

Ein cyf/Our ref: CAS-272905-G2V5
Eich cyf/Your ref: 25/0030

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 12 February 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONVERSION OF VACANT SHOP INTO 2NO. BEDROOM HOUSE

LLEOLIAD/LOCATION: 24 COURTYBELLA TERRACE, NEWPORT, NP20 2LA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 21 January 2025.

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.

Flood Risk

The planning application proposes highly vulnerable development (residential). Our Flood Risk Map confirms the site to be within Zone B of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The [Flood Map for Planning](#) identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Sea.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, 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.

We have reviewed the FCA undertaken by KRS Enviro, dated January 2025, reference KRS.0848.001.R.001A.

Our advice to you is that the FCA fails to demonstrate that the risks and consequences of flooding can be managed to an acceptable level for the reasons explained below.

The existing site currently comprises a 2 storey end of terrace property with a vacant ground floor commercial unit and two bedrooms on the first floor. It is proposed to convert and 'change the use of the former ground floor commercial unit to create a 2 storey two bedroom residential flat. There will be a living room, kitchen and storage on the ground floor and two bedrooms and a shower on the first floor. It should be noted that there are already two bedrooms on the first floor and this will remain the same post development, the change of use will be for the ground floor shop to facilitate these two bedrooms on the first floor.'

We note that the FCA refers to the proposed development as a flat but the planning application indicates that the conversion will be into a 2 bedroom house.

Section 2.4 of the FCA states that the minimum ground floor level is 8.3metres (m) above ordnance datum (AOD), this will not be changed as part of the conversion.

Section 4.3 states that 'all sleeping accommodation will be located on the first floor of the building. The levels of the first floor are located above any floodwater levels. This would provide a 'safe haven' above any floodwater levels ... which would be a minimum of 2.5m above the ground floor and floodwaters.'

The FCA states that the site is protected against tidal flooding by flood defences in the form of a flood embankment and flood walls maintained by NRW. Please note that this site is not in an area protected by any flood defences, the defences in the area are located on the opposite side of the River Usk and will not provide any benefit to this development site. When the DAM is consulted the site is located within the Zone B.

A1.14 and A1.15

The site will be inundated when climate change is considered from the 2096 flood events. The following flood levels are provided for a 2121 (96 year lifetime of development) event:

- 1 in 200 year (0.5%) plus climate change (2121 event): 9.31m AOD
- 1 in 1000 year (1%) plus climate change (2121 event): 9.73m AOD

When these levels are compared with given floor levels it shows that the site cannot be designed to be compliant with A1.14 and A1.15 TAN 15 requirements. The flooding on site is expected to be slightly higher with a full 100 year lifetime of development applied to the extreme events, we note that this data is missing within the FCA.

We note that the building is existing, and no land raising will occur within the site. The proposed development will not impede the movement of floodwaters across the site.

The FCA includes flood resilience and resistance measures that will be included in conversion. It also states that that given the flood warnings available for the site, the occupants will be advised to sign up to flood warnings and produce an evacuation plan. It is suggested in the FCA that the safe access and egress routes, via Courtybella Terrace to the south east, via Commercial Road to the north west and then on to Chapel Crescent to the south west. We would encourage consultation with the Emergency Planners within the LPA for any emergency plans proposed on the site.

Summary

We note that there is already a highly vulnerable development on site. We also note that no new built development is being proposed and it is not proposed to significantly alter existing levels on site. Given this, it is unlikely the proposal will be able to be designed in line with TAN 15.

Your authority may wish to consider this in your determination. However, please note that our role is limited to providing the planning authority with technical flood risk advice on the consequences of flooding.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, 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.

European Protected Species

Our records indicate a bat roost within 55m of the site. We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of bats, a European Protected Species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and Planning (paragraph 6.2.2) a bat survey may be required.

The survey should be carried out in accordance with 'Bat Surveys for Professional Ecologists; Good Practice Guidelines 4th Edition' published by the Bat Conservation Trust 2023.

We therefore have no comments to make on the application, as submitted. Please consult us again if any survey undertaken finds that bats are present at the site, and you require further advice from us.

Advice to the Applicant

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](#).

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

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.