

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 02 June 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: REMODELLING OF PART OF LOWER GROUND FLOOR FLAT AND PART OF GROUND FLOOR TO CREATE TWO FLATS (C3 USE) INCLUDING ENLARGED LOWER GROUND FLOOR FLAT AND GROUND FLOOR FLAT

LLEOLIAD/LOCATION: 12 COMMERCIAL ROAD, NEWPORT, NP20 2PA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 23 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.

The planning application proposes highly vulnerable development (extended lower ground floor flat and new ground floor flat). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Sea).

Our understanding is that the current proposals include a self contained ground floor flat. 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. In particular, where proposals for redevelopment include residential use, local authorities should ensure that such uses do not occur at ground floor level.

We note the submission of a 'Flooding Statement', we advise this does not contain any flood data and therefore, we are unable to give you technical advice on the acceptability of flooding consequences as a full Flood Consequences Assessment (FCA) has not 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](#).

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 are likely to / we would **object** to the application.

Other Matters

Our comments above only relate specifically to matters set out at <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-developers/when-to-consult-natural-resources-wales-about-a-planning-application/?lang=en>. 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

Claire McCorkindale

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: 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.