

FLOOD CONSEQUENCES STATEMENT

36 High Street, Newport

Change of use and conversion to provide five residential apartments with retained commercial accommodation

Client	Document ref	Revision / status	Date
Paresh Patel	10114-BBS-ZZ-ZZ-RP-A-0002	P.01 — S3 Suitable for Review & Comment	July 2026

Coral text denotes information to be confirmed or inserted prior to issue.

1.0 Introduction and Purpose

This statement has been prepared by Blackbrick Studio, as project architects, on behalf of Paresh Patel in support of a planning application for the change of use and conversion of 36 High Street, Newport. It responds to feedback from Newport City Council which advised: "The site is within a flood risk zone, please consider flood risk and the need to provide an FCA."

The statement sets out the flood risk context of the site, describes how the proposals have been arranged in direct response to that context, and demonstrates that the consequences of flooding for the proposed development are acceptable when assessed against the framework of Technical Advice Note 15: Development, Flooding and Coastal Erosion (TAN 15, 2025) and Planning Policy Wales (Edition 12).

Given the nature of the proposals — the conversion of an existing city centre building within its existing envelope, with no habitable accommodation below second floor level — it is the applicant's position that this statement addresses the substance of TAN 15 proportionately, and that site-specific hydraulic modelling would not alter its conclusions. Should Natural Resources Wales or the Council nonetheless advise that a formal Flood Consequences Assessment is required to determine the application, the applicant is willing to provide one, and the assessment framework has been prepared in readiness.

2.0 Site and Planning Context

The site comprises 36 High Street, Newport, a five-storey terraced building of traditional construction with a stone principal elevation, located within the commercial core of the city centre. The building extends over basement, ground and four upper floors. The basement (89.72 m²), ground floor (42.35 m²) and first floor (34.67 m²) comprise vacant retail space, with the upper floors also vacant. High Street runs broadly parallel with the tidal River Usk, which lies a short distance to the east of the site.

The principle of the redevelopment and residential conversion of the building has previously been established through the planning history of the site. While every application falls to be determined against current policy, the planning history is a material consideration and demonstrates that the local planning authority has previously found development of this nature at this location to be acceptable.

Structural slab levels are taken from the Blackbrick Studio proposed drawing package and are relative to a site datum of SSL 0.000 m at ground floor level, which sits at approximately street level on High Street. The vertical arrangement of the building is central to the flood risk position and is summarised below.

Level	SSL (site datum)	Proposed use
Basement	-0.850 m	Cycle and refuse storage (non-habitable)
Ground floor	0.000 m	Residential entrance lobby, post lockers, cycle and refuse storage; retained commercial frontage
First floor	+1.916 m	Commercial (33.27 m ²) and shared stair lobby
Second floor	+4.846 m	Residential – studio and one-bedroom apartments
Third floor	+8.646 m	Residential – studio and one-bedroom apartments
Fourth floor	+12.201 m	Residential – two-bedroom apartment

3.0 The Proposals

The proposals comprise the change of use and conversion of the upper floors of the building to provide five residential apartments – a studio and a one-bedroom apartment at each of second and third floors, and a two-bedroom apartment at fourth floor – with commercial floorspace retained at ground and first floor. A dedicated residential entrance is formed from High Street, with communal cycle and refuse storage at ground floor and basement level. Externally, the stonework of the principal elevation is repaired and restored, with new dormers and finishes to match the character of the street.

The works are contained entirely within the existing building envelope. There is no extension of the footprint, no change to external ground levels, no additional impermeable area, and consequently no displacement of floodwater, no loss of floodplain storage and no alteration to flood flow paths. Surface water arrangements are unchanged, with roof drainage continuing to discharge to the existing connections.

4.0 Flood Risk Context

Flood risk for planning purposes in Wales is assessed under TAN 15 (2025), which came into force on 31 March 2025, using the Flood Map for Planning produced by Natural Resources Wales. The principal source of flood risk to Newport city centre is tidal, arising from the Severn Estuary and the tidal River Usk, with a secondary fluvial influence from the Usk catchment. The site's designation on the current Flood Map for Planning is **to be confirmed and appended; the site is anticipated to fall within Zone 3 (Rivers and Sea) on an undefended basis, within the TAN 15 Defended Zone associated with the city centre defences.**

The city centre benefits from formal flood defences along the Usk frontage, and Natural Resources Wales has invested substantially in the river corridor in recent years, completing major flood risk management schemes at Crindau upstream of the city centre (2021) and at Stephenson Street, Lliswerry, on the east bank (2025), the latter designed to accommodate projected sea level rise. Tidal flooding, where it occurs, is forecastable with meaningful lead time and is of limited duration around high water; the site lies within the coverage of the NRW Flood Warning Service for the tidal Usk.

Residential use is classified by TAN 15 as highly vulnerable development. It is precisely for this reason that the scheme locates all residential accommodation at second floor level and above, as set out below.

