



## **FLOOD CONSEQUENCES ASSESSMENT**

Proposal: Conversion of a former non-residential institution to a five-person House in Multiple Occupation within Use Class C4, including the provision of an external bin-storage platform

Site: 35 St Mary Street, Newport, NP20 4DF

Planning application reference: 26/0540

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# 1. Introduction

## 1.1 Purpose

This Flood Consequences Assessment has been prepared on behalf of the applicant in support of planning application 26/0540 for the conversion of the former St Mary Street Sunday School to a five-person House in Multiple Occupation.

Newport City Council issued a notice of non-validation dated 21 July 2026. The notice states that the site is within a surface-water and small-watercourse flood zone and requests consideration of flood risk and the submission of a Flood Consequences Assessment.

This assessment has therefore been prepared to:

- identify the relevant sources of flood risk;
  - consider the vulnerability of the proposed residential use;
  - assess the implications of the proposed basement bedroom;
  - consider access, escape and internal refuge;
  - establish whether the development would increase flood risk elsewhere;
  - identify proportionate resistance and resilience measures;
  - consider the requirement for Sustainable Drainage Approving Body approval; and
  - demonstrate how the consequences of flooding would be managed.
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# 2. Scope and Status of the Assessment

## 2.1 Proportionate assessment

The proposal principally comprises the change of use and internal reconfiguration of an existing building. It does not involve the construction of a new residential building, a substantive extension or a material increase in the established building footprint.

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The only external construction is limited to a timber platform adjacent to the rear doorway for the storage of refuse and recycling containers.

The assessment is therefore proportionate to:

- the continued use of an existing building;
- the absence of a material increase in building footprint;
- the limited extent of external works; and
- the identified surface-water and small-watercourse source of flood risk.

## **2.2 Available evidence**

The following matters are established:

- the site is identified by Newport City Council as being close to a surface-water and small-watercourse flood zone 2;
- the development is a change of use to a five-person HMO;
- one bedroom is located at basement level;
- the basement has rear-facing openings and access to the rear garden;
- the building footprint would not materially increase;
- the rear garden would be retained;
- the external bin-storage platform would occupy a limited area; and
- no off-street parking or extensive new hard surfacing is proposed.

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## **3. Site Description and Surrounding Context**

### **3.1 Existing building**

The existing building is positioned directly adjacent to the pavement and has no front curtilage. An enclosed garden is located to the rear.

The site is previously developed and already contains:

- the established building footprint;
- the existing roof area;
- the existing basement;
- the existing front pedestrian access; and
- the rear garden.

The proposal does not include excavation for a new basement.

### **3.2 Surrounding uses**

The surrounding area contains a mixture of residential, community and institutional uses. The adjoining boxing club is separate from the application property.

The site is within the established urban area and is not an undeveloped greenfield site.

### **3.3 External works**

Refuse and recycling bins would be stored on a small timber platform within the rear garden, close to the rear doorway.

The platform is not intended to form:

- a building extension;
- an enclosed bin-store structure;
- a concrete hardstanding;
- a vehicle parking area; or
- a substantial impermeable surface.

For the purposes of this assessment, the platform should be formed using open-jointed timber decking or a similarly permeable construction placed over the retained garden surface.

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## **4. Planning Policy and Flood-Risk Framework**

### **4.1 Planning Policy Wales**

Planning Policy Wales establishes a precautionary approach to flooding and requires planning decisions to consider the effects of climate change, the vulnerability of the proposed use and the consequences of flooding for people and property.

Development should not increase flood risk elsewhere and should incorporate suitable resistance, resilience and drainage measures where required (Welsh Government, 2024).

### **4.2 Technical Advice Note 15**

Technical Advice Note 15: Development, Flooding and Coastal Erosion provides the principal national planning guidance for development affected by flooding in Wales.

