

Ein cyf/Our ref: CAS-247053-R0H6  
Eich cyf/Your ref: 23/0703

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 19 February 2024

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CONVERSION OF THE UPPER FLOORS OF EXISTING HOTEL TO CREATE 10NO. RESIDENTIAL APARTMENTS AND ASSOCIATED EXTERNAL AND INTERNAL WORKS**

**LLEOLIAD/LOCATION: West of England Hotel, 42 Mill Parade, Newport, NP20 2JS**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 19 January 2024.

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

**Flood Risk**

The planning application proposes highly vulnerable development in the form of 10 residential apartments at the first and second floor level, the ground floor will remain as a public house (less vulnerable development) with all habitable spaces to be located exclusively on the first and second floors. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN)15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 3 Sea.

We refer you to Section 6 of TAN15 and the Chief Planning Officer letter from Welsh Government, dated 9 January 2014, which affirms that highly vulnerable development should not be permitted in Zone C2 (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 of TAN15 do not apply to highly vulnerable development in Zone C2.

The decision as to whether a development is justified is entirely a matter for your Authority.

To aid your decision making we have reviewed the FCA undertaken by Vale Consultancy, dated January 2024, reference:15320–FCA–R02, submitted in support of the application

and provide the following comments on the acceptability of flooding consequences as assessed in the FCA.

Review of LiDAR data indicates a minimum floor level of 8.04 metres Above Ordnance Datum (AOD). The FCA states that the finished floor levels (FFL) are raised at least 150 millimetres above surrounding ground levels and therefore, an existing FFL of 8.19 metres AOD is assumed for the existing property (public house).

To assess the flood risk, product 5 and product 6 data from the Newport\_5\_V6.0\_2016 model has been provided by NRW. This has been reviewed and interrogated in conjunction with the modelling report to quantitatively interrogate the fluvial / tidal flood risk posed to the site during the relevant storm events.

The base year for the model was taken as 2015 with climate change values set at 75 years (2090) and 100 years (2115). To account for climate change the FCDPAG3 guidance was used which adds 0.69 metres to sea levels for 2090 and 1.06 meters for 2115.

The FCA states that during the 0.5% (1 in 200 year) plus climate change 2115 flood event, a maximum flood depth of 1.40 metres is recorded at the public house and a maximum flood depth of 1.56 metres is recorded at the location of the parking spaces. We note that there is no new built development, and the parking spaces are as existing.

The FCA concludes that due to all habitable rooms being located on the first and second floors, and the fact that UK ceilings have a minimum height from floor to ceiling of 2.2 metres, it can be ascertained that the first and second floors (developable aspects of the property) will remain flood free during all events up to and including the 0.5% (1 in 200 year) flood event plus climate change (2115). In our previous letter (reference: CAS-241214-Y9T8), dated 23 November 2023, we advised a full allowance of climate change should be included, which should have been used in relation to 2124 - the FCA used 2015 as the base event and applied the allowance to this. Ideally the model should be interrogated, and tolerances applied.

It states that there will be no loss of floodplain / displacement of floodplain storage as a result of the proposed works. Therefore, the proposed development will not increase flood risk elsewhere or to third-party land. We are satisfied with this conclusion for this aspect of the FCA and require no further assessment in this regard.

We cannot offer any information in relation to A1.15 because this is not included in the FCA.

### Further Advise

The above is our technical advice on the submitted FCA. It is for your Authority to make a balanced decision on the risks and consequences of flooding and to determine whether the risks and consequences of flooding can be managed in accordance with TAN15.

There are details within the FCA in Section 5 regarding Mitigation and Recommendations, emergency access/ egress which include details in relation to evacuation details, flood resilience measures and flood plans, which we would recommend the Emergency Planners for the Planning Authority review to ensure they are satisfied with these details.

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 or grant 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.

## **Advice for the Applicant**

### Flood Warning Service

The availability of a flood warning service to the development location should be confirmed by visiting the Natural Resources Wales website. NRW provides warnings where it is technically possible, but this service must not be relied on to guarantee the timely and safe evacuation of occupants. Where available, the flood warning service can be a useful means of alerting occupants who have voluntarily signed up to receive Flood Alerts and Flood Warning, enabling them to take action in advance of a flood event. Protection measures should not be wholly dependent on the flood warning service and should be implemented to manage risks and impacts of flooding.

### Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please refer to Guidance for Pollution Prevention 5: Works and maintenance in or near water, and Pollution Prevention Guidelines 6: Working at construction and demolition sites, which are available on the [NetRegs website](#).

## **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

**Gemma James**

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.

