

3 Clytha Crescent

Flood Consequences Assessment



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1 Introduction

- 1.1.1 Wai Studio have been appointed by Skerryvore Design to produce a Flood Consequence Assessment (FCA) report in support of a planning application for the change of use of an existing residential flat to a House in Multiple Occupation (HMO) at 3 Clytha Crescent, Newport.
- 1.1.2 The FCA will establish if suitable avoidance and mitigation measures can be incorporated, in a manner compatible with the placemaking aims of Planning Policy Wales, within the site design to ensure that development is safe and there is:
- ▶ Minimal risk to life;
 - ▶ Minimal disruption to people living and working in the area;
 - ▶ Minimal potential damage to property;
 - ▶ Minimal impact of the proposed development on flood risk generally; and
 - ▶ Minimal disruption to the sustainable management of natural resources.

2 Site Description

2.1 Site Location

- 2.1.1 The site is located at 3 Clytha Crescent, within the Pillgwenlly ward of Newport, South Wales. It lies within a well-established residential area just south-west of the city centre and is accessed directly from Clytha Crescent to the north of the site. The surrounding area is predominantly residential in nature, with nearby commercial and institutional uses. The site comprises an existing residential flat within a traditional Victorian terrace and is approximately 0.01 hectares in size. The site is centred at approximate OS coordinates E: 328321, N: 187225, with the nearest postcode NP20 2FF. A site location plan is provided in Figure 1 below and included in *Appendix A*.

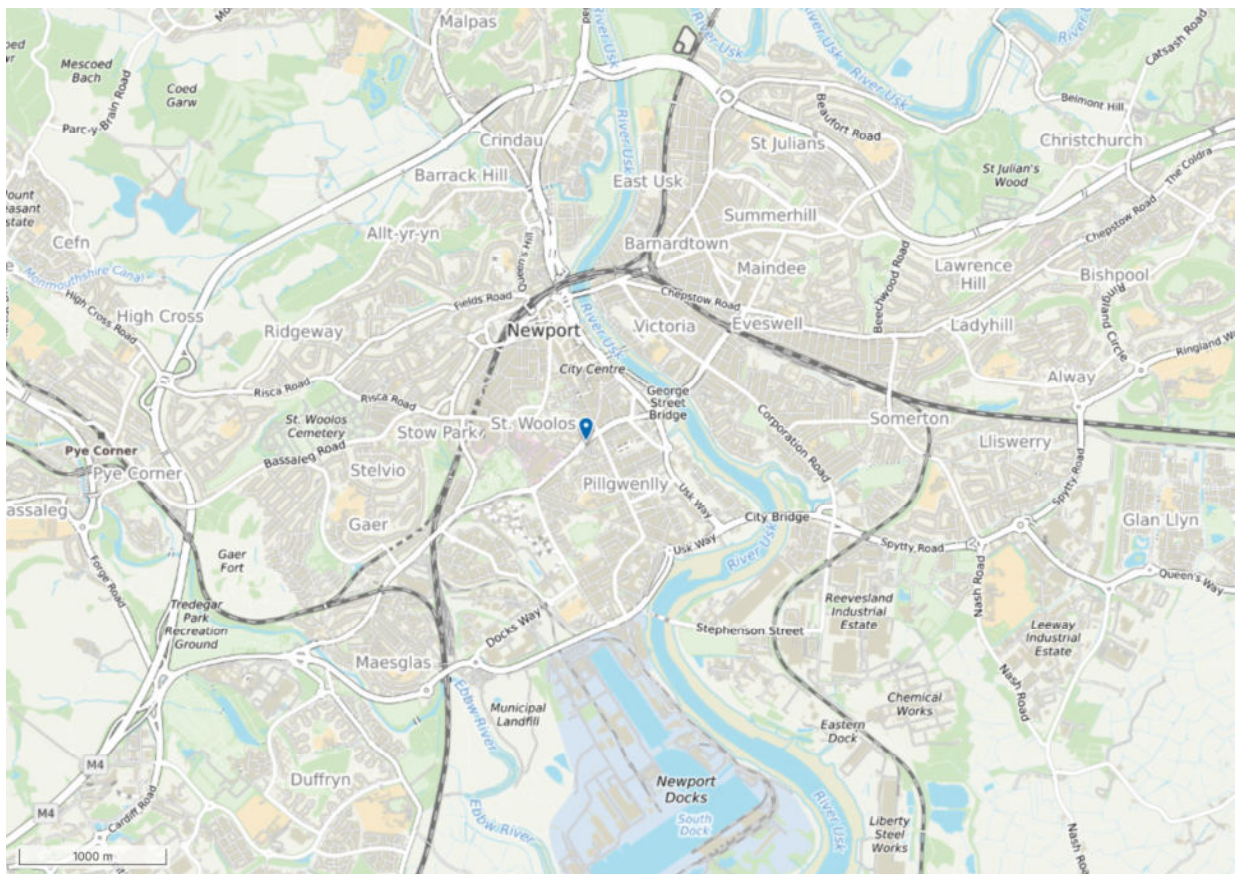


Figure 1 - Site location map

2.2 Site Topography

- 2.2.1 Topographic information for the site at 3 Clytha Crescent has been obtained from open licence LiDAR data, processed through SCALGO Live. A cross-section of the property confirms a significant level change between the front and rear of the plot, consistent with the terraced topography typical of this part of Newport.
- 2.2.2 The front of the site, at street level on Clytha Crescent, is elevated at approximately 9.5–10.0 metres AOD, as shown on the contour map and profile. The land then slopes steeply down to the rear garden, where levels fall to approximately 7.8–8.0 metres AOD. The total fall across the site is around 2 metres over 18 metres horizontally.
- 2.2.3 There are no watercourses, drainage channels, or reens directly adjacent to the site. Overland flow is expected to follow the general topographic slope eastward toward the River Usk, which lies