TAN 15 requires consideration of:

- the source and probability of flooding;
- the vulnerability of the proposed development;
- the consequences for occupants and property;
- access and escape;
- flood resistance and resilience;
- climate change;
- flood risk elsewhere; and
- residual risk.

The current TAN 15 is a material consideration when determining applications affected by river, sea, surface-water or small-watercourse flooding (Welsh Government, 2026).

### **4.3 Flood Map for Planning**

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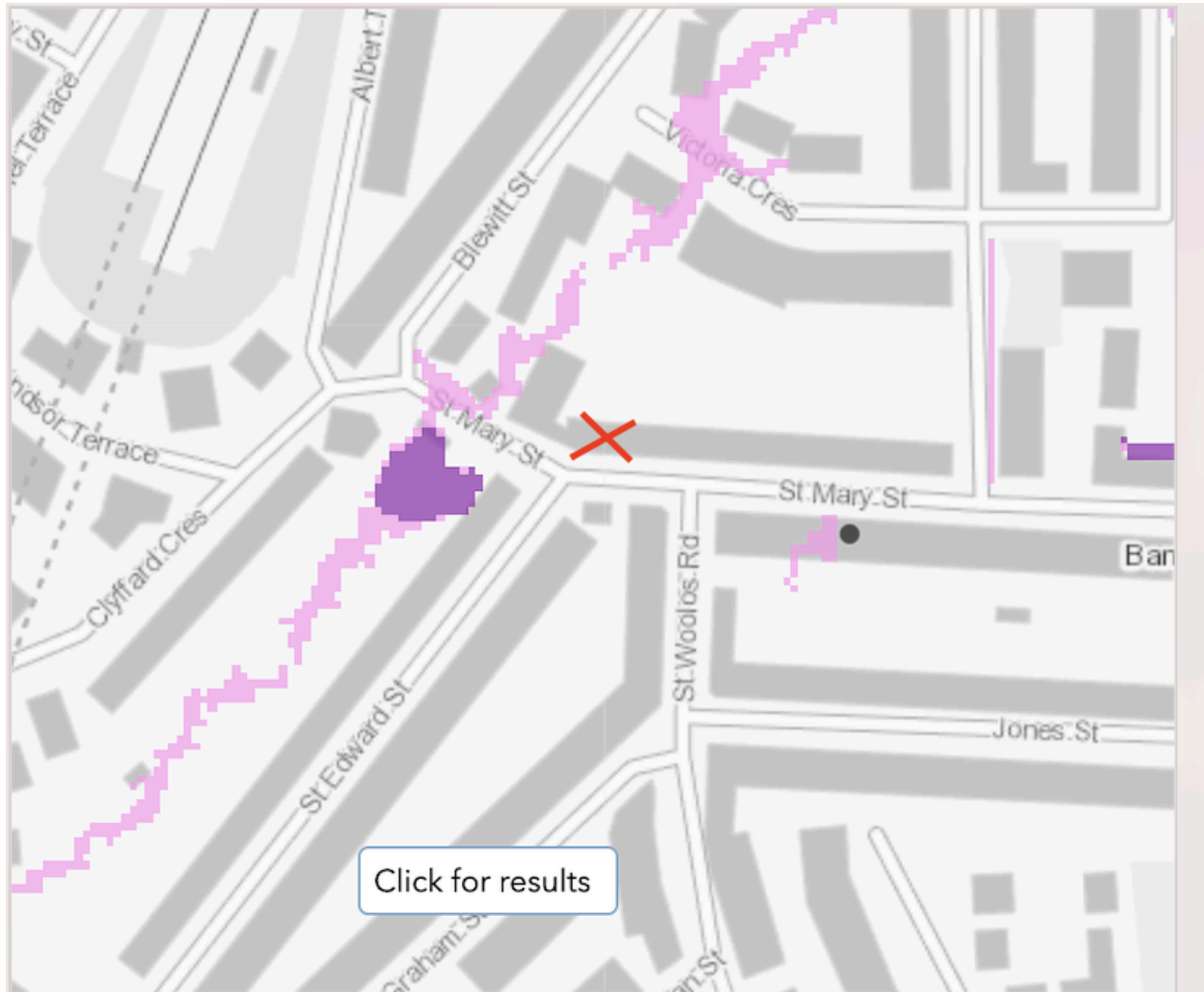
The Flood Map for Planning is the appropriate screening map for planning applications in Wales. It incorporates the anticipated effects of climate change and indicates where more detailed site-specific assessment may be needed.

