

Ein cyf/Our ref: CAS-309786-W7X1
Eich cyf/Your ref: 26/0390

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: PROPOSED CONVERSION OF 3 BEDROOM DWELLINGHOUSE (C3) TO 4 BEDROOM HMO (C4)

Lleoliad/Location: 11 Coverack Road, Newport, NP19 0DS

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 29 May 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 development (residential), including the introduction of two bedrooms to the ground floor. The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Sea) and 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.

We have reviewed the FCA undertaken by Aegaea referenced AEG9849_NP19_Newport_01 dated January 2026. Our advice to you is 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 identified:

Frequency thresholds (Figure 5 - designing development to be flood free)

The FCA includes an assessment of 0.5% (1 in 200 year) Annual Exceedance Probability (AEP) tidal flood event plus climate change (CC) allowance to 2126, and flood levels of up to 7.68m above ordnance datum (AOD) are predicted. Given the ground floor finished floor level (FFL) is estimated to be 7.51m, the building is predicted to experience flood depths of up to 170mm. This is not compliant with Figure 5.

Tolerable conditions (Figure 6 - managing consequences in an extreme flood event)

No assessment of the 0.1% (1 in 1000) AED + CC event has been provided. We are therefore unable to provide technical advice regarding compliance with Figure 6.

Overtopping, breach, and blockage assessment

This site is located within a TAN 15 Defended Zone. No assessment of breach scenarios for either of the 0.5% AED event + CC or 0.1% AED + CC event is provided. We are therefore unable to provide technical advice regarding flood risk in the event of a breach.

Flood risk elsewhere

The application proposes change of use and does not include an increase in the building footprint. This will not increase flood risk elsewhere.

Mitigation and resilience measures

The provision of a first floor “refuge room” is proposed.

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.

Upper end climate change estimate

We note there is no information provided in the FCA regarding the upper end climate change estimate. 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.

Conclusion

We advise you request an updated FCA which includes:

- assessment of the 0.1% AEP event plus climate change allowance in line with current Welsh Government guidance on [climate change allowances for planning purposes](#)
- breach assessment for both the 0.5% AEP + CC and 0.1% AEP + CC events
- predicted flood depths compared to FFL to establish the flood risk for all modelling scenarios

A revised FCA addressing the above requirements will be necessary before further assessment of flood risks and consequences for this proposal can progress. Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient 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.

TAN15 advises that the FCA should be proportionate to the nature and scale of the proposal. Developers should refer to all relevant sections of the TAN to determine the scope of the FCA that is required for this proposal. Further guidance is also available on our website.

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,

Heather McDowell

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.