

Ein cyf/Our ref: CAS-314990-V4C2
Eich cyf/Your ref: 26/0558

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 27 August 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Change of use from 4-bedroom dwelling (C3) to 8-bedroom house in multiple occupation (sui generis)

Lleoliad/Location: 46 Corporation Road, Newport, NP19 0AW

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 28 July 2026.

We 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**. If this information is not provided, we would object to this planning application. Further details are provided below.

Flood risk

The planning application proposes highly vulnerable residential development. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 3 (Sea) and is sited within a TAN15 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.

Therefore, we have reviewed the FCA undertaken by JBA Consulting, dated July 2026, reference SSL-JBA-XX-XX-RP-HM-0001-D3-C01-Land_at_Severn_Stiles_Avenue_FCA.

Our advice to you in that the FCA is incomplete. The advice in paragraph 10.24 of TAN15 is clear:

“In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.”

Therefore, in accordance with paragraph 15.4, we advise you to use your powers to request the following information:

- The FCA fails to include a full lifetime of the development and climate change allowance. The lifetime of development for residential development is considered to be 100 years, whereas the information within the FCA refers to 2121, which relates to 95 years. The revised FCA should account for the extra allowance for sea level rise within the additional 5 years to account for a full climate change allowance.
- The FCA does not include any flood data for the 1 in 1000 year plus climate change events. We therefore cannot comment on acceptability in terms of Figure 11 of TAN 15. The FCA should be updated to include this information.
- Sites within a TAN 15 Defended Zone must consider a breach of those defences in their assessment. This scenario will be considered as the Design Event. Rather than the development being flood free during the 1 in 200 year plus climate change event, they should be flood free during a breach in the 1 in 200 year plus climate change event in order to comply with TAN15. A breach assessment has not been included in the FCA. The document should be amended to include this scenario.

We note from section 5.1 of the FCA that a second-floor refuge room and a communal bathroom on the first floor is proposed, following observations made by the Inspector on the previous unsuccessful planning appeal (Inspector's report ref. CAS-04768-F7Q0D3, dated 10 June 2026). However, insufficient information has been provided in the FCA to assess the risk of flooding and to demonstrate that the consequences of flooding would be acceptable, particularly where the proposal would increase the number of occupants exposed to flood risk at ground floor level. Paragraph 10.23 of TAN15 states that proposals for residential development in zone 3 must ensure that such uses do not occur at ground floor level. Redevelopment proposals in defended zones should not overly intensify the use (paragraph 10.17) and must also be consistent with the acceptability considerations and tolerable conditions set out in section 11 of TAN15.

Paragraph 15.4 of TAN15 is clear that where insufficient information is provided, the planning authority should use its powers to request further information. Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow reasonable time for us to make further representations.

Please note, if an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to **object** to the application.

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 about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Owen Jones

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.