The map includes separate layers for flooding from:

- rivers;
- the sea;
- surface water and small watercourses;
- defended areas; and
- recorded flood extents.

Natural Resources Wales describes the map as the best available national information for planning purposes and as a screening framework for site-specific FCAs (Natural Resources Wales, 2026a).

Surface Water and Small Watercourses Flood Zone 2 identifies land with an annual probability of flooding between 0.1 per cent and 1 per cent, including climate change. The application site is outside the area subject to flooding according to the map below.



## 5. Development Vulnerability

The proposal would introduce residential occupation into an existing building rather than construct a new dwelling on undeveloped land. This distinction limits the physical effect of the proposal on flood storage and overland flow.

Nevertheless, the change of use increases the sensitivity of the building because:

- residents would occupy it overnight;
- one occupant would sleep at basement level; and
- the building may need to provide internal refuge during an extreme surface-water event.

The principal planning consideration is therefore the safety of future occupants, particularly the basement resident, rather than any material increase in runoff or flood displacement.

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## **6. Sources of Flood Risk**

### **6.1 Surface water and small watercourses**

The Council has identified surface water and small watercourses as the source requiring consideration. The application site is located in Zone 1 and close to an area within Zone 2.

Surface-water flooding occurs when rainfall cannot infiltrate into the ground or enter the drainage system quickly enough. Water may then pond or flow across roads, pavements, gardens and other land.

Flooding from small watercourses can arise where a minor channel, drain or culvert exceeds capacity or becomes obstructed.

### **6.2 River and tidal flooding**

The invalidity notice does not identify river or tidal flooding as the reason for requesting the FCA.

No new development is proposed within or immediately adjacent to a main river, tidal channel or flood defence.

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### **6.3 Groundwater**

No site-specific evidence has been provided to identify groundwater flooding as a material source of risk.

The proposal does not involve the excavation or formation of a new basement. It would reuse the existing basement accommodation.

Any existing signs of seepage, dampness or water ingress should be investigated and remedied before residential occupation.

### **6.4 Public sewers and drainage infrastructure**

During an intense rainfall event, the capacity of the public drainage network may be exceeded. Blocked or surcharged drainage infrastructure could contribute to localised surface-water flooding.

No alteration to the public sewer network is proposed. Existing gutters, downpipes, gullies and drainage channels serving the site should be inspected and maintained.

### **6.5 Reservoirs and artificial sources**

The supplied documents do not identify a material risk from reservoirs, canals or other artificial sources.

No works are proposed that would alter such infrastructure.

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## **7. Surface-Water and Small-Watercourse Flood Risk**

### **7.1 Existing site relationship**

The flood risk arises from the existing location and levels of the building and surrounding land. The proposal would not create the mapped flood risk.

The building, roof and principal external levels already exist. No material alteration to the building footprint or site topography is proposed.

## **7.2 Potential pathways**

Potential pathways may include:

- overland flow along St Mary Street;
- localised ponding against the front elevation;
- surface water entering the rear garden;
- flow from adjoining land;
- surcharge from local drainage infrastructure; and
- water reaching low-level basement openings.

## **7.3 Potential receptors**

The potential receptors include:

- the basement bedroom;
- the rear basement doorway;
- basement windows and service penetrations;
- communal circulation areas;
- residents using the front entrance;
- the rear garden;
- refuse and recycling containers; and
- adjoining properties.

