

Ein cyf/Our ref: CAS-289828-C5S2
Eich cyf/Your ref: 25/0725

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 30 October 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: RENOVATION OF GROUND FLOOR COMMERCIAL UNIT (USE CLASS A3) AND CREATION OF 1 NO. GROUND FLOOR STUDIO FLAT AND 2. NO FIRST FLOOR 1 BEDROOM FLATS AND ASSOCIATED WORKS.

LLEOLIAD/LOCATION: Land And Buildings Encompassing 114 To 116 Alexandra Road, Newport.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 07 October 2025.

We have concerns with the application as submitted. However, we are satisfied that these concerns can be overcome if the document identified below is included in the approved plans and documents condition on the decision notice:

Flood Consequence Assessment by Flume Consulting Engineers, dated September 2025, Version 1.

Please note, without the inclusion of this document we would object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (residential flats). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea).

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.

Therefore, we have reviewed the FCA undertaken by Flume Consulting Engineers, dated September 2025, Version 1. Our advice to you is that the FCA demonstrates that the risks and consequences of flooding could be managed to an acceptable level, provided the above FCA (and finished floor levels set out within this document) are included as an approved document on the decision notice if planning permission is granted. Further details are provided below.

Technical Advice

The submitted FCA states that all habitable and sleeping accommodation will be set at finished floor levels at or above 9.485 mAOD.

Detailed flood risk assessment tables within the FCA state that the flood level for the 0.5% (1 in 200 year) plus climate change allowance is 9.470 mAOD (this event is incorrectly labelled as the 0.1% (1 in 1000 year) event plus climate change allowance within the FCA). This is below the proposed finished floor level of 9.485 mAOD and therefore compliant with Figure 5 of TAN 15 (2025).

The FCA has used an hydraulic tidal model updated by NRW in 2025 for the River Usk, which runs defended and undefended scenarios as part of the model. Despite the site being located outside the TAN 15 Defended Zone, the flood defences influencing the River Usk model may impact upon the hydrology of the area. As a precautionary approach, we have reviewed the defended scenario detailed within the FCA; this scenario shows higher flooding than the undefended scenario, potentially due to the nature of tidal flooding which results in tidal surges.

Further to the above, during the defended 0.1% (1 in 1000 year) event plus climate change allowance, the site flood level is 9.817 mAOD. This equates to a flood depth of 0.906m. This is above the tolerable limits of Figure 6 in TAN 15 (2025). Under this scenario, the site falls within the 'Danger for Most' classification, with a hazard score of 1.576.

Given the source of flooding and the scale of the level change on site, we are satisfied that there will be no impact with regards to flood risk elsewhere.

European Protected Species (EPS)

We note that the information submitted in support of the above application (Bat Survey by Ecological Services Ltd, July 2025, Version 1.0) has identified that bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend that you discuss the need to secure further measures/ avoidance measures with your internal ecological advisor.

Protected Sites

We note the site is within 200 metres of the River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI).

From the information provided, we consider that the proposal is not likely to have a significant effect on the SAC given the nature of the proposed development, which does not involve significant external works at the site which could result in a pollution risk.

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 carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC, 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 NRW and have regard to any representations we make within such reasonable time as you specify.

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

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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.