

Ein cyf/Our ref: CAS-286323-Y4Z9  
Eich cyf/Your ref: 25/0324

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 26 August 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 12 August 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 FCA by KRS enviro, reference KRS.0886.001.R.001 (August 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.

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.

An assessment has been provided of the 1% (1 in 100 year) plus 20% climate change annual probability fluvial flood event; the 1% (1 in 100 year) plus 25% climate change annual probability fluvial flood event; the 0.1% (1 in 1000 year) annual probability fluvial flood event; the 0.5% (1 in 200 year) to 2125 annual probability tidal flood event; and the 0.1% (1 in 1000 year) to 2125 annual probability tidal flood event. In accordance with TAN 15, assessment is required of the central climate change estimate for all scenarios.

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.

#### *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.*' 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.

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 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.