

Ein cyf/Our ref: CAS-310470-L7D1

Eich cyf/Your ref: 25/0986

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use of land and outbuildings to northeast side of existing residence from agriculture to residential (resubmission)

Lleoliad/Location: The Moorlands, Goldcliff Road, Newport, NP18 2AU

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 25 May 2026.

We note that the information submitted in support of the application states if the change of use is granted it is the applicant's intention to submit a new planning application to dismantle existing range of outbuildings and to rebuild in the current form as an extension to the existing residential use of the main house.

Please note we provide the following comments based on the current change of use application only. If any future application for any demolition works is forthcoming we request to be consulted on this application.

We continue to 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 the conversion of existing outbuildings from agriculture use (less vulnerable development) to residential (highly vulnerable development). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and 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 Civil Engineering Solutions Ltd, dated 19 May 2026, reference Version Final. 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.

Flood modelling

Two available sets of hydraulic modelling outputs were used comprising of the Caldicot and Wentlooge flood modelling (2016) and a subsequent updated modelling dataset (2022). The 2016 modelling, undertaken for NRW by JBA Consulting, represents a comprehensive coastal flood risk assessment incorporating extreme tidal water levels and wave overtopping processes.

Although NRW's 2022 modelling provides the most up-to-date representation of tidal flood risk, it does not include a representation of wave overtopping and instead characterises flood risk primarily on the basis of tidal water levels and defence performance.

Consequently, the updated modelling predicts reduced flood extents and shallower flood depths relative to the 2016 dataset. The 2016 modelling remains important in demonstrating the potential influence of wave overtopping as a secondary mechanism and represents a more precautionary scenario.

Flood depths

The 2016 modelling provides the following peak tidal levels:

- 1 in 200 year plus climate change: 9.64m Above Ordnance Datum (AOD)
- 1 in 1000 year plus climate change: 9.97m AOD

The 2022 modelling provides the following peak tidal levels:

- 1 in 200 year plus climate change: 9.43m AOD
- 1 in 1000 year plus climate change: 9.77m AOD

The Welsh Government (March 2026) published updated UKCP18-based climate change guidance, identifying mean sea level rise allowances for Newport of approximately +1.25 m (70th percentile) and +1.68 m (95th percentile) relative to the 1981–2000 baseline period. Application of the 70th percentile climate change allowance (+1.25 m) results in the following indicative future design tidal levels:

- 1 in 200 year plus climate change 9.66m AOD
- 1 in 1000 year plus climate change 10.43m AOD

The 0.5% plus climate change (CC) event aligns reasonably well with the sampled 2016 model outputs, whereas the corresponding 0.1% plus CC level exceeds both the 2016 and 2022 modelled climate change scenarios, reflecting differences in modelling assumptions and approach.

The ground level information identifies the site to have ground levels between 5.8m - 6.9m AOD. With a comparison of the ground levels to the above flood levels, it is demonstrated that the proposals do not meet the requirements of TAN 15. This is acknowledged within the FCA.

Breach of flood defences

Review of LiDAR data along the coastal defence line indicates crest levels of approximately 10.0m AOD. Whilst such levels may provide an appropriate standard of protection against present-day still water tidal conditions, they are unlikely to provide a sufficient standard of protection against future extreme events incorporating sea level rise and wave overtopping and may require raising over time. The FCA does not contain any breach data, this should be considered the design event. Even with this data in the FCA, it is unlikely to demonstrate compliance with TAN 15.

Flood risk elsewhere

We have no concerns in relation to third party impacts given the source of flooding.

Flood resistance and resilience measures

No specific flood resistance or resilience measures are incorporated within this application; existing floor levels are not to be raised. The FCA suggests that safe refuge is available within the existing dwelling at first floor level and above, providing a location where occupants can remain during a flood event. A flood plan is also recommended.

Paragraph 15.4 of TAN15 is clear that where insufficient information is provided, the planning authority should use its powers to request further information. Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow reasonable time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended 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

The application form states foul drainage will be by means of septic tank. It is unclear whether this is the existing system or not. We provide our comments based on the existing septic tank being used. If this is not the case and a new/different system is proposed, then we would wish to be re-consulted so as to provide updated advice.

The developer/applicant should ensure that the existing septic tank has sufficient capacity to accommodate any increase in flows from the proposed development.

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. Septic tanks and small sewage treatment works that meet certain criteria may be registered as exempt.

A step by step guide to registering an exemption can be found on our [website](#).

If the septic tank or private sewage treatment system is not eligible for an exemption, the Applicant will need to apply for an environmental permit, further details can be found [here](#). Should a permit be required further information may be needed as part of that application process. The Applicant is therefore advised to contact us for pre-application advice at the earliest opportunity to try to ensure that 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 that 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. Applicants are encouraged to ensure they 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 the Applicant to Guidance for Pollution Prevention 4 on the NetRegs [website](#), which provides further information.

Gwent Levels Nash and Goldcliff Site of Special Scientific Interest (SSSI)

The proposed development is within the Gwent Levels Nash and Goldcliff Site of Special Scientific Interest (SSSI) which is notified for its range of aquatic plants and invertebrates associated with the interconnected reens and ditches of the drainage system. The special interests of the SSSI are dependent on the water quality, water quantity, the existence of the drainage system and its continued management. Any development which has an adverse impact on any of these factors will have an adverse impact on the wildlife for which the area was notified.

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. For further guidance please refer to 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](#).

Internal drainage district

The site is located within the Caldicot and Wentlooge Levels Internal Drainage District (IDD). The IDD is managed and maintained by us. Our primary role is to manage water

levels and reduce flood risk through the management and maintenance of drainage channels, ordinary watercourses, pumping stations and control structures. More information can be found [here](#).

The Planning Application Form and the Site Layout as Proposed Drawing, Drawing No. PL06, by Howard Hicks Design (undated), confirm surface water will be disposed of via soakaway. Provided no new connection to the reën is proposed and the discharge does not exceed the existing discharge, we have no adverse comments to make in relation to the IDD. Please consult us again if a new connection to the reën is proposed or the discharge will exceed the existing discharge.

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,

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.