

Ein cyf/Our ref: CAS-315031-V0X7
Eich cyf/Your ref: 26/0567

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 13 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Use of land for the purpose of vehicle storage

Lleoliad/Location: Land adjacent to and south of Matalan Newport Retail Park Seven Stiles Avenue Newport South Wales, NP19 4TX

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 28 July 2026.

We have **concerns** with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following **condition** to any planning permission granted:

- Condition: Construction Environmental Management Plan (CEMP)

Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Protected sites

The site is located 0.3 miles from Gwent Levels Nash and Goldcliff Site of Special Scientific Interest (SSSI) which is designated for rare flora and invertebrates that inhabit the reens and ditches of this SSSI.

We have concerns that the proposed development may damage the notified features of the Gwent Levels – Nash and Goldcliff SSSI. We therefore recommend that planning permission should only be granted if appropriate planning conditions are included.

Paragraph 6.4.26 of Planning Policy Wales (PPW) (edition 12) states that

“...development should be refused where there are adverse impacts on the features for which a site has been designated.”

We have considered the information submitted in support of the above planning application, namely the Ecological Appraisal (Soltys Brewster Ecology, May 2026, E24126401). On the basis of the information submitted, we consider that the proposed development will, subject to the inclusion of planning conditions, avoid likely damage to the notified features of the SSSI.

We welcome the intention within the appraisal that a construction environment management plan (CEMP) is to be undertaken, which will reduce the risk of the potential contamination entering the watercourses associated with the SSSI. We therefore advise that the following CEMP condition is attached to any planning permission granted.

Condition: CEMP

No development, including site clearance, shall commence until a site wide Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:

- Construction methods: details of materials, how waste generated will be managed
- General site management: details of the construction programme including timetable, details of site clearance; details of site construction drainage, containment areas, appropriately sized buffer zones between storage areas (of spoil, oils, fuels, concrete mixing and washing areas) and any watercourse or surface drain.
- Pollution prevention: demonstrate how relevant Guidelines for Pollution Prevention and best practice will be implemented, including details of emergency spill procedures and incident response plan. GPP5 Works and maintenance in or near water is relevant for this development.
- Details of the persons and bodies responsible for activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Justification: A CEMP should be submitted to ensure necessary management measures are agreed prior to construction and implemented for the protection of the environment

Without the inclusion of the relevant planning condition described above, we would object to the planning application.

Ultimately, the decision as to whether the proposed development should proceed is entirely a matter for your authority, having followed the step-wise approach in PPW. Our advice above focuses on the likelihood and significance of impacts on the notified features of the SSSI from the proposed development.

Should you be minded to grant planning permission for the above planning application without attaching the planning condition as described above, we ask that you notify us under the provisions contained in Section 28I of the Wildlife and Countryside Act 1981 (as amended). We also direct you to paragraph 6.4.28 of PPW which states that if you are minded to grant planning permission against our advice, then you must notify Welsh Ministers.

Flood risk

The planning application proposes less vulnerable development for the storage of vehicles. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 for Sea and is sited within a 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 JBA Consulting, dated July 2026, reference SSL-JBA-XX-XX-RP-HM-0001-D3-C01-Land_at_Severn_Stiles_Avenue_FCA.

Our advice to you is that the FCA satisfactorily demonstrates that the risks and consequences of flooding are manageable to an acceptable level. Therefore, we have no objection to the application as submitted on flood risk grounds. Further detail is provided below.

Frequency thresholds (Figure 5 - designing development to be flood free)

The FCA states that the site is predominantly flat, the highest levels reach up to 7.32m AOD and the lowest levels are in the centre of the site at 6.13m AOD.

A lifetime of development of 75 years has been applied to this assessment, and the model results for 2100 have been used to assess flood risk to the development site.

The detailed tidal flood risk assessment is based on Version 7.0 of the Newport Tidal Flood Model (June 2020). This is a 1D-2D ESTRY-TUFLOW tidal model of Newport which was further updated by JBA in 2022 and 2025 to incorporate several improvements.

Tolerable conditions (Figure 6 - managing consequences in an extreme flood event)

The following flood levels and depths were provided for the extreme events:

- 0.5% (1 in 200 year) event plus climate change allowance (CCA) 2100: the site is predicted to be flood free
- 0.1% (1 in 1000 year) event plus CCA 2100: the site is predicted to be flood free

Overtopping, breach and blockage assessment

The site lies within a TAN-15 Defended Zone and therefore a breach scenario was undertaken in accordance with Section 10.26 of TAN 15 to assess the residual risk

associated with potential failure of the NRW flood defences. This flood event would be considered the design event.

Two breach locations have been assessed to understand the residual risk associated with potential failure of the tidal defences on the banks of the River Usk. The locations were modelled separately.

- Breach Location one:
 - 0.5% (1 in 200 year) plus climate change 2100: flood free
 - 0.1% (1 in 1000) year plus climate change 2100: flood free
- Breach Location two:
 - 0.5% (1 in 200) year plus climate change 2100: flood free
 - 0.1% (1 in 1000) year plus climate change 2100: 6.59m AOD with a flood depth of 0.44m

The modelling information shows the site will remain flood free during the design event and will flood to depths within the tolerable limits of Figure 11. Due to the site remaining flood free, there is no requirement for flood resistant and resilient measures.

Flood risk elsewhere

The proposed development would not increase flood risk elsewhere, there is no built development proposed, and typical ground levels will remain unchanged.

Escape or evacuation routes

The FCA does provide evacuation routes which are predicted to flood during the 1 in 1000 year plus climate change breach event, with shallow depths of less than 400mm. The LPA should determine if the routes are considered acceptable, and if any further mitigation is required.

Advice to Developer

Landscaping

We note the Landscape Management Plan (DEP Landscape Architecture Ltd, 26/6/26) and the Softworks plan (6/26, 01/A). Trees and other plants should be of UK provenance and sourced within UK. These will be better able to support biodiversity on site. Plants of UK provenance and grown in British nurseries remove the risks of importing diseases that our plants have no resistance to and spreading pests that have no natural predators in the UK.

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,

Owen Jones

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

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.