

Ein cyf/Our ref: CAS-283775-Y8K5
Eich cyf/Your ref: 25/0497

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 14 August 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Conversion to 10 No. bedroom supported care accommodation with communal kitchen and lounge, ancillary staff accommodation, office/reception area, staffroom and changes to fenestration and external fire escape

LLEOLIAD/LOCATION: Suite 2A First Floor 22 Chepstow Road Newport NP19 8EA

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 02 July 2025.

We object to the proposed development as submitted, for the reasons explained 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 TAN15 Defended Zone.

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 submitted documents in relation to flood risk:

- FCA undertaken by JBA, dated June 2025, reference PTF-JBA-XX-XX-RP-Z-0001-S0-P01-22_Chepstow_Road_FCA Revision P01.

We note within the FCA there is some ambiguity regarding the existing use of the site. The current and proposed plans indicate residential use, however the application form and FCA indicate commercial use on site. An email from Newport City Council dated 04 August

confirms the change of use from less vulnerable to highly vulnerable use. We will therefore review the application as highly vulnerable.

In addition to the above, we have considered the existing and proposed floor plans. The proposed floor plan indicates that there will be 1 staff accommodation room and 2 bedrooms on the ground floor. The FCA states that 'the redevelopment proposes that only 2 bedrooms are to be located on the ground floor, these bedrooms will be occupied by support staff on a rolling basis and will not be permanent'.

We recommend that these discrepancies between the proposed floor plan and the FCA regarding number and use of bedrooms on the ground floor are clarified to ensure coherence.

Notwithstanding the above, we have reviewed the information contained within the submitted FCA. 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.

Our Advice

LiDAR shows that the site is relatively flat with a slight fall in a northerly direction towards Chepstow Road - site levels range from 7.39meters (m) in the south to 6.94m Above Ordnance Datum (AOD) in the north, adjacent to Chepstow Road.

As the proposals are for a residential development a 100-year lifetime of development has been considered in this assessment.

The detailed assessment of tidal flood risk is based on Version 7.0 of the Newport Tidal Flood Model (June 2020). This is a 1D-2D ESTRY-TUFLOW tidal model of Newport, which JBA Consulting prepared for a successful Flood Map Challenge at that time. Further to the model updates contained in the Flood Map Challenge, the Newport Tidal model (Version 7.0) was further updated by JBA Consulting in 2022 and 2023 to include several further model improvements. The latest JBA model of Newport was updated to include the recently completed Crindau flood defences, and the ESTRY-TUFLOW version was updated to 2020-10-AD -iSP-w64. In addition, the tidal boundary conditions were updated in line with the latest (September 2021) Welsh Government climate change guidance for Flood Consequence Assessments 7 to consider flood risk for the lifetime of development (100 years).

The FCA states that the site benefits from comprehensive NRW flood defences along the River Usk. These typically provide a good standard of flood protection for the next 50 years, after which they will need to be further upgraded to keep pace with rising sea levels. Detailed flood modelling undertaken by JBA shows that the site will remain flood free in the 0.5% plus climate change event up to 2097.

To represent the present-day (2023) scenario, the tidal boundary conditions were uplifted to the current year. Relevant climate change inclusions were applied to the model to account for a full lifetime of development, this ensured that flood data was provided for the 2123 flood event. To account for the impact of sea level rise over the lifetime of the development (100 years), a further uplift was calculated for the 2123 scenario based on the Higher Central allowance (70th percentile) of the UKCP 18 for 2100, RCP 8.5 dataset.

The uplift for the 23 years of additional climate change beyond 2100 was applied based on the dataset's average increase in the last five years, the flood levels provided as follows:

2123 - 0.5% Annual Exceedance Probability (AEP) plus climate change event

The FCA states that the predicted maximum flood depth on site during this event is 1.2m and can be found by the site entrance from Chepstow Road. Typically, flood depths do not exceed 1.0m, including the footprint of the building with a depth of 0.86m found towards the south of the site.

2123 - 0.1% AEP plus climate change event

During this event, the predicted maximum flood depths are predicted to exceed 2.0m across the site. The greatest depth of 2.5m is found close to the northern boundary with Chepstow Road. Maximum flood depths within the existing building are predicted to reach an average depth of 2.3m.

