

Ein cyf/Our Ref: CAS-294103-B4S5
Eich cyf/Your Ref: CONNEX/25/0986

Lydia Burrows
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 11 December 2025

Annwyl Ms Burrows/Dear Ms Burrows

BWRIAD/PROPOSAL: CHANGE OF USE OF LAND AND OUTBUILDINGS TO NORTH EAST SIDE OF EXISTING RESIDENCE FROM AGRICULTURE TO RESIDENTIAL (RESUBMISSION).

LLEOLIAD/LOCATION: THE MOORLANDS, GOLDCLIFF ROAD, GOLDCLIFF, NEWPORT, SOUTH WALES.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 26 November 2025.

We note that the information submitted in support of the application states if the change of use is granted it is the applicants 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 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 conversion of existing outbuildings from agriculture use (less vulnerable development) to residential (highly vulnerable development). The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 3 – Sea and 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.

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 would **object** to the application.

Further advice

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 via soakaway. Provided no new connection to the reen 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 reen 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 on the above, please do not hesitate to contact us.

Yn gywir/Yours faithfully

Andrew Hurst

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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.