

Ein cyf/Our ref: CAS-283895-J0J0
Eich cyf/Your ref: 25/0239

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 17 July 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 03 July 2025.

We continue to 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 within Flood Zone 2 and 3 (Sea) and the 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.

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

In our previous letter reference CAS-281518-R5K5 (23 June 2025) we advised the FCA considers the site is flood free during the 0.5% (1 in 200 year) plus climate change (+CC)

flood event to 2115 and 2125. We raised concerns about the flood data supplied in the FCA, and therefore the null results.

Section 3.9 of the FCA replies to our previous letter. The FCA assumes '*Natural Resources Wales are getting mixed up with the defended, and undefended scenarios and have jumped to the incorrect conclusions.*' We have reviewed FCAs for other planning applications in this area which demonstrated flooding is predicted during the climate change events for this part of Newport. The defences in this area are expected to over top after the 50 year climate change allowance.

In our previous letter we advised your Authority to seek the applicant to check the model, data, interpretation, and provide evidence/clarification for the data used within the FCA to determine the null results. We advise the revised FCA does not provide this. As we do not provide site specific flood data, we expect to see model runs to demonstrate the consultants review of the available model. We advise you seek this information from the applicant.

We continue to have concerns as outlined above and in our letter reference CAS-281518-R5K5 about the data supplied in the FCA for the 0.5% +CC annual probability tidal flood event.

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 the additional information advised above and/or 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

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.