

Ein cyf/Our Ref: CAS-308642-X0Z4
Eich cyf/Your Ref: RCONEX/26/0099

Geraint N Roberts
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 3 June 2026

Annwyl Mr Roberts/Dear Mr Roberts

BWRIAD/PROPOSAL: Construction of a new full-size 3G synthetic sports pitch, spectator viewing areas including 2 no. 125 - seater stands, TV gantry, changing facilities, parking area, access improvements and associated works.

Lleoliad/Location: Dragon Park, Spyttty Boulevard, Newport International Sport Village, Newport, NP19 4RA.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, with additional information which we received on 14 May 2026.

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 construction of a synthetic sports pitch, spectator seating areas and associated works which are defined as less vulnerable development in Technical Advice Note 15: Development, flooding and coastal erosion (TAN15), dated 2025. The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 2 – Rivers, Flood Zone 3 – Sea and 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. 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.

We have reviewed the following Flood Consequences Assessment (FCA) submitted in support of the application:

- Proposed Artificial Grass Pitch Dragon Park Velodrome Way Newport, R - 00364 – 001 – FCA – 0 May 2026, Revision 0, prepared by SEA Consulting Engineers, dated 13.05.26.

Our advice to you is that the FCA is incomplete. 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 the following information identified.

The FCA states in paragraph 3.6.4:

- A topographical survey drawing is presented in Appendix C and indicates existing ground levels of between 6.1 and 6.45.

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

The FCA states that during the 0.5% (1 in 200 year) plus climate change (CC) flood event flood levels could reach 7.430m. Based on the stated ground levels the proposed development could flood to depths of between 0.98m and 1.33m Based on these depths of flooding the proposed development is not compliant with Figure 5 of TAN15, which states that new development should be flood free in this event.

However, we acknowledge that the FCA states in paragraph 6.4.5 that it is not possible to lift the site outside of the 0.5% plus CC event due to the nature of the proposed development.

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

No assessment of the 0.1% (1 in 1000 year) plus CC flood event has been included within the FCA. Therefore, we are unable to advise on whether the proposed development is compliant with Figure 6 of TAN15. If your authority is minded to request this information, we would be happy to provide further advice.

We have no further concerns regarding the tidal source of flooding at the site. Section 3.8 of the FCA details mitigation and emergency plans and warnings and states that these will be implemented.

We note that no assessment has been undertaken of the 1% (1 in 100 year) plus CC or 0.1% (1 in 1000 year) fluvial flood events.

All sources of flooding should be included in the FCA to highlight the potential flood risk to the development, especially the changing room element. The FCA should be updated so that all parties are fully aware the flood risk and use appropriate mitigation to manage this risk.

Summary

In summary we request that any updated FCA provides an assessment of fluvial flood risk to the proposed development site as per Figure 6 TAN15.

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.

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.