



Seven Stiles Avenue, Newport Retail Park– Flood Consequences Assessment

Version 1

Prepared for
Day's Property Holdings
Limited

Date
August 2025

Days Rental

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This report describes work commissioned by ARC Building and Project Management Ltd by an instruction dated 18th June 2025. The Client's representative for the contract was Robin Golder of ARC Building and Project Management Ltd. Hannah Booth of JBA Consulting carried out this work.

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The methodology adopted and the sources of information used by JBA in providing its services are outlined in this Report. The work described in this Report was undertaken between June 2025 and August 2025 and is based on the conditions encountered and the information available during the said period. The scope of this Report and the services are accordingly factually limited by these circumstances.

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1 Introduction

1.1 Terms of Reference

JBA Consulting (JBA) was commissioned by ARC Building and Project Management Ltd to undertake a Flood Consequences Assessment (FCA) to support a planning application for a proposed redevelopment at a site located off Severn Stiles Avenue, Newport.

This FCA assesses and demonstrates the suitability of the proposed development and describes the flood mitigation measures recommended to appropriately manage flooding at the site.

1.2 FCA Requirements

This FCA follows the Welsh Government guidance on development and flood risk set out in the Technical Advice Note 15: Development, Flood Risk and Coastal Erosion (TAN-15). TAN-15 states that:

'The prime objective of a Flood Consequences Assessment is to develop a full appreciation of:

- The risks and consequences of flooding on the development; and
- The risk and consequences (i.e the overall impacts) of the development on flood risk elsewhere.'

To achieve this, the FCA should 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 Summary

The proposed development site is located on land east of Severn Stiles Avenue, Newport as shown in Figure 2-1. The site is approximately 0.19ha in area and comprises previously developed land. The site has lain vacant for a number of years and has partially re-greened over this time period.

The proposed development is bounded to the east by vegetated land, and the Glan Llyn development beyond, to the south of the site is a car dealership, to the west by Severn Stiles Avenue and Newport Retail Park and to the north by commercial development comprising vehicle rental and maintenance, recently approved under planning reference 24/0969 (Section 2.5). The development site forms an extension to this recently approved facility.

Table 2-1 below summarises the key site characteristics.

Table 2-1 Site Summary

Site name	Severn Stiles Avenue
Site Area	0.19ha
Existing land use	Brownfield land
Purpose of Development	Car parking
OS NGR	ST 34800 86868
Local Planning Authorities	Newport City Council
Lead Local Flood Authority	Newport City Council



Figure 2-1 Site Overview

2.2 Site Topography

A topographic survey was undertaken by Zenith Land Surveys Ltd in July 2024 and is contained in Appendix A.

The site is predominantly flat with raised areas of rubble around the outside of the site as a result of previously undertaken works. Levels around the site generally range from 6.13mAOD to 6.40mAOD.

2.3 Soils and Geology

According to the British Geological Survey (BGS) Geology of Britain Viewer¹, bedrock at the site is described as Mercia Mudstone Group comprised of mudstone. Superficial deposits are classified as Tidal Flat Deposits comprised of clay and silt.

The Cranfield University Soilscapes² viewer describes the underlying strata as loamy and clayey soils of coastal flats with naturally high groundwater.

¹ <https://www.bgs.ac.uk/map-viewers/bgs-geology-viewer/>

² <https://www.landis.org.uk/soilscapes/index.cfm>

2.4 Watercourses and Flood Defences

The site is located 14m away from an unnamed reen (shown as Unnamed Reen 1 in Figure 2-2). Another unnamed reen (shown as Unnamed Reen 2) is located 264m north of the site. The nearest NRW designated Main Rivers are the Liswerry Pill and the Spyty Pill which are located 560m and 820m respectively from the development site. The River Usk is located approximately 2.1km west of the site.

The site is within the tidal reaches of the River Usk and the Bristol Channel. A series of NRW flood defences serve the eastern bank of the River Usk, providing flood protection to large areas of the city. Most recently (circa 2012) the NRW flood defences were upgraded in the Riverside area, through the Riverside Flood Alleviation Scheme (FAS). The Riverside FAS was designed to account for approximately 50 years of climate change and to be further raised to account for future sea level rise beyond this time if required. The area benefitting from these established flood defences along the River Usk and the location of these defences is shown below in Figure 2-2

The site is also located within the tidal floodplain of the Severn Estuary, which is located approximately 5km to the south of the site. The coastline between Newport and Caldicot is protected by extensive and significant coastal flood defences owned and maintained by NRW.

