

Ein cyf/Our ref: CAS-293745-Z6G2
Eich cyf/Your ref: 25/0993

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONVERSION OF THE FIRST FLOOR TO CREATE TWO FLATS (C3 USE)

LLEOLIAD/LOCATION: 47 DUCKPOOL ROAD, NEWPORT, NP19 8FL

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 21 November 2025.

We have no objection to the proposed development as submitted and provide the following advice.

Flood Risk

The planning application proposes the retention and extension of highly vulnerable development (residential) on the first floor level and the retention of less vulnerable development (commercial) on the ground floor level. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Sea) and the TAN15 Defended Zone.

The proposal will result in the intensification of the highly vulnerable use on the first floor. However, this will be elevated above the flood risk. There is no change in the vulnerability use at the ground floor level. Therefore, given the nature of the proposed development, we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website [Natural Resources Wales / Preparing for a flood](#) which may be useful for the developer or occupant of the proposal.

Further Advice

In coming to your decision you must be satisfied the proposal is acceptable in terms of flood risk, particularly with regard to access and egress considerations and for emergency planning purposes. To aid your decision making, we refer your Authority to the following evidence presented in the Flood Consequences Assessment (FCA) by Quad Consult (October 2025). We consider the FCA to be proportionate given the nature of the proposed development.

Ground levels fall marginally to the south-west, from 7.81 metres above ordnance datum (m AOD) at the junction between Bristol Street and Duckpool Road, to 7.37m AOD at the south western corner of the site adjacent to Bristol Street. Ground levels adjacent to the north-eastern elevation of the property on Duckpool Road are 8.19m AOD.

Each of the commercial units at the ground floor level and each of the flats at first floor level are to make use of one of the five entryways, with each having a separate access/egress point. As the proposed development comprises internal and layout modifications only, the finished floor levels (FFL) are to remain as existing. FFL are given in the FCA as 7.58m AOD - 8.03m AOD.

Flood data was obtained from the Caldicot and Wentlooge Coastal Model (2016) Product 6, factoring in a 0.22m reduction to align with the required 0.84m sea level rise allowance instead of the 1.06m allowance included in the data.

Frequency Thresholds (Figure 5 of TAN 15)

During the 0.5% (1 in 200 year) plus climate change (CC) tidal flood event, the building is predicted to flood to a maximum depth of 540mm. This does not comply with Figure 5 of TAN 15.

Tolerable Conditions (Figure 6 of TAN 15)

During the 0.1% (1 in 1000 year) plus CC tidal flood event, the building is predicted to flood to a maximum depth of 1.45m at a maximum velocity of 0.11m/s. This flood depth exceeds the tolerable conditions in Figure 6 of TAN 15 (600mm).

Breach Assessment

During the 0.5% (1 in 200 year) plus CC tidal breach flood event, the building is predicted to flood to a maximum depth of 220mm. This does not comply with Figure 5 of TAN 15.

During the 0.1% (1 in 1000 year) plus CC tidal breach flood event, the building is predicted to flood to a maximum depth of 1.61m. This flood depth exceeds the tolerable conditions in Figure 6 of TAN 15 (600mm).

Flood Resistance and Resilience Measures

The FCA proposes the management of flood risk by recommending flood resilient design measures be incorporated into the development; the owner and occupiers sign up to receive flood warnings from us; suggesting access and egress is available via Christchurch Road and Duckpool Road, located approximately 80m north of the site.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15, we recommend you consider consulting other

professional advisors on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

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 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.