

Ein cyf/Our ref: CAS-289640-W1K5
Eich cyf/Your ref: 25/0641

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 16 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: EXTENSION TO APPROVED VEHICLE STORAGE AND
MAINTENANCE FACILITY AND ASSOCIATED DEVELOPMENT**

**LLEOLIAD/LOCATION: Land Adjacent to and South of Matalan, Newport Retail Park,
Spytty Road, Newport, NP19 4QQ**

Thank you for your email of 3 October 2025 in relation to the above proposal.

Further to the clarification on the nature of the proposal, we understand that the drainage for the development is as existing. Therefore, our advice is now as follows:

We continue to have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition to any planning permission granted:

Condition : Construction Environmental Management Plan

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Pollution Prevention

Due to the likely connectivity of watercourses in this area to the reens and ditches in the Nash and Goldcliff Site of Special Scientific Interest, we advise that a condition for a Construction Environmental Management Plan should be attached to any planning permission granted.

Condition

No development 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:

- 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, containments areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Soil Management: details of topsoil strip, storage and amelioration for re-use.
- Control of Nuisances: details of restrictions to be applied during construction including timing, duration and frequency of works; details of measures to minimise noise and vibration from piling activities, for example acoustic barriers; details of dust control measures.
- Resource Management: details of fuel and chemical storage and containment; details of waste generation and its management; details of water consumption, wastewater and energy use.
- Traffic Management: details of site deliveries, plant on site, wheel wash facilities.
- 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.
- 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 commencement of development and implemented for the protection of the environment during construction.

Internal Drainage District

The proposed development site is located inside the Gwent Levels Internal Drainage District, an area of special drainage need operated by Natural Resources Wales. The Lead Local Flood Authority powers and as such surface water and ordinary watercourse consenting powers fall to Natural Resources Wales in Internal Drainage Districts in Wales.

We note that Flood Consequences Assessment *2.4 Watercourses & Flood Defences*, states the site is 14m from 'Unnamed Reen 1' figure 2-2. This is an Internal Drainage District (IDD) maintained watercourse - C80 Longditch Reen.

Any discharge into the adjacent watercourses will require Land Drainage Consent (LDC) from us. The applicant is advised that more information on this process is available [here](#).

The proposed works, pre and post development should not impede the IDD annual maintenance programme of the surrounding reens and ditches.

Flood Risk

The planning application proposes less vulnerable development (extension to approved vehicle storage and maintenance facility and associated development). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 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 FCA undertaken by JBA dated August 2025 referenced QMK-JBAU-XX-XX-RP-Z-0001-S3-P01-Seven_Stiles_Avenue_FCA. Our advice to you is that the FCA satisfactorily demonstrates that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection to the application on flood risk grounds. Further detail is provided below.

In assessing tidal flood risks for less vulnerable development, the appropriate lifetime of development (LOD) is considered to be 75 years.

The FCA indicates the following results for a 77 year LOD for the central (70th) percentile -

- 2102 – 1 in 200 year plus climate change – no flooding on site
- 2102 – 1 in 1000 year plus climate change – site is predicted to flood to depths of 0.46m

These results demonstrate compliance with the figures 5 and 6 of TAN15.

The proposals are not predicted to increase flooding elsewhere as there will be no built development and no change in ground levels.

The FCA recognises that the site is within a TAN 15 defended zone, with the defences designed to account of approximately 50 years of climate change. Given the nature of the development, we do not require a breach assessment to support this application.

The FCA recommends a flood response plan be used to highlight action to evacuate the site in the event of the extreme flood event. The evacuation routes are predicted to flood free in the 1 in 200 year plus climate change event and to shallow flood depths of less than 300mm in the 1 in 1000 year plus climate change event. We do not comment on whether safe access and egress can be achieved to and from a site as this is a matter for emergency services to determine.

Whilst we have no objection on flood risk grounds, we note there is no information provided in the FCA regarding the upper end climate change estimate. TAN15 (paragraph 4.3) states that '*detailed Flood Consequences Assessments, to accompany planning applications, will be required to consider a range of climate change scenarios, including upper end estimates, making reference to the Welsh Government guidance on climate change allowances for planning purposes*'. Current Welsh Government guidance on [climate change allowances for planning purposes](#) states that this information should be used to inform mitigation measures that help to ensure the long term resilience of the development. You may therefore wish to request the Applicant provides this information. However, please note, it is not our role to comment on the acceptability long-term resilience of individual developments. As such, should you choose to request this information, it will be a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors e.g. LPA emergency planners/LLFAs.

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,

Claire McCorkindale

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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.