

Ein cyf/Our ref: CAS-298106-L4J3  
Eich cyf/Your ref: 25/1031

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 11 February 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: PROPOSED SUBDIVISION OF 1 NO. DWELLING TO CREATE 2 NO. RESIDENTIAL UNITS**

**LLEOLIAD/LOCATION: 63 GEORGE STREET, NEWPORT, NP20 2AA**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 January 2026.

**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 Zones 2 and 3 (Sea).

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 MCA dated 16.01.2025. 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.

The proposed plans show a self-contained ground floor flat with no apparent access to a communal area/refuge. We note that this appears to be the current situation, although this does not benefit from formal planning permission.

The FCA states '*All occupants have access to first-floor safe refuge managed by the Landlords*'. However, this is not apparent on the submitted plans.

The proposed plans illustrate the inclusion of a new internal stair leading directly into the hallway of the first floor flat. However, plans show a ground floor door enclosing this stair for use of occupants of the first floor flat and therefore no apparent access to this stair and first floor by ground floor flat occupants.

We also note the existence of an external staircase and short first floor landing which is currently the only entrance to/exit from the first floor flat. It is proposed to change the external first floor flat door direction so that it opens outward onto the landing. However, it is not clear if this stair is intended for use by residents of the ground floor flat and whether your Authority considers this offers appropriate refuge for them in the event of a flood.

With regard to an assessment of flood risk, the FCA does not contain any technical flood risk data in terms of site levels, flood levels, depths, velocity and hazard rating. As such we are unable to provide you with any technical advice on flood risk.

We acknowledge that the existing use is highly vulnerable development (residential) and the proposed use is also highly vulnerable development (residential). However, whilst we recognise there is no change in vulnerability and there are existing ground floor bedrooms we note the proposal is for the change of use from one dwelling to two self-contained units, and as such there is a likely increased risk to people from flooding as the proposal includes a self-contained unit at ground floor level. This may create more pressure on emergency services should evacuation be required.

We therefore advise an updated FCA that is informed by technical flood risk data is submitted demonstrating that TAN 15 criteria are met; or amended plans are submitted showing no self-contained units situated on the ground floor; or amended plans are submitted confirming the provision of an upstairs communal area that the occupants of the ground floor unit could use in the event of a flood.

Paragraph 15.4 of TAN15 is clear that where insufficient information is provided, the planning authority should use its powers to request further information. Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow reasonable 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, or amended plans as advised above, then we may 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,

**Annabelle Evans**

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)

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.