

Our Ref: CAS-305523-W5G3

Your Ref: 26.165

Asbri Planning
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Dyddiad/Date: 30 April 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Statutory pre-application consultation – Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended

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: Land Parcel B16 off West Way Road, Newport Docks, Newport

Thank you for providing a requisite notice to us under Article 2D of the above Order. We received a copy of your proposed application on 09 April 2026.

We have **concerns** with the application as proposed because inadequate information has been provided. To overcome these concerns, you should provide further information in your planning application regarding **foul drainage**. If this information is not provided, we may object to the planning application when formally consulted by the planning authority. Further details are provided below.

Foul drainage

We understand the proposed development is not located in a mains sewered area. The draft planning application form confirms 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, you should provide amended foul drainage proposals in your planning application which uses a package sewage treatment plant, or you should provide information in your planning application which clearly demonstrates a connection to a package sewage treatment plant is not feasible.

Furthermore, since a new private sewerage system is proposed, you need 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. You need to demonstrate disposal of foul effluent from any proposed private sewerage system would be effective at this location.

Therefore, you should also provide information in your planning application 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)

Further advice

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; 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.

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 (TAN) 15: Development, flooding and coastal erosion* (2025) for advice on how the planning authority should consider this application in line with current planning policy. Our role is to provide the planning authority 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 the Lead Local Flood Authority.

Therefore, we have reviewed the FCA by Vale Consultancy (01.04.2026). Our advice to you is that the FCA satisfactorily demonstrates the risks and consequences of flooding are manageable to an acceptable level. Therefore, we would have no objection to the application on flood risk grounds as submitted. Further detail is provided below.

The FCA includes the following site-specific topographic survey information:

- Wider site levels range from 8.52 m to 10.73 m above ordnance datum (AOD)
- Proposed covered pallet storage shelter levels range from 9.30 m to 9.67 m AOD
- Proposed manufacturing building levels range from 9.48 m to 10.23 m AOD

The FCA has been informed by our Product 5 and 6 flood model data. This data covers tidal flood events incorporating a climate change allowance (CCA) up to the year 2121. This exceeds the required 75-year lifetime of development applicable to this type of proposal.

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

The FCA shows the site is not at risk of flooding during all flood events up to and including the 0.5% (1 in 200 year) + CCA annual probability tidal event to 2121. This is compliant with Figure 5 of TAN 15.

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

The FCA shows the western part of the site is predicted to be at risk of flooding during the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2121. The proposed covered pallet storage shelter is predicted to marginally encroach into this flood extent during the same event. However, the FCA does not provide the associated flood depth for this encroachment. In contrast, the proposed manufacturing building is shown to be flood free across all flood events up to and including the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2121.

Overtopping and/or breach and blockage assessment

The FCA includes data for the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2115 breach scenario. This data indicates that, under the breach scenario, the western part of the site is predicted to be at risk of flooding. A small section of the proposed covered pallet storage shelter is predicted to flood to a depth of 0.14 m. In

contrast, the proposed manufacturing building would be shown to be flood free during all the modelled breach scenarios.

Based on the data, and when applying the required 75-year lifetime of development, it can be assumed the site would be flood free during the 0.1% (1 in 1000 year) + CCA annual probability tidal flood event to 2101. This is compliant with figure 6 of TAN 15.

There is no information provided in the FCA on the flood levels associated with the relevant extreme events that would enable flood depths to be derived across the wider site. The planning authority may wish to request this additional information is submitted by the applicant for emergency planning purposes.

Latest climate change allowances

As you are most likely already aware, Welsh Government has issued recent updates to the [Flood Consequences Assessments: Climate change allowances](#) guidance, as detailed within Welsh Government's [Dear CPO Letter](#). The updated guidance states:

"This document replaces the guidance issued in September 2021 and should be applied to planning applications (full, outline and reserved matters) submitted from 1st April 2026, and all development plans to be submitted to Welsh Government from 1st April 2026."

Section 3.3 of the guidance states:

"The 2100 allowance is currently appropriate for development with a 75-year lifetime, while the 2125-2130 allowances can be used to determine impacts for development with a 100-year lifetime."

As the FCA has been informed by data covering tidal flood events incorporating a CCA up to the year 2121, we are satisfied that, in this instance, the latest climate change allowances have been appropriately considered.

Flood risk elsewhere

Given the scale and nature of the proposals, we agree with the FCA conclusion that the proposed building footprints would have a negligible impact on flood risk elsewhere.

Mitigation measures

It is recommended the site owners and occupants:

- sign up to receive flood warnings from us
- display appropriate documentation to inform users of the site of the potential flood risk
- prepare a Flood Evacuation Management Plan for implementation during an extreme event

Site access

The FCA states access and egress would be provided via West Way, travelling north-west towards Docks Way, before continuing west along the Southern Distributor Road. This route leads away from all modelled tidal flood extents up to and including the extreme 0.1% (1 in 100 year) + CCA annual probability tidal flood event to 2121.

Conclusion

Overall, we are satisfied the proposed development complies with the requirements of TAN 15.

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 the planning authority to carry out the test of Likely Significant Effects for the proposed development. Should they 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. The planning authority must for the purposes of the assessment consult us and have regard to any representations we make within such reasonable time as they 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

We recommend the requirements of *Planning Policy Wales* (2024) and the [Land Contamination Risk Management](#) guidance should be followed.

We would not provide detailed site-specific advice or comments with regards to land contamination issues for this site as we assume gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site the planning authority may wish to re-consult us.

Other matters

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

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.

In addition to planning permission, you are advised to ensure all other permits/consents/licences relevant to the development are secured. Please refer to our [website](#) for further details.

Further advice on the above matters could be provided prior to your planning application being submitted, however there would be a charge for this service. Additional details are available on our [website](#).

Advice for the developer

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,

Sarah Lund

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.