## **7.4 Consequences**

The principal potential consequences are:

- 
- water entering the basement;
  - damage to finishes, furnishings and electrical systems;
  - an occupant being exposed to floodwater while asleep;
  - loss of the normal external access route;
  - temporary confinement within the building;
  - contamination from surface water or sewer surcharge; and
  - movement of unsecured refuse containers.

These consequences can be reduced through a combination of internal escape, early warning, passive resilience and property-management measures.

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## **8. Basement Bedroom**

### **8.1 Nature of the risk**

The basement bedroom is the most flood-sensitive part of the proposal because it is located below the principal ground-floor accommodation.

If floodwater reached the rear garden or low-level building openings, the basement could be affected before the upper floors.

Surface-water events can develop quickly and may occur at night. The assessment therefore does not rely solely upon an occupant observing external conditions.

### **8.2 Internal escape**

The basement bedroom must maintain a direct and unobstructed internal route to the ground and upper floors.

Before first occupation:

- the route should be clearly identifiable;
- doors along the route should be readily openable from the basement side;
- the staircase should remain free from storage and obstruction;
- emergency lighting should be provided where required by the relevant building and HMO standards; and
- the route should be incorporated into the property fire and emergency management information.

The basement occupant should move internally to a higher floor if water is observed entering the garden or basement, or if a relevant warning indicates an immediate risk.

### **8.3 Flood alarm**

A water-detection alarm should be installed at the lowest practical point adjacent to the most credible entry route.

The alarm should:

- provide an audible warning within the basement bedroom;
- be audible within the communal parts of the building;
- operate independently of the normal mains supply or include battery back-up;
- be tested regularly; and
- be recorded within the HMO management and maintenance schedule.

An alarm is an additional safeguard and does not replace the need for an unobstructed internal escape route.

### **8.4 Basement resistance and resilience**

The following measures should be incorporated where technically appropriate:

- water-resistant or easily replaceable floor finishes;
- low-level wall finishes capable of drying and cleaning;

- 
- electrical sockets positioned above floor level where practicable;
  - sensitive electrical equipment located above the lowest part of the room;
  - sealed service penetrations;
  - inspection and maintenance of rear-door and window seals;
  - suitable non-return protection to low-level drainage connections, where confirmed appropriate by a drainage professional; and
  - storage arrangements that keep important possessions above floor level.

Any flood barrier installed at the rear doorway should be a proprietary product selected with regard to the construction and structural capacity of the existing building.

## **8.5 Occupation management**

At commencement of each tenancy, the basement resident should receive written information explaining:

- that the property is near a mapped surface-water and small-watercourse flood-risk area;
- the internal route to higher floors;
- the operation of the water-detection alarm;
- the location of emergency contact information;
- the instruction not to enter external floodwater; and
- the procedure following any water ingress.

The property manager should maintain current contact details for all residents.

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# **9. Access, Escape and Internal Refuge**

## **9.1 Normal access**

The normal pedestrian entrance is at the front of the property onto St Mary Street.

The basement also has access to the rear garden.

## **9.2 External evacuation**

During surface-water flooding, the safest action may not be immediate external evacuation. Residents should not be directed into floodwater where its depth, velocity or contamination status is unknown.

No person should attempt to walk or drive through visibly flowing floodwater.

Where a safe external route is available before flooding reaches the site, residents may leave in accordance with official advice. Once the adjoining route is affected, residents should move to higher accommodation within the building.

## **9.3 Internal refuge**

The ground and upper floors provide a potential internal refuge above the basement.

The designated refuge arrangement should:

- be accessible to all five residents;
  - be reached without passing through external floodwater;
  - provide access to communication;
  - provide access to drinking water;
  - provide reasonable access to sanitary facilities;
  - remain free from storage or locked barriers; and
  - be identified within the HMO management plan.
- 

# **10. Flood Risk Elsewhere**

## **10.1 Building footprint**

The proposal would not materially increase the footprint, scale or mass of the existing building.