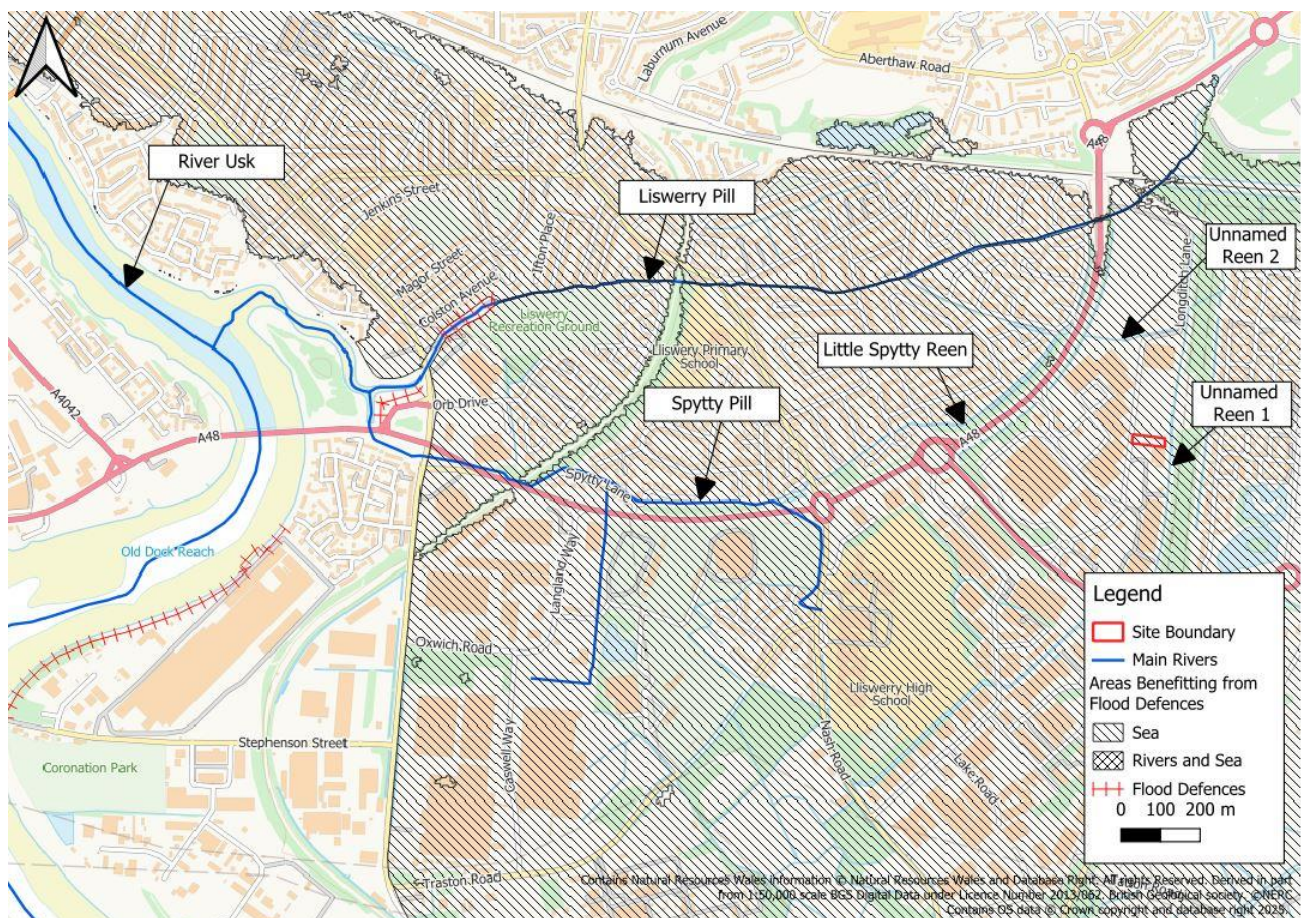


Figure 2-2 Watercourses and Nearby Defences

2.5 Planning History

A previous outline planning application (24/0969) which covered a site to the north of the proposed development site, was approved in April 2025. The scheme was for the re-development of the site for vehicle hire and included the construction of a vehicle maintenance and workshop building, as well as the formation of car parking areas and EV charging points. The layout of the approved scheme is shown in Figure 2-3.



Figure 2-3 Development proposals for the north of the proposed development site

2.6 Development Proposals

Development proposals are for hardstanding for car parking. The development proposals will form an extension to the approved works in the land to the north of the site, as noted in Section 2.5.

An extract of the plans is provided in Figure 2-4 and full plans are contained in Appendix B.

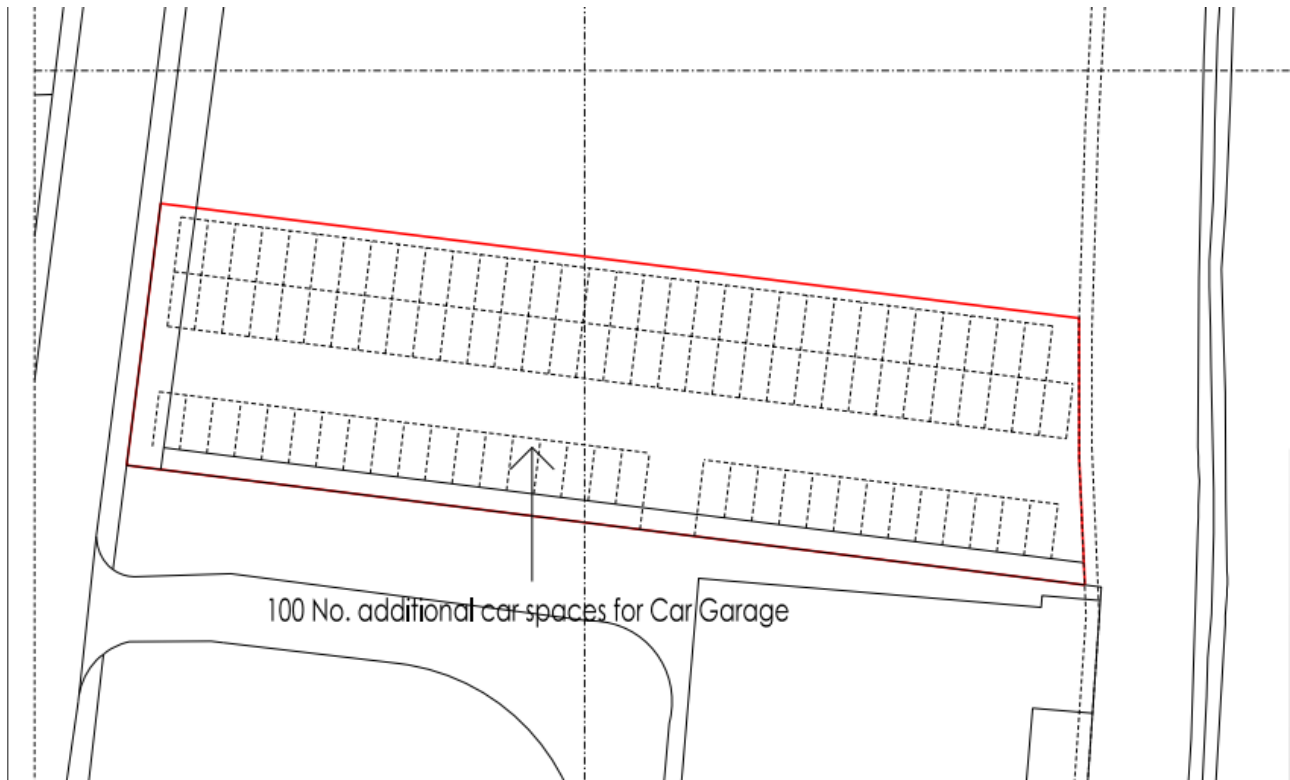


Figure 2-4 Development Proposals

3 Planning Policy and Flood Risk

3.1 Planning Context

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which, together with PPW, provide the national planning policy framework for Wales. These policies aim to make all development in Wales sustainable and improve the social, economic, environmental, and cultural wellbeing of Wales as set out in the Wellbeing of Future Generations Act 2015.