approximately 600 metres away. The property is connected to an urban surface water drainage network, which may be influenced by tidal locking during high tide conditions.

2.2.4 A copy of the topographic profile and LiDAR-derived cross-section is included in *Appendix B*.

2.3 Land Use

2.3.1 The site is currently in residential use and forms part of an existing mid-terrace property located on Clytha Crescent. The property is set within a well-established urban residential area, with no recent history of industrial or commercial land use. The surrounding land use is primarily residential, with nearby schools, healthcare facilities, and local shops.

2.4 Ground Conditions

2.4.1 British Geological Survey (BGS) mapping indicates that the site is underlain by Alluvium deposits comprising clay, silt, sand and gravel, typically associated with tidal or riverine floodplains. The bedrock geology is mapped as part of the Mercia Mudstone Group, which is characterised by mudstone with occasional siltstone or sandstone layers.

2.4.2 No ground investigation data or geotechnical studies specific to the site are currently available. However, given the urban setting and small-scale nature of the proposal, significant ground contamination or geotechnical constraints are not anticipated. Should more detailed assessment be required at a later stage, such investigations would be commissioned as appropriate.

2.5 Development proposals

2.5.1 The property is a traditional Victorian terrace with a lower ground floor that opens out onto the rear garden. This level is currently in residential use, including bedrooms. As part of the proposed development, this space will be converted to non-sleeping accommodation, in line with TAN15 (2024) guidance, which restricts vulnerable sleeping areas in flood-exposed ground floors.

3 Policy Context

3.1 Planning Policy Wales and TAN 15

- 3.1.1 Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion (2024) provides national planning guidance for managing flood and coastal erosion risk in Wales. It introduces a risk-based, precautionary framework to support the delivery of sustainable development while minimising risks to life, property, and infrastructure.
- 3.1.2 The overarching aims of TAN15 are:
- ▶ To direct new development away from areas at risk of flooding or coastal erosion, particularly where it would be highly vulnerable or increase risk to others.
 - ▶ Where development must occur in such areas, to ensure it is justified, resilient, and that the consequences of flooding are acceptable.
- 3.1.3 TAN15 requires that a Flood Consequences Assessment (FCA) be submitted for development within Zones 2 and 3. The FCA must demonstrate that:
- ▶ The development is in an appropriate location and consistent with the Local Development Plan (LDP);
 - ▶ The site is previously developed land;
 - ▶ The development delivers sustainability benefits;
 - ▶ Flood consequences are assessed and deemed acceptable, especially in relation to depth, velocity, access/egress, and resilience.

3.2 Flood Zone Classification

- 3.2.1 TAN15 (2024) replaces the previous Development Advice Map (DAM) with the Flood Map for Planning, which defines flood zones based on the latest NRW flood modelling and climate change allowances. These zones are:

Table 1: Flood Risk Classification by Zone	
Flood Zone	Description
Zone 1	Little or no risk of flooding from rivers or the sea
Zone 2	0.1% to 1% (river) or 0.1% to 0.5% (sea) annual probability of flooding
Zone 3	>1% (river) or >0.5% (sea) annual probability of flooding, including climate change
TAN15 Defended Zone	Areas protected by flood defences to the design standard for Zone 3 events

3.2.2 The TAN15 framework also defines development vulnerability categories, which inform whether a proposal is appropriate in a given flood zone.

Table 2: Development Category and Flood Risk Threshold			
Development Category	Typical Uses	Maximum Allowable Flood Event	
		Rivers	Seas
Emergency Services	Hospitals, emergency depots, police/fire stations	0.1%+CC (1 in 1,000)	0.1%+CC (1 in 1,000)
Highly Vulnerable Development	Residential buildings, schools, care homes, hotels	1% +CC (1 in 100)	0.5%+CC (1 in 200)
Less Vulnerable Development	Retail, offices, general industrial, utilities	1% +CC (1 in 100)	0.5%+CC (1 in 200)
Water Compatible	Flood storage, marinas, open space	1% +CC (1 in 100)	0.5%+CC (1 in 200)

3.3 Acceptability Criteria for Flooding Consequences

3.3.1 For development to be considered acceptable in areas at risk of flooding, it must be demonstrated that the consequences of flooding can be safely managed on-site, and that the proposal does not increase flood risk to neighbouring land, infrastructure, or people.

3.3.2 TAN15 sets out conditions that must be met for development in flood risk areas:

- ▶ No increase in flooding elsewhere
- ▶ Occupiers aware of flood risk
- ▶ Escape/evacuation routes present
- ▶ Flood emergency plans and procedures agreed and in place
- ▶ Flood resistant and resilient design
- ▶ Acceptable consequences for type of use.

