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## **Bear Consulting Response to NRW comments on 30/09/2025**

Bear Consulting Document Reference: P0644rc05

Date: 07/10/2025

**Please see Bear Consulting's responses in green.**

*Our advice to you is that the FCA fails to demonstrate that the potential risks and consequences of flooding are manageable for the reasons explained below.*

*The FCA states: Ground levels across the site range from 7.32m to 8.40m AOD, generally falling away from the existing building. However, no finished floor levels have been provided within the FCA.*

FFL of the proposed units have now been clarified and set as 8.370m AOD, matching the existing building's FFL.

*Figure 5 TAN15*

*During a 0.5% (1 in 200 year) plus climate change allowance (2115) flood event the development is predicted to flood to a depth of 691mm.*

*This figure would not be compliant with Figure 5 of TAN15 based on the general ground levels. We note that as no Finished Floor Levels (FFL) are included within the FCA, we are unable to confirm the correct levels of any potential flood depths.*

FFL of the proposed units has been clarified and set as 8.370m AOD, matching the existing building's FFL. It has been assessed against the 'flood water level for the 1 in 200-year coastal flooding event with climate change (year 2115 horizon year) with breached flood defence scenario', and is considered flood-free.

*Figure 6 TAN15 During a 0.1% (1 in 1000 year) plus climate change allowance (2115) flood event, the development is predicted to flood to a depth of 2152mm and flood velocities of 0.94m/s.*

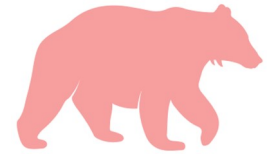
*As above, based on the ground levels, this figure would not be compliant with Figure 6 of TAN15 and we are unable to confirm any correct finished floor levels of any potential flood depths.*

The updated flood levels & depths for the extreme event have now been included in the updated report. TAN 15 states that each site 'must be considered individually, and a judgement taken in the context of the circumstances which could prevail at that site.'

*The FCA concludes that all proposed building units on the site are considered extensions to the existing site, rather than new development. Therefore, the received NRW flood modelling information, which shows flooding in a 1 in 200 years coastal flooding event with climate change (year 2115 horizon year with 95% confidence interval", should not be treated as a criterion for refusal of development in this area.*

*We would like to highlight that the proposed units are stand-alone units and should be designed to be flood free in this event as per TAN 15 – given that they are not constrained to adjoining existing units' levels, there may be scope to set the units higher; we would deem*





*the proposals an extension to the existing site use rather than an extension to the units on site. We advise that this is for you as the competent authority to determine.*

*FFL of all proposed units have now been confirmed in the updated report.*

*Paragraph 15.4 of TAN15 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 an amended FCA is not submitted or any subsequent amended FCA fails to demonstrate that the consequences of flooding can be acceptably managed over the lifetime of the development, then we are likely to object to the application.*

*Further advice*

*Access/Egress*

*It is recommended that that occupants evacuate via the adjacent public road, Langland Way to the north of Spytty Road, following the designated egress route, and continue to the public highway outside any NRW-designated flood zones.*

*It should also be noted that the existing site building is two storeys in height. If evacuation cannot be undertaken safely in time, occupants may temporarily seek refuge on the first floor of the building until it is safe to leave or assistance arrives. All unit occupiers will be expected to prepare a flood plan, setting out the precautions and actions to be taken when a flood event is anticipated, to minimise potential impacts and damage. The LPA should review any emergency plans / proposed routes to ensure that they are acceptable.*

*The flood plan, and access/egress information has been included within the report.*

*Increase in flood risk elsewhere*

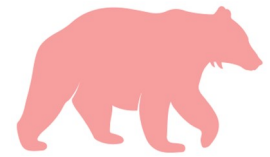
*As required in TAN15, it should be demonstrated that the proposed development does not increase flood risk elsewhere. The effects of the reduction of existing flood storage volume and/or flood conveyance on land outside the redline boundary should be quantified (i.e. change in flood levels elsewhere, identify whether additional properties at risk, onset of flooding etc.), and appropriate mitigation and/or compensatory flood storage should be proposed.*

*A note regarding this has been included within the updated report.*

*Climate change*

*The FCA only provides flood depths with the higher confidence levels for a complete FCA the central and upper estimates should be provided.*

*The JBA flood modelling data received includes the climate change simulations for the 200-year and 1,000-year events. These simulations represent the potential increase in flood risk up to the year 2115 based on the Welsh Government guidance for sea-level rise estimates (FCDPAG3).*



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*At present, there is no inclusion in the FCA of a breach scenario – the flood defences only allow a standard of protection for current 200 year event and as per TAN 15 guidance, development within a TAN 15 defended zone should use the breach 1 in 200 year plus climate change event as the design event and ensure compliance with this event requirements – i.e. flood free site.*

The 1 in 200-year plus climate change event (breach scenario) has now been included within the updated FCA and used to assess against the flood-free condition of the development.