

Ein cyf/Our ref: CAS-308197-N3C5
Eich cyf/Your ref: RCONEX/25/1088

Emma Brinkworth
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 28 May 2026

Annwyl Ms Brinkworth/Dear Ms Brinkworth

Bwriad/Proposal: Development of a detached outdoor classroom.

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

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, with additional information which we received on 8 May 2026.

We continue to have no objection to the proposed development as submitted and provide the following advice.

Flood Risk

The planning application proposes highly vulnerable development, development of a detached outdoor classroom. Our [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within the TAN15 Defended Zone, Flood Zone 3 – Rivers & Sea, 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 submitted in support of this application:

- Flood Consequence Assessment (FCA), Acorn Nurseries, Alma House, Lighthouse Road, Duffryn, NP10 8TG, Project Ref: 24627, Issue 01, prepared by Vale Consultancy, dated 08/05/2026.

Our advice to you is that the FCA fails to demonstrate that the potential risks and

consequences of flooding are manageable for the reasons explained below.

Therefore, you may wish to use your powers to request further information. In its current form, the assessment does not consider the necessary technical requirements or acceptability criteria as set out in TAN15.

In particular, to assess the acceptability of consequences the FCA should be prepared in accordance with:

- Fluvial flood risk assessment. All sources of flooding must be assessed, the FCA incorrectly states they have undertaken this but there is no assessment of the River Ebbw fluvial flood risk. The site is shown on the FMfP within the Zones 2&3 and the Defended Zones, with defences along this river. Fluvial assessment should include breach assessment as the design event.
- Inclusion of the most up to date climate change allowances as of 1st April, on both extreme events for both tidal and fluvial events.
- Breach assessments for both fluvial and tidal events.
- Figures 8 and 9 also appear to contradict the FMfP – the source of these figures is given as Modelled Flood Extents for the Future CC Events – 2096/2121 but it is not clear which tidal model this output relates to either : the FCA states the site has been assessed using both the Newport_5_V8.0_2022 and CaldicotAndWentlooge_5_V1.0_2016 models. We need to ensure that the main source of tidal flooding is used in the assessment, given that the consultant as both models they should be able to determine the main source (maximum flooding).
- We would also require a Finished Floor Level (FFL) for comparison.

A revised FCA addressing the above requirements would be necessary before further assessment of flood risks and consequences for this proposal can progress

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](#).

Foul Drainage

No information has been provided regarding the disposal of foul waters from the proposed development. We refer you to Welsh Government Circular 008/2018 on the use of private sewerage in new developments, and specifically paragraphs 2.3-2.5, which stress the first presumption must be to provide a system of foul drainage discharging into a public sewer. We advise you that the proposed development is in a publicly sewered area. Please consult us again if foul sewage from the proposed development is to be disposed of by a private sewerage system.

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.

Yn gywir/Yours faithfully

Andrew Hurst

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.