3.3.3 The thresholds in Table 2 may be applied with more flexibility for redevelopment, changes of use, conversions and extensions, where the ability to substantially redesign a development is limited. In those circumstances the thresholds are a guide. If they cannot reasonably be met, the planning authority should seek the views of the relevant risk management authorities on the resilience measures proposed to help it reach a decision

3.3.4 During extreme flood events there is recognition that it may not be possible to keep all development flood-free. In these circumstances it is imperative that flooding does not endanger life, therefore it needs to be demonstrated that conditions within the development during an extreme event will be tolerable.

Table 3: Maximum Flood Conditions for New Development		
Types of new development	Maximum depth of flooding (mm)	Maximum velocity of flood waters (m/s)
Highly vulnerable development	600	0.15
Less vulnerable/Water Compatible	600	0.3

- 3.3.5 The above figures are tolerances below which new development may be acceptable. Each site, however, must be considered individually, and a judgement taken in the context of the circumstances which could prevail at that site.

4 Assessment of Flood Risk

4.1.1 The following assessments are based on the Envirocheck Flood Screening report contained within of this report, review of the Newport City Council's Local Flood Risk Management Strategy (2024–2030) report (see *Appendix D*) and NRW Flood Risk Assessment Wales map.

4.1 Flood History

4.1.1 A review of the Natural Resources Wales Historic Flood Map indicates that there are no recorded historic flood events directly affecting the site at 3 Clytha Crescent. Similarly, Newport City Council's Local Flood Risk Management Strategy (2024–2030) does not identify this area as a recurrent flood hotspot. The Pillgwenlly Ward Local Flood Risk summary from the FRMS is included in *Appendix D*.

4.2 Sea (Tidal) Flood Risk

4.2.1 According to the Natural Resources Wales (NRW) Flood Map for Planning, the site at 3 Clytha Crescent lies within Flood Zone 3 (Tidal) (see *Appendix C*). This indicates a greater than 0.5% (1 in 200) annual probability of tidal flooding, including the effects of climate change. The site is not located in a TAN15 Defended Zone, meaning it is not currently protected to that return period by formal tidal defences.

4.2.2 The primary source of flood risk is the River Usk estuary, located approximately 600 metres east of the site. Tidal influence can propagate inland along the river channel and potentially impact low-lying urban areas of Newport, especially during extreme sea level events or storm surges.

4.2.3 Modelling specific to this site has not been undertaken; however, publicly available flood depth and hazard mapping indicates:

- ▶ Shallow to moderate flooding may reach the lower parts of the site in a 1 in 200 year tidal event (2090 scenario), with estimated depths up to 600 mm in the most affected zones.
- ▶ Hazard ratings in the surrounding area range from “low” to “danger for most”, particularly along lower routes such as Herbert Street and Mountjoy Place, which may be affected during extreme tidal events.

4.2.4 Given the site's topography (see Section 1.2), the rear garden and lower ground floor are most at risk. However, the proposed development removes bedrooms from this level and includes non-sleeping, flood-resilient uses, reducing the vulnerability in line with TAN15 policy.

4.3 River (Fluvial) Flood Risk

4.3.1 There is no significant riverine flood risk from smaller watercourses in the vicinity of the site. The River Usk is the only notable watercourse, but in this location the dominant risk is tidal, not fluvial. NRW mapping does not show independent fluvial flood extents reaching this far inland.

4.4 Surface Water (Pluvial) Flooding

4.4.1 The NRW Surface Water Flood Map indicates that the site and immediate surroundings are at low risk of pluvial (surface water) flooding, even during the 1 in 100 year event.

4.4.2 The site is not within a mapped surface water flow path, and no standing surface water is shown to accumulate at the site under modelled scenarios.

4.4.3 The local area is drained via a combined sewer network. According to Welsh Water asset maps, a 1950mm diameter combined sewer passes near the southern boundary of the site, flowing south-west beneath the terrace. While this sewer is large, there is no record of surcharge issues or localised surface flooding in recent flood history records (See *Appendix F*).

4.5 Groundwater Flooding

- 4.5.1 Publicly available geological information and strategic policy documents confirm that groundwater flooding is not a significant risk at the site at 3 Clytha Crescent, Newport.
- 4.5.2 The site is underlain by superficial Alluvium deposits and bedrock of the Mercia Mudstone Group, which are typically of low permeability. These findings are supported by the British Geological Survey (BGS) GeoIndex and Geology of Britain Viewer. The site does not lie in a mapped groundwater emergence zone, and no shallow water table or spring lines are present in the immediate area.
- 4.5.3 The Newport Local Flood Risk Management Strategy (2024–2030) supports this conclusion at a strategic level, stating:
- "Groundwater is not considered to be a significant flood risk and is considered to rise and fall relatively slowly. In addition, the local geology is not considered to yield significant volumes of groundwater."*
- 4.5.4 The rear of the site is at a lower elevation (~7.8m AOD) than the street frontage, and while this introduces a localised susceptibility to dampness or water ingress, there is no evidence of historical groundwater flooding. Monitoring will be undertaken during any construction or conversion works, but no formal mitigation is required based on current evidence and policy.

