

Ein cyf/Our ref: CAS-303193-N0F9
Eich cyf/Your ref: 25/0852

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 01 April 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 reconsulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 13 March 2026.

We continue to have concerns with the proposed development as submitted. We advise you consider the following flood risk advice prior to determining this application.

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 P03, by Curtins (12 March 2026). The amendments primarily address flooding from surface water and small watercourses, rather than flooding from rivers and/or the sea. Our advice to you, as outlined in our previous letter reference CAS-300162-Q1W4 (23 February 2026), is the FCA is incomplete. Therefore, we are unable to provide you with detailed advice on the findings and conclusions of the FCA in relation to flooding from rivers and/or the sea.

Notwithstanding this, as the proposed highly vulnerable use is located on the upper floors we are satisfied it is elevated above the flood risk, and the less vulnerable use is being maintained on the ground floor. Therefore, we do not consider a further updated FCA is needed for this application.

However, it is for planning authorities to determine whether the risks and consequences of flooding are acceptable. Therefore, you should be satisfied the proposal has fully considered access requirements, including evacuation routes used in an emergency flood event. We refer you to sections 6.4 and 7.0 of the FCA.

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.