

Ein cyf/Our ref: CAS-280284-P5H0  
Eich cyf/Your ref: 25/0324

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 14 May 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 consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 07 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 (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 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.

The Flooding Statement (date received 30/04/2025) included in the submission considers, given the nature of the proposal, a Flood Consequences Assessment (FCA) is not required. However, the advice in 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.'* We are unable to give you technical advice on the acceptability of flooding consequences as no FCA has been submitted. Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request further information.

TAN 15 advises the FCA should be proportionate to the nature and scale of the proposal. Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this particular proposal. 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 FCA is not submitted or any subsequent FCA fails to demonstrate 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 on 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

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.