4.6 Existing Flood Alleviation Measures

- 4.6.1 The site itself does not lie within a TAN15 Defended Zone, and there are no formal flood defences immediately adjacent to 3 Clytha Crescent. However, the wider Newport area benefits from a network of tidal flood defences along the River Usk Estuary, approximately 700 metres east of the site. These include a combination of embankments, quay walls, and other tidal structures managed by Natural Resources Wales (NRW).
- 4.6.2 While these defences reduce the frequency of tidal flooding in central Newport, they do not offer full protection during extreme flood events that consider climate change impacts and potential sea level rise. As such, residual risk from overtopping or breach must be considered, and the site remains classified within Flood Zone 3 (Tidal).

4.7 Structures Influencing Flow

- 4.7.1 There are no significant open watercourses or reed systems in the immediate vicinity of the site at 3 Clytha Crescent. However, the property is situated approximately 600 metres west of the River Usk, a major tidally influenced watercourse that plays a key role in the city's overall flood dynamics.
- 4.7.2 The Newport Local Flood Risk Management Strategy (2024–2030) identifies tidal flood risk from the Usk Estuary as a primary concern, particularly in low-lying urban areas where surface water drainage systems may interact with high tidal levels. While there are no known culverts or structures directly adjacent to the site that would redirect or constrain overland flow, it is acknowledged that tidal locking can reduce the capacity of the combined sewer network to discharge during extreme high tides.
- 4.7.3 The local area is served by an urban drainage network managed by Dŵr Cymru Welsh Water, and no known surface water flood routes intersect the site. However, in line with the city's strategy, flood awareness and building resilience are recommended where development lies in proximity to critical drainage infrastructure or tidal watercourses.

5 Consequences of Development

5.1 Development Levels and Displacement of Floodwaters

5.1.1 The proposed development will not alter existing ground levels or increase impermeable surfaces beyond the current condition. There is no net displacement of floodwaters anticipated as:

- ▶ The built form remains unchanged;
- ▶ The ground floor is not extended; and
- ▶ Surface levels and volumes remain constant.

5.1 Access and Evacuation Routes

5.1.1 In the event of tidal flooding, access and egress from the site would be via Clytha Crescent, which connects directly to the A4042 (Kingsway) to the north-east. This route provides elevated access to the wider road network, including Cardiff Road and Usk Way, which lead towards areas of lower flood risk and designated emergency response routes. The site is located near the Royal Gwent Hospital, a key emergency services hub, and benefits from proximity to existing flood warning infrastructure.

5.1.2 Although the site lies on the edge of Flood Zone 3 (Tidal), mapping suggests that flood extents will not cover the entirety of the surrounding area, allowing for safe evacuation routes during flood events.

5.2 Risk to life

5.2.1 The proposed conversion removes all sleeping accommodation from the lower ground floor, significantly reducing the residual risk to life. The upper floors remain well above anticipated flood levels for both the 1 in 200 and 1 in 1000 year events, even when accounting for future climate change.

5.2.2 Although the site is not located within an NRW-designated Flood Warning Area, residents are encouraged to monitor local conditions and register for updates via Floodline Warnings Direct (0345 988 1188 or www.gov.uk/sign-up-for-flood-warnings). This service provides warnings for nearby areas and general preparedness advice. A site-specific Flood Action Plan will be implemented to support early action and safe evacuation if necessary.

5.2.3 As such, the development is not expected to pose an unacceptable risk to life, provided the mitigation measures outlined in the Flood Action Plan (*Appendix E*) are implemented, including occupant awareness, safe evacuation planning, and flood-resilient ground floor design.

5.3 Disruption to people living and working in the area

5.3.1 As the development involves a single residential unit within an existing terrace, there is no intensification of flood-sensitive land use or significant additional occupancy.

5.3.2 Disruption to residents is considered minimal and consistent with that of the existing building. The inclusion of flood awareness measures and a flood action plan further reduces the potential for unanticipated impacts during flood events.

5.4 Potential damage to property

5.4.1 Floodwater may reach the lower ground floor in a 1 in 200 or 1 in 1000 year event, depending on confidence intervals and future climate change allowances. However, this level will be converted to non-sleeping accommodation and will incorporate flood-resilient construction measures.

5.4.2 The upper floors will remain dry and accessible in all but the most extreme scenarios. The likelihood of significant structural damage is considered low, and the site is not in a flood pathway that would result in scouring or high-velocity flows.

5.5 Disruption to the sustainable management of natural resources.

5.5.1 The site is located in a built-up urban environment with no proximity to ecological features, open watercourses, or natural floodplain systems. The proposal does not involve land raising, culverting, or encroachment into ecologically sensitive areas, and therefore poses no significant disruption to the sustainable management of natural resources.

6 TAN15 Acceptability Criteria

6.1.1 Following the justification test and assessment of flood consequences, Table 3 below appraises the proposed development against the acceptability criteria outlined within TAN 15 policy.

