

Ein cyf/Our ref: CAS-288536-Q8K3
Eich cyf/Your ref: 25/0741

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 14 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Construction of stable block, alterations to access and ecological enhancements

LLEOLIAD/LOCATION: Church Lane, Marshfield

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 September 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.

Flood Risk

The planning application proposes less vulnerable development (stable block). 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 Francis Sant, dated November 2021. Our advice to you is that the FCA is incomplete. 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.'

The submitted FCA has not been undertaken for the current planning application site and appears to have been produced for a site further along the road. As the FCA is dated 2021, it was also produced prior to the updated TAN15 (2025).

We advise that an updated site specific FCA is undertaken in accordance with TAN15 (2025).

Gwent Levels – St Brides Site of Special Scientific Interest (SSSI)

The site lies within the Gwent Levels -St Brides Site of Special Scientific Interest (SSSI).

The Gwent Levels SSSIs are 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 drainage system and its continued management. Any works which has an impact on water quality of the nearby ditches and reens can have an adverse impact on the wildlife for which the area was notified.

Muck Store

Based on the information submitted it is not clear if the muck heap is constructed to British Standard, to ensure the base is impermeable preventing effluent entering ground water. We requested conformation of the construction standards.

No muck to be spread within 10m of any ditches and reens to safeguard water quality of the connected watercourses within the SSSI. This is reflected in the Code of Good Agricultural practice which identifies no muck spreading within 10m of watercourses <https://gov.wales/code-good-agricultural-practice>.

Also, there should be no planting of vegetation within 10m of the reen on site. It appears from the plans that this required buffer would be met by the application. New planting within the site should be taken from the Gwent Levels SSSI native species list.

Further Advice for applicant - Pollution Prevention Appropriate pollution prevention measures must be employed to protect the water quality during construction. Guidance for Pollution Prevention (GPP) documents are available on www.naturalresourceswales.gov.uk www.cyfoethnaturiolcymru.gov.uk Page 3 of 4 the NetRegs website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Gemma Beynon

Arweinydd Tim Cynllunio Datblygu / Development Planning Team Leader
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.