Access and egress to and from the proposed development site would be restricted due to the flood depths present across the site in both the 0.5% plus climate change and 0.1% plus climate change scenario.

Therefore the site is not compliant with TAN 15.

In addition, we note there is no breach assessment included in the FCA despite the recognition of the defences in the area and the statement regarding overtopping beyond a 50 year climate change scenario.

We note there is no information provided in the FCA regarding the upper end climate change estimate. The modelling represents the design event using the 70th percentile allowance.

The advice in paragraph 10.24 of TAN15 is clear 'In zones 2, 3 and TAN 15 defended zone developers must undertake a flood consequences assessment proportionate to the nature and scale of the proposal. Before granting planning permission, decision makers should be satisfied the scheme is justifiable in accordance with the principles set out in section 8, where they are not satisfied, planning permission should be refused.'

Summary

We note that the FCA recognises in section 7.3 that the site is predicted to flood during the 2123 0.5% and the 2123 0.1% design events and is therefore not compliant with TAN15.

We understand that no alteration to existing finished floor levels are taking place and the building is being retained largely in its current form and format. Given this and the predicted flood depths we object to the application as submitted.

The site benefits from flood defences and is within a TAN 15 Defended Zone which inline with TAN15 requires overtopping and breach assessments.

Should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow sufficient time for us to make further representations.

Further Advice

We recommend you consult on any emergency plans for the site, especially given that the access/egress for the site will be compromised in the extreme flood events.

TAN15 (paragraph 4.3) states that '*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*'. Current Welsh Government guidance on [climate change allowances for planning purposes](#) states that this information should be used to inform mitigation measures that help to ensure the long term resilience of the development. You may therefore wish to request the Applicant provides this information. However, please note, it is not our role to comment on the acceptability and/or long-term resilience of individual developments. As such, should you choose to request this information, it will be a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors e.g. LPA emergency planners/Local Lead Flood Authority.

Further Information

As it is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN15, we recommend that you consider consulting other professional advisors on the acceptability of the developer's proposals, on matters that we cannot advise you on such as emergency plans, procedures, and measures to address structural damage that may result from flooding.

We refer you to the above information and the FCA to aid these considerations.

Please note, we do not normally comment on or approve the adequacy of flood emergency response and procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

Notwithstanding the above objection, we have provided comments on other issues, as set out below. This includes designated sites and protected species.

Designated Sites

The River Usk Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is within 300m of the site. From the information provided, we consider that the proposal may affect the River Usk SAC and SSSI and have identified pollution as a potential impact pathway to features of the site.

However, we consider the above pathway would not result in an adverse effect if the developer implements/adheres to standard pollution prevention guidelines. Further information on standard pollution prevention guidelines is provided under the 'Advice for the developer' section below.

As the competent authority under the Conservation of Habitats and Species Regulations 2017 (as amended), it is for your Authority to carry out the test of Likely Significant Effects for the proposed development. Should you conclude that the proposal is likely to have a significant effect on a SAC/SPA/Ramsar site, either alone or in combination with other plans or projects, an appropriate assessment must be made of the implications of the project for that site in view of its conservation objectives. You must for the purposes of the

assessment consult NRW and have regard to any representations we make within such reasonable time as you specify.

Protected Species

No ecological information has been submitted in support of this application. We note that there are records of Bats and Otter in the vicinity.

We recommend you seek the advice of your Authority's internal ecological adviser about the requirement for further information to be submitted in support of the application, the need for bespoke surveys and the scope of further information, where required.

Advice for the Developer

Pollution Prevention

During the construction phase you should take any precaution to prevent contamination of surface water drains and local watercourses. Oils and chemicals should be stored in bunded areas and spill kits should be readily available in case of accidental spillages. For further guidance please refer to Guidance for Pollution Prevention (GPP) 5: Works and maintenance in or near water, and GPP 6: Working on construction and demolition sites, which are available on the [NetRegs website](#).

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 on the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Melinda Marshall

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.