5.0 Acceptability of Flood Consequences

TAN 15 requires that development is flood-free over its lifetime in the design event – the 1 in 200 annual probability tidal event including an allowance for climate change – and that the consequences of the extreme 1 in 1000 event are acceptable, having regard to depths, velocities and rate of rise within the property and on access routes. The proposals meet these requirements through their arrangement, without reliance on active or mechanical measures.

No habitable accommodation is proposed below second floor level. The lowest residential floor sits at SSL +4.846 m above the ground floor street datum, with further apartments at +8.646 m and +12.201 m. On any realistic relationship between street level on High Street and predicted extreme tidal levels in the Usk at Newport, this places every apartment several metres clear of the design and extreme flood levels – a margin that holds in defended, undefended and defence-breach scenarios alike. The retained commercial accommodation at first floor (+1.916 m) is similarly expected to remain flood-free in the design event, and commercial use is in any case classified as less vulnerable. The only parts of the building which could experience ingress in an extreme or breach event are the ground floor entrance, circulation and storage areas and the basement stores: non-habitable, low-consequence spaces from which recovery is rapid.

The building inherently provides safe refuge. In a forecast tidal event, the primary response is early evacuation along High Street in advance of high water, using the lead time afforded by tidal forecasting and the Flood Warning Service; where evacuation is not undertaken, all apartments remain dry, habitable and accessible via the protected stair for the duration of any event, which for tidal flooding is measured in hours around high water rather than days. Occupants are not placed at risk, and no reliance is placed on emergency services for rescue.

Because the works are contained within the existing envelope, the development is neutral with respect to flood risk elsewhere: no floodwater is displaced, no storage is lost, and the question of compensatory provision does not arise. The scheme in fact delivers betterment, bringing a vacant building back into use with resistance and resilience measures incorporated at its most exposed levels, as set out in Section 6.0.

6.0 Mitigation and Resilience Commitments

The following measures are committed within the proposals and can, if the Council prefers, be secured by condition. At basement and ground floor level, construction and finishes will be water-resistant – dense masonry, cementitious or lime-based finishes, closed-cell insulation and sealed or tiled floors – so that any ingress is of low consequence and reinstatement is rapid. Electrical accessories at these levels will be set a minimum of 600 mm above finished floor level with cabling dropped from above, and all metering, intake and communal services serving the residential accommodation will be located at first floor level or above. Non-return valves will be fitted to below-ground foul and surface water connections, protecting the lower levels from sewer surcharge. Threshold detailing to the residential entrance will be developed to resist overland flow from the highway, with provision for demountable barriers should confirmed levels warrant them.

A Flood Emergency Plan will be prepared for the building, addressing registration with the NRW Flood Warning Service, trigger levels and actions on Flood Alert, Flood Warning and Severe Flood Warning, the evacuation route and assembly point, the safe refuge strategy, isolation of services at lower levels, and management contacts. The Plan will be incorporated into resident induction material and the lease documentation for the commercial unit, and reviewed annually by the management company.

7.0 Proportionality and Conclusion

The purpose of a Flood Consequences Assessment under TAN 15 is to establish whether development can be made flood-free and safe over its lifetime without increasing risk elsewhere. For this scheme, those questions are answered by the fabric and arrangement of the building itself. The conversion introduces no built form into the floodplain; it places every habitable room at least 4.8 m above street level; it retains only non-habitable and less vulnerable uses at the levels theoretically exposed to flooding; and it provides inherent safe refuge supported by tidal forecasting, flood warning coverage and an emergency plan. Site-specific hydraulic modelling would refine the numbers attached to these conclusions; it would not change them. The margin between predicted extreme tidal levels and the lowest residential floor is not one of millimetres to be verified, but of metres, evident from the section of the building.

The applicant therefore respectfully submits that this statement provides a proportionate and sufficient response to the Council's feedback, demonstrating that the consequences of flooding for the proposed development are acceptable and that the aims of TAN 15 and Planning Policy Wales are met. The planning history of the site, in which development of this nature has previously been found acceptable, supports that position as a material consideration. The applicant welcomes conditions securing the resilience measures and Flood Emergency Plan described at Section 6.0, and remains willing to provide a formal Flood Consequences Assessment, with supporting data from Natural Resources Wales, should the Council or NRW advise that one is necessary to determine the application.

Referenced drawings – Blackbrick Studio

Drawing No.	Title
10114-BBS-ZZ-ZZ-DR-A-10100	Proposed Site Plan
10114-BBS-ZZ-ZZ-DR-A-11000	Existing Plans & Elevations
10114-BBS-ZZ-ZZ-DR-A-11099	Proposed Basement Plan
10114-BBS-ZZ-ZZ-DR-A-11100	Proposed Ground Floor Plan
10114-BBS-ZZ-ZZ-DR-A-11101	Proposed First Floor Plan
10114-BBS-ZZ-ZZ-DR-A-11102	Proposed Second Floor Plan
10114-BBS-ZZ-ZZ-DR-A-11103	Proposed Third Floor Plan
10114-BBS-ZZ-ZZ-DR-A-11104	Proposed Fourth Floor Plan
10114-BBS-ZZ-ZZ-DR-A-12100	Proposed Elevations