

Ein cyf/Our ref: CAS-286847-M7F5
Eich cyf/Your ref: 25/0585

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 04 September 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: CHANGE OF USE FROM 12 BED HMO TO 12 BED HOSTEL
INCLUDING SUPPORT ROOM AND OFFICE**

**LLEOLIAD/LOCATION: 52 - 54 CLARENCE PLACE, NEWPORT, SOUTH WALES,
NP19 0AH**

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 20 August 2025.

We have concerns with the application as submitted. However, we are satisfied these concerns can be overcome if the document identified is included in the approved plans condition on the decision notice.

Please note, without the inclusion of this document 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 (LLFA).

We have reviewed the FCA by KRS Enviro (March 2025), reference KRS.0844.001.R.001.D. Our advice to you is the FCA does not demonstrate the potential risks and consequences of flooding are manageable for the reasons explained below. However, recognising the nature of the proposed development; the highly vulnerable use already exists and the plans show the hostel bedrooms are located on the upper floors

only, as such the status quo is maintained, we would advise the Ground Floor/Site Plan by Trewent Designs Ltd, dwg no. - 2093-60 be included in the list of approved plans on the decision notice to secure the proposed layout of the hostel.

The FCA confirms the site is relatively flat with a minimum ground level of 7.43 metres (m) above ordnance datum (AOD). The FCA confirms the finished floor level (FFL) will remain as existing.

The FCA states the site would be flood free during the defended 1 in 200 year (0.5%) to 2096 event, and it is only when climate change is applied to 2125 the site will be inundated with flood waters in the extreme events.

The following flood levels are provided within the FCA for the defended flood events and the flood depths are based on the above ground level:

Frequency Thresholds (Figure 5 of TAN 15)

- During the 0.5% (1 in 200 year) plus climate change (to 2125) tidal flood event, the predicted flood level is 8.38m AOD. During this flood event, the site is predicted to flood to a maximum depth of 0.95m, at a maximum velocity of velocity 0.5 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;

Tolerable Condition (Figure 6 of TAN 15)

- During the 0.1% (1 in 1000 year) plus climate change (to 2125) tidal flood event, the predicted flood level is 9.65m AOD. During this flood event, the site is predicted to flood to a maximum depth of 2.22m, at a maximum velocity of 0.68 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 FCA has provided a ground 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

The FCA confirms the building is existing and no land raising will occur within the site. Therefore, the proposed development will not impede the movement of floodwater across the site or have a detriment to the flood storage capacity of the site. The overall direction of the movement of water will be maintained within the developed site and surrounding areas. There will be no increase in the flood water levels due to the proposed development.

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 occupants sign up to receive flood warnings from us; the production of a Flood Plan; flood resistance and resilience

measures be incorporated into the design of the development; a Flood Warning and Evacuation Plan be developed; access and egress routes, including emergency access can be maintained for vehicles and/or foot via Clarence Place to the east and then along Caerleon Road to the northwest.

The FCA confirms the mechanism for flooding is tidal which should afford time for flood warnings to be issued. It is suggested a minimum of two days forewarning may be available to assist occupants of the development.

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).

However, recognising the nature of the proposed development; the highly vulnerable use already exists and the plans show the hostel bedrooms are located on the upper floors only, as such the status quo is maintained, we would advise the Ground Floor/Site Plan by Trewent Designs Ltd, dwg no. - 2093-60 be included in the list of approved plans on the decision notice, to secure the proposed layout of the hostel.

Further Advice

We understand this planning application is a re-submission of planning application 25/0013 for the 'change of use to hostel, including changes of layout to provide additional bedrooms and a training/support/meeting room.' The FCA has not been updated to reflect the changes to the proposed layout (i.e. no longer bedrooms proposed on the ground floor). Furthermore, the FCA considers TAN 15 (2004) and has not been updated in-line with TAN 15 (2025). If your Authority is minded seek an updated FCA from the applicant which considers these, we would be happy to provide further advice. However, we consider an updated FCA which considers these, would not change our conclusion above.

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

E-bost/E-mail: southeastplanning@cyfoethnaturiolcymru.gov.uk

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.