drainage

This application proposes the disposal of foul drainage to a new cesspit.

The applicant has submitted Technical Advice Note TN01 Revision 3 Foul Water Drainage Strategy by Daniel Rees to address the advice provided in our letter dated 7 August 2026 reference CAS-312536-K9Z3. In this letter, we raised concerns regarding the justification of the cesspit and advised that it had not been demonstrated that the installation of a package treatment plant with discharge to watercourse was not feasible.

We note the distance from the application site to the nearest surface water body is approximately 180m. The information provided states that the land between the application site and this water body is under the ownership of multiple third parties. We understand a railway track also crosses this land. Therefore, we acknowledge the limitations in utilising drainage to surface water as a means of disposing of treated foul wastewater.

On this basis, it is our opinion that the applicant has demonstrated that the first three priorities for foul drainage as set out in Circular 008/2018, being drainage to public sewer, package treatment plant and septic tank respectively, cannot be met at this location.

In principle, a properly constructed and maintained cesspool, being a holding tank with no discharges, should not lead to environmental, amenity or public health problems. However, cesspools are not a sustainable, long-term solution for sewage provision. In practice, it is known such problems occur as a result of frequent overflows due to poor maintenance, irregular emptying, lack of suitable vehicular access for emptying and through inadequate capacity. These problems can be exacerbated by unsuitable conditions, such as some of those listed in paragraph 2.6 (of Circular 008/2018). When considering a scheme proposing the use of cesspools, you, as the planning authority, should adopt the same process of considering the possibility of significant problems arising as described in paragraph 2.6, and whether these problems can be overcome by the attachment of suitable conditions to a planning permission.

Flood risk

The planning application proposes less vulnerable development (general industrial). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 (Sea).

We have reviewed the Flood Consequence Assessment (FCA) by Vale Consultancy dated 01.04.2026. Our advice to you is that the FCA satisfactorily demonstrates the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection to the application on flood risk grounds as submitted. Further detail is provided below.

The FCA includes the following site-specific topographic survey information:

- Wider site levels range from 8.52 m to 10.73 m above ordnance datum (AOD)
- Proposed covered pallet storage shelter levels range from 9.30 m to 9.67 m AOD
- Proposed manufacturing building levels range from 9.48 m to 10.23 m AOD

The FCA has been informed by our Product 5 and 6 flood model data. This data covers tidal flood events incorporating a climate change allowance (CCA) up to the year 2121. This exceeds the required 75-year lifetime of development applicable to this type of proposal.

Frequency thresholds (Figure 5 - designing development to be flood free)

The FCA shows the site is not at risk of flooding during all flood events up to and including the 0.5% (1 in 200 year) + CCA annual probability tidal event to 2121. This is compliant with Figure 5 of TAN 15.

Tolerable conditions (Figure 6 - managing consequences in an extreme flood event)

The FCA shows the western part of the site is predicted to be at risk of flooding during the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2121. The proposed covered pallet storage shelter is predicted to marginally encroach into this flood extent during the same event. However, the FCA does not provide the associated flood depth for this encroachment. In contrast, the proposed manufacturing building is shown to be flood free across all flood events up to and including the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2121.

Overtopping and/or breach and blockage assessment

The FCA includes data for the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2115 breach scenario. This data indicates that, under the breach scenario, the western part of the site is predicted to be at risk of flooding. A small section of the proposed covered pallet storage shelter is predicted to flood to a depth of 0.14 m. In contrast, the proposed manufacturing building is shown to be flood free during all the modelled breach scenarios.

Based on the data, and when applying the required 75-year lifetime of development, it can be assumed the site would be flood free during the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2101. This is compliant with figure 6 of TAN 15.

There is no information provided in the FCA on the flood levels associated with the relevant extreme events that would enable flood depths to be derived across the wider site. You may wish to request this additional information is submitted by the applicant for emergency planning purposes.

Latest climate change allowances

Welsh Government has issued recent updates to the [Flood Consequences Assessments: Climate change allowances guidance](#), as detailed within Welsh Government's [Dear CPO Letter](#). The updated guidance states:

"This document replaces the guidance issued in September 2021 and should be applied to planning applications (full, outline and reserved matters) submitted from 1st April 2026, and all development plans to be submitted to Welsh Government from 1st April 2026."

Section 3.3 of the guidance states:

"The 2100 allowance is currently appropriate for development with a 75-year lifetime, while the 2125-2130 allowances can be used to determine impacts for development with a 100-year lifetime."

As the FCA has been informed by data covering tidal flood events incorporating a CCA up to the year 2121, we are satisfied that, in this instance, the latest climate change allowances have been appropriately considered.

Flood risk elsewhere

Given the scale and nature of the proposals, we agree with the FCA conclusion that the proposed building footprints would have a negligible impact on flood risk elsewhere.

Mitigation measures

Section 5.3 recommends that site owners and occupants:

- sign up to receive flood warnings from us
- display appropriate documentation to inform users of the site of the potential flood risk
- prepare a Flood Evacuation Management Plan for implementation during an extreme event

It is not our role to comment on the acceptability of such proposals for individual developments, and we cannot advise you on matters such as emergency plans and procedures. We recommend you seek advice from other appropriate advisors such as emergency planners and the Local Lead Flood Authority.

Site access

The FCA states access and egress would be provided via West Way, travelling north-west towards Docks Way, before continuing west along the Southern Distributor Road. This route leads away from all modelled tidal flood extents up to and including the extreme 0.1% (1 in 100 year) + CCA annual probability tidal flood event to 2121.

Conclusion

Overall, we are satisfied the proposed development complies with the requirements of TAN 15.

Other matters

We previously provided comments relating to protected sites and land contamination in our response letter dated 16 June 2026 reference CAS-309127-H7L2. These comments remain applicable.

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.

Advice for the developer

It is essential that any cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination of the ground, groundwater and, sometimes surface water. Any damage to the fabric of the cesspool, such as cracks or holes, is difficult to detect but needs to be rectified immediately in order to prevent pollution. The cesspit

should meet the requirement of British Standard BS 6297. It should be fitted with a level warning device to indicate when the tank needs emptying.

We recommend the applicant reviews the following guidance in relation to the proposed development:

- Guidance for Pollution Prevention 4 ([NetRegs website](#)): Sewage treatment and disposal where there is no foul sewer (GPP4)
- EPR (Environmental Permitting Regulations) Guidance

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

Yn gywir / Yours faithfully,

Heather McDowell

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.