

Our ref: 1584

Cynghorydd - Cynllun Datblygu / Advisor - Development Planning

Cyfoeth Naturiol Cymru / Natural Resources Wales

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24/02/2025

**Re: Flood Consequence Assessment for Proposed Change of Use at 39 Dolphin Street,
Newport, NP20 2AT**

Annwyl Syr/Madam / Dear Sir/Madam,

We are pleased to submit this Flood Consequence Assessment (FCA) in support of the planning application for the proposed change of use at 39 Dolphin Street, Newport. This assessment evaluates the potential flood risks to the site and outlines appropriate mitigation measures, ensuring compliance with Technical Advice Note 15 (TAN 15): Development and Flood Risk and Planning Policy Wales.

Site and Development Proposal

The site is identified within Zone B on the Development Advice Map (DAM) contained in TAN 15 (2004). In practical terms, Zone B does not denote an active flood risk area, but rather an area where historical flood evidence exists, yet flood defences, topography, or other factors have reduced the immediate flood risk. This designation acknowledges that flooding may have previously occurred, but it does not trigger the same stringent justification and acceptability tests that apply to Zones C1 and C2.

Under the Flood Map for Planning (FMfP), the site is partially located within Flood Zone 3 (Sea), indicating a potential risk of tidal flooding. However, it is essential to emphasise that this proposal involves no additional built development, no increase in footprint, and no intensification of vulnerability. The existing building is already in residential use (a highly vulnerable classification), and the change of use does not introduce new flood risk exposure beyond the present condition.

The proposal seeks to convert the existing single dwelling into a six-bedroom House in Multiple Occupancy (HMO). While two ground-floor bedrooms are being introduced, a dedicated refuge room has been incorporated into the attic, ensuring a safe upper-floor refuge for occupants in the unlikely event of a flood.

Flood Zone Classification and Policy Context

The site is currently designated as Zone B under the Development Advice Map (DAM) in TAN 15 (2004). However, under the new Flood Map for Planning (FMfP), which has yet to be formally adopted into policy, the site is identified as being within Flood Zone 3 (Sea) - reference should be made to Figure 1 for greater context.

As the updated TAN 15 and FMfP have not yet come into effect, the current policy framework remains based on the 2004 DAM classification. Therefore, this assessment is prepared in accordance with existing policy requirements, where Zone B does not impose the same level of flood risk constraints as Zones C1 or C2. While the future FMfP classification will be noted, it does not currently influence the planning decision-making process.

Flood Risk Assessment

Fluvial and Tidal Flooding

NRW's Flood Map for Planning (FMfP) identifies the site as being at risk from tidal flooding due to its partial inclusion in Flood Zone 3 (Sea). However, the key consideration is that the existing building is already a residential property, meaning no new vulnerability or displacement of floodwaters will arise as a result of this proposal.

The attic refuge space provides an additional safety measure, ensuring that all occupants have access to a dedicated safe area above potential flood levels. This directly mitigates any potential risks posed by tidal flooding, addressing any concerns regarding safe refuge and emergency preparedness.

