

Ein cyf/Our ref: CAS-276488-J6F8  
Eich cyf/Your ref: 25/0187

Newport City Council  
Civic Centre  
Newport  
NP20 4UR

Dyddiad/Date: 21 March 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE OF BUILDING FROM GARAGE WORKSHOP TO RETAIN GARAGE WORKSHOP ON THE GROUND FLOOR AND PROVIDE 1 NO. ONE BED DWELLING ABOVE**

**LLEOLIAD/LOCATION: 3B EAST MARKET STREET, NEWPORT, NP20 2AY**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 11 March 2025.

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

### **Flood Risk**

The application site is within Zone B of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). However, our [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding and is within Flood Zone 2 and 3 (Sea). As confirmed in the [letter](#) from Welsh Government dated 15 December 2021, the FMfP represents better and more up-to-date information on areas at flood risk than the DAM.

The proposal would result in highly vulnerable development (residential) being introduced into an area of flood risk. The highly vulnerable development will be elevated above the flood risk and there is no change in the vulnerability use at the ground floor level. Therefore, given the nature of the proposed development, we have no objection to the application as submitted and we consider the proposal could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development.

In areas at risk of flooding, we recommend 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](#).

### Further Advice

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15, and you must be satisfied the development is acceptable in terms of flood risk, particularly regarding access and egress considerations and emergency planning purposes. To aid your decision making, we provide you with the following advice on the Flood Consequence Assessment (FCA) by Nene Valley Transport Planning Consultants Ltd. (February 5, 2025).

The FCA states the site is 8.773 metres above ordnance datum (m AOD); the finished floor level for the existing garage on the ground floor is a minimum of 8.923m AOD; and the residential use will be located on the first floor at 11.730m AOD. Based on these levels, the FCA shows:

- The proposed residential use on the first floor is predicted to be flood free during a 0.5% (1 in 200 year) plus climate change annual probability tidal flood event. This is compliant with A1.14 of TAN 15;
- The proposed residential use on the first floor is predicted to be flood free during 0.1% (1 in 1000 year) plus climate change annual probability tidal flood event. This is compliant with A1.15 of TAN 15;
- The existing garage on the ground floor is predicted to flood to a depth of 657mm during a 0.5% (1 in 200 year) plus climate change annual probability tidal flood event. This does not comply with A1.14 of TAN 15;
- The existing garage on the ground floor is predicted to flood to a depth of 997mm during a 0.1% (1 in 1000 year) plus climate change annual probability tidal flood event. This flood depth exceeds the tolerable limits in A1.15 of TAN 15;
- The building is existing, and no land raising is proposed. Therefore, the proposed development will not impede or impact the movement of floodwater across the site. The proposed development will therefore not result in an increase in flood risk elsewhere or to third party land / infrastructure. This meets the requirements of A1.12 of TAN 15.

The FCA states a 100 year lifetime of development is used in the flood assessment. We advise the flood levels used in the assessment appear to be for the 2120 extreme tidal event, not the 2125 extreme tidal event. Therefore, the flood levels do not include the full allowance for climate change. The predicted flood depths may be higher than those stated above when the full allowance is included.

The FCA proposes the management of flood risk by recommending the incorporation of flood resistance and resilience measures into the design of the development; the occupiers of the development sign up to our Flood Warning Service; and, an access and egress route, including advising emergency access can be maintained for pedestrians via Dolphin Street and Commercial Road leading on to Alma Street or Capel Crescent both of which are identified as areas outside of all extreme flood events at higher ground away from all sources of flooding.

The FCA considers the site is served by significant flood defence infrastructure along the River Usk and its tidal tributaries in the Newport City Council area and around the coastline. The FCA also considers the coastal sea defences serving the site comprise an embankment which has a recorded cover level of 9.96m AOD. We advise the defences noted in the FCA do not provide protection to this application site. The application site is not located in a protected sites zone according to the DAM or FMfP.

We provide this advice on the FCA to aid your decision making. Overall, the proposed highly vulnerable development will be elevated above the flood risk and there is no change in the vulnerability use at the ground floor level. Therefore, given the nature of the proposed development, we have no objection to the application as submitted.

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 conduct these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

## **Designated and Protected Sites**

### River Usk Special Area of Conservation

The application site is located within 350m of the River Usk Special Area of Conservation (SAC). From the information provided, we consider the proposal is not likely to have a significant effect on the SAC as there does not appear to be potential pathways to the protected site.

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to conduct the test of Likely Significant Effects for the proposed development. Should you conclude the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made on the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult us and have regard to any representations we make within such reasonable time as you specify.

### River Usk (Lower Usk) Site of Special Scientific Interest

The application site is located within 350m of the River Usk (Lower Usk) Site of Special Scientific Interest (SSSI). We have considered the information submitted in support of the above application. We consider the proposed development is not likely to damage the features for which the SSSI is of special interest.

## **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,

**Sarah Lund**

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.