It would therefore not create a substantial new obstruction to overland flow or displace a material volume of floodwater.

## **10.2 Rear garden**

The existing garden would be retained as communal amenity space.

It would not be converted into:

- a parking area;
- an access road;
- a substantial patio;
- an extensive concrete slab; or
- another predominantly impermeable use.

Retention of the garden preserves its existing capacity to intercept and receive rainfall.

## **10.3 Bin-storage platform**

The timber bin platform would occupy a limited area near the rear doorway.

To ensure that the platform does not increase runoff or obstruct floodwater:

- the surface should be open-jointed and permeable;
- all existing permeable ground beneath should be retained;
- no solid concrete base should be formed unless separately assessed;
- the platform should not cover an existing drainage gully;
- the platform should not form a barrier across an overland flow route;
- the containers should be capable of being secured; and
- the structure should be kept clear of accumulated debris.

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Subject to these details, the platform would not result in a material increase in impermeable surface area or surface-water discharge.

## **10.4 Refuse containers**

Bins and recycling containers can become mobile during a flood event and may obstruct drainage infrastructure.

The management arrangements should therefore require:

- containers to remain in the designated area;
- lids to remain closed;
- containers to be restrained during severe weather;
- the area to be kept free of loose waste; and
- containers to be returned promptly after collection.

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# **11. Surface-Water Drainage and SAB Requirements**

## **11.1 Existing drainage position**

No new drainage system is proposed as part of the change of use.

The building would continue to use its established roof-water and drainage arrangements, subject to inspection and maintenance.

The proposal does not include a material increase in roof area or extensive new hard surfacing.

## **11.2 SAB threshold**

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Newport City Council states that developments with a construction area of 100 square metres or more require an approved sustainable drainage system, subject to the relevant statutory requirements and exemptions.

The Council also identifies construction areas below 100 square metres as an exemption from the normal SAB approval requirement (Newport City Council, 2026b).

The proposal comprises:

- change of use of one existing building;
- internal reconfiguration;
- no new dwelling building;
- no substantial extension;
- no new road or parking area; and
- only a small rear timber bin platform.

On the basis of the works described in the application, the proposal does not create a construction area of 100 square metres or more.

Separate SAB approval is therefore not considered to be triggered by the development.

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## **12. Flood Resistance and Resilience**

### **12.1 Objectives**

The objectives of the proposed measures are to:

- reduce the likelihood of shallow water entering the basement;
- provide early warning;
- enable safe movement to higher accommodation;
- reduce damage and recovery time;

- prevent loose materials obstructing drainage; and
- maintain the use of the building following a flood event.

## **12.2 Resistance measures**

The following should be considered before occupation:

- inspection and repair of low-level door and window seals;
- sealing of unnecessary low-level penetrations;
- suitable protection to air bricks where ventilation and building-condition requirements allow;
- a proprietary demountable barrier for the rear basement doorway;
- regular clearance of drainage channels and gullies; and
- secure storage of refuse containers.

Resistance measures should be selected having regard to the construction of the existing building and the potential for hydrostatic loading.

## **12.3 Resilience measures**

The basement should incorporate, where reasonably practicable:

- water-resistant flooring;
- easily cleanable wall finishes;
- raised electrical sockets;
- raised storage;
- accessible utility isolation points;
- removable or replaceable low-level fittings; and
- materials capable of drying without extensive demolition.

## **12.4 Maintenance**

The property manager should maintain a written inspection schedule covering:

- gutters;
  - downpipes;
  - external gullies;
  - drainage channels;
  - doorway seals;
  - basement windows;
  - water alarms;
  - flood barriers;
  - refuse restraints; and
  - emergency information.
- 

## **13. Flood Warning and Management**

### **13.1 Before occupation**

Before first occupation, the property manager should:

- prepare a written flood-action plan;
- install and test the basement water alarm;
- identify the internal refuge area;
- display emergency contact information;
- confirm that the internal staircase is unobstructed;
- inspect external drainage features;
- secure the refuse containers; and
- provide each resident with flood-risk information.

