

Ein cyf/Our ref: CAS-293003-R7M8
Eich cyf/Your ref: 25/0954

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 11 December 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: CHANGE OF USE FROM 4 BEDROOM DWELLING (C3) TO 6 BEDROOM HOUSE IN MULTIPLE OCCUPATION (RESUBMISSION)

LLEOLIAD/LOCATION: 46 Corporation Road, Newport, NP19 0AW.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 November 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 (change of use from dwelling to house in multiple occupation (HMO)). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and within Technical Advice Note (TAN) 15 Defended Zone.

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.

We note that the current application is a resubmission of a previous proposal (25/0611) which included bedrooms on the ground floor. The current application does not include bedrooms at ground floor level and therefore will not result in any increased vulnerability to the ground floor. Notwithstanding, we have reviewed the submitted FCA undertaken by Floodplan Ltd, dated 4th November 2025 and provide the following technical advice for your information.

Technical Advice

The submitted FCA notes that the site is located within the TAN 15 Defended Zone and that flood data was obtained from the NRW River Usk model. During the 0.5% (1 in 200 year) event plus climate change allowance (CCA), the FCA states that the site will experience flooding up to 8.26 mAOD, which equates to a flood depth of 660mm. This exceeds the frequency threshold set out within Figure 5 of TAN 15 (2025).

No data has been provided for the 0.1% (1 in 1000 year) event plus CCA and therefore no velocities or upper end climate change estimates. If your Authority is minded to request this information, we would be happy to review again.

Upper End Climate Change Estimates

TAN15 (paragraph 4.3) states that '*detailed Flood Consequences Assessments, to accompany planning applications, will be required to consider a range of climate change scenarios, including upper end estimates, making reference to the Welsh Government guidance on climate change allowances for planning purposes*'.

Current Welsh Government guidance on [climate change allowances for planning purposes](#) states that this information should be used to inform mitigation measures that help to ensure the long term resilience of the development. You may therefore wish to request the Applicant provides this information. However, please note, it is not our role to comment on the acceptability long-term resilience of individual developments.

As such, should you choose to request this information, it will be a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors e.g. LPA emergency planners/LLFAs.

Refuge Space

In our opinion, provision of communal areas as a 'safe' space as a form of mitigation, or as part of an evacuation/flood emergency plan is not a sustainable means of managing flood risk. However, it is not our role to comment on the acceptability of such proposals for individual developments, and as such, we recommend you / the LPA seek advice from other appropriate advisors e.g. LPA emergency planners/LLFAs.

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

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.