

Ein cyf/Our ref: CAS-312545-C4P4
Eich cyf/Your ref: RCONEX/25/1088

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 21 July 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Development of a detached outdoor classroom

Lleoliad/Location: Alma House, Lighthouse Road, Newport, NP10 8TG

Thank you for re-consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 30 June 2026.

We have **no objection** to the proposed development as submitted and provide the following advice. We advise that you consider the following advice regarding **flood risk** to inform your determination of this application.

Flood risk

The planning application proposes highly vulnerable development (detached outdoor classroom). The Flood Map for Planning identifies the application site to be at risk of flooding and within flood zone 2 and 3 Rivers and flood zone 2 and 3 Sea, TAN15 Defended Zone for fluvial and tidal.

We have reviewed the updated FCA undertaken by Vale Consultancy, dated 17 June 2026. Our advice to you is that the FCA continues to be inadequate and fails to demonstrate that the potential risks and consequences of flooding are manageable.

We note that the FCA has been updated to include finished floor levels of 8.535m Above Ordnance Datum (AOD). However, there is no valid flood data to allow for a comparison to determine the flood risk.

It is for the planning authority to determine whether the risks and consequences of flooding are acceptable. Should you be minded to request an amended FCA, we advise you to use your powers to request the following information identified:

- Fluvial flood risk assessment. All sources of flooding must be assessed. The FCA incorrectly states that this has been undertaken, however there is no assessment of fluvial flood risk from the River Ebbw.

- Tidal flood risk assessment. The FCA does not assess tidal risk from the coast (using the Caldicot and Wentlooge model).
- Breach assessments for both fluvial and tidal events. A fluvial assessment should include a breach assessment as the design event.
- The FCA should provide a flood level for a fluvial/tidal event extreme events and undertake a comparison to the FFL.

Notwithstanding the above comments, given the scale and nature of the proposed development we consider the proposal to be low risk, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website [Natural Resources Wales / Preparing for a flood](#) which may be useful for the developer or occupant of the proposal.

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 James

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.