Technical Advice Note 15 (TAN-15), originally introduced by the Welsh Government in 2004 and most recently updated in March 2025, provides technical guidance relating to development planning and flood risk in Wales. TAN-15 provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. The approach set out in the most recent update to TAN-15 ensures flooding and coastal erosion are accorded appropriate consideration in plan making and development management decisions.

3.2 Form of Development

TAN-15 recognises two key forms of development: New development and Redevelopment. The definition of both terms is provided in Table 3-1.

Table 3-1 Form of Development

Form of Development	Definition
New Development	Any development on greenfield land
Redevelopment	Any development on previously developed land, as defined in Planning Policy Wales

The development proposals are for car parking on a previously developed site. As such, the development proposals are classified as **Redevelopment**.

3.3 Vulnerability Classification

TAN-15 assigns one of three flood risk vulnerability classifications to developments, as shown in Table 3-2. The proposed development best aligns with the **Less Vulnerable Development** classification as it is proposed to be used for car parking.

Table 3-2 TAN-15 Vulnerability Classification

Development category	
Highly vulnerable development	All residential premises (including hotels, Gypsy and Traveller sites, caravan parks and camping sites). Schools and childcare establishments, colleges and universities. Hospitals and GP surgeries. Especially vulnerable industrial development (e.g. power generating and distribution elements of power stations, transformers, chemical plants, incinerators), and waste disposal sites. Emergency services, including ambulance stations, fire stations, police stations, command centres, and emergency depots. Buildings used to provide emergency shelter in time of flood.
Less vulnerable development	General industrial, employment, commercial and retail development. Transport and utilities infrastructure. Car parks. Mineral extraction sites and associated processing facilities (excluding waste disposal sites). Public buildings including libraries, community centres and leisure centres (excluding those identified as in Highly Vulnerable category and emergency shelters). Places of worship. Cemeteries. Equipped play areas. Renewable energy generation facilities (excluding hydro generation).
Water Compatible Development	Boatyards, marinas and essential works required at mooring basins. Development associated with canals. Flood defences and management infrastructure. Open spaces (excluding equipped play areas). Hydro renewable energy generation.

3.4 Lifetime of Development

Section 10.28 of TAN-15 advises that "*Generally, it is appropriate to think of new dwellings as having a lifetime of 100 years. Lifetimes for other types of development will vary, but 75 years is considered a reasonable rule of thumb.*"

Therefore, a lifetime of development of at least 75 years has been applied to this assessment.

3.5 Flood Map for Planning Classifications

The Flood Map for Planning (FMfP) is the starting point for the consideration of flood risk in the planning system. The map uses flood zones to indicate the degree to which land is at risk of flooding from rivers, the sea, surface water and small watercourses. The main zones are Flood Zone 1, Flood Zone 2, Flood Zone 3 and the Defended Zone. The FMfP displays predicted future flood risk with an allowance made for climate change.

Proposals for development located partially or wholly in Flood Zone 2 or 3 must be supported by a Flood Consequences Assessment (FCA).

3.5.1 Flood Map for Planning - Rivers

The site is within Flood Zone 1 of the FMfP - Flood risk from Rivers, as shown in Figure 3-1. Flood Zone 1 represents areas that have a less than 0.1% AEP (1 in 1000 year) chance of flooding.

This source of flooding risk is assessed further in Section 0 of the FCA.



Figure 3-1 Flood Map for Planning - Rivers

3.5.2 Flood Map for Planning - Sea

As shown in Figure 3-2, the site is entirely located in the TAN15 Defended Zone for flood risk from the Sea. This indicates areas where flood risk management infrastructure provides a minimum standard of protection against flooding from the sea of 1 in 200 years (plus climate change and freeboard).

This source of flooding risk is assessed in detail in Section 5 of the FCA.



Figure 3-2 Flood Map for Planning - Sea

3.5.3 Flood Map for Planning - Flood Risk from Surface Water and Small Watercourses

Figure 3-3 shows large areas of the site are situated in Flood Zones 2 and 3 of the FMfP for Surface Water and Small Watercourses. Flood Zone 2 indicates areas which have a less than 1% AEP but greater than 0.1% AEP chance of surface water flooding in any given year, including climate change. Flood Zone 3 shows areas with a 1% chance or greater of flooding occurring in any given year, including an allowance for climate change.

This source of flooding risk is assessed further in Section 4.3 of the FCA.

