

Ein cyf/Our ref: CAS-286701-M8P0
Eich cyf/Your ref: 25/0239

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: ALTERATIONS AND EXTENSION TO CREATE A 5NO. BED
HMO**

**LLEOLIAD/LOCATION: 24 LLANWERN STREET, NEWPORT, SOUTH WALES, NP19
0BZ**

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 18 August 2025.

We continue to have concerns with the application as submitted. We advise you consider the following technical flood risk advice prior to determining this application.

Flood Risk

The planning application proposes highly vulnerable development (residential). The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 2 and 3 (Sea) and the TAN 15 Defended Zone.

Whilst we recognise there is no change in vulnerability, there is a likely increased risk to people and property as units are proposed on the ground floor. This may also lead to intensification of highly vulnerable use and create more pressure on emergency services should evacuation be required.

We refer you to Section 10 of Technical Advice Note (TAN) 15: Development, flooding and coastal erosion (2025) 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 revised FCA by KRS enviro (July 2025), reference KRS.0860.001.R.001.D. Our advice to you is the FCA fails to demonstrate the potential risks and consequences of flooding are manageable for the reasons explained below.

However, it is for your Authority to be satisfied the predicted flooding consequences, as outlined below, are acceptable,

We previously raised concerns about the flood data supplied in the FCA, and the associated findings that there would be no flooding during the 0.5% (1 in 200 year) plus climate change tidal flood event. The updated FCA provides flood levels for the site, which we are satisfied adequately represent the flood risk to the site.

Section 2.4 of the FCA confirms the site is relatively flat with a minimum ground level of 7.34 metres (m) above ordnance datum (AOD). Section 4.2 of the FCA confirms the finished floor levels (FFLs) will remain as existing.

Predicted flood levels are provided in Table 4 (defended scenario) and Table 6 (breach scenario) of the FCA. The FCA confirms the flood defences in the area provide a 0.5% (1 in 200 year) standard of protection and will be overtopped after a 50 year climate change allowance. The breach scenario should be considered the Design Event.

The predicted flood depths given below are derived by comparing the predicted flood levels with the minimum ground level for the site (7.34 mAOD).

Frequency Thresholds (Figure 5 of TAN 15)

- During the 0.5% (1 in 200 year) plus climate change (to 2125) tidal flood event (defended scenario), the predicted flood level is 8.44 mAOD. During this flood event, the site is predicted to flood to a maximum depth of 1.1m, at a maximum velocity of 0.46 m/second (s). This does not comply with Figure 5 of TAN 15. This results in a Danger for most – includes the general public flood hazard rating;
- During the 0.5% (1 in 200 year) plus climate change (to 2125) tidal flood event (breach scenario), the predicted flood level is 8.11 mAOD. During this flood event, the site is predicted to flood to a maximum depth of 0.77m, at a maximum velocity of 0.49m/second (s). This does not comply with Figure 5 of TAN 15. This results in a Danger for most – includes the general public flood hazard rating;

Tolerable Condition (Figure 6 of TAN 15)

- During the 0.1% (1 in 1000 year) plus climate change (to 2125) tidal flood event (defended scenario), the predicted flood level is 9.35 mAOD. During this flood event, the site is predicted to flood to a maximum depth of 2.01m, at a maximum velocity of 0.6 m/s. This exceeds the tolerable conditions in Figure 6 of TAN 15. This results in a Danger for all – includes the emergency services flood hazard rating;
- During the 0.1% (1 in 1000 year) plus climate change (to 2125) tidal flood event (breach scenario), the predicted flood level is 9.51 mAOD. During this flood event, the site is predicted to flood to a maximum depth of 2.17m, at a maximum velocity of 0.56 m/s. This exceeds the tolerable conditions in Figure 6 of TAN 15. This results in a Danger for all – includes the emergency services flood hazard rating.

The above flood levels use the upper end climate change estimate. TAN 15 (paragraph 4.3) states '*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. As such, both the upper end and central climate change estimates should have been used in the FCA. If you choose to request this information from the applicant, we would be happy to provide further advice.

The FCA has provided a site level, rather than a FFL. We advise comparing the predicted flood levels with the FFL of the building may reduce the predicted flood depths. However, given the above predicted flood levels for the site, we consider it remains unlikely the development would comply with TAN 15 if FFLs are used. If you choose to request this information from the applicant, we would be happy to provide further advice.

Flood Risk Elsewhere

We are satisfied there is no impact on flooding elsewhere in terms of displacement of flood storage or flood flow routes.

Flood Avoidance, Mitigation, and Resilience Measures

The FCA proposes the management of flood risk by advising occupiers of the site sign up to receive flood warnings from us; the development of a Flood Plan; flood resistance and resilience measures be incorporated into the design of the development; the first floor provides a 'safe haven' located a minimum of 2.5m above the ground floor finished floor level; an access and egress route, including emergency access which can be maintained for vehicles and/or by foot via Llanwern Street to the northeast along Jeffrey Street to the southeast and then along Wharf Road to the north.

Paragraph 13.2 of TAN 15 notes '*Any development in Zones 2 and 3 and the TAN 15 Defended Zones must have resilience to flood built-in at site and property level.*' You must be satisfied any flood resilience measures proposed as part of the development are appropriate so it remains flood-free and safe over its lifetime. Please note, we are only able to advise on how certain resilience measures, such as changes to site layouts or finished floor levels, will affect the risk of flooding. Advice on measures aimed to manage surface water at the site level should be sought from your Lead Local Flood Authority. A combination of resilience and resistance measures may be necessary depending on the flood risk to the site.

For advice on other flood resilience measures, for example, those aimed at minimising the amount of water that can enter a property, or resistance measures that can help limit the impact of flooding can be sought from the Construction Industry Research and Information Association (CIRIA), including the Code of Practice and Guidance for Property. The [Association of British Insurers](#) have more information about flooding and insurance.

Conclusion

The application site is predicted to experience flooding and does not comply with all the requirements of TAN 15, particularly for the development to be designed flood free in the 0.5% (1 in 200 year) plus climate change (to 2125) tidal flood event (Figure 5 requirement).

Section 4.2 of the FCA confirms it is considered impractical to raise the FFLs. Therefore, this application does not provide betterment in flood risk terms compared to the existing FFL. Furthermore, there is a likely increased risk to people and property as units are proposed on the ground floor, which may also lead to intensification of highly vulnerable use and create more pressure on emergency services should evacuation be required. In

this instance, we advise your Authority to consider the above advice prior to determining the application. It is for your Authority to be satisfied the predicted flooding consequences, as outlined above, are acceptable.

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,

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.