

Our Ref: [REDACTED]

Date: 10/04/26

[REDACTED]
[REDACTED]
Hywel Dda University Health Board

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS
Tel: 02920 732 652

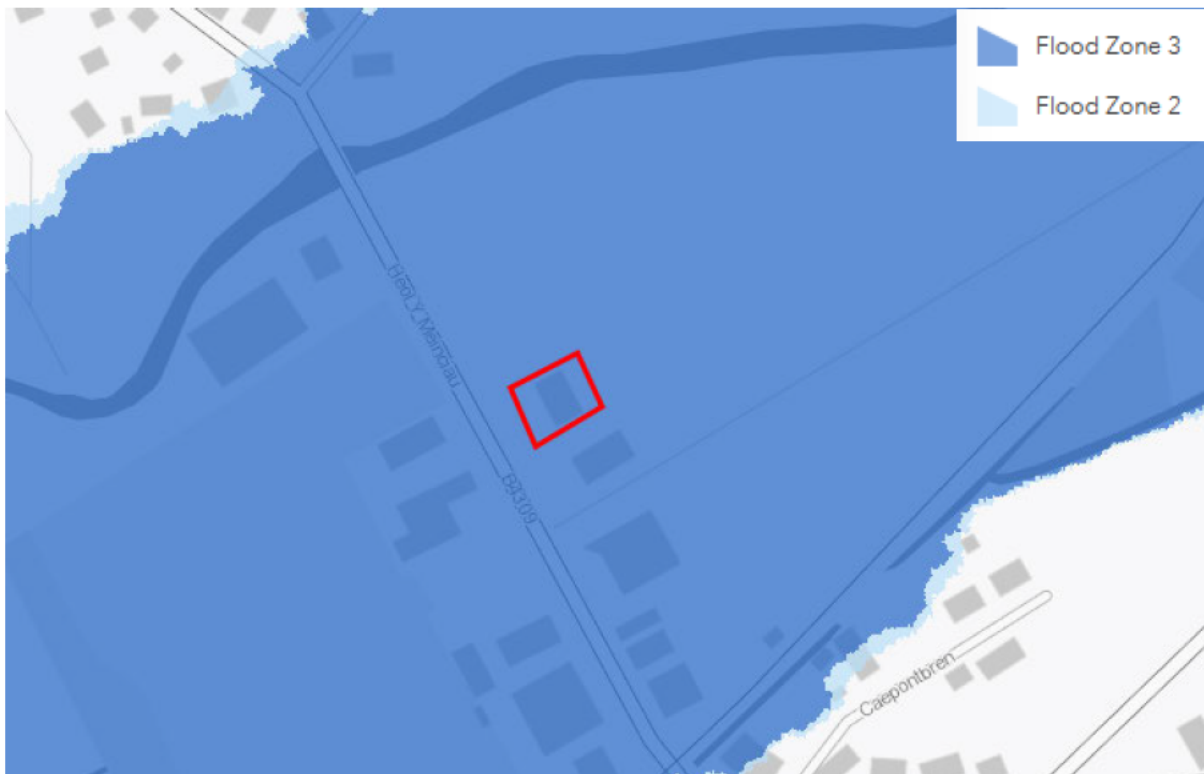
Dear [REDACTED]

Review of Flood Risk at Pontyates Surgery, Llanelli SA15 5TR

This letter provides a desk based review of flood risk affecting the site at Pontyates Surgery, Llanelli SA15 5TR, in accordance with the Technical advice note (TAN) 15: Development, Flooding and Coastal Erosion set out by the Welsh Government as guidance for local planning authorities to reduce flood risk and develop away from high risk areas.

