

Ein cyf/Our ref: CAS-293296-M8B8  
Eich cyf/Your ref: 25/0937

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 24 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM DWELLING (C3 USE) TO A 6  
BEDROOM HOUSE IN MULTIPLE OCCUPATION (C4 USE)**

**LLEOLIAD/LOCATION: 236 CHEPSTOW ROAD, NEWPORT, NP19 8EN**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 November 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 Zones 2 and 3 (Sea) and TAN 15 Defended Zone.

We acknowledge that the existing use is highly vulnerable development (residential) and the proposed use is also highly vulnerable development (residential). Whilst we recognise there is no change in vulnerability, there is a likely increased risk to people as the proposal includes a ground floor bedroom. This may also lead to intensification of highly vulnerable use and create more pressure on emergency services should evacuation be required.

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.

We acknowledge the submission of a 'Flooding Statement'. However, we are unable to give you technical advice on the acceptability of flooding consequences as no Flood Consequences Assessment (FCA) has been submitted. 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.

TAN15 advises that 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](#).

We also note from the submitted plans that a ground floor bedroom is proposed. We advise that the applicant may wish to amend the proposed layout such that no self-contained units are situated on the ground floor.

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 that the consequences of flooding can be acceptably managed over the lifetime of the development, then we may object to the application.

### **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,

### **Annabelle Evans**

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.