

Ein cyf/Our ref: CAS-285630-Z5W8
Eich cyf/Your ref: 25/0583

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: ERECTION OF BUILDING TO PROVIDE WELFARE FACILITY AND CAFÉ AT GROUND FLOOR IN ASSOCIATION WITH LORRY PARK AND STORAGE AT FIRST FLOOR (RETROSPECTIVE)

LLEOLIAD/LOCATION: R J Mason Transport Ltd, Albany Street, Newport, NP20 5NJ

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 31 July 2025.

We have concerns with the application as submitted. We advise you consider the following technical flood risk advice prior to determining this application.

Flood Risk

The planning application proposes less vulnerable development (welfare unit and café). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 Sea and TAN15 Defended Zone Tidal.

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 JBA, dated June 2025, reference PSE-JBA-XX-XX-RP-Z-0001-S3-P01. 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 building is a replacement for two portacabins that were formerly present on the site and is demountable in nature. The building is situated on concrete blocks, which is marginally elevated above the existing ground levels on the site. The building serves as an office, toilet/shower facility and café for customers of the lorry park.

No topographical survey was supplied to inform the FCA, so LiDAR data across the site has been reviewed. However, these represent predevelopment ground levels and show the site is generally flat with a small decrease in ground levels in a southerly direction of between 8.46m AOD - 8.06m AOD.

Flood defences are present along the western bank of the River Usk and the Crindau Pill. These defences comprise a flood wall which protects the site from tidal flooding and has a standard of protection of 50 years. The site is therefore located within an area benefitting from coastal defences.

The FCA states that because the proposed welfare facility and café is located on an area of existing impermeable hardstanding, previously occupied by portacabin buildings the development proposals are classified as redevelopment. Given the demountable nature of the building and the fact that it is not a permanent structure and may be replaced / removed easily from the site, the FCA states that the lifetime of the development will be limited. The FCA considers that an appropriate lifetime of development of the development is 50 years.

As detailed in Section 10.29 of TAN-15, 'Where new developments will have shorter lifetimes, it is reasonable that the flood consequences assessment focusses on potential risks during the developments lifetime'. We would expect the LPA to review these above statements and if not in agreement request an updated FCA to use the 75 year lifetime of development (LOD) associated with commercial developments as per TAN guidance. Our review of the FCA is based on the data provided, and that of a 50 year lifetime of development.

It is identified that the predominant source of flood risk to the site is tidal. Therefore, to better understand the risk of tidal flooding posed to the site and the potential implications of climate change, further assessment using detailed hydraulic modelling is provided. The assessment of tidal flood risk has been based on the best available and updated flood modelling of Newport. This is based on version 7.0 of NRW's Newport Tidal Flood Model (June 2020), and the updated 2022 version 7.0 model which incorporated several improvements.

Given the 50 years LOD, the 2072 model results (as the closest to this epoch) have been used to inform the detailed assessment within this report. This would represent a lifetime of development of 47 years. The following information is provided (data based on the central climate change (70th) percentile):

- 1 in 200 year plus climate change 2072 - the whole site is predicted to be flood free in this event.
- 1 in 1000 year plus climate change 2072 - flood depths are predicted to be shallow and are a maximum of 240mm. The welfare facility and café is sited on concrete

blocks, which will marginally elevate it above the existing ground levels on the site and consequently, low the flood depths within the building.

Due to the tidal nature of flood risk to the site, it is unlikely that flood waters shall be displaced by the structure. In addition, the building is raised on concrete blocks which will allow the predicted shallow flood water within the extreme event to flow underneath. We are satisfied that no further third party information/assessment is required given the source of the flooding.

In the 1 in 200 plus climate change event (2072), the access road is predicted to be flood free and shallow flooding of up to 440mm is present along Albany Street in the 2072 1 in 1000 plus climate change event. This access remains unchanged from the existing access road for the Newport Lorry Park and should allow pedestrian and vehicular users to evacuate if required. A flood response plan may be beneficial to highlight actions to evacuate in the event of the extreme flood event.

The FCA states that due to the temporary nature of the building, it is not designed to withstand significant flooding. Therefore, resilient, and resistant design is not suitable for the proposed use. The LPA should review any details in relation to emergency plan for the site to ensure they are satisfied

Whilst the site is located within a TAN 15 Defended Zone, the site is shown to remain flood free during the 1 in 200 year 2072 flood event, therefore the breach parameters are not applicable, and we would not require a breach assessment for this application. However, should the LPA require an alternative LOD for the site, breach of the defences should be assessed / justified within the FCA.

The FCA does not include flood data for the 1 in 200 year event plus climate change (upper estimate 90th percentile) this is normally required to inform mitigation/resilience measures and for a complete FCA. TAN15 (paragraph 4.3) states that '*detailed Flood Consequences Assessments, to accompany planning applications, will be required to consider a range of climate change scenarios, including upper end estimates, making reference to the Welsh Government guidance on climate change allowances for planning purposes*'. Current Welsh Government guidance on [climate change allowances for planning purposes](#) states that this information should be used to inform mitigation measures that help to ensure the long term resilience of the development. You may therefore wish to request the Applicant provides this information. However, please note, it is not our role to comment on the acceptability long-term resilience of individual developments. As such, should you choose to request this information, it will be a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors e.g. LPA emergency planners/Local Lead Flood Authorities.

Provided the LPA are satisfied with the lower LOD, the development shows compliance with the requirements of TAN 15. We recognise the modelling used to inform the FCA and would highlight that despite 50 years being considered appropriate, data is only available for 47 years (flood depths on site would therefore be slightly higher than those stated for the extreme 1 in 1000 year plus climate change event).

We are satisfied with the data missing 3 years of climate change allowance, however, 3 years is considered the upper limit for missing data.

We cannot advise you on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not conduct these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15. You must be satisfied the development is acceptable in terms of flood risk, particularly with regard to access and egress considerations and emergency planning purposes.

River Usk Special Area of Conservation and Site of Special Scientific Interest

The River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located within 70 meters of the site.

We have considered the documents submitted in support of the above application. Based on the information submitted, we consider that the proposed development is not likely to damage the features for which River Usk SAC and SSSI are of special interest.

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you 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 on the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

Protected Species

No ecological information has been submitted in support of this application. We note that there are records of a bat roost within 100 meters of the site. We recommend you seek the advice of your Authority's internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.

Advice for the Developer

Pollution Prevention

Due to the proximity of the site to watercourses, during the construction phase the applicant 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](#).

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,

Gemma James

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.