

Ein cyf/Our ref: CAS-275134-R8N3
Eich cyf/Your ref: 25/0030

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 18 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CONVERSION OF VACANT SHOP INTO 2NO. BEDROOM HOUSE

LLEOLIAD/LOCATION: 24 COURTYBELLA TERRACE, NEWPORT, NP20 2LA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 19 February 2025.

We previously provided advise (reference: CAS-272905-G2V5), dated 12 February 2025.

We continue to 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.

Flood Risk

The planning application proposes highly vulnerable development (residential). Our Flood Risk Map confirms the site to be within Zone B of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning identifies the application site to be at risk of flooding and falls into Flood Zone 2 and 3 Sea.

We have reviewed the updated flood risk information, addendum, submitted by KRS Enviro dated 18 February 2025, reference P.0848.001.R002.A.

It states that a 'pragmatic approach' needs to be considered by NRW and Newport City Council when assessing the flood risk at this location and that undertaking more modelling would not provide more useful information or be cost effective given the scale of the proposed development.

In our previous response, dated 12 February 2025, we confirmed that due to the depths of flooding during the extreme events that the development proposals 'cannot be designed to be compliant with A1.14 and A1.15 TAN 15 requirements'. NRW did not request further modelling to support the application.

The addendum includes, by applying the sea level increments, a full climate change allowance which may be useful to the LPA in determining the application.

These levels are:

- 1 in 200 year plus climate change : 9.35metres (m) Above Ordnance Datum (AOD)
- 1 in 1000 year plus climate change : 9.77m AOD.

In our previous response, dated 12 February 2025, we confirmed that the full allowance would only increase the flooding slightly, in this case the additional years of climate change allowance increased the previous flood levels by 0.04m.

The addendum states that A1.14 is indicative and not mandatory, this is incorrect. NRW will always state if a development fails or meets the requirements of A1.14 and it is for the authority to determine other factors that may override an A1.14 failure. As stated previously the flood depth on the site is at such a level compared to the ground site levels that this or any development not altered will not achieve A1.14 compliance.

We recognise that the development will include flood resilience and resistance measures that will be included in conversion, it also states that that given the flood warnings available for the site, the occupants will be advised to sign up to flood warnings and produce an evacuation plan. The inclusion of this mitigation does not lead to compliance with TAN 15 alone.

It is suggested in the FCA that the safe access and egress routes, via Courtybella Terrace to the south east, via Commercial Road to the north west and then on to Chapel Crescent to the south west. We would encourage consultation with the Emergency Planners within the authority for any emergency plans proposed on the site.

Other than providing the updated flood levels, the letter does not provide any further information that can alter our initial response. We therefore refer you to our previous advice, dated 12 February 2025, which remains relevant.

Further Advise

Our role is to advise the authority of the flood risk associated with the proposals and for the authority to determine if this is acceptable.

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, 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

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,

Gemma James

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.