

Ein cyf/Our ref: CAS-290073-M6D6
Eich cyf/Your ref: 25/0841

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 28 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM DWELLING (C3 USE) TO A 4
BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)**

LLEOLIAD/LOCATION: 7 Conway Road, Newport, NP19 8PA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 October 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. 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 (house in multiple occupation). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 Sea and TAN15 Defended Zone⁽¹⁾.

Whilst we recognise there is no change in vulnerability, there is a likely increased risk to people and property as one bedroom is proposed wholly on the ground floor. This may also lead to intensification of highly vulnerable use and create more pressure on emergency services should evacuation be required.

We refer you to Section 10 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) 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 KRS Enviro, dated September 2025, referenced KRS.0896.001.R.001. 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.

Flood model data for the River Usk was obtained from NRW and 0.11m was applied to the given flood levels to calculate the 100 year lifetime of development climate change allowances. We are satisfied with this use of the data given the sources of flooding and scale of the development.

Frequency thresholds (Figure 5)

Section 2.4 of the FCA indicates an approximate maximum ground level of 7.5m AOD with an appropriate minimum ground level of 7.3m AOD. Section 4.2 of the FCA states that *finished floor levels will be set at the existing finished floor levels*. However, no level is provided.

For the 1 in 200 year (0.5%) to 2125 flood event, the predicted flood level is given as 8.43m AOD (FCA table 4). Therefore, based on the minimum ground level of 7.3m AOD, the development is predicted to flood to 1.13m during the 1 in 200 year plus climate change event (0.5%+CC).

This does not comply with Figure 5 of TAN15.

Tolerable Conditions (Figure 6)

For the 1 in 1000 year (0.1%) to 2125 flood event, the predicted flood level is given as 9.35m AOD (Table 4 FCA).

Therefore, based on the minimum ground level of 7.3m AOD, the development is predicted to flood to 2.05m during the 1 in 1000 year plus climate event (0.1%+CC).

This exceeds the tolerable threshold of 600mm set out in Figure 6 of TAN15.

Breach Assessment

The site is located in an area benefitting from flood defences which provide a 1 in 200 year standard of protection. These defences take the form of flood embankments and flood walls which are maintained by NRW. Given that the site is located within a TAN 15 Defended Zone, a breach assessment is required, with a breach 1 in 200 year plus climate change 2125 flood event being the Design Event.

The following breach flood levels are provided in the FCA:

- 1 in 200 year 2125: 8.11m AOD
- 1 in 1000 year 2125: 9.51m AOD

Based on the breach flood levels provided, the development is predicted to flood to a depth of 810mm in the 0.5%+CC flood event. This does not comply with Figure 5 of TAN 15.

We request confirmation of the source of the breach data, and to which defences the information relates and for the FCA to be updated accordingly.

Additional comments

The proposal is a change of use and there will be no increase in building footprint, therefore, this will not increase flooding elsewhere.

Section 4 of the FCA provides information relating to recommended flood plans and access/egress route which we recommend are reviewed by appropriate advisors.

Paragraph 13.2 of TAN15 notes that that '*Any development in Zones 2 and 3 and the TAN 15 Defended Zones must have resilience to flood built-in at site and property level*'. You must be satisfied that any flood resilience measures proposed as part of the development are appropriate so that it remains flood-free and safe over its lifetime. Please note we are only able to advise on how certain resilience measures, such as changes to site layouts or finished floor levels, will affect the risk of flooding. Advice on measures aimed to manage surface water at the site level should be sought from your Lead Local Flood Authority. A combination of resilience and resistance measures may be necessary depending on the flood risk to the site.

For advice on other flood resilience measures, for example, those aimed at minimising the amount of water that can enter a property, or resistance measures that can help limit the impact of flooding can be sought from the Construction Industry Research and Information Association (CIRIA), including the Code of Practice and Guidance for Property. The [Association of British Insurers](#) have more information about flooding and insurance.

We note there is no information provided in the FCA regarding the upper end climate change estimate. TAN15 (paragraph 4.3) states that '*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*'. Current Welsh Government guidance on [climate change allowances for planning purposes](#) states that 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 e.g. LPA emergency planners/LLFAs.

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.

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.

If you have any queries on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Claire McCorkindale

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.

¹ TAN15 Defended Zones are defined as areas that benefit from Risk Management Authority flood defences with the following minimum Standard of Protection:

- 1 in 100 year (present day) for rivers
- 1 in 200 year (present day) for the sea

For flood defences built from 2016 onwards there must be allowance for climate change and design freeboard. The Defended Zones are served by defences that provide protection from at least one of the main sources of flooding – sea or river, or both in some instances. However, it is important to note that some areas within the TAN 15 Defended Zones may be vulnerable to other sources of flood risk, i.e. protection may be provided against fluvial flood risk but not tidal risk or vice versa.