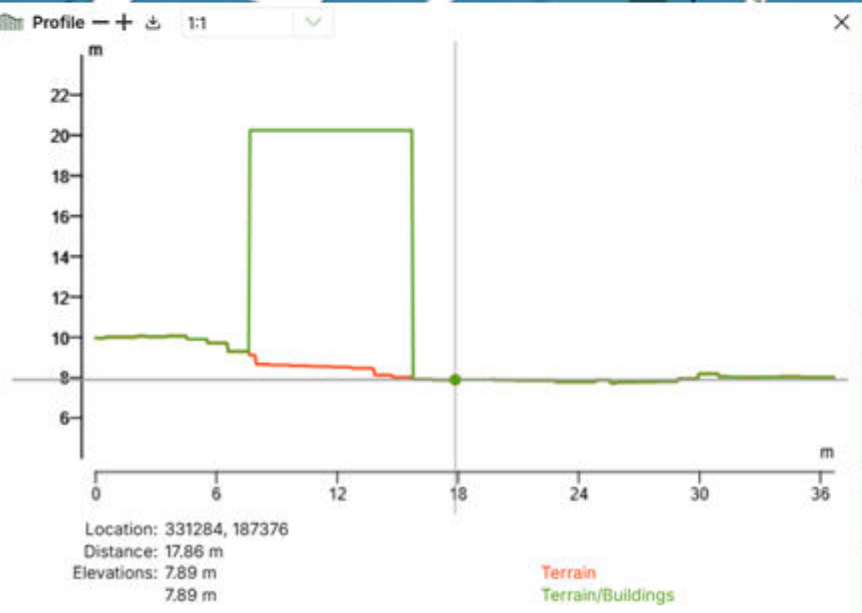
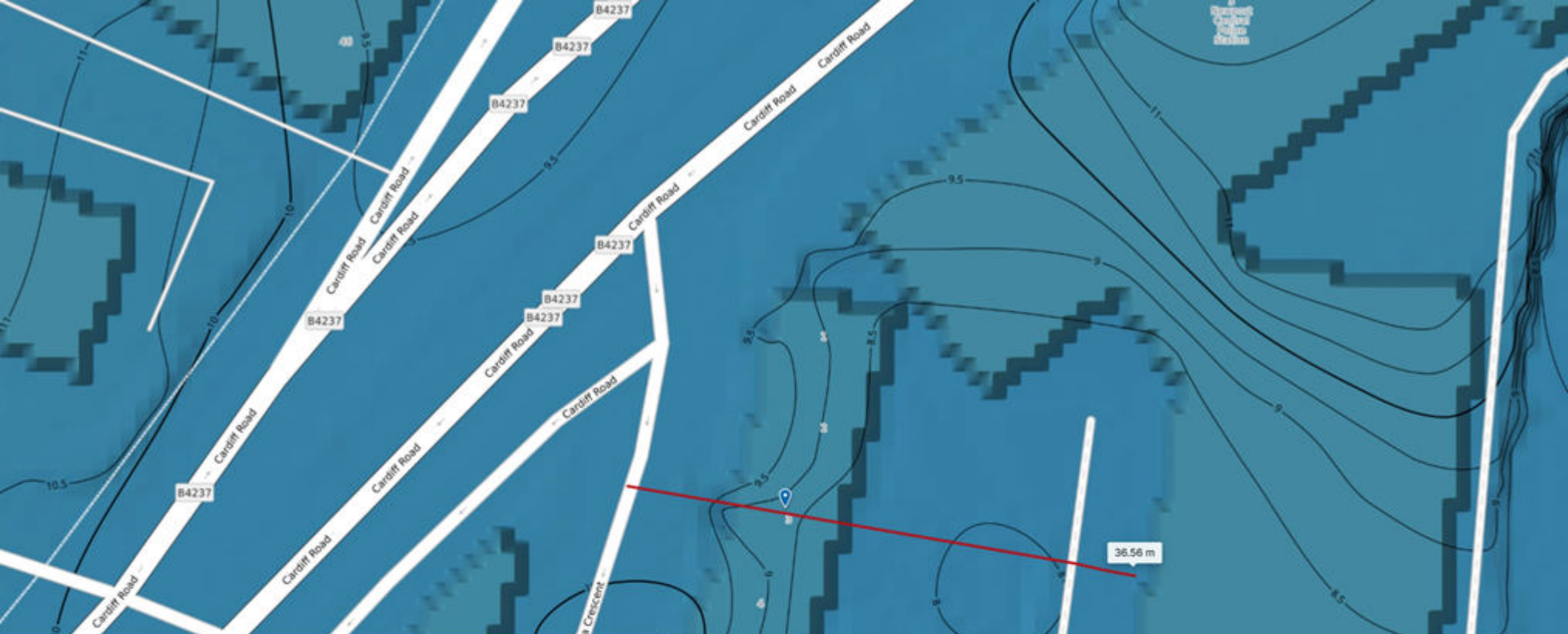
TAN15 Acceptability Criteria		
Criteria	Comments	Met?
No increase in flooding elsewhere	The development does not increase built footprint or alter site levels. No displacement of floodwater or loss of storage is anticipated.	✓
Occupiers aware of flood risk	A Flood Action Plan will be developed for all occupants, outlining risk awareness, emergency contacts, and response actions.	✓
Escape/evacuation routes present	Safe egress is possible via Clytha Crescent to Kingsway and Cardiff Road, which are typically flood-free in extreme tidal events.	✓
Flood emergency plans and procedures agreed and in place	A site-specific Flood Action Plan will be implemented, including trigger thresholds, notification procedures, and safe locations.	✓
Flood resistant and resilient design	The lower ground floor will be converted to non-sleeping use and fitted with resilient finishes. No sleeping accommodation is proposed below the 1 in 200 yr flood level.	✓
Acceptable consequences for type of use	Although classified as highly vulnerable, the layout avoids sleeping uses at flood risk and meets TAN15 tolerances for flood depth and velocity.	✓
Minimal risk to life	Sleeping areas are relocated above anticipated flood levels. Early warning systems and planned egress further reduce risk.	✓
Minimal disruption to people	The development does not increase the number of occupants and includes mitigation measures that minimise flood disruption.	✓
Minimal potential damage to property	Flood resilient materials and avoidance of critical infrastructure on the lower ground floor reduce the likelihood of property damage.	✓
Minimal potential damage to property	Flood resilient materials and avoidance of critical infrastructure on the lower ground floor reduce the likelihood of property damage.	✓
Minimal impact on flood risk generally	No impact on existing flood flows or volumes is expected. Surface water pathways remain unchanged.	✓
Minimal disruption to sustainable management of natural resources	The proposal involves reuse of existing urban fabric without affecting natural floodplains, watercourses, or ecological receptors.	✓

