

Ein cyf/Our ref: CAS-299928-Q0S9
Eich cyf/Your ref: 25/0741

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 March 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONSTRUCTION OF STABLE BLOCK, ALTERATIONS TO ACCESS AND ECOLOGICAL ENHANCEMENTS.

LLEOLIAD/LOCATION: North of St Mary's Church, MARSHFIELD.

Thank you for re consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 06 February 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 protected sites. If this information is not provided, we would object to this planning application. Further details are provided below.

We also have concerns with the application as submitted in regard to flood risk; further details are provided below.

Protected Sites

The site lies within the Gwent Levels -St Brides Site of Special Scientific Interest (SSSI).

The Gwent Levels SSSIs are notified for its range of aquatic plants and invertebrates associated with the interconnected reens and ditches of the drainage system. In summary, 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 works which has an impact on water quality of the nearby ditches and reens can have an adverse impact on the wildlife for which the area was notified.

Muck Store

Based on the information submitted it is not clear if the muck heap is constructed to British Standard, to ensure the base is impermeable preventing effluent entering ground water. We requested conformation of the construction standards.

No muck to be spread within 10m of any ditches and reens to safeguard water quality of the connected watercourses within the SSSI. This is reflected in the Code of Good Agricultural practice which identifies no muck spreading within 10m of watercourses <https://gov.wales/code-good-agricultural-practice>.

Also, there should be no planting of vegetation within 10m of the reen on site. It appears from the plans that this required buffer would be met by the application. New planting within the site should be taken from the Gwent Levels SSSI native species list.

Flood Risk

The planning application proposes less vulnerable development (stable block). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Sea) and Technical Advice Note 15 (TAN 15) Defended Zone.

We refer you to Section 10 of TAN 15: Development, flooding and coastal erosion, dated 2025 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 Francis Sant, dated May 2025, reference C/WSG/P/2434. 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.

Acceptability Criteria - Frequency thresholds

Section 2.2 of TAN15 indicates the site levels range between 6.60 – 8.40m Above Ordnance Datum (mAOD) and states 'Preferably the finished floor level of the stables should be set above 8.944m'. However, it is unclear whether finished floor levels (FFL) are proposed to be set at this level. Our advice is based on the assumption that the FFL will be set at 8.944m.

Fluvial risk:

The site is outside the fluvial extents on Flood map for planning (Fmfp), therefore remains flood free for fluvial sources.

Tidal risk:

Section 3.2 of the FCA indicates the following extreme sea levels:

-0.5% (1 in 200 year) event plus climate change allowance (CCA) (95% confidence) – 8.94 mAOD.

-0.5% (1 in 200 year) event plus climate change allowance (CCA) (97.5% confidence) – 9.40 mAOD.

During the 0.5% (1 in 200 year) event plus climate change allowance (CCA 0.5% + CC (95% confidence) event, the proposed site could flood up to 2.34m, however the stable would remain free.

During the 0.5% (1 in 200 year) event plus climate change allowance (CCA 0.5% + CC (97.5% confidence) event, the proposed site and stable could flood up to 2.80m and 0.46m respectively.

Therefore, this is non-compliant with Figure 5 of TAN 15.

Tolerable Conditions

Section 3.2 of the FCA indicates the 0.1% (1 in 1000 year) event plus CCA is 9.28 mAOD. Based on the ground levels, the site could flood up to 2.68m and the stable could flood up to 0.34m.

The FCA has indicated flow velocity at the upper end of the tide is expected to be low, however, no flood velocities have been specified or corresponding hazard ratings.

The depths on site would exceed the tolerable threshold.

Therefore, this is non-compliant with Figure 6 of TAN 15.

Increase in flood risk elsewhere

When taking into account the development footprint in comparison to the overall floodplain at this location, the impact on flooding elsewhere would be negligible.

Climate change

We note that the FCA has assessed both the central and upper end allowance, in accordance with TAN 15.

Overtopping and/or breach assessment

The proposed site is located in an area which benefits from flood defences.

The FCA concludes the site is not considered to be at risk during potential overtopping of defences from wave action especially considering the distance between the proposed site and coastline. We agree with this conclusion.

The FCA has assessed a potential breach of the defences during the 0.1% AEP + CC event, no assessment has been undertaken for the 0.5% AEP + CC event. The FCA indicates that flood depths onsite during a 0.1% AEP + CC breach scenario could reach up to 800 mm.

Proposed access to the site

Section 3.2 of the FCA indicates access could be along Church Lane towards Castleton. However, no flood risk information has been provided along these routes which is recommended for completeness. This is a matter for yourselves the local planning authority and emergency planners to review.

We recommend you consider consulting other professional advisors 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 carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

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.

Advice for the Developer

Further Advice for applicant - Pollution Prevention Appropriate pollution prevention measures must be employed to protect the water quality during construction. Guidance for Pollution Prevention (GPP) documents are available on www.naturalresourceswales.gov.uk www.cyfoethnaturiolcymru.gov.uk Page 3 of 4 the NetRegs website: <http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

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.