

Ein cyf/Our ref: CAS-290697-L5G3
Eich cyf/Your ref: 25/0497

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 06 November 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: Conversion to 8no. 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 re- consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 October 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 Flood Consult Response prepared by JBA Consulting dated 09/10/2025, reference PTF-JBA-XX-XX-LT-Z-0001-S0-P01.01. We have reviewed this alongside the submitted FCA undertaken by JBA, dated June 2025, reference PTF-JBA-XX-XX-RP-Z-0001- S0-P01-22_Chepstow_Road_FCA Revision P01. Our advice to you is that it fails to demonstrate that the potential risks and consequences of flooding are manageable for the reasons explained below.

The flood consult response confirms the redesign of the development, stating that only a staff accommodation room is provided on the ground floor and no resident bedrooms as

previously proposed. This element of the development as stated, will provide accommodation for overnight staff. It will be distinct from the residential units, in that it is used by staff on a temporary and rotational basis and not a primary residence. This accommodation could easily and quickly be evacuated if required given the pre-warning times available and that there would be safe refuge on the upper floors.

The flood consult response provides information regarding the flood defences in the area and justification for not undertaking separate breach modelling. It is stated that the closest defences is a NRW Riverside Flood Alleviation Scheme (FAS) completed by NRW in 2012 which consists of very large sheet piles and ground anchors, driven to a significant depth into the banks of the River Usk. The flood defences were designed to accommodate the additional loading of being further raised in the future to account for climate change. The statement continues that given scale, nature and modern design of the flood defence, it is difficult to conceive of a realistic failure mechanism and concluded that it would not be appropriate or proportionate to undertake breach modelling. It also states that the predicted flood level in the extreme 0.1% Annual Exceedance Probability (AEP) design event, without breach, only differs by approximately 200mm between the river and 22 Chepstow Road. Therefore, a breach in the flood defence would not significantly change the flood risk at the site in the extreme event. We are satisfied with the justification presented in this statement in relation to the breach assessments for the development.

The statement now also includes the flood level for the 0.5% AEP plus climate change event upper end estimate design event (2125, given as 9.68m Above Ordnance Datum and flood depths of 2.40m are predicted. The development will experience flooding in both the central and upper end estimates for this event and will not be flood free as required in TAN 15.

Summary

Based on the submitted information we note that the site is predicted to flood during the 2125 0.5% upper end estimate design event, the 2123 0.5% design event and the 2123 0.1% design event 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 flood consult response states that paragraph 11.8 of TAN15 suggests that 'The thresholds may be applied with more flexibility for redevelopment, changes of use, conversions and extensions, where the ability to substantially redesign a development is limited. In those circumstances, the thresholds are a guide.' The associated case arguing for the flexibility towards redevelopment has been presented in the FCA. We would suggest that, as detailed in 11.8, it is for the LPA to consider the specific circumstances when considering the acceptability of flood consequences.

We advise that it is likely the building will always fail to meet the requirements of TAN 15 given its location and the source of flooding.

We believe that sufficient evidence has been provided to inform the LPA in their decision. We advise you consider the technical flood risk advice prior to determining this application.

We cannot advise you on matters such as emergency plans, procedures and measures to address structural damage that may result from flooding. Please note, we do not normally

comment on the adequacy of flood emergency response plans and procedures accompanying development proposals, as we do not conduct these roles during a flood. Our involvement during a flood emergency would be limited to delivering flood warnings to occupants/users.

It is for your Authority to determine whether the risks and consequences of flooding can be managed in accordance with TAN 15. You must be satisfied the development is acceptable in terms of flood risk, particularly with regard to access and egress considerations and emergency planning purposes.

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,

Gemma James
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.