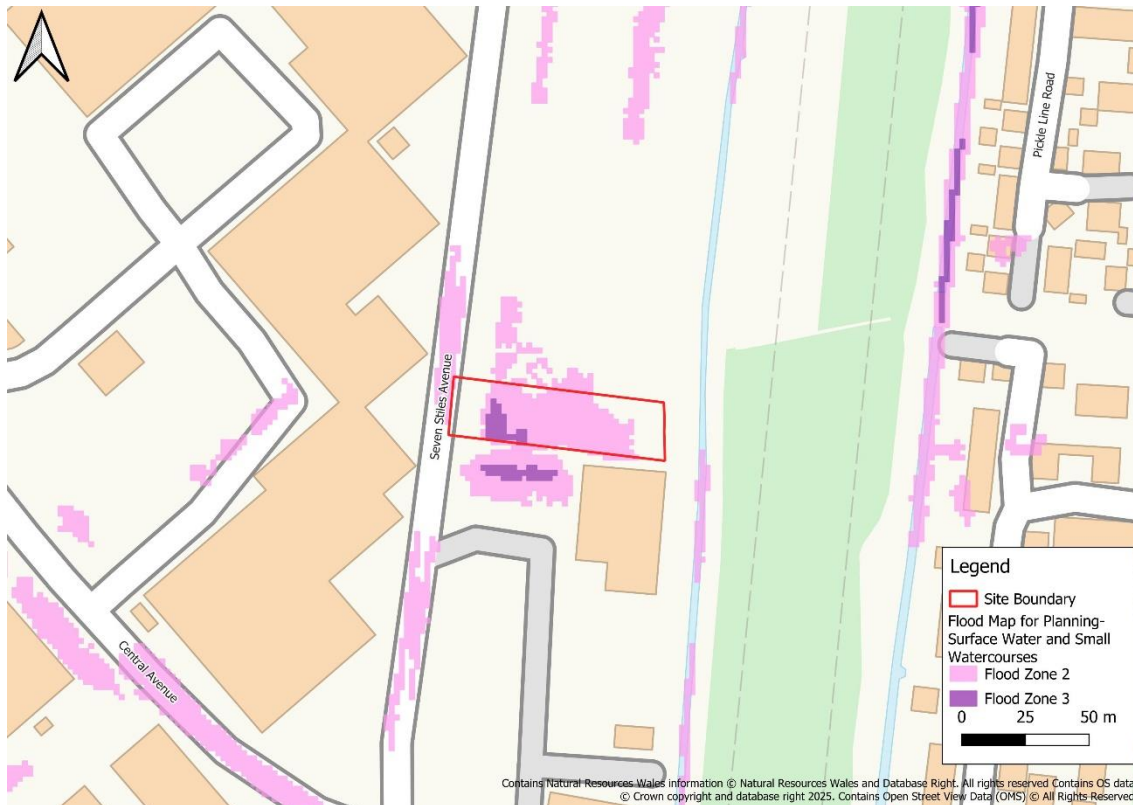


Figure 3-3 FMfP - Flood Risk from Surface Water and Small Watercourses

4 Flood Risk Assessment

This section has been completed using publicly available information only, including the NRW datasets.

Table 4-1 below provides a summary of the flood risk to the site from all sources of risk.

Table 4-1 Summary of Flood Risk

Source of Flooding	Onsite Presence	Description
Flood Risk from Rivers	✗	Very Low- Located in an area at very low risk of river flooding
Flood Risk from the Sea	✓	Refer to Chapter 5 for detailed assessment
Flood Risk from Surface Water and Small Watercourses	✓	Low- The site is at low risk of surface water flooding.
Flood Risk from Groundwater	✗	Low- The site is at low risk of flooding from groundwater.
Flood Risk from Reservoirs	✓	Low- The site is at low risk of flooding from reservoirs.
Flood Risk from Sewers	✗	Low- The site is at low risk of flooding from sewers.

4.1 Historical Flooding

NRW's map of recorded flood extents does not record any historic flooding on the site.

Newport City Council's Preliminary Flood Risk Assessment³ and Flood Risk Management Strategy identified no other historic flooding records at the site.

4.2 Flood Risk from Rivers

Flood risk should be considered for a site with an appropriate consideration for climate change. Within the available NRW datasets, it is considered that the FMfP provides the most up to date assessment of flood risk, with an allowance for climate change included.

As shown in Figure 3-1, the FMfP for Rivers shows that the redevelopment site is at **very low risk** of flooding from these sources (i.e. Flood Zone 1). This means that there is a less than 1 in 1000 (<0.1% AEP) chance of flooding in any given year, including with an allowance with climate change.

Therefore, the risk of flooding is concluded to be **very low**.

³ Newport City Council - Preliminary Flood Risk Assessment (2011). Retrieved from: <https://www.newport.gov.uk/documents/Planning-Documents/Flood-risk/Preliminary-Flood-Risk-Assessment-Report-April-2011.pdf>

4.3 Flood Risk from Surface Water and Small Watercourses

As shown in Figure 3-3, the Flood Map for Planning Surface Water and Small Watercourses mapping shows that large parts of the site are shown to be at risk of flooding (located in Flood Zones 2 and 3).

Surface water flooding on the site occurs as a result of rainfall ponding within the topographic depressions on the site. The areas of raised ground around the edge of the site cause water to be constricted in these areas and is therefore unable to runoff onto the surrounding land. It is currently unknown whether there is any surface water drainage infrastructure on the site.

Given the nature of the site, surface water flooding can be managed through Sustainable Urban Drainage Systems (SuDS), which would need to be designed in line with the statutory standards. A Drainage Statement is required to be submitted with the application, which shall demonstrate how this risk shall be managed on site.

Given the nature of risk on the site and the expectation that it can be managed, this FCA doesn't consider surface water risk further. Consequently it is concluded that the site is at **Very Low** risk of surface water and small watercourse flooding.

4.4 Flood Risk from Groundwater

Groundwater flooding is caused by unusually high groundwater levels. It occurs as excess water emerges at the ground surface or within manmade structures such as basements. Groundwater flooding tends to be more persistent than surface water flooding, in some cases lasting for weeks or months, and can result in damage to property. The risk of groundwater flooding depends on the nature of the geological strata underlying the site and the local topography.

Newport City Council's Local Flood Risk Management Strategy⁴ (FRMP) notes 'groundwater is not considered to be a significant flood risk and is considered to rise and fall relatively slowly'. It has been concluded that the risk of groundwater flooding at the site is **low**.

4.5 Flood Risk from Reservoirs

The NRW FRAW Flood Risk from Reservoir map shows that the site is at **very low risk** from reservoir failure flooding.

4.6 Flood Risk from Sewers

Newport's Preliminary Flood Risk Assessment suggests there is no evidence of historic sewer flooding at the site. The PFRA concluded that flooding from sewers does not have significant consequences at a strategic scale. There is no known sewerage infrastructure crossing the site. It is therefore concluded that the risk of sewer flooding at the site is **low**.

⁴ <https://www.newport.gov.uk/sites/default/files/media/media-documents/Easy%20read%20version%20-%20Newport%20Local%20Flood%20Risk%20Management%20Strategy%20v5.pdf>

5 Detailed Tidal Flood Risk Assessment

As identified in Sections 3.5.2, the predominant source of flood risk to the site is from the sea (tidal). Therefore, to better understand the risk of tidal flooding posed to the site and the potential implications of climate change, further assessment using detailed hydraulic modelling is provided in this section.

