

Ein cyf/Our ref: CAS-314091-M5W0
Eich cyf/Your ref: CONNEX/26/0515

Marnie Ostler
Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 10 August 2026

Annwyl Ms Ostler/Dear Ms Ostler

Bwriad/Proposal: Change of use from single dwelling house to 6 bed HMO (Resubmission).

Lleoliad/Location: 3 Clytha Crescent, Newport, NP20 2EY.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 22 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 may wish to seek further information from the applicant regarding **flood risk**.

Flood Risk

The planning application proposes change of use from a single dwelling to a 6 bed House of Multiple Occupation (HMO) which is defined as highly vulnerable development in Technical Advice Note 15: Development, flooding and coastal erosion (TAN15), dated 2025. The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding 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.

We have reviewed the following Flood Consequences Assessment (FCA) submitted in support of the application:

- 3 Clytha Crescent - Flood Consequences Assessment, prepared by JBA Consulting, dated July 2026.

Our advice to you is that the FCA fails to demonstrate that the potential risks and consequences of flooding are manageable for the reasons explained below.

The FCA states:

- Access to the site is via Clytha Crescent, directly onto the first floor, with a threshold level of 10.43 mAOD. Access to the garden is via the ground floor with a threshold level of 7.91 mAOD.
- The site has a general west-to-east slope, with the rear levels lower than those on Clytha Crescent. Street level is noted at 9.96mAOD and the far east of the garden, at the eastern boundary of the site, has an approximate ground level of 7.73mAOD.

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

The FCA states that during the 0.5% (1 in 200 year) plus climate change (CC) flood event flood levels could reach 9.1m AOD. Based on the stated threshold level the proposed development could flood to a depth of 1.19m. Based on these depths of flooding the proposed development is not compliant with Figure 5 of TAN15. We note that this area will be formed of a kitchen, living room and lounge. The FCA states that all other areas of the proposal will remain flood free and elevated above the flood level.

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

The FCA states that during the 0.1% (1 in 1000 year) plus climate change (CC) flood event flood levels could reach 9.69m AOD. Based on the stated threshold level the proposed development could flood to a depth of 1.78m. Based on these depths of flooding the proposed development is not compliant with Figure 6 of TAN15, as these depths of flooding are above the prescribed limits of 600mm in TAN15.

Mitigation and resilience measures

The FCA states that the site/building managers should sign up to the NRW's local flood warnings to allow the evacuation of the site before a flood event if sufficient warning is provided. Flood Warning lead times for tidal flooding are currently around 48 hours. This should be ample time to evacuate in an emergency.

It is recommended that a Flood Response Plan (FRP) is prepared to inform the management company and residents of the risk of flooding and detail actions before, during and after a flood event. As a minimum, the Flood Response Plan should cover adequate flood warning, evacuation, and access/egress routes in the event of flooding for the lifetime of the development.

Escape/evacuation routes

The FCA confirms that there is flood free access and egress via Clytha Crescent on the first floor. The LPA should determine if this is suitable mitigation and advise on any flood plans for the site.

Summary

While the proposed development is not compliant with Figures 5 & 6 of TAN15, we note that the application does not now include a ground floor bedroom. Table 6.1 and section 7.1 of the FCA states that the bedrooms would be flood free for the lifetime of the development, and safe refuge is provided within the bedrooms.

In light of this, we advise your authority to take the above considerations into account when determining the application. It is ultimately for your authority to decide whether the consequences of flooding are acceptable and can be managed in accordance with TAN 15.

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,

Andrew Hurst

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.