7 Conclusions

- 7.1.1 The proposed development at 3 Clytha Crescent, Newport involves the change of use of an existing flat to a House in Multiple Occupation (HMO). The site lies within Flood Zone 3 (Tidal) as defined by the TAN15 (2024) Flood Map for Planning. While this indicates a high probability of flooding, the development has been carefully designed to reduce vulnerability by removing sleeping accommodation from the lower ground floor and incorporating flood resilience measures.
- 7.1.2 A detailed assessment of flood risks has been undertaken using topographic data, flood zone mapping, and policy guidance. The site is not located within a TAN15 Defended Zone and has no history of flooding. However, residual tidal risk remains and has been appropriately addressed.
- 7.1.3 The proposal satisfies the Justification Test and all relevant TAN15 (2024) Acceptability Criteria. Mitigation measures, including the implementation of a Flood Action Plan and use of flood-resilient design in the lower ground floor, ensure that the consequences of flooding can be safely managed.
- 7.1.4 It is concluded that the development is acceptable in flood risk terms and aligns with the policy aims of Planning Policy Wales and TAN15. Subject to the identified mitigation being implemented, the site is considered suitable for the proposed change of use.

Appendix A. Site Location Plan

Appendix B. Site Topography and LiDAR Cross-Section



Legend

- Contours: Contours, 50 cm
- Elevation: Terrain (0 m to 500 m)
- Terrain/Buildings: (0 m to 500 m)
- Topographic Map: Outdoor

