

Ein cyf/Our ref: CAS-304137-B3M4
Eich cyf/Your ref: 26/0175

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 10 April 2026

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: PARTIAL DEMOLITION/PART CONVERSION OF VACANT BAKERY TO RESIDENTIAL DWELLING TOGETHER WITH ALTERATION WORKS

LLEOLIAD/LOCATION: LAND TO REAR OF 31 - 33 CHURCH ROAD, NEWPORT, NP19 7FD.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 25 March 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 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 development) The Flood Map for Planning identifies the application site to be at risk of flooding and within Flood Zone 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.

Therefore, we have reviewed the FCA undertaken by Enviro Planning, dated December 2025. Our advice to you is that the FCA is incomplete. 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.'

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

Up to date climate change figures

The FCA states that the lifetime of development considered is 75 years however, for highly vulnerable development 100 years should be applied as per section 10.28 of TAN15. Therefore, a climate change allowance up to 2126 should be provided

Sources of flood risk

We advise that the River Usk tidal model for Newport should also be used to inform the FCA. Currently the only model used is the coastal Caldicot and Wentlooge model, which does not provide data in close proximity to the site. All sources of flooding should be assessed in an updated FCA.

Ground floor residential

The proposed floorplans show that there will be a bedroom located on the ground floor level. We refer you to paragraph 10.23 of TAN15 which states 'Any redevelopment proposal must be consistent with the acceptability considerations in section 11. In addition, proposals which include residential development must ensure that such uses do not occur at ground floor level'.

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 an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that 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,

K Murphy

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.