5.1 Hydraulic Modelling Availability

The assessment of tidal flood risk has been based on the best available and updated flood modelling of Newport. This is based on version 7.0 of NRW's Newport Tidal Flood Model (June 2020), which was prepared by JBA Consulting for a successful Flood Map Challenge at the time. The version 7.0 model has subsequently been further updated to incorporate several improvements, including:

- Updating design events to align with a base year of 2022;
- Updating the tidal boundary in line with new climate change guidance; and
- Adding in the recently completed Crindau flood defences to the model.

The model was run for a range of climate change epochs based on the central (70th) percentile. These epochs include:

- 2022 - present day scenario
- 2062 - 40-year design life
- 2072 - 50-year design life
- 2082 - 60-year design life
- 2092 - 70-year design life
- 2097 - 75-year design life
- 2102 - 80-year design life
- 2112 - 90-year design life
- 2122 - 100-year design life

As the redevelopment site has a lifetime of development of 75 years, the 2102 results (as the closest to this epoch) have been used to inform the detailed assessment within this report. This would represent a lifetime of development of 77 years, which the structure is unlikely to exceed, and therefore presents a precautionary approach to this FCA. The model has been used unamended from the 2022 update.

5.2 Tidal flood risk results

During the 2102 0.5% AEP tidal flood event, the site remains flood-free, as shown in Figure 5-1.

During the 2102 0.1% AEP event, the site is predicted to flood to shallow depths of up to 0.46m, as shown in Figure 5-2.

