

Ein cyf/Our ref: CAS-304304-N8C0
Eich cyf/Your ref: CONNEX/25/1091

Emma Brinkworth
Newport City Council
Regeneration, Investment & Housing
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 14 April 2026

Annwyl Ms Brinkworth/Dear Ms Brinkworth

BWRIAD/PROPOSAL: RETROSPECTIVE APPLICATION FOR THE CHANGE OF USE TO 4NO BED HMO.

LLEOLIAD/LOCATION: 236 CROMWELL ROAD, NEWPORT, NP19 0HS.

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 26 March 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 object to this planning application. Further details are provided below.

Flood Risk

The planning application proposes change of use to 4 bed HMO (highly vulnerable development). The [Flood Map for Planning](#) (FMfP) identifies the application site to be at risk of flooding within Flood Zone 2 – Rivers, Flood Zone 3 – Sea, 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 following additional information submitted in support of the application:

- Flood Consequence Assessment, 236 Cromwell Road Newport NP19 0HS, Report Reference EF000876R1, prepared by Geosmart Information, dated 20/02/2026.

The FCA states:

- The general ground levels on the Site are between 6.71 and 6.97 mAOD with the Site rising to the north and south.

Whilst noted in the FCA that the site is within the fluvial Flood Zone 2, there is no assessment from this source of flooding. We would expect flood levels to be provided for this event, even if not considered the main source of flooding. TAN 15 requires all sources of flooding be assessed. The Fluvial flood risk may be associated with the Liswerry Pill Reen and the FCA should provide flood levels/depths for this source of flooding. Defences on this stretch of the watercourse may provide protection to the site, and this should also be assessed to provide a complete FCA.

Figure 5 TAN15

We note that no Finished Floor Level (FFL's) have been provided. However, during the 0.5% (1 in 200 year) annual exceedance Probability (AEP) plus climate change (CC) flood event the FCA confirms that the site is expected to flood up to a depth of 1.08m.

The flood depth for a breach/undefended 0.5% (1 in 200 year) plus climate change (2126) event the depths of flooding will increase to 2.07m on site.

The proposed development is therefore not compliant with Figure 5 TAN15.

Given the TAN 15 Defended Zone designation of the site and in lieu of breach data the FCA has used undefended data to establish the flood risk in a "breach" scenario. Given the scale of the development, we are satisfied this information can be used.

Figure 6 TAN15

We note that no Finished Floor Level (FFL's) have been provided. However, during the 0.1% (1 in 1000 year) AEP plus CC flood event (undefended) the FCA confirms the site could experience flood depths of up to 2.75m AOD. The depths of flooding exceed the tolerable limits as set out in TAN15.

Therefore, the proposed development is not compliant with Figure 6 TAN15.

Given the TAN 15 Defended Zone designation of the site and in lieu of breach data the FCA has used undefended data to establish the flood risk in a "breach" scenario. Given the scale of the development, we are satisfied this information can be used.

We note that ground floor bedrooms are proposed as part of the change of use. We note from the supporting proposed plans, that whilst there is internal access to the upper floors there is no communal area for occupiers to gather during a flood event.

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,

Andrew Hurst

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.