

Ein cyf/Our ref: CAS-289127-F3Q3
Eich cyf/Your ref: 25/0324

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 13 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM A 3 BEDROOM DWELLING (C3 USE)
TO A 5 BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)**

LLEOLIAD/LOCATION: 201 MALPAS ROAD, NEWPORT, NP20 5PP

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

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 flood risk. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (residential). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Rivers and Sea) and the TAN 15 Defended Zone.

We refer you to Section 10 of Technical Advice Note (TAN) 15: Development, flooding and coastal erosion (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 amended FCA by KRS enviro, reference KRS.0886.001.R.001.A (September 2025). Our advice to you is the FCA is incomplete. Paragraph 10.24 of TAN 15 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 an amended FCA which includes the following information identified:

The FCA confirms our Malpas Brook flood model update 2012 was used to assess the fluvial and tidal flood risk to the site.

In our letter reference CAS-286323-Y4Z9 (26 August 2025) we advised given the age of the model data, to ensure it represents the most up to date information and is fit for purpose, we expect the model to be checked, relevant hydrology and topography updates to be undertaken as necessary, and confirmation of this be included in the FCA. This can then be used to ensure the flooding scenarios are relevant to current guidelines. Without this, we cannot comment on the acceptability of the model used to assess the flood risk at the site.

The FCA suggests ‘...Undertaking more modelling would not provide any more useful information than what is already available and would not be cost effective given the scale of the proposed development...’ The FCA considers our Malpas Brook flood model update 2012 is acceptable to assess the fluvial flood risk posed to the site.

For clarity, our previous advice was for flood model checks to be undertaken of the existing Malpas Brook flood model update 2012, not for new or additional modelling to be undertaken at this stage. The results of the model check would determine whether further modelling work is needed.

We confirm the Malpas Brook flood model update 2012 is the most up to date model for this area we hold. This does not mean it is the most reliable form of flood data for the site. Whilst we make reasonable efforts to keep our information accurate, we assume no responsibility for its accuracy and correctness, or for any consequences of relying on it. Our website [Natural Resources Wales / Modelling for Flood Consequence Assessments](#) states:

You must fully assess flood risks and impacts in your FCA. These might include:

- *an appropriate and robust baseline hydraulic model that represents current conditions and includes the latest hydraulic modelling software (if you use a hydraulic model)*
- *a hydraulic model that integrates your proposed permanent and temporary works with the baseline model*
- *topographical surveys (in accordance with Ordnance Datum where possible) and the flood flow estimates you have used*
- *outputs from both the baseline and proposed hydraulic model that calculate the flood risk in depth, velocity and extent for the flood flows you have chosen*
- *a comparison of your baseline and proposal results*
- *a range of flood scenarios “up to and including” the maximum design event*
- *an allowance for climate change in line with current government guidance*
- *an assessment of the impacts of flooding associated with a breach of defences and/or a blockage on a bridge/culvert, or pipe crossing a watercourse*
- *an assessment of the impacts of flooding associated with wave overtopping in coastal locations*

It is the responsibility of the applicant to determine the flood risk to their development site. This may mean ensuring the available data is fit for purpose. Therefore, we maintain our

advice; without the flood model check, we cannot comment on the acceptability of the model used to assess the flood risk at the site.

We advise there is also no information provided in the FCA for the 0.1% (1 in 1000 year) plus 25% climate change annual probability fluvial flood event.

The tidal flooding scenarios provided in the FCA show non-compliance with TAN 15.

The FCA considers the site is protected against fluvial and tidal flooding by existing flood defences. The crest level of the flood wall varies from 9.01m to 9.13m above ordnance datum (AOD). When climate change is taken into account, these defences are overtopped and will not offer complete protection to the development site. Therefore, we consider the FCA continuing to state the site is protected against fluvial and tidal flooding is misleading.

In our letter reference CAS-286323-Y4Z9, we advised the site is located within a TAN 15 Defended Zone. In accordance with TAN 15, assessment is required for the breach of a defence (breach scenario) and blockage of a structure (blockage scenario), which should be considered as the 'design event.' In the absence of breach assessment and blockage assessment, justification for not including them should be provided in the FCA.

When providing justification, the FCA considers breach and blockage scenarios are not proportionate to the nature of the development. Undefined data is provided. However, as this data is from the Malpas Brook flood model update 2012, without the flood model check referred to above, we are unable to confirm whether the undefended scenarios are accurate.

Further Advice

There is also no information provided in the FCA regarding the upper end climate change estimate. TAN 15 (paragraph 4.3) states '*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.*' The FCA considers the upper end climate change estimate is not applicable to the proposed development when the scale and nature of the site is taken into account.

Current Welsh Government guidance on [climate change allowances for planning purposes](#) states 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.

Summary

Whilst we appreciate the scale and nature of the proposal, we consider the FCA is incomplete. We advise you to request an amended FCA from the applicant. In the absence of the flood model check and the 0.1% plus 25% climate change annual probability fluvial flood event information, we would be able to provide you with limited flood risk advice

which is not in accordance with TAN 15. If your Authority would like to receive this advice from us, please consult us again.

Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to object to the application.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Sarah Lund

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.