

**From:** Sule, Daniel (Flood Risk Officer)

**Sent:** Friday, April 17, 2026 16:53

**To:** Burrows, Lydia (Planning Officer) <Lydia.Burrows@newport.gov.uk>

**Cc:** Turner, Joanne (Team Manager - Assets and Planning) >; Jones, Steven (Senior Engineer) >; Davidson, Joanne (East Area Development Manager) >; NCC - Planning <Planning@newport.gov.uk>

**Subject:** Re: Planning Consultation Request for case ref: 25/0325

Prynhawn da/Good Afternoon Lydia,

Thank you for your email and patience.

Please find the comments below.

The review has considered the evolution of the FCA submissions and places particular emphasis on the latest FCA Update dated 25 March 2025 (FCA-03).

### **Site and Proposal**

The proposal relates to the change of use, conversion and extension of a redundant day centre to provide four assisted living flats (Use Class C2). The development is located on previously developed (brownfield) land, with the existing care home remaining operational and unaffected.

### **Flood Risk Context**

The site is located within:

- **Flood Zone 1** (Rivers and Sea), and
- **Flood Zone 3** (Surface Water and Small Watercourses).

There is no recorded history of flooding at the site. The FCA identifies surface water flooding as the principal source of risk, associated with an unnamed ordinary watercourse that is culverted beneath the site.

### **Evolution of the FCA**

Earlier versions of the FCA (FCA-01 and FCA-02) identified the presence of surface water flood risk but relied primarily on qualitative assessment and standard mitigation measures. These versions did not fully quantify flood depths or explicitly assess blockage scenarios.

The FCA Update dated 25-03-25 (FCA-03) represents an improvement and reflects the consequence-based approach required by TAN 15 (2025). In particular, the updated FCA:

- Quantifies surface water flood depths for high, medium and low probability events;
- Explicitly identifies a culvert blockage scenario;
- Uses a precautionary design flood depth of up to 0.9m;
- Provides an option-led mitigation strategy rather than generic advice;
- Considers the vulnerability of future occupants given the assisted living use.

### **Mitigation and Flood Consequences**

The FCA demonstrates that, while surface water flood risk is categorised as High, the consequences are capable of being managed over the lifetime of the development through appropriate mitigation, including:

- Raised finished floor levels where feasible, or alternatively the use of bespoke flood doors capable of resisting flood depths up to 0.9m;
- Flood-resilient construction measures (resilient finishes, raised electrical services, non-return valves, sealed ducts, self-closing airbricks);
- Long-term management measures such as drainage maintenance, flood awareness, and preparation of a Flood Evacuation Management Plan (FEMP).

Safe refuge is available within the existing care home at a higher elevation, and safe access/egress is achievable via Magor Road.

### **Flood Risk Elsewhere**

The proposed increase in footprint is minimal, and the FCA demonstrates that floodwaters would be contained within the site boundary. The development is not expected to increase flood risk elsewhere, in accordance with TAN 15 requirements.

### **Overall Conclusion**

On balance, the FCA Update dated 25-03-25 is considered to:

- Align with the intent and technical requirements of TAN 15 (March 2025);
- Provide an adequate assessment of flood risk based on probability and consequence.
- Demonstrate that residual risks are acceptable, tolerable and manageable for a redevelopment scheme on brownfield land.

It is therefore considered that flood risk does not present an overriding objection to the proposal, subject to the implementation of the mitigation measures identified within the FCA, which could be secured by appropriate planning conditions.

Cofion Cynnes/Kind Regards

**Daniel Sule**

**Swyddog Pergyl Llifogydd / Flood Risk Officer**

Asedau a Cynllunio / Assets & Planning

Seilwaith / Infrastructure

Cyngor Dinas Casnewydd / Newport City Council