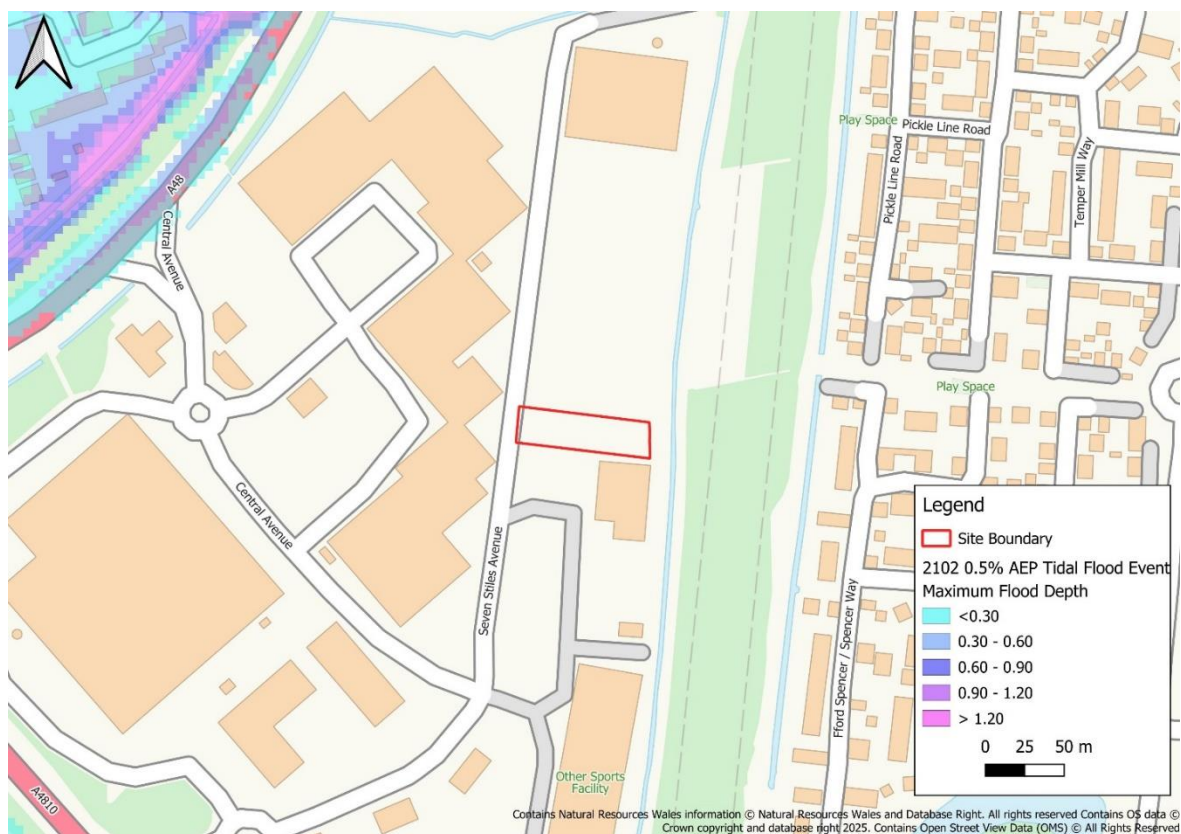


Figure 5-1 Tidal 2102 0.5% AEP scenario- maximum flood depth

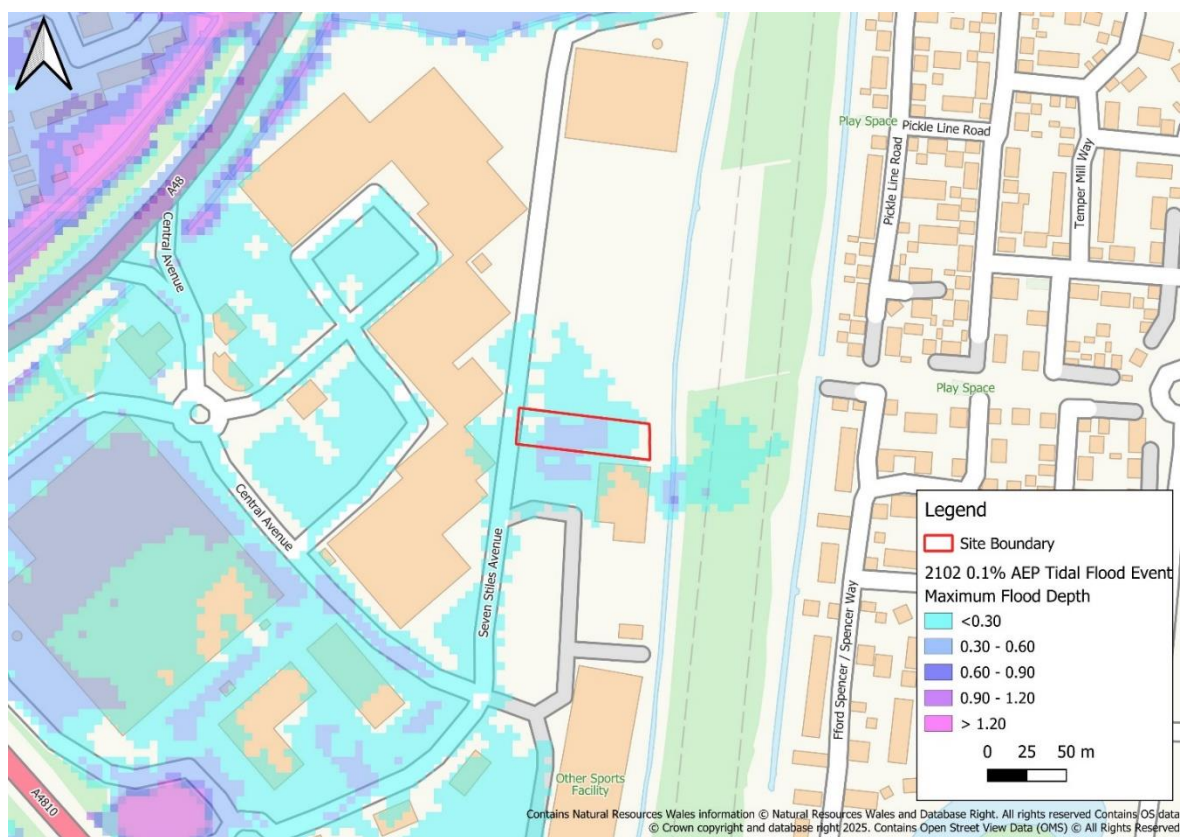


Figure 5-2 Tidal 2102 0.1% AEP scenario - maximum flood depth

6 Flooding and the Plan Led System

6.1 Application of Flood Zones to Development Management Decisions

When considering a site for development, TAN-15 sets out the requirements for the form of development in any given flood zone.

It is understood that the presence of the site within the TAN-15 Defended Zone supplants the sites' location within Flood Zones 3, regardless of the source of risk. For a proposed redevelopment site within a Defended Zone, Section 10.17 of TAN-15 states:

"On brownfield sites redevelopment proposals should not over intensify use neither should they reduce the area's ability to absorb flood water nor cause problems with flooding elsewhere. All applications should consider opportunities to incorporate flood resilient design as appropriate and any proposal involving highly vulnerable development must be compliant with the tolerable conditions set out in section 11".

As noted in Section 2.5, the development proposals are for car parking which will provide an extension to the vehicle hire site to the northern boundary. The development proposals will not result in an over-intensification of development within the wider site, as development is proposed within a predominantly commercial area of Newport, and support existing, approved development in the area.

Provided that the principal of development is justified, development must demonstrate compliance with the acceptability considerations set out within Section 11 of TAN-15. This is demonstrated in Section 6.1.

6.2 Acceptability of Flood Consequences

Whether a development should proceed or not will depend upon whether the consequences of flooding can be safely managed, including its effects on flood risk elsewhere. TAN-15 sets out the key conditions that should be met to demonstrate that development is appropriate for its location.

The site has been assessed against the Acceptability Criteria of Section 11 of TAN-15, as shown in Table 6-1 below.

Table 6-1 Assessment of Acceptability Criteria

TAN-15 Acceptability Criteria	Comments	Achieved
No increase in flooding elsewhere.	The proposed development site will not result in an increase in flooding elsewhere as there will be no built development and no change in ground levels which will displace flood water.	Yes
Occupiers aware of flood risk	The site owners will be provided with information on the risk to the site in the form of this report.	Yes

TAN-15 Acceptability Criteria	Comments	Achieved
Escape/evacuation routes present	The evacuation routes are predicted to be flood free in the 0.5% AEP plus climate change event and flood to shallow depths of less than 300mm in the 0.1% AEP plus climate change event.	Yes
Flood emergency plans and procedures agreed and in place	Access and egress provision remains unchanged from the existing site use. However, a flood response plan may be beneficial to highlight actions to evacuate in the event of the extreme flood event.	Yes
Flood resistant and resilient design	Not required.	Yes
Acceptable consequences for type of use	The site is flood free in the 2102 0.5% AEP event, and floods to depths of less than 600mm in the 2102 0.1% AEP event, as per Figure 5 and 6 of TAN15.	Yes

7 Conclusions

JBA Consulting (JBA) were commissioned by ARC Building and Project Management Ltd to undertake a Flood Consequences Assessment (FCA) to support a planning application for a proposed redevelopment at a site located off Severn Stiles Avenue, Newport.

The proposed development site is located on land east of Severn Stiles Avenue, Newport. The site is 0.19ha and is currently comprised of brownfield land. Development proposals are for the construction of a car parking area, which will provide an extension to the site to the north, which has planning permission (planning application- 24/0969) for the construction of a vehicle hire centre.

