

Review and Comments

24627 – Acorn Nurseries, Alma House, Lighthouse Road, Duffryn, NP10 8TG - Vale Response

Date: 17/06/2026

NRW Comments – 28/05/2026	Agent Comments – 17/06/2026	Revised Documentation (Where applicable)
COMMENT	RESPONSE	DOCUMENT (FCA USUALLY)
Fluvial flood risk assessment. All sources of flooding must be assessed, the FCA incorrectly states they have undertaken this but there is no assessment of the River Ebbw fluvial flood risk. The site is shown on the FMfP within the Zones 2&3 and the Defended Zones, with defences along this river. Fluvial assessment should include breach assessment as the design event.	“The assessment specifically considers fluvial flood risk arising from the River Ebbw and tidal flood risk associated with the Severn Estuary and wider floodplain. The site is located within an area influenced by the defended floodplain associated with the River Ebbw and Severn Estuary system; therefore, both defended flood scenarios and flood defence breach scenarios have been assessed.” “Following correspondence with NRW (ref: CAS-308197-N3C5) and given the presence of flood defences associated with the River Ebbw and wider floodplain, the modelled 0.1% AEP + CC breach event has been reviewed as the design event for assessing residual fluvial flood risk.”	FCA
Inclusion of the most up to date climate change allowances as of 1st April, on both extreme events for both tidal and fluvial events.	“Additionally, the model includes climate change scenarios within the assessment. These incorporate the most up-to-date climate change allowances effective from the 1st of April 2026 and have been applied to both fluvial (River Ebbw) and tidal extreme flood events, including the modelled 1 in 30, 1 in 200 and 1 in 1000 year extreme event.	FCA

Breach assessments for both fluvial and tidal events.	“In addition, as previously mentioned, the Newport 2022 model does not include breach scenarios of defended watercourses. To ensure high-consequence, low-probability events are captured, breach scenarios from the 2016 Caldicot and Wentlooge model are incorporated into the consequence assessment. This analysis was carried out by HR Wallingford using the EMBREA (Embankment Breach) model to simulate the breaching process for various embankments represented within the Caldicot and Wentlooge model. The breach assessment has been reviewed to identify residual flood risk arising from both fluvial and tidal flood mechanisms affecting the site.”	FCA
Figures 8 and 9 also appear to contradict the FMfP – the source of these figures is given as Modelled Flood Extents for the Future CC Events – 2096/2121 but it is not clear which tidal model this output relates to either : the FCA states the site has been assessed using both the Newport_5_V8.0_2022 and CaldicotAndWentlooge_5_V1.0_2016 models. We need to ensure that the main source of tidal flooding is used in the assessment, given that the consultant as both models they should be able to determine the main source (maximum flooding).	“The 2022 Newport model has been adopted as the primary source for present day (2021) and climate change (75 year - 2096 and 100 year - 2121) flood extents due to its updated topography, as-built flood defence surveys (including Crindau Pill), updated tidal and fluvial inflows, and high-resolution hydrodynamic simulations.” Figure 8: “These results are derived solely from the Newport_5_V8.0_2022 hydraulic model climate change outputs.” Figure 9: “These results are derived solely from the Newport_5_V8.0_2022 hydraulic model climate change outputs and represent the maximum flood extents for the site under future tidal and fluvial scenarios.”	FCA
We would also require a Finished Floor Level (FFL) for comparison.	“In the absence of a proposed FFL for the classroom, an Assumed Ground Floor Level (AGFL) of 8.535m can be adopted for the purposes of this assessment, based on the average ground level derived from the LiDAR mapping.”	FCA