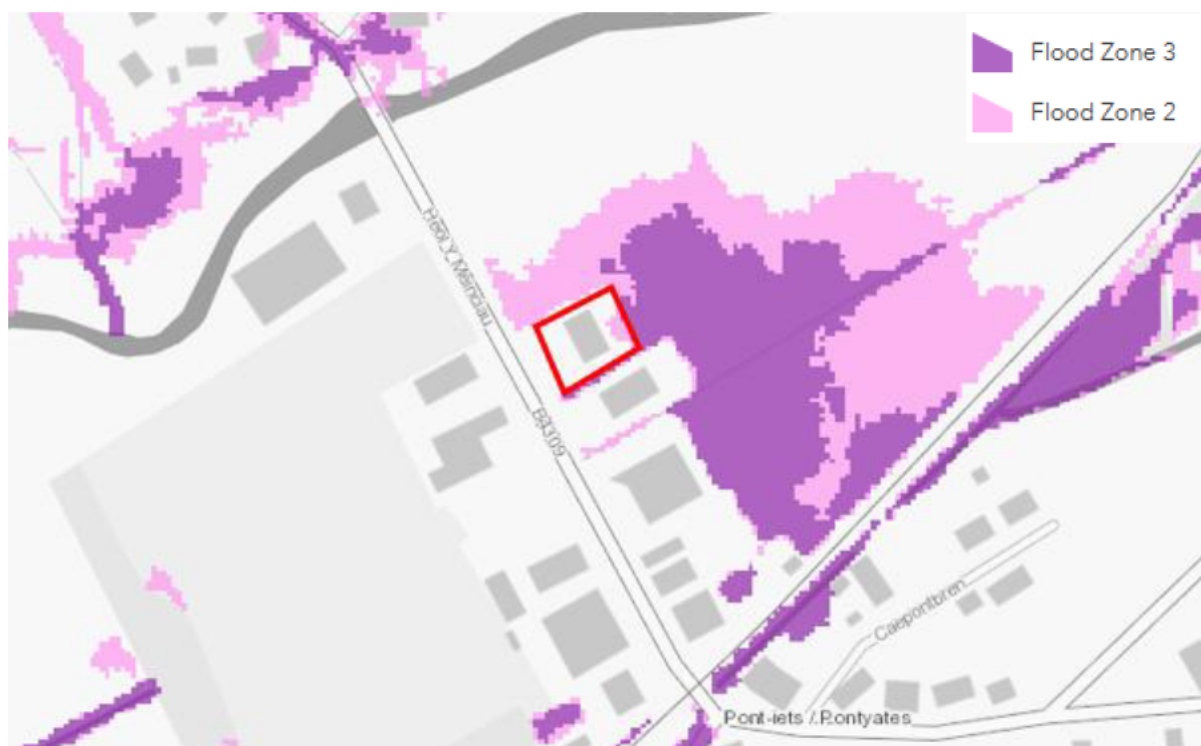
Natural Resources Wales' Flood Map for Planning, adopted under TAN 15: Development, Flooding and Coastal Erosion, provides the most up-to-date information on flood risk and is used to inform planning decisions.

The mapping indicates that the whole portion of the site is susceptible to fluvial flooding, with the whole site falling within Flood Zones 2 and 3. This is likely attributable to the site's proximity to the Gwendraeth Fawr which is considered a main river on the flood map for planning detailed map.



National Resources Wales Flood Map for Planning extract (flooding from rivers and sea)

It is also noted that part of the site is identified as being at risk of surface water flooding (marked pink and purple below), falling within both the higher risk Zone 3 and the lower risk Zone 2.



National Resources Wales Flood Map for Planning extract (flooding from Surface Water and Small Watercourses)

The Flood Map for Planning has the following layers, which show the potential extent of flooding, assuming no defences are in place.

Zone	Flooding from rivers	Flooding from the sea	Flooding from surface water and small watercourses
1	Less than 1 in 1000 (0.1%) (plus climate change) chance of flooding in a given year		
2	Less than 1 in 100 (1%) but greater than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change.	Less than 1 in 200 (0.5%) but greater than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change.	Less than 1 in 100 (1%) but greater than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change.
3	A greater than 1 in 100 (1%) chance of flooding in a given year, including climate change.	A greater than 1 in 200 (0.5%) chance of flooding in a given year, including climate change.	A greater than 1 in 100 (1%) chance of flooding in a given year, including climate change.

TAN 15 states:

“A Flood Consequences Assessment is required for any development proposal located fully or partly in Surface Water and Small Watercourses - Flood Zones 2 and 3”

Any development will therefore require a Flood Consequences Assessment to demonstrate that the risk and potential consequences of flooding can be appropriately managed and are acceptable. Responsibility for assessing the Surface Water Flood risk would lie with the Lead Local Flood Authority rather than Natural Resources Wales, and it will therefore require careful consideration as part of any development proposal.

TAN 15 also identifies the varying vulnerability of different forms of development, indicating that some land uses may be capable of accommodating low-level flooding in an acceptable manner. The table below summarises these vulnerability classifications.

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

“Highly vulnerable development is development where the ability of occupants to decide on whether they wish to accept the risks to life and property associated with flooding, or be able to manage the consequences of such a risk, is limited.”

“Less vulnerable development is development where the ability of occupants to decide if risks and consequences are acceptable is greater than that in the highly vulnerable category.”

“For larger developments, mixed use schemes and those comprising multiple buildings, a single vulnerability category may not be appropriate. It may be appropriate to regard some parts of a development as highly vulnerable and other parts less vulnerable or water compatible. This can provide some flexibility when considering how best to use sites that are partially in flood risk areas. Locating some types of sustainable drainage systems (SuDS) features and open spaces in flood risk areas and using the land for appropriate flood alleviation, for example, can help make best use of a site. Making water an integral feature within a development can enhance the design and function of places.”

“All small new developments, including single dwellings, should be considered under a single vulnerability category. For example, it is important that gardens, access paths and driveways of a residential dwelling should remain flood-free, therefore the whole area of development should be considered highly vulnerable.”

In summary, the site is identified as being at risk of both fluvial and surface water flooding, with all areas falling within Flood Zones 2 and 3. As a result, any proposed development will require a Flood Consequences Assessment to demonstrate that flood risks can be appropriately managed in line with TAN 15 policy.

Yours sincerely,