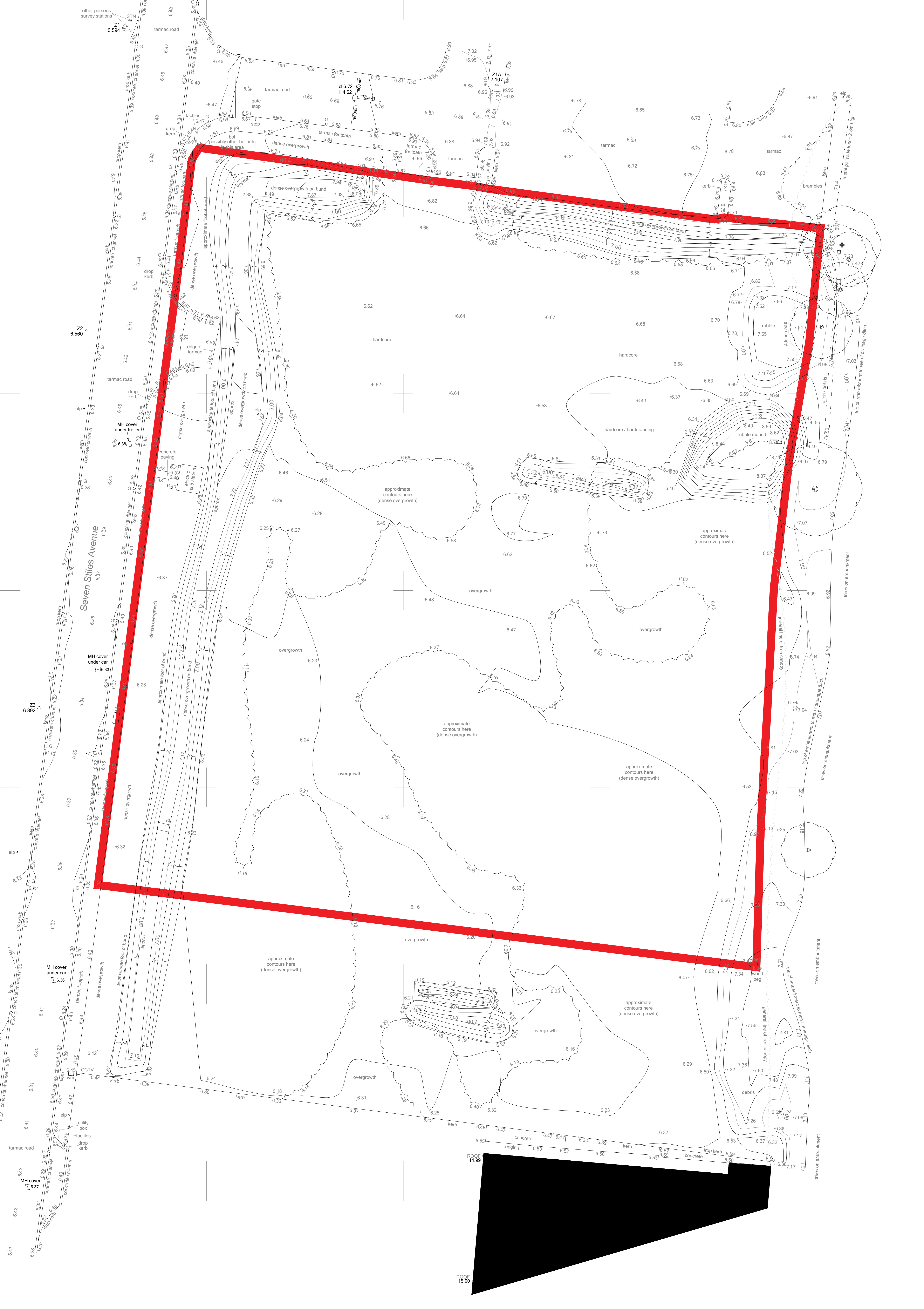
The Flood Map for Planning shows the site to be located within a TAN15 Defended Zone for the Sea and Flood Zones 2 and 3 of the Flood Map for Planning for Surface Water and Small Watercourses.

The site is at low to very low risk of groundwater, sewer and reservoir. Given the nature of surface water flooding on the site, it is expected that this can be managed through the use of SuDS features, and therefore the risk of flooding is very low.

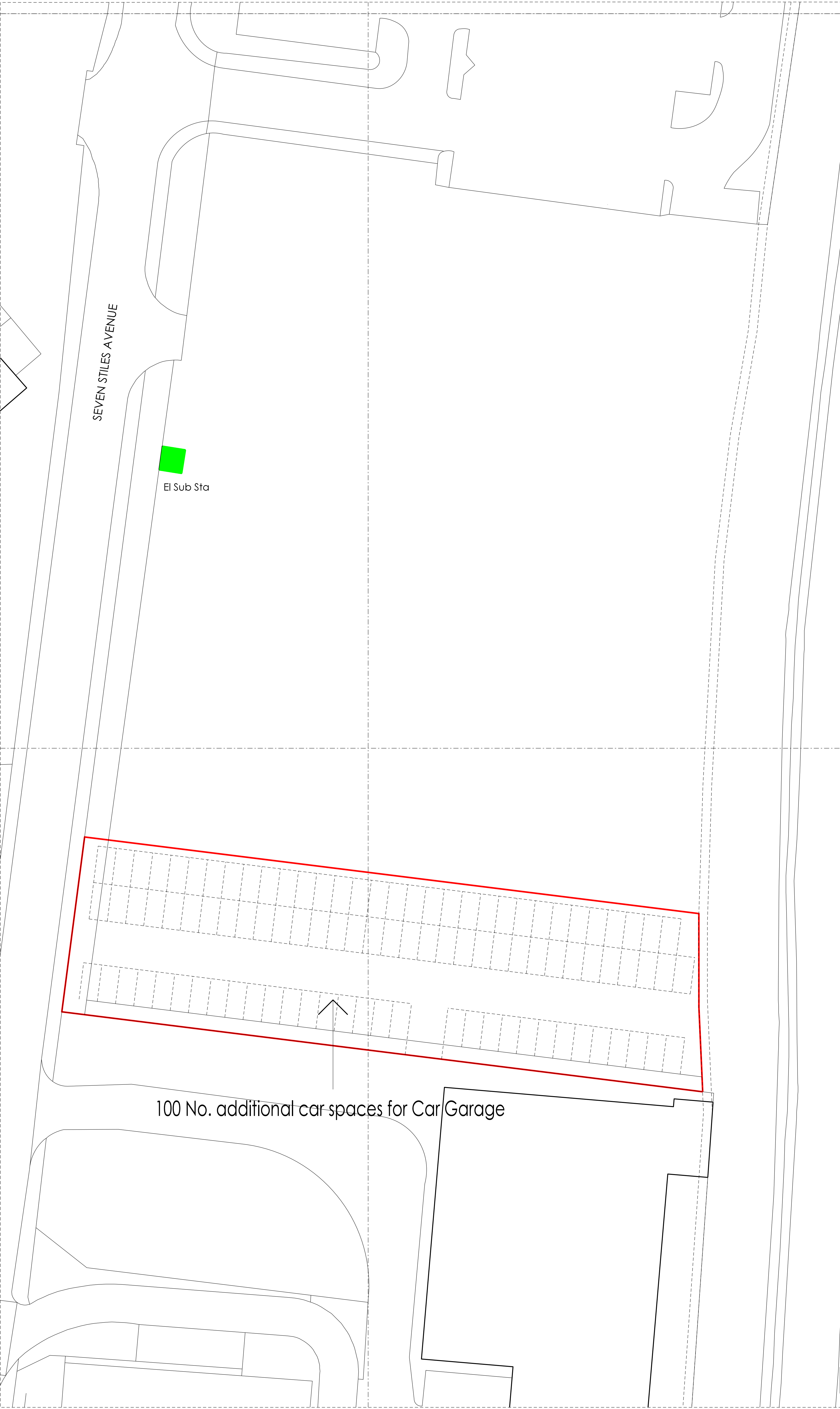
A review of JBA's Newport Tidal Flood Model updated in 2022 showed that proposed development site is predicted to remain flood-free during both the 2102 0.5% AEP and is predicted to flood to very shallow depths in the 2102 0.1% AEP events.

