

Our Ref: CAS-309127-H7L2

Your Ref: 26/0185

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 16 June 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 May 2026.

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 **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 01.04.2026 and provided the applicant with advice as part of our response to the statutory pre-application consultation. An FCA however has not been submitted as part of

this application for planning permission. We asked you on 1 June 2026 to request the FCA via email from the applicant, however it has not yet been submitted.

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 for planning permission. 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 are likely to **object** to the application.

Foul drainage

We understand the proposed development is not located in a mains sewerage area. The planning application form and proposed plans confirm foul sewage is to be disposed of to a new septic tank.

We refer you to Welsh Government Circular 008/2018 on the use of private sewerage in new development, which advises if a connection to mains sewer is not feasible, a package sewage treatment plant should be considered. Only if it can be clearly demonstrated by the developer that a connection via a package sewage treatment plant is not feasible, considering cost and/or practicability, should a system incorporating septic tank(s) be considered.

Therefore, we advise that foul drainage proposals are amended to a package sewage treatment plant, or information provided which clearly demonstrates that a connection to a package sewage treatment plant is not feasible.

Furthermore, since a new private sewerage system is proposed, we advise that the applicant provides further information to demonstrate the proposal would not pose an unacceptable risk to the environment. Welsh Government Circular 008/2018 advises full and detailed consideration be given to the environmental criteria listed under paragraph 2.6 of the Circular, to justify the use of private sewerage.

In order to demonstrate disposal of foul effluent from any proposed private sewerage system would be effective at this location, we advise you seek further information from the applicant which confirms:

- how the foul effluent will be discharged, for example via soakaway to ground or to watercourse
- the location of the discharge, for example a plan showing the location of the proposed private sewerage system and the soakaway or discharge point to watercourse
- disposal of foul effluent would be effective at this location, for example if discharge is proposed to ground you should submit porosity/percolation testing results and calculations for the specific size of any proposed soakaway(s) and ensure there is sufficient space to install the drainage field as set out in British Standard 6297:2007+A1:2008)

Protected sites

Severn Estuary European Marine Site and River Usk Special Area of Conservation

The application site is within Alexandra Docks, which is hydrologically linked to the Severn Estuary European Marine Site (Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar) and the River Usk SAC. We have identified potential impact pathways to features of the protected sites by pollution.

From the information provided, we consider that providing the developer adheres to standard industry-wide best practice measures, in this instance pollution prevention guidelines, which would be applied onsite independently of the Habitats Regulations Assessment process, the proposal would not result in a likely significant or adverse effect.

Further information on pollution prevention guidelines is provided under the 'Advice for the developer' section below.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for you to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult us and have regard to any representations we make within such reasonable time as you specify.

Severn Estuary Site of Special Scientific Interest and River Usk (Lower Usk) Site of Special Scientific Interest

The application site is within Alexandra Docks, which is hydrologically linked to the Severn Estuary Site of Special Scientific Interest (SSSI) and the River Usk (Lower Usk) SSSI. We consider the proposals have the potential to impact upon the Severn Estuary SSSI and the River Usk (Lower Usk) SSSI. Providing the impact pathways referenced above for the Severn Estuary European Marine Site and River Usk SAC are adequately addressed, we would consider the features of the SSSIs will also be adequately safeguarded.

Land contamination

Whilst there is no indication of gross land contamination present at this site, we recommend that the requirements of Planning Policy Wales 12 (2024) and the Land Contamination Risk Management guidance are followed. If gross contamination is found to be present at the site you may wish to re-consult us.

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

Private sewerage systems: exemption and permitting

Applicants wishing to operate a private sewerage system will need either to apply to us for an environmental permit or register with us for an exemption from the permit requirement. Small sewerage systems that meet certain criteria may be registered as exempt.

If a private sewerage system is not eligible for an exemption, you will need to apply to us for an environmental permit. Further details can be found [here](#). Further information may be needed as part of the permit application process. You are therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure there is no conflict between any planning permission granted and the permit requirements. Further details on how to access our pre-application advice service can be found [here](#).

It is important to note that a grant of planning permission does not guarantee a permit will be granted. A proposal may be deemed unacceptable either because of environmental risk or because upon further investigation, a connection to mains sewer was feasible. You are encouraged to ensure you have all the required permissions, consents, permits, and any other approvals in place prior to commencement of works on the site.

Where private sewage treatment/disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations. We also refer you to Guidance for Pollution Prevention 4 on the NetRegs [website](#), which provides further information

Pollution prevention

All works at the site must be carried out in accordance with Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the NetRegs website. During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages.

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.