Location: 331277.4, 187374.3
 Scale: 1:380

Appendix C. Flood Map for Planning Extract

Flood Map for Planning - Detail
3 Clytha Crescent

Legend

TAN15 Defended Zones

Rivers

Sea

Rivers and Sea

Rivers

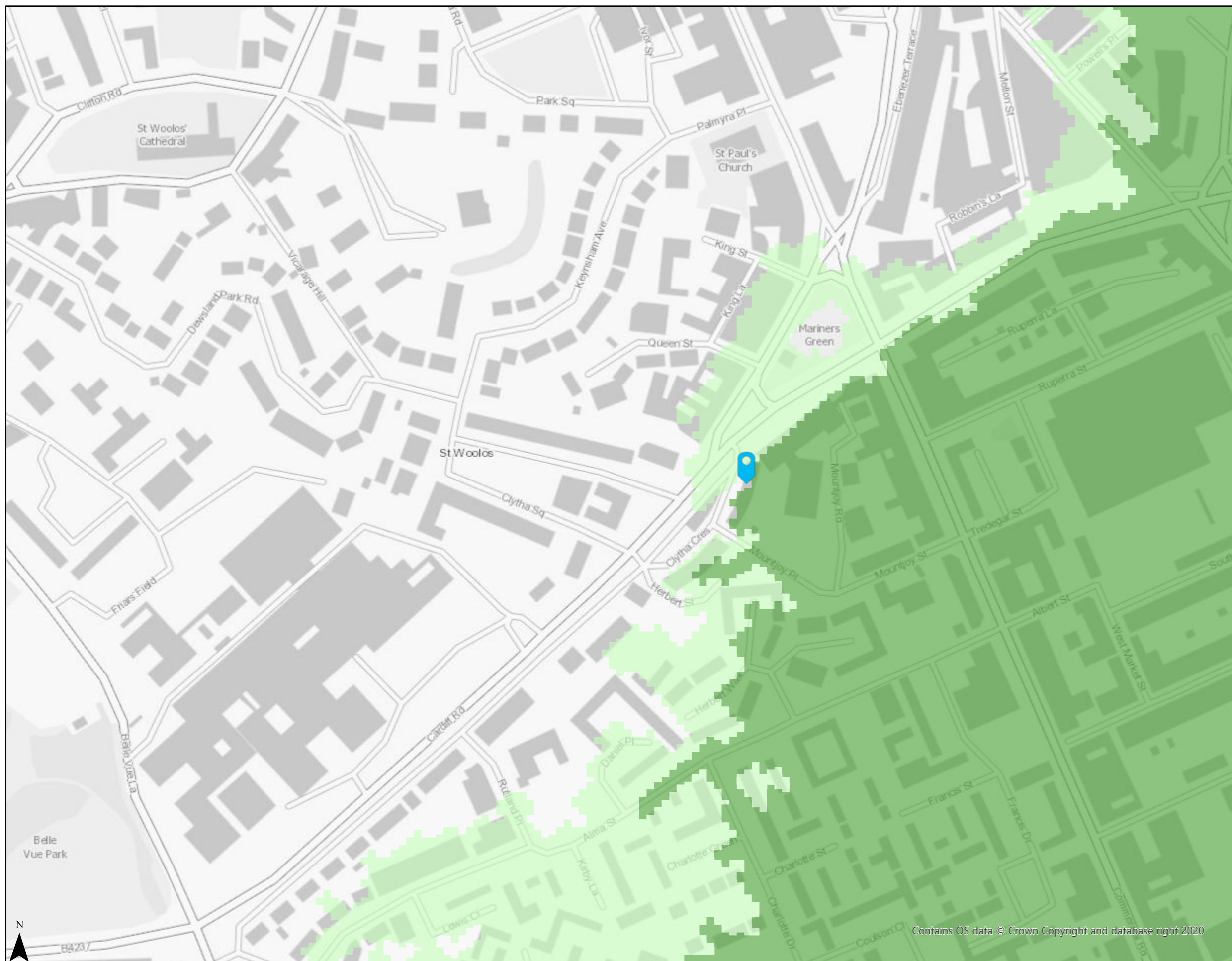
Flood Zone 3

Flood Zone 2

Sea

Flood Zone 3

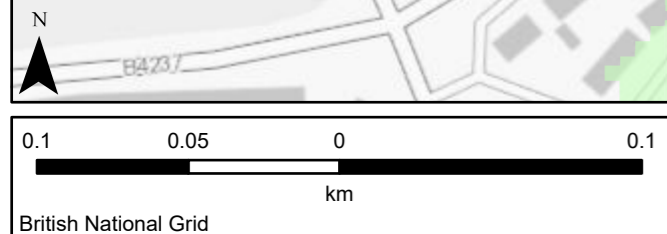
Flood Zone 2



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Scale at A3: 1:2,500

Date: 18/04/2025



Disclaimer

<https://naturalresources.wales/flooding/disclaimer-for-our-flood-and-coastal-erosion-risk-maps/?lang=en>

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Appendix D. Pillgwenlly Ward Extract from Newport LFRMS

6.4.12 Pillgwenlly

Pillgwenlly ward is situated in the central part of Newport City Council, to the immediate south of Central Newport. It has a population of 8,1161 and an area of 6.43 km², which is approximately 3.4% of the total area of Newport. The ward is flat and contains industrial, commercial and some residential properties. The main River Ebbw flows along the boundary of the ward, to the south-west and the River Usk to the east.

The majority of the reported flood risk incidents in Pillgwenlly are clustered towards the north of the ward following major highways, such as Usk Way (A4042) which experienced a storm pumping station issue and Commercial Road. However more sparsely located incidents did occur throughout the ward on more minor routes such as Temple Street, Carlisle Street and Lime Close. The surface water flood maps show isolated areas of low risk flooding with a few small areas of high-risk flooding. The main areas of properties affected is in the north of the ward in the vicinity of the Enterprise Park and is low risk only. The proposed actions by Newport City Council include investigation of highway flooding alongside replacement of damaged pipework and review of maintenance schedules.

Newport City Council have recently undertaken works to clear the culvert under West Way Road and contacted the riparian landowners in the area to undertake clearance of watercourses to alleviate flooding at the rear of Mendalgief Road. During 2023/24 a CCTV survey, desilting and relining works have been carried out to the storm line at Usk Way/Dolphin Street.

