

Ein cyf/Our ref: CAS-295694-J1Y6  
Eich cyf/Your ref: 25/1044

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 07 January 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: DEMOLISH GARAGES AND ERECT PAIR OF SEMI-DETACHED DWELLINGS**

**LLEOLIAD/LOCATION: LAND WEST OF 10 THOMPSON AVENUE, NEWPORT, NP19 4LY**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 December 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 (residential). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and a TAN15 Defended Zone.

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 February 2025, referenced KRS.0786.001.R.001.C. Our advice to you is that the FCA is incomplete.

The FCA provides flood levels for the site, with climate change, up to 2124. Without a breach scenario, the FCA demonstrates that the proposed dwellings would remain flood free during the 1 in 200 year 2124 event and would flood to depths within the tolerable limits set out in TAN15. The wider areas of the site would experience flooding from 300 to 730mm in the extreme events.

Paragraph 6.8 of TAN 15 recommends that a breach scenario is undertaken for sites located in the Defended Zone and that this scenario should act as the design event to inform the design of the development. This would normally take the form of a gap in the defences of a certain size. Depending on the flood type, this would provide flood levels and act as the design event.

A breach scenario is not included in the FCA and there is no justification to explain why. The FCA recognises that the site is protected against tidal flooding by flood defences which provide a 1 in 200 year standard of protection. The flood defences take the form of flood embankments and flood walls, and are all maintained by NRW. The FCA acknowledges the site's location and states that a breach in the flood defences is unlikely. However, following recent storm events, defences in South Wales, with no previous history of doing so, have overtopped or breached.

Flood levels are provided for the undefended scenario, as follows:

- 1 in 200 year plus climate change 2124: 7.61m AOD - units will flood to a depth of 330mm and the wider site to a depth of 830mm.
- 1 in 1000 year plus climate change 2124: 7.86m AOD.

The undefended data demonstrates that the site would experience higher depths of flooding, which is to be expected. However, we do not consider this information to be appropriate for use as a breach scenario. If the applicant intends to use the undefended figures, in the absence of a breach scenario, these figures should be considered the design event.

The breach event is likely to have less severe impacts on the site than the undefended scenario represented in the FCA. However, we are unable to provide technical flood risk advice on this element as it is not included in the FCA. Given the presence of the defences, using the undefended event data, whilst demonstrating the worst-case scenario, does not provide a realistic flood event scenario.

Paragraph 15.4 of TAN15 is clear that where insufficient information is provided, the planning authority should use its powers to request further information. The advice in paragraph 10.24 of TAN15 is also 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 the following information:

- An amended FCA to include an assessment of a breach scenario.

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 that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would **object** to the application.

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

Yn gywir / Yours faithfully,

*Jessica Jones*

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning  
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [southeastplanning@cyfoethnaturiolcymru.gov.uk](mailto:southeastplanning@cyfoethnaturiolcymru.gov.uk)  
Ffôn/Phone:

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.