

Ein cyf/Our ref: CAS-283360-S2V2
Eich cyf/Your ref: 25/0075

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 15 July 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM DOMESTIC DWELLING TO HMO,
NEW REAR SINGLE STOREY EXTENSION AND NEW REAR SINGLE STOREY
GARAGE (PART RETROSPECTIVE).**

LLEOLIAD/LOCATION: 48 Rugby Road, Newport, NP19 0BR

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 25 June 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

We note that the planning application was received on 31 January 2025. In accordance with [Welsh Government's Written Statement](#) dated 31 March 2025, our advice is based on Technical Advice Note 15 (TAN15), July 2004.

The planning application proposes highly vulnerable development (conversion of a single dwelling into an HMO). Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in TAN15 and the Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zones 2 and 3 Sea.

The proposed layout of the HMO results in two ensuite bedrooms on the ground floor which are at risk from flooding. We consider there to be a lack of access to a suitable area on the upper floor for the ground floor residents to use in the event of a flood. This proposal may also intensify the residential use, creating additional pressures on emergency services should evacuation during a flood event be required.

Section 6 of TAN15 requires the Local Planning Authority to determine whether the development at this location is justified. Therefore, we refer you to the tests set out in section 6.2 of TAN15. If you consider the proposal meets the tests set out in criteria (i) to (iii), then the final test (iv) is for the applicant to demonstrate, through the submission of an FCA, that the potential consequences of flooding can be managed to an acceptable level.

We are unable to give you technical advice on the acceptability of flooding consequences, as no FCA has been submitted. Therefore, if the development can be justified, the above requirement should be met prior to the determination of the application. We can advise you whether the FCA is in accordance with the technical criteria in Appendix 1 of TAN15. The criteria for the FCA, which should normally be undertaken by a suitably qualified person carrying an appropriate professional indemnity, are given in Section 7 and Appendix 1 of TAN15. The FCA should be proportionate to the development proposed. To help prepare an FCA, we have developed [guidance](#), which contains technical advice and recommendations.

Alternatively, and subject to your authority being satisfied with this approach, the applicant may wish to consider amending the proposed layout to remove the bedrooms from the ground floor; or include an appropriate communal area on the upper floor.

The application currently provides no details on issues surrounding access and egress from the property in line with criteria in TAN15. Matters regarding safe access and egress and emergency evacuation are for the planning authority to consider. If you have concerns regarding these matters, you should consider consulting other professional advisors on the acceptability of the proposals. We are not the appropriate body to comment on or approve the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood event. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

In summary, if an FCA is not submitted or any subsequent FCA fails to demonstrate that the consequences of flooding can be acceptably managed; or an amendment to the layout is not considered acceptable to your authority, we would **object** to the application.

Please inform us, in accordance with paragraph 11.7 of TAN15, if you are minded to grant permission for the application contrary to our advice.

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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully

Claire McCorkindale

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.