

Ein cyf/Our ref: CAS-272491-V3M6
Eich cyf/Your ref: 24/1046

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 22 January 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PROPOSED CHANGE OF USE TO 7NO. BEDROOM HOUSE IN MULTIPLE OCCUPATION, INCLUDING SINGLE STOREY EXTENSION, BALCONY IMPROVEMENTS, GARAGE CONVERSION AND ASSOCIATED WORKS

LLEOLIAD/LOCATION: 19 MILMAN STREET, NEWPORT, NP20 2HR

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 15 January 2025.

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

Flood Risk

The planning application proposes highly vulnerable development (residential). The application site is within Zone B of the Development Advice Map (DAM) contained in TAN15 (2004). However, our [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding and within Flood Zones 2 and 3 Sea. As confirmed in the [letter](#) from Welsh Government dated 15 December 2021, the FMfP represents better and more up-to-date information on areas at flood risk than the DAM.

We note that the application documents indicate that:

- The current use of the application site is a vacant dwelling-house, the last use was a single dwelling-house and the proposed use is a house in multiple occupation.
- The first floor communal study is proposed as a refuge area.

Our advice is given on the assumption that the residential use of the application site has not lapsed, the proposal is for an HMO and your Authority is satisfied with the refuge space indicated on proposed plans. If any of these assumptions is incorrect please reconsult us. For clarity we have not considered the adequacy of the refuge area.

Having regard to the above, we consider the existing and proposed use is residential and therefore the vulnerability of the use is unchanged.

The proposal may result in a potential intensification of use and may create more pressure on emergency services should evacuation be required. Your Authority should be satisfied that the proposal is acceptable in terms of flood risk, particularly with regard to access and egress considerations and for emergency planning purposes, as such you may wish to request an FCA from the applicant to aid your decision making.

We note the Design and Access Statement submitted contains a section on flood risk, however, this is not informed by flood data and contains no flood depths and is therefore not in accordance with the technical criteria in Appendix 1 of TAN15.

If you have concerns regarding matters that we cannot advise you on, such as emergency plans, procedures and measures to address structural damage that may result from flooding, you should consider consulting other professional advisors on the acceptability of the developer's proposals. Please note, we do not normally comment on or approve the adequacy of flood emergency response 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.

In areas at risk of flooding, we recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development. These could include flood barriers on ground floor doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels.

We refer the applicant to our [website](#) for further advice and guidance is available. Additional guidance including the leaflet "Prepare your Property for flooding" can be found [here](#).

The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties', can be found [here](#).

European Protected Species

We recommend you seek the advice of your in-house ecologist to determine if there is a reasonable likelihood of bats, a European Protected Species, being present within the application site. If so, in accordance with Technical Advice Note 5: Nature Conservation and Planning (paragraph 6.2.2) a bat survey may be required.

The survey should be carried out in accordance with 'Bat Surveys for Professional Ecologists; Good Practice Guidelines 4th Edition' published by the Bat Conservation Trust 2023.

Please consult us again if any survey undertaken finds that bats are present at the site, and you require further advice from us.

Foul Drainage

We note the application form states that foul water is to be disposed of via mains sewer but that it is not proposing to connect to the existing drainage system. We advise your Authority needs to be satisfied the foul drainage arrangements are suitable.

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

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.