

Newport City Council
Civic Centre
Newport
NP20 4UR

Ein cyf/Our ref: CAS-277977-D2H6
Eich cyf/Your ref: 25/0145

Dyddiad/Date: 30 April 2025

Annwyl Syr/Madam/Dear Sir/Madam,

BWRIAD/PROPOSAL: THE ALTERATION AND EXTENSION OF EXISTING BUILDINGS TO PROVIDE A CAFE, OFFICES, STORE AND PLANT ROOMS, TOGETHER WITH ASSOCIATED LANDSCAPE ALTERATIONS AND OUTDOOR SEATING AREA.

LLEOLIAD/LOCATION: TREDEGAR PARK LODGE CARDIFF ROAD NEWPORT SOUTH WALES NP10 8TF

Thank you for re-consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 31 March 2025.

We have no objection to the proposed development as submitted and provide the following advice.

Flood Risk

The planning application proposes less vulnerable development. Our Flood Risk Map confirms the site to be within Zone C1 of the Development Advice Map (DAM) contained in Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Flood Map for Planning (FMfP) identifies the application site to be at risk of flooding and falls into Flood Zone 2 and or 3 Rivers.

We note the change of use of the existing building from residential to a commercial premises results in a decrease in vulnerability classification from Highly Vulnerable to Less Vulnerable.

Whilst the development fails to meet the requirements of TAN15 we note that the nature of the developments (extension) and the change in vulnerability from high to low, we consider the development could be acceptable subject to the developer being made aware of the potential flood risks and consequences. We would also expect the developer to take the opportunity to incorporate flood resilient design where feasible.

Guidance on resilient design can be found in Chapter 13 of Technical Advice Note 15: Development, flooding and coastal erosion, dated 2025, which references advice from

Construction Industry Research and Information Association, including a Code of Practice and Guidance for Property Flood Resilience.

We provide advice on our website Natural Resources Wales / Preparing for a flood which may be useful for the developer or occupant of the proposal.

We have reviewed the supporting FCA undertaken by JBA dated February 2025 referenced OCB-JBA-XX-XX-RP-Z-0001-The_Lodge_FCA for the proposal to convert an existing residential building into a café by constructing an extension to expand the premises. The existing building will form additional seating, toilets, and the store, whilst the proposed extension will comprise of the main seating area, entrance and the kitchen. External developments will include the construction of a garden courtyard and stage with outdoor seating. The existing park ranger office building will be unchanged with only internal reconfigurations.

The finished floor level for the existing residential building is shown to be 11.43m AOD, with the ranger office at 10.59m AOD. The proposed finished floor levels will remain the same for both buildings, with the proposed extension for the café level at 11.43m AOD.

The topographic survey demonstrates that the proposed development site is relatively flat with a slight fall from the southwest (11.21m AOD) to the south (10.11m AOD). It is also evident that the disused residential building is located at a higher elevation than the remainder of the development site.

It was established the River Ebbw is the main source of flooding and there is a fluvial flood defence, comprising of an embankment present to the north and east of the site. In order to assess the flood risk the NRW Lower Ebbw model updated in 2023 by JBA was used and provided the following flood data:

1 in 100 year plus climate change flood level – 11.78m AOD.

The FCA states that there will be a maximum flood depth of 1.65m in the northeast of the site and an average flood depth on site is shown to be 1.35m, with flood depths across the proposed extension reaching 1.43m. Given the elevated nature of the existing residential unit, the internal flood depth would be 350mm. Whilst we note the existing and proposed change of the Rangers Office we would highlight that the internal flood depth to this unit would be 1.19m during this flood event.

All elements of the proposals fail to meet the requirements of A1.14 of TAN 15.

1 in 1000 year flood level – 12.17m AOD

The FCA states that this flood extent is generally similar to that within the 1 in 100 year plus climate change event, though flood depths are predicted to be deeper. A maximum flood depth of 2.05m is predicted in the east of the proposed development site and an average depth within the site boundary is shown to be 1.74m, with a maximum depth of 1.83m within the proposed extension. Given the elevated nature of the existing residential unit, the internal flood depth would be 740mm. Whilst we note the existing and proposed change to the Rangers Office, we would like to highlight that the internal flood depth to this unit would be 1.58m during this flood event.

All elements of the proposals fail to meet the tolerable limits set out in A1.15 of TAN 15, and given the flood depth (and suggested acceptable maximum velocities in TAN15) would result in a Danger for All Hazard Rating.

Third Party Impacts

The proposals result in a modest extension to the existing building, with the existing FFL to be retained from the existing building to the proposed extension. As a result of the severity of flooding within the 1% AEP plus climate change and 0.1% AEP events, and the development site's location within Tredegar Park, the detriment because of the modest increase in building footprint is likely to be negligible. Given the flood plain at this location, we do support the FCA statement in relation to negligible third-party impacts as a result of the extension.

Protected Species

We note the bat report submitted in support of the above application (An Ecological report prepared by Just Mammals, September 2023) has identified bats were not using the application site. We therefore have no adverse comments to make on the application as submitted.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

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,

Rhian Isaac

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.