

Ein cyf/Our ref: CAS-278511-V9D8  
Eich cyf/Your ref: 25/0051

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 28 April 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE OF GROUND FLOOR FROM OFFICE TO 4NO. RESIDENTIAL APARTMENTS**

**LLEOLIAD/LOCATION: 8-10 GRIFFIN STREET, NEWPORT, NP20 1GL**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 08 April 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**

We note the planning application was received on Friday 24 January 2025 and validated on Wednesday 9 April 2025. The [Ministerial Written Statement](#) accompanying the recently updated Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025 (TAN15) states there will be a transitional period for the implementation of the TAN. It states planning applications which were submitted and registered before the publication of the new TAN will continue to be assessed against the previous version, however any development proposal, including those at pre-application stage not yet registered with the LPA will need to use the newly published version of the TAN. It will be for your authority to determine which version of the TAN should be considered in the determination of this application.

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 Zone 3 (Sea). However, we are unable to give you technical advice on the acceptability of flooding consequences as no Flood Consequences Assessment (FCA) has been submitted. An FCA is required regardless of which version of the TAN is being considered.

If it is the recently published TAN, the advice in paragraph 10.24 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.

Furthermore, it is worth noting at this point that paragraph 10.23 of TAN15 (2025) states, '*Any redevelopment proposal (in Zone 3) must be consistent with the acceptability considerations in section 11.... proposals which include residential development must ensure that such uses do not occur at ground floor level*'.

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 would object to the application.

### **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

E-bost/E-mail: [southeastplanning@cyfoethnaturiolcymru.gov.uk](mailto: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.