

Ein cyf/Our ref: CAS-315967-X0R7
Eich cyf/Your ref: 26/0390

Newport City Council
Civic Centre
Newport
NP20 4UR

Dyddiad/Date: 23 September 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: PROPOSED CONVERSION OF 3 BEDROOM DWELLINGHOUSE (C3) TO 4 BEDROOM HMO (C4)

Lleoliad/Location: 11 Coverack Road, Newport, NP19 0DS

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 06 August 2026.

We have concerns with the application as submitted. To address these concerns, we advise you consider the following advice regarding **flood risk** to inform your determination of this application.

Flood Risk

As outlined in our previous advice dated 23 June 2026 reference CAS-309786-W7X1, the planning application proposes highly vulnerable development (residential), including the introduction of two bedrooms to the ground floor. 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 have reviewed the FCA Addendum reference AEG9849 by Aegaea dated August 2026 and provide the following advice.

Frequency thresholds (Figure 5 - designing development to be flood free)

The original FCA dated January 2026 included an assessment of 0.5% (1 in 200 year) Annual Exceedance Probability (AEP) tidal flood event plus climate change (CC) allowance to 2126, for which flood levels up to 7.68m Above Ordnance Datum (AOD)

where predicted. Given the ground floor finished floor level (FFL) is estimated to be 7.51m, the building is predicted to experience flood depths of up to 170mm.

To achieve compliance with Figure 5, the proposed FFL within the dwelling is proposed to be raised to a level of 7.68m AOD, which corresponds to the maximum flood depths predicted in the 0.5% + CC event.

As we noted in our previous advice, the application site is located within a TAN 15 Defended Zone and no assessment of a breach scenario for the 0.5% AEP + CC event was originally provided. This assessment has now been included in the FCA Addendum for which flood depths of up to 8.12m AOD are predicted, during which the building could experience flood depths up to 440mm.

Given that we consider this breach scenario to be the design event for the purposes of TAN 15, we advise that the proposal is non-compliant with Figure 5.

Tolerable conditions (Figure 6 - managing consequences in an extreme flood event)

The FCA Addendum includes an assessment of the 0.1% (1 in 1000 year) AEP tidal flood event plus CC to 2126, during which flood depths of up to 1220mm are predicted on the basis of the revised FFL of 7.68m AOD.

For this scenario, velocities within the site are predicted to range between 0.24 and 0.69 metres per second. With the predicted flood depths, this corresponds to a Flood Hazard Rating of at least 'Danger to Most – includes the general public'.

No assessment of the breach scenario for the 0.1% AEP + CC event has been provided, which we had previously requested. The addendum states that no dedicated breach modelling is available for this scenario, and in the absence of this we are unable to provide further technical advice. However, the outcome of any such modelling would likely correspond to a Flood Hazard Rating of 'Danger to All – including Emergency Services'.

We advise the proposal is non-compliant with Figure 6 for the breach scenarios both with and without CC allowances.

Flood risk elsewhere

The application proposes change of use and does not include an increase in the building footprint. Taking into account the proposed increase to internal FFL to 7.68m, we do not anticipate that the proposals will increase flood risk elsewhere.

Mitigation and resilience measures

The provision of a first floor "refuge room" is proposed.

We previously advised that, in our opinion, provision of communal areas as a 'safe' space as a form of mitigation, or as part of an evacuation/flood emergency plan is not a sustainable means of managing flood risk. We maintain this position.

However, it is not our role to comment on the acceptability of such proposals for individual developments, and as such, we recommend you seek advice from other appropriate advisors, for example, Local Authority emergency planners and/or Lead Local Flood Authority (LLFA).

Upper end climate change estimate

We note there is no information provided in the FCA regarding the upper end climate change estimate. We had previously advised that this information is sought from the applicant. TAN15 (paragraph 4.3) states that

‘detailed Flood Consequences Assessments, to accompany planning applications, will be required to consider a range of climate change scenarios, including upper end estimates, making reference to the Welsh Government guidance on climate change allowances for planning purposes’.

Current Welsh Government guidance on climate change allowances for planning purposes states that this information should be used to inform mitigation measures that help to ensure the long term resilience of the development. You may therefore wish to request the applicant provides this information.

However, please note, it is not our role to comment on the acceptability long-term resilience of individual developments. As such, should you choose to request this information, it will be a matter for your Authority to assess information provided in respect of the upper end climate change estimate. To assist you, we recommend you seek advice from other appropriate advisors, for example, Local Authority emergency planners and/or LLFA.

Vulnerability classification

We note that Section 5 of the FCA Addendum states that the proposed

‘change of use does not alter the vulnerability classification of the site and the proposal results in an increase in FFL existing thereby providing a betterment (decrease in flood depth)’.

Whilst the proposal does include a betterment in terms of raising FFL of the ground floor by 170mm, the proposal also introduces self-contained ground floor residential accommodation.

Section 10.19 of TAN 15 states that in Flood Zones 2 and 3

‘Where proposals for redevelopment include residential use, local authorities should ensure that such uses do not occur at ground floor level, they will also need to be compatible with the tolerable conditions set out in section 11 and exhibit resilient flood design as described in section 13’.

Furthermore, Section 10.23 states

‘proposals which include residential development must ensure that such uses do not occur at ground floor level’.

It is our opinion that the proposals constitute redevelopment including residential use at ground floor level, and therefore conflict with the requirements of TAN 15 as set out in Sections 10.19 and 10.23.

Conclusion

The FCA fails to demonstrate that the potential risks and consequences of flooding at this site are manageable. Based on the information available and the matters outlined above, it is our view that further modelling and a revised FCA would be unlikely to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development.

In light of this, we advise your authority to take the above considerations into account when determining the application. It is ultimately for your authority to decide whether the consequences of flooding are acceptable and can be managed in accordance with TAN 15.

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,

Heather McDowell

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.