

Ein cyf/Our ref: CAS-312536-K9Z3
Eich cyf/Your ref: 26/0185

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 07 August 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 29 June 2026.

We continue to 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 foul drainage**. If this information is not provided, we would object to this planning application. Further details are provided below.

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 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.

We previously reviewed a Flood Consequence Assessment (FCA) by Vale Consultancy dated 1 April 2026 and provided the applicant with advice as part of our response to the statutory pre-application consultation on the proposed development. However, an FCA has not been submitted in support of the planning application (our letter dated 16 June 2026 ref CAS-309127-H7L2 refers).

We note that section 1.4 of the Drainage Strategy Report by Vale Consultancy dated 9 April 2026 references the FCA, but it has not been included in full.

We are therefore unable to give you technical advice on the acceptability of flooding consequences as no FCA has been formally submitted as part of this application. The advice in paragraph 10.24 of TAN15 is clear:

“In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.”

Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request further information.

TAN15 advises that the FCA should be proportionate to the nature and scale of the proposal. Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal. Further guidance is also available on our website.

Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Please note, if an FCA is not submitted or any subsequent FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would object to the application.

Foul drainage

We note that the proposed method of foul drainage is a new cesspit.

Within the Approach to Groundwater Protection guidance (issued by the Environment Agency in 2018 and adopted by Natural Resources Wales), Position Statement G6 states,

“Natural Resources Wales does not encourage the use of cesspools or cesspits, other than in exceptional circumstances. A cesspool or cesspit is a sealed unit that is used for the storage of untreated sewage. There must be no discharge to the environment. Poorly managed cesspools and cesspits present a considerable risk of causing pollution, which can be difficult to monitor and correct.”

In exceptional circumstances, where a cesspool/cesspit can be justified, Welsh Government Circular 008/2018 (July 2018) advises that full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular.

We understand that Technical Note TN01 (Foul Water Drainage Strategy) has been submitted to address the advice provided in our letter dated 16 June 2026 (ref. CAS-309127-H7L2). The technical note states that connection to existing public sewerage is not viable and provides information on ground conditions regarding unsuitability for installation

of a drainage field. However, in line with the requirements of the hierarchy set out in Circular 008/2018, evidence should be provided by the applicant as to the feasibility of discharge to surface water.

It is essential that any cesspit is installed correctly. Incorrectly maintained cesspools can cause pollution by contamination of the ground, groundwater and 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.

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.

Advice for the developer

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.