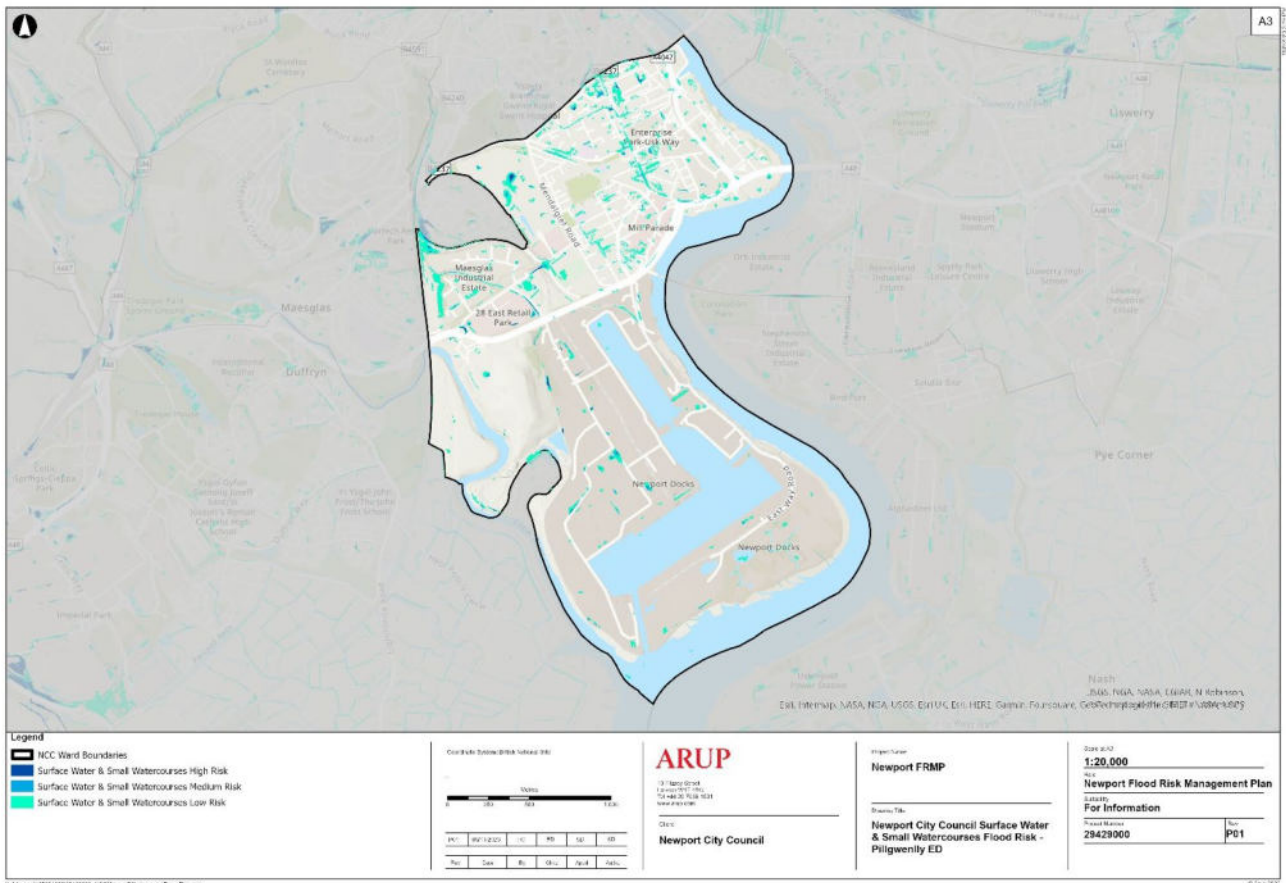


Figure 21 Pillgwenlly surface water flood risk

Appendix E. Draft Flood Action Plan

Flood Action Plan – 3 Clytha Crescent, Newport

Purpose: This Flood Action Plan outlines the actions to be taken by residents of 3 Clytha Crescent in the event of a flood warning. The aim is to reduce risk to life, damage to property, and disruption to services.

1. Flood Risk Summary

- ▶ The site lies within Flood Zone 3 (Tidal) and is at risk from extreme tidal events.
- ▶ The lower ground floor is most vulnerable to flooding.
- ▶ There are no formal flood defences protecting the site directly.

2. Key Flood Warning Services

- ▶ As of the time of writing, the site is not located within an active NRW Flood Warning Area.
- ▶ Residents are still encouraged to register for nearby alerts via Floodline Warnings Direct (0345 988 1188 or www.gov.uk/sign-up-for-flood-warnings) and to monitor local conditions.
- ▶ In the event of an official alert or observed high water levels, residents should implement precautionary actions as detailed below.

3. Site Contacts and Responsibilities

- ▶ Occupiers are responsible for monitoring flood alerts and taking action.
- ▶ The owner/landlord must provide residents with a copy of this plan and ensure contact details are kept up to date.

4. Alert Levels and Actions

Alert Type	What It Means	Resident Actions
Flood Alert	Flooding is possible – be prepared	Monitor NRW alerts, check flood kit, review plan
Flood Warning	Flooding is expected – act now	Move belongings to upper floor, turn off gas/electricity, prepare to evacuate
Severe Flood Warning	Danger to life	Evacuate immediately if advised, follow emergency services instructions

5. Emergency Kit Recommended items:

- ▶ Mobile phone + charger
- ▶ Torch and batteries
- ▶ Warm clothing and blankets
- ▶ Water and non-perishable food
- ▶ Insurance documents and ID
- ▶ Medication and hygiene items

6. Evacuation and Safe Route

- ▶ Primary egress: via Clytha Crescent to Kingsway (A4042), then west to Cardiff Road.
- ▶ Nearest high ground: Cardiff Road and surrounding commercial areas.
- ▶ Emergency services: Royal Gwent Hospital and local police/fire services within 0.5 miles.

7. After the Flood

- ▶ Do not enter flooded rooms until electrics are checked.
- ▶ Inform insurance provider and take photos of damage.
- ▶ Ventilate and clean affected areas to prevent mould growth.

8. Plan Maintenance

- ▶ This plan should be reviewed annually and after any flood event.
- ▶ Updates to contact details or procedures should be logged immediately.

This draft Flood Action Plan can be tailored further following consultation with residents, emergency planning officers, or as part of building management procedures

Appendix F. Welsh Water Sewer Plans

