

Ein cyf/Our ref: CAS-280811-C1W8  
Eich cyf/Your ref: 25/0364

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 09 June 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM SINGLE DWELLING TO 6NO. BED HMO.**

**LLEOLIAD/LOCATION: 3 CLYTHA CRESCENT, NEWPORT, NP20 2EY**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 15 May 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 in the form of a change of use from residential dwelling to House in Multiple Occupancy (HMO), with additional bedrooms proposed on the ground floor. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 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 Wai Studio, dated 14/04/25, rev P01, project reference WS2502. Our advice to you is that the FCA fails to demonstrate that the potential risks and consequences of flooding are manageable. The FCA does not contain

any site specific flood risk data (such as predicted flood depths and velocities). Therefore, we cannot advise you on the acceptability criteria, including frequency thresholds and tolerable conditions, set out within Section 11 of TAN 15 (2025).

The advice in paragraph 10.24 of TAN15 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 further information in the form of an updated FCA.

Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal, including the technical requirements set out in Figure 2 of TAN 15. Further guidance is also available on our [website](#).

Furthermore, 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 safely managed over the lifetime of the development, then we may **object** to the application.

### **Other Matters**

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (May 2025), 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

### **Eleanor Sullivan**

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.