The FCA has demonstrated that all aspects of the Acceptability Criteria set out in TAN-15 have been satisfied. Consequently, we conclude that on the grounds of flood risk, the proposed development meets the requirements set out in TAN-15 and the aims of Planning Policy Wales.

A Topographic Survey



B Development Plans



El Sub Sta

SEVEN STILES AVENUE

100 No. additional car spaces for Car Garage

Construction (Design and Management) Regulations

Design risk assessments are carried out throughout the design stage of this project. In accordance with the company procedures and best practice, where reasonably practicable, all risks of the work due to the design have been identified and then eliminated, mitigated or control for action. However, some risks specific to this design may remain and are to be taken into consideration when developing their strategy or controlling work on the ground. Note that general risks of which a competent designer or contractor should be aware are not included. The drawing is to be read in conjunction with the safety plan and all related documents prepared in accordance with current Construction (Design and Management) Regulations and all subsequent amendments.

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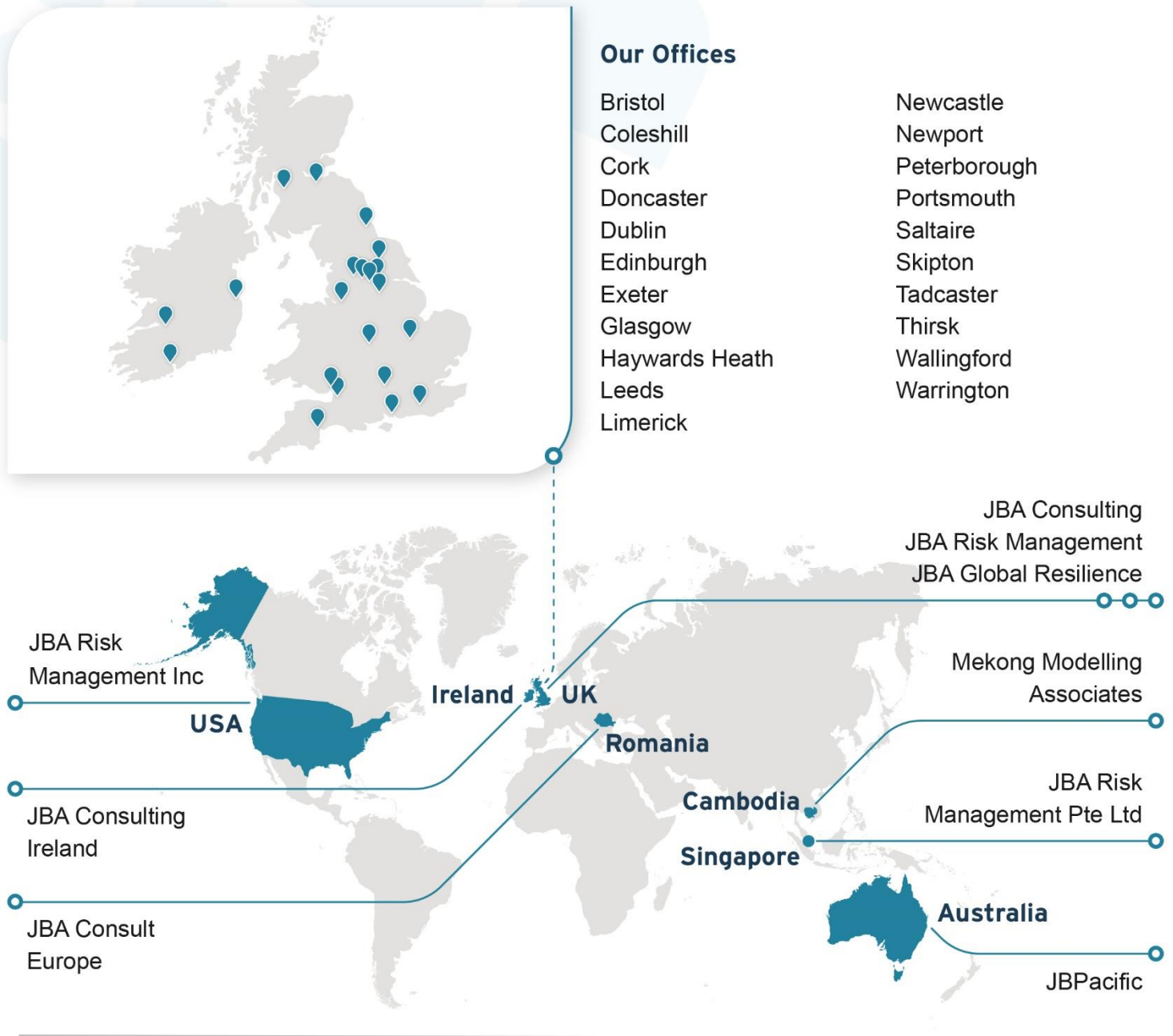
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