

Ein cyf/Our ref: CAS-278444-W2Q8
Eich cyf/Your ref: 25/0239

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 April 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 consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 08 April 2025.

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). The Flood Map for Planning identifies the application site to be at risk of flooding and is within Flood Zone 2 and 3 (Sea) and the TAN 15 Defended Zone.

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.

Therefore, we have reviewed the FCA by KRS enviro (February 2025), reference KRS.0860.001.R.001.A. Our advice to you is the FCA fails to demonstrate the potential risks and consequences of flooding are manageable for the reasons explained below.

Welsh Government's Climate Change Allowances and Flood Consequences Assessments guidance states residential development should be assessed with a 100-year lifetime of development (LOD).

Whilst the FCA includes some flood data, we advise the data used is not sufficient to assess the flood risk to this development. It appears the data used is from a Product 4 data set from us. This data does not include the full allowance for climate change.

When our flood data is used, it needs to be updated to include the relevant, full climate change allowance. The data used in the FCA is based on a climate change allowance of 90 years (to 2115), rather than the required climate change allowance of one hundred years (to 2125). This means there are ten years of sea level rise increments missing from the assessment.

Therefore, we advise you seek a revised FCA from the applicant which uses the required climate change allowance of one hundred years (to 2125) to assess the risks and consequences of flooding to the entire development and meets the requirements on TAN 15.

Furthermore, as the data used appears to be from a Product 4 data set, it is not clear whether the data is site specific, and the age of the flood data is not provided. The consultant may wish to clarify this in any revised FCA.

In addition, the FCA refers to the TAN 15: Development and Flood Risk (2004). We advise the recently published TAN 15: Development, flooding and coastal erosion (2025) is applicable to this proposal.

Paragraph 15.4 of TAN 15 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 a revised FCA is not submitted or any revised FCA fails to demonstrate 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

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.