### **13.2 Severe-weather preparation**

When intense rainfall is forecast, the property manager or responsible person should:

- 
- monitor official weather and flood information;
  - inform residents of the potential risk;
  - contact the basement resident;
  - ensure that the internal route to higher floors is clear;
  - secure external refuse containers;
  - clear accessible gullies where it is safe to do so; and
  - deploy any approved demountable barrier before water reaches the property.

Because surface-water flooding can be highly localised, warning systems should be treated as an aid rather than the sole means of protecting occupants.

### **13.3 During flooding**

Residents should:

- leave the basement immediately if water enters or the alarm operates;
- move internally to a higher floor;
- not enter the rear garden where it contains floodwater;
- not use an external route affected by flowing water;
- avoid contact with potentially contaminated water;
- call the emergency services where there is an immediate risk to life; and
- follow official instructions.

### **13.4 After flooding**

The basement should not be reoccupied until:

- floodwater has receded;
- the source of entry has been investigated;
- electrical installations have been checked where affected;
- contaminated finishes and contents have been cleaned or removed;
- the room has been dried;
- the water alarm has been checked; and

- 
- the property manager is satisfied that the accommodation is safe and habitable.
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## 14. Climate Change

The Flood Map for Planning incorporates the anticipated effects of climate change over the next century and shows potential flood extents on the assumption that relevant defences are not present (Natural Resources Wales, 2026a).

Climate change is expected to increase the intensity of some rainfall events and may increase pressure upon urban drainage systems.

The proposal responds to that risk by:

- retaining the existing building footprint;
- retaining the permeable rear garden;
- avoiding extensive new hard surfacing;
- providing internal access to higher floors;
- incorporating a water-detection alarm;
- adopting flood-resilient basement finishes;
- securing external refuse containers; and
- establishing a managed response procedure.

## 15. Residual Risk

It is not possible to remove all flood risk from an existing urban property situated near a mapped surface-water and small-watercourse flood-risk area.

Residual risks include:

- rainfall exceeding modelled or drainage-system capacity;
- blockage of gullies or drainage infrastructure;

- 
- water entering through low-level openings;
  - loss of external access;
  - failure of electrical systems;
  - failure or non-deployment of a demountable barrier;
  - localised flooding occurring without a property-specific warning; and
  - an event exceeding the assumptions used in national mapping.

The consequences are reduced by:

- the absence of material new construction;
- access from the basement to higher floors;
- internal refuge;
- early water detection;
- passive flood-resilient construction;
- drainage maintenance;
- restraint of refuse containers; and
- resident and property-management procedures.

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## 16. Conclusions

Newport City Council has identified the site as being close to a surface-water and small-watercourse flood zone 2.

The proposal is a change of use and internal conversion of an existing building. It would not:

- materially enlarge the existing building;
- introduce a substantial new obstruction to overland flow;
- create a large new impermeable area;
- provide new parking or access roads;

- 
- substantially alter site levels; or
  - increase the number of dwellings by constructing a new residential building.

The rear garden would be retained and the limited timber bin-storage platform can be formed using a permeable construction.

The principal flood consequence is associated with the proposed basement bedroom. The risk can be reduced through:

- an unobstructed internal route to higher floors;
- a basement water-detection alarm;
- access to internal refuge;
- flood-resistant and resilient finishes;
- inspection and maintenance of low-level openings;
- restraint of external refuse containers; and
- a managed emergency procedure.
- implementation of the flood-management plan; and
- construction of the bin platform as a permeable structure,
- the proposal would not be expected to materially increase surface-water runoff or flood risk elsewhere.

The limited physical development, retention of permeable garden land and availability of higher-floor refuge provide a basis upon which the proposed change of use can be considered. The residual risk should be assessed by the local planning authority against TAN 15 and any advice provided by its flood-risk officers.

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