

Ein cyf/Our ref: CAS-281518-R5K5
Eich cyf/Your ref: 25/0239

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 June 2025

Annwyl Syr/Madam/Dear Sir/Madam,

**BWRIAD/PROPOSAL: ALTERATIONS AND EXTENSION TO CREATE A 5NO. BED
HMO**

**LLEOLIAD/LOCATION: 24 LLANWERN STREET, NEWPORT, SOUTH WALES, NP19
0BZ**

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 27 May 2025.

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 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 the 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 revised FCA by KRS enviro (May 2025), reference KRS.0860.001.R.001.B. Our advice to you is the FCA fails to demonstrate the potential risks and consequences of flooding are manageable for the reasons explained below.

The FCA states the proposed finished floor levels (FFL) will be set at 7.34 metres (m) above ordnance datum (AOD).

Figure 5 of TAN 15 - 0.5% (1 in 200 year) plus climate change annual probability tidal flood event

Section 3.5 of the FCA states: *'The Site is protected against tidal flooding by flood defence measures which provide a 1 in 200 year Standard of Protection (SoP). The flood defences take the form of flood embankments and flood walls.'*

Section 3.9 of the FCA considers the flood defences provide a 1 in 200 year to 2115 SoP. The FCA considers it can therefore be assumed the site would be flood free during the defended 0.5% (1 in 200 year) plus climate change (+CC) to 2125 flood event. Table 4 in the FCA shows there is no flooding predicted at the site during the 0.5% +CC to 2115 and 2125 flood events. The FCA considers the site is flood free during the 0.5% +CC flood events to 2115 and 2125.

Whilst the flood defences provided a 1 in 200 year SoP at the time of construction, we query the statement in the FCA about the flood defences providing a 0.5% (1 in 200 year) to 2115 and 2125 SoP. We have undertaken a basic review of our flood model for this area to check the data provided in the FCA. We have concerns about the 0.5% +CC flood data supplied in the FCA.

Our review indicates flooding occurs at the site during the 0.5% +CC flood event. As such, we expect there to be flooding at the site during the 0.5% +CC flood event. Furthermore, Table 5 in the FCA recognises the flood defences could be overtopped, and the site could experience flood levels up to 9.92 m AOD during the undefended 0.5% +CC to 2125 flood event. Therefore, we consider the conclusion in the FCA about the site being flood free during the 0.5% +CC flood events may be inaccurate. We advise you seek the applicant to check the model, data, and interpretation, and provide evidence/clarification, and a revised FCA, as necessary.

Figure 6 of TAN 15 - 0.1% (1 in 1000 year) annual probability tidal flood event

Section 3.9 of the FCA concludes when climate change to 2115-2125 is considered, the site may be inundated with floodwater during the 0.1% (1 in 1000 year) +CC flood event. The flood level in Table 4 of the FCA for the 0.1% +CC to 2125 flood event is 9.35m AOD. When this is compared to the above FFL, the proposed development is predicted to flood to a maximum depth of 2.01 m, at a maximum velocity of 0.6 m/s, during the 0.1% +CC to 2125 flood event. This flood depth and velocity exceed the tolerable limits in Figure 6 of TAN 15. The hazard rating for the development site based on this flood depth and velocity is Danger for All - includes the emergency services.

Further Advice

The FCA states: *'The likelihood of a rapid water level rise and possible rapid inundation of urban areas posing a risk of life is minimal with a forewarning of two days of a pending flood event.'*

The FCA suggests the management of flood risk by recommending: flood resistance and resilience measures be incorporated into the design of the development; occupants of the site sign up to received flood warnings; the production of a flood plan; ground floor occupants to retreat to higher floor levels during times of flood if needed; and, an access and egress route via Llanwern Street to the north east, along Jeffery Street to the south east, and along Wharf Road to the north.

There is an extension proposed as part of the development. The FCA considers the building is existing and no land raising will occur within the site. Therefore the proposed development will not impede movement of floodwater across the site, there will be no detriment to the flood storage capacity of the site, and the overall direction of movement of water will be maintained within the developed site and surrounding area. Given the scale of the extension and the source of flooding, we agree it is unlikely there will be any impact on flooding elsewhere because of the development.

Conclusion

We have concerns as outlined above about the data supplied in the FCA for the 0.5% +CC annual probability tidal flood event.

Paragraph 15.4 of TAN 15 is clear that where insufficient information is provided, the planning authority should use its powers to request further information. Furthermore, should you be minded to go against our advice, you should inform us at the earliest opportunity prior to granting consent and allow reasonable time for us to make further representations.

Please note, if the additional information advised above and/or a revised FCA is not submitted, or any revised 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.

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,

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.