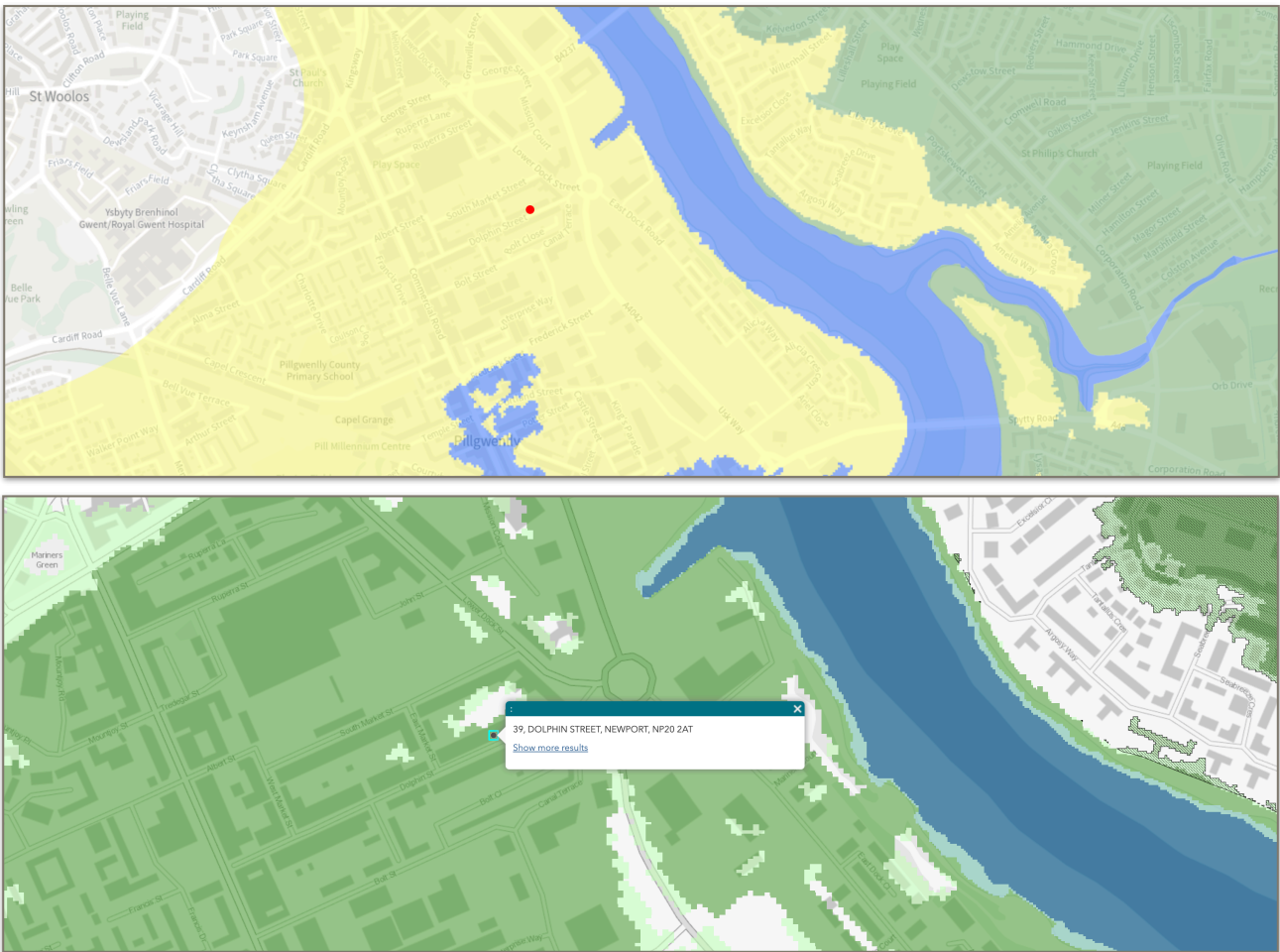


FIGURE 1. DEVELOPMENT ADVICE MAP AND FLOOD MAP FOR PLANNING, RESPECTIVELY

Groundwater Flooding

The risk of groundwater flooding is considered low. British Geological Survey (BGS) data shows that the underlying geology consists of impermeable layers, which reduce the likelihood of significant groundwater flooding at the site.

Surface Water Flooding

NRW's surface water flood risk maps indicate that the site is not at risk from surface water flooding. However, measures such as permeable paving and effective drainage will be incorporated into the development to ensure the site remains resilient to any potential surface water accumulation.

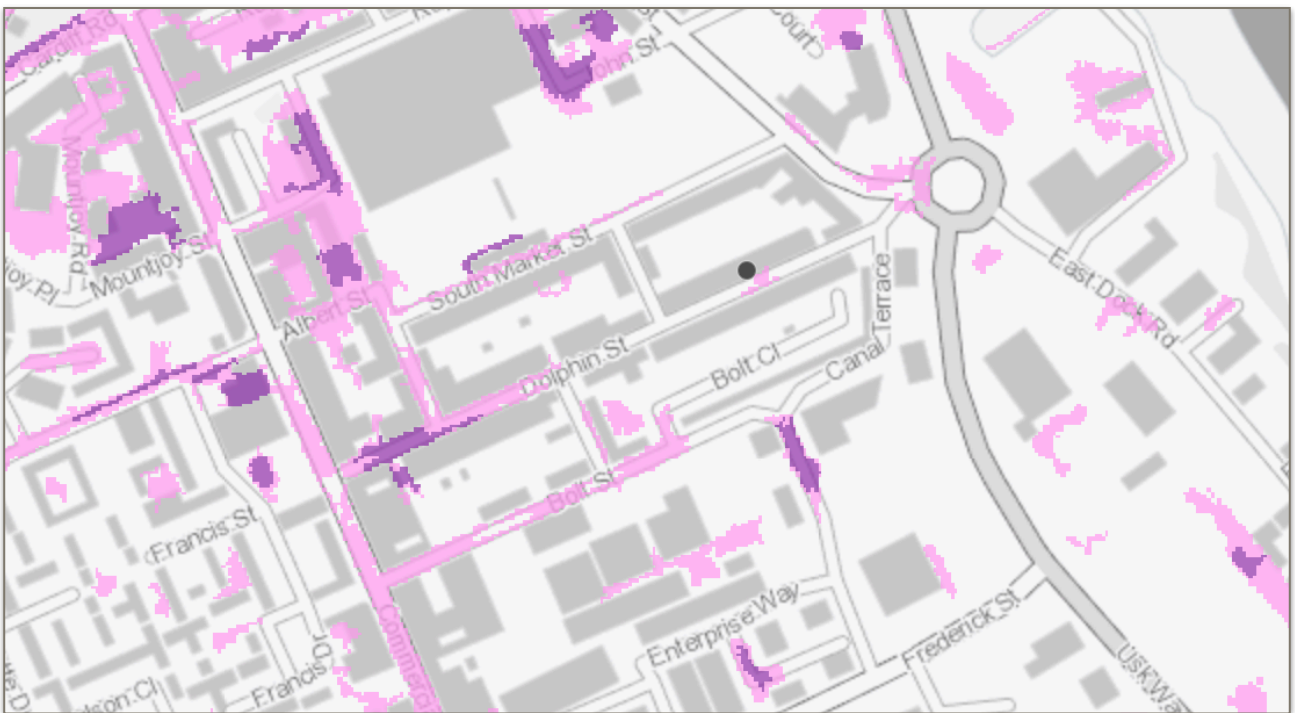


FIGURE 2. SURFACE WATER FLOOD RISK MAP

Flooding from Reservoir Failure

NRW's reservoir failure risk maps do not identify this site as being at risk from reservoir flooding. Consequently, this is not considered a constraint on the development.

Mitigation Measures and Emergency Planning

- I. The proposed development is located within Zone B, which indicates historical flooding evidence but does not represent an active or ongoing flood risk. Given this classification, strict justification tests are not required under TAN 15, but appropriate mitigation measures have been incorporated to ensure the long-term safety and resilience of the site.
- II. A dedicated attic refuge space has been incorporated into the building layout, providing a safe, dry location above potential flood levels. This ensures that in the unlikely event of a flood, ground floor occupants have access to immediate vertical evacuation, eliminating concerns regarding safe refuge.
- III. The development will implement flood-resilient design measures to reduce potential damage. Water-resistant materials will be used for ground-floor walls and floors, electrical outlets and services will be raised, and flood-proof doors will enhance protection against water ingress. These measures ensure that, even in extreme scenarios, the property remains functional and damage is minimised.
- IV. A comprehensive Flood Action Plan will be implemented to ensure that occupants are fully prepared. The property will be registered with NRW's Flood Warning System, providing early alerts of potential flooding. Clear evacuation procedures and emergency response guidance will be established to ensure a safe and coordinated approach in extreme weather events.

Compliance with TAN 15

Under TAN 15, Zone B development does not require the same level of justification and acceptability testing as Zones C1 and C2, as it does not indicate an ongoing or active flood risk. Instead, developments must demonstrate that historical flood concerns have been addressed through appropriate mitigation, which this proposal achieves.

TAN 15 allows development in areas where flood risks are manageable, and this FCA confirms that all potential sources of flooding have been assessed and mitigated through resilient design, emergency planning, and an attic refuge space. As a result, the proposal ensures that any residual risks are fully controlled and acceptable.

The proposal also aligns with sustainable development objectives, as it reuses an existing building without expanding its footprint. This approach supports efficient land use while minimising pressure on greenfield sites, fully complying with national and local planning priorities.

Furthermore, the proposal meets TAN 15's justification criteria as it does not increase flood vulnerability, and all risks have been mitigated. The incorporation of flood-resistant materials,



surface water management, and a dedicated Flood Action Plan ensures that the site remains safe, sustainable, and resilient over the long term.

Conclusion

This proposal involves no additional built development, no increase in footprint, and no intensification of flood risk vulnerability beyond the existing residential use. The Zone B designation indicates historical flooding evidence, but not an active or ongoing flood risk, distinguishing it from sites in Zones C1 and C2, where development controls are far stricter.

Through the incorporation of a dedicated attic refuge, flood resilience measures, and surface water management, the proposal demonstrates full compliance with TAN 15's guidance for development in Zone B. Given the low-risk nature of the site and the absence of any new construction, this application should not be treated as a high-risk flood proposal.

We trust that this assessment adequately demonstrates that the potential consequences of flooding can be managed to an acceptable level.

Should you require any further information or clarification, please do not hesitate to contact us.

Yours sincerely,
for Flume Consulting Engineers

A handwritten signature in black ink, appearing to read "Tom Quigg".

Tom Quigg
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