

Ein cyf/Our ref: CAS-300843-R8D2
Eich cyf/Your ref: 26/0112

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 03 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PROPOSED CHANGE OF USE TO CHILDREN'S DAY NURSERY (D1) (RESUBMISSION).

LLEOLIAD/LOCATION: 100 SOMERTON ROAD, NEWPORT, NP19 0JX.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 16 February 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. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes a highly vulnerable development (childcare establishment). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Rivers and Sea) and the TAN 15 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.

We are unable to give you technical advice on the acceptability of flooding consequences as no Flood Consequences Assessment (FCA) has been submitted. 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.

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

Works Near a Watercourse

Due to the proximity of the site to Liswerry Pill Reen, please advise the applicant 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](#).

Flood Risk Activity Permit

Please advise the Applicant the Environmental Permitting Regulations (2016) require them to obtain a bespoke Flood Risk Activity Permit for any works or structures located in, under, over, or within 8 metres of the bank top of the Liswerry Pill Reen, a designated main river. Further advice and guidance is available on our website [Natural Resources Wales / Check if you need a flood risk activity permit \(FRAP\)](#).

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

K Murphy

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.

