

Ein cyf/Our ref: CAS-300162-Q1W4
Eich cyf/Your ref: 25/0852

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 February 2026

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: EXTERNAL AND INTERNAL WORKS INCLUDING THE
REFURBISHMENT OF THE GROUND FLOOR UNIT AND THE CONVERSION OF THE
UPPER FLOORS TO A 8NO BED HOSTEL**

**LLEOLIAD/LOCATION: 10 CLARENCE PLACE, NEWPORT, SOUTH WALES NP19
0AE**

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 09 February 2026.

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 likely object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes highly vulnerable development (residential) on the upper floors and less vulnerable development (commercial) on the ground floor. The Flood Map for Planning (FMfP) 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.

We have reviewed the amended FCA, Revision P02, by Curtins (21 January 2026). Our advice to you is the FCA is incomplete. The advice in paragraph 10.24 of TAN 15 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.'

In accordance with paragraph 15.4, we advise you to use your powers to request the following information identified:

Section 2.1 of the FCA gives a finished floor level of +0.000m AD for the ground floor of the proposed development. We advise a finished floor level of 0m above ordnance datum (AOD), which indicates the ground floor is precisely at the mean sea level, is unlikely (for example, the FMfP shows there is a spot level range on the road outside the site of 8.1m-7.9m AOD). We advise the finished floor level for the ground floor is checked and updated, as necessary. This is needed to compare to the flood levels for the site.

The FCA highlights the site is within the defended zone, with defences offering a minimum level of protection against flooding at the 0.5% (1 in 200 year) plus climate change and freeboard annual probability tidal flood event. There is no other data in the FCA relating to the defences in terms of standard of protection or crest level. We advise flood defence information is needed for us to confirm whether the site is protected to the minimum level stated in the FCA.

Our flood data was obtained and analysed for five individual points around the proposed building. Section 5.3 of the FCA states "the Flood data for 2021, 2121 and 2096 was obtained from NRW for the defended and undefended scenarios." This does not confirm which model the flood data is from (i.e. from the River Usk tidal model for Newport or from the coastal Caldicot and Wentlooge model). The River Usk is tidal at this location. Given the proximity to the River Usk and distance from the coast we would expect flood data to be provided from the River Usk tidal model for Newport. Furthermore, breach data is provided in the FCA. The FCA does not confirm which flood model this data relates to, or which defences the breach data is taken from.

We advise the source of the flood data in the FCA, in terms of onsite flood levels and breach, needs to be confirmed for us to be able to validate the assessment of the flood data, and confirm whether the correct/all sources of flood data have been used for the assessment. If the data contained the FCA relates to the coastal Caldicot and Wentlooge model, we advise an updated FCA would be needed to also establish the risk from the River Usk, as all sources of tidal flooding must be considered.

There is no indication in the FCA if the data is the central or upper end climate change estimates. TAN 15 (paragraph 4.3) states '*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*'. Therefore, we advise ideally the FCA should include both the central and upper end climate change estimates.

Additionally, the climate change allowances in the FCA extend only to the year 2115. For highly vulnerable development, a 100-year climate change allowance period should be applied. On this basis, climate change allowances should be provided to 2126.

In consideration of the missing information identified above, we are unable to provide comprehensive flood risk advice on this proposal.

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.

Please note, if further information is not submitted/an amended FCA is not submitted or any subsequent information/amended 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.

Protected Sites

River Usk Special Area of Conservation

The application site is located within 100 metres of the River Usk Special Area of Conservation (SAC). From the information provided in the Ecological Inspection letter by Ecology Wales (September 25, 2025), we consider the proposal is not likely to have a significant effect on the SAC due to the scale and nature of the proposed development.

Our advice may change should modifications be made to the proposed development prior to the determination of the application. If there are any changes to the proposed development which may affect the consideration of potential environmental impacts, please consult us again before you determine the application.

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 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 on the implications of the project for that site in view of its conservation objectives. You must for the purposes of the assessment consult us and have regard to any representations we make within such reasonable time as you specify.

River Usk (Lower Usk) Site of Special Scientific Interest

The application site is located within 100 metres of the River Usk (Lower Usk) Site of Special Scientific Interest (SSSI). Based on the information submitted, we consider the proposed development is not likely to damage the features for which the SSSI is of special interest.

European Protected Species

The Ecological Inspection letter has identified bats are unlikely to be using the application site. We therefore have no comments to make on the application as submitted in respect of bats.

We recommend you discuss the need to secure further measures/avoidance measures with your internal ecological advisor.

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.