

Ein cyf/Our ref: CAS-250860-X4X3  
Eich cyf/Your ref: 23/0703

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 22 March 2024

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CONVERSION OF FIRST AND SECOND FLOORS TO CREATE 7NO. RESIDENTIAL APARTMENTS, COMMUNITY FACILITY AT GROUND FLOOR AND ASSOICATED INTERNAL AND EXTERNAL WORKS**

**LLEOLIAD/LOCATION: West of England Hotel, 42 Mill Parade, Newport, NP20 2JS**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 19 January 2024.

We note that change in proposal from a 'Conversion of the upper floors of existing hotel to create 10no. residential apartments and associated external and internal works' to 'Conversion of first and second floors to create 7no. residential apartments, community facility at ground floor and associated internal and external works'.

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

**Flood Risk**

The planning application proposes highly vulnerable development in the form of 07 residential apartments at the first and second floor level, the ground floor proposed a change of use from a public house (less vulnerable development) to a community space (less vulnerable development) with all habitable spaces to be located exclusively on the first and second floors. Our Flood Risk Map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN)15 and the FMfP identifies the application site to be at risk of flooding and falls into Flood Zone 3 Sea.

We refer you to Section 6 of TAN15 and the Chief Planning Officer letter from Welsh Government, dated 9 January 2014, which affirms that highly vulnerable development should not be permitted in Zone C2 (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 of TAN15 do not apply to highly vulnerable development in Zone C2.

The decision as to whether a development is justified is entirely a matter for your Authority.

We have considered the additional information submitted and note that the ground floor use will change from a public house to a community space to serve both the residents and members of the public.

Our position remains the same as per our previous letter dated 22 January 2024, reference: CAS-247053-R0H6, under the assumption that the community use is considered less vulnerable development by the Authority.

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.

### Further Advice

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](#).

## **Advice for the Applicant**

### Flood Warning Service

The availability of a flood warning service to the development location should be confirmed by visiting the Natural Resources Wales website. NRW provides warnings where it is technically possible, but this service must not be relied on to guarantee the timely and safe evacuation of occupants. Where available, the flood warning service can be a useful means of alerting occupants who have voluntarily signed up to receive Flood Alerts and Flood Warning, enabling them to take action in advance of a flood event. Protection measures should not be wholly dependent on the flood warning service and should be implemented to manage risks and impacts of flooding.

### **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](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.