

Ein cyf/Our ref: CAS-288522-C9T5  
Eich cyf/Your ref: 25/0734

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 09 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE OF GROUND FLOOR FROM RETAIL USE (A1) TO A ONCE BEDROOM GROUND FLOOR FLAT.**

**LLEOLIAD/LOCATION: 64 GEORGE STREET, NEWPORT, NP20 2AA.**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 September 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 (ground floor residential flat). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea).

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. Our role is to provide you with detailed advice on the findings and conclusions of the Flood Consequences Assessment (FCA) in relation to flooding from rivers and/or the sea, including the impact on flooding elsewhere. For advice on flood risk from surface water and or small watercourses you should consult with your Lead Local Flood Authority.

Therefore, we have reviewed the FCA undertaken by KRS Enviro, dated August 2024, reference KRS.0817.001.R.001.A. Our advice to you is that the FCA is incomplete. 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 the following information identified below.

### Technical Advice

Section 3.10 of the FCA confirms that the River Usk poses the primary flood risk to the site. However, the FCA has used flood data from the Calidcot and Wentlooge Coastal Model, rather than the Usk Model.

In addition, we note the submitted FCA makes reference to the site being protected against tidal flooding. However, it should be noted that the site is not located within a TAN 15 Defended Zone, according to the Flood Map for Planning (FMfP). Therefore, the site is not protected by coastal flood defences or defences within Newport City Centre.

We also advise for future reference, defences in the area these cannot be relied upon to aid future development, they are in place to help mitigate flood risk to existing developments.

We would advise the FCA is updated to ensure that all sources of flooding are considered, especially the primary source of flooding for the site. Until this information is provided, we are unable to provide a complete technical response on the risks and consequences at the site.

In addition, we note that mitigation is suggested via first floor refuge. We note this application is for the change of use of a ground floor from retail use (LVD) to a one bedroom flat (HVD) only and does not include the upper floors. Therefore, there is no guarantee that refuge will be made available. In addition, on review of the submitted floor plans, it appears that the ground floor flat will be accessed via a separate stairwell to the upper floor flat, with no guaranteed access or landing space made available to those on the ground floor.

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 amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we would **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,

**Eleanor Sullivan**

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.