

**Technical Advice Note 15: Development, Flooding and Coastal Erosion**

Frequently Asked Questions

March 2026

Question / Issue Raised	Answer
<b>Key Principles</b>	
What is this document?	This document has been prepared to support TAN15: Development, Flooding & Coastal Erosion. It provides answers to many questions that have been asked of the Welsh Government in the run up and after the document's amendment and publication on 31 <sup>st</sup> March 2025.
What is the status of this document?	This document is published for information purposes only. It reflects TAN15 and does not introduce any new requirements. Readers are advised to review TAN15 in its entirety alongside other national planning policies when making decisions on new development and flood risk.
What are the key principles of TAN15?	TAN15 looks to balance allowing communities to change and regenerate whilst placing flood risk high on the agenda. Through a risk-based approach using the Flood Map for Planning (FMfP) it looks to balance likelihood of flooding against vulnerability of development. The higher the likelihood of flooding and the greater the vulnerability the more restrictive the policy becomes.
When did the updated TAN15 take effect?	The updated TAN15 took effect from 31 <sup>st</sup> March 2025.
What is the Transitional Period?	Applications validated before 31st March 2025 and any subsequent appeals are to be determined under the previous TAN15 (2004). This is to allow a period of grace and determination against the policy framework that was in effect at the time that they were registered.
What key aspects have changed from the 2021 version of the TAN that was consulted upon?	<ul style="list-style-type: none"> <li>• Increase emphasis on Local Development Plans (LDPs) in assessing risk and identifying flood mitigation measures.</li> <li>• Distinguishes between greenfield and brownfield with more flexibility for regeneration in different Zones where it supports LDP strategy or regeneration plans.</li> <li>• More flexibility for Local Planning Authorities (LPAs) to make informed decisions considering local evidence and engagement with key stakeholders.</li> <li>• A new Notification Direction to allow Welsh Ministers to be sighted on new highly vulnerable development proposals in flood zone 3 (River and Sea) which LPAs are minded to approve.</li> </ul>

<p>What key aspects remain unchanged from the 2021 version of the TAN that was consulted upon?</p>	<ul style="list-style-type: none"> <li>• The TAN is still based on the FMfP which identifies flood risk zones.</li> <li>• The TAN still includes vulnerability considerations for different types of development ranging from less vulnerable to highly vulnerable.</li> <li>• The TAN is still risk-based seeking to limit exposure to risk for the most vulnerable new development in areas of highest risk.</li> <li>• The TAN still requires local evidence - through Strategic Flood Consequences Assessments (SFCA) to underpin LDPs and Flood Consequences Assessments (FCA) for individual applications.</li> </ul>
<p>The increased flexibility in the TAN has resulted in more ambiguity for decision makers when considering acceptability of flood risk.</p>	<p>TAN15 has been significantly revised after two separate public consultations. The feedback from these consultations were considered and adjustments made to TAN15 to provide appropriate flexibility for regeneration projects whilst continuing to acknowledge the increased flood risk due to climate change.</p> <p>TAN15 is the starting point for flood risk and outlines the actions that should be taken when considering development in different Flood Zones. Whilst the intent of national planning policy is clear, it cannot address every conceivable circumstance. A core principle of the TAN is that whilst risks can be mapped and presented on a national basis, the understanding of the nature of those risks will be local. An assessment of flood risk must therefore be informed by robust local evidence, the level of which is a matter for planning authorities considering local circumstances and through engagement with key stakeholders. Decisions on allocating and approving development must be on the basis that the risk of flooding is acceptable over its lifetime.</p> <p>Section 10 sets requirements for development plan and planning application decision making considering FMfP zones, development vulnerability and type. Welsh Government have prepared Decision Trees to further assist in its implementation – see Appendix 1 &amp; 2.</p>

	<p>Section 5 provides requirements and guidance relating to SFCAs which must be undertaken for all sources of flood risk to provide evidence to inform policies and site selection for Development Plans.</p> <p>Section 6 provides requirements and guidance relating to FCAs for all sources of flood risk. FCAs are required to accompany planning applications in Zones 2, 3 and Defended Zones proportionate to the nature and scale of the proposal.</p> <p>Section 11 applies to all forms of flooding providing acceptability criteria for SFCA &amp; FCAs including flood event frequency thresholds, tolerable conditions and a flood hazard matrix.</p>
<b>Flood Map for Planning</b>	
<p>How often is the Flood Map for Planning (FMfP) updated?</p>	<p>Natural Resources Wales (NRW) updates the FMfP every 6 months (May and November) to reflect local, or site-specific changes to flood extents. Any changes will be at the local level only, based on new model information. Updates may result in the flood zones extending, contracting or being redefined.</p> <p>As a further means of maintaining the map's accuracy, NRW will review the existing TAN15 Defended Zones every 2-3 years (baseline from May 2025). If the standard of protection provided by defences is found to have dropped below the required threshold, it will be necessary to remove the Defended Zone and reclassify the affected areas as Flood Zone 2 or 3. TAN15 Defended Zones will not be removed as part of the 6-monthly updates. However, small scale refinements to existing TAN15 Defended Zones may take place, to match updated flood zone or flood defence information.</p> <p>NRW also manage the flood map challenge process where third parties seek to change the FMfP. Successful challenges will result in the FMfP being updated at the next available opportunity. Once the map challenge is accepted by NRW this will become a material consideration for decision makers, effective from when</p>

	<p>NRW accept it.</p> <p>Note that climate change allowances used in the FMfP are those available at the time of its update. Any SFCA or FCAs should refer to the Welsh Government's latest guidance on climate change allowances for planning purposes <a href="#">Climate change allowances and flood consequence assessments   GOV.WALES</a></p>
<p>What are the criteria to meet the definition of a TAN15 Defended Zone?</p>	<p>The TAN sets out the minimum criteria for a flood risk asset to meet the definition of a TAN15 Defended Zone.</p> <p