

Ein cyf/Our ref: CAS-275495-C6H2
Eich cyf/Your ref: 24/1047

Marnie Ostler
Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 05 March 2025

Annwyl Marnie/Dear Marnie,

BWRIAD/PROPOSAL: CHANGE OF USE FROM SINGLE DWELLING TO 6NO. BED HMO.

LLEOLIAD/LOCATION: 39 DOLPHIN STREET, NEWPORT, NP20 2AT.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 25 February 2025.

We have no objection to the proposed development as submitted and provide the following advice.

Flood Risk

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 (FMfP) identifies the application site to be at risk of flooding and falls partially into Flood Zone 3 for Sea.

The application proposes the retention of a highly vulnerable development through the conversion of an existing dwelling to a House in Multiple Occupancy (HMO).

Whilst the proposal would not increase vulnerability of the use, the potential intensification of the residential use may create additional pressure on emergency services, should evacuation during a flood event be required.

We note the application is supported by a 'Flooding Addendum' by Flume Consulting (dated 24/02/2025). However, it is not supported by a full Flood Consequence Assessment (FCA). Notwithstanding, we note the amended plan (drawing no.: KD1993/1A) identifies a dedicated attic refuge area, which the Flooding Addendum states will be available to ground floor occupants in the event of a flood.

Subject to your Authority satisfying itself that the proposed internal arrangement is acceptable in flood risk management terms, we have no objection. However, we advise you consider with other professional advisors as necessary, whether the proposed attic refuge area is fit for purpose in terms of refuge and evacuation.

If you request a FCA from the Applicant, or the Applicant decides to undertake an FCA for their own benefit, for example, to explore suitable options for incorporating flood resistance and/or resilience measures into the design and to develop a flood plan for the occupants, we would be happy to review it. We refer to our [website](#) for further advice and guidance.

Additional guidance including the leaflet "Prepare your Property for flooding" can be found [here](#). The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', can be found [here](#).

Protected Sites

We refer you to our previous response (Ref: CAS-273536-Y6R2, Dated: 17th February 2025), which sets out our comments with regards to protected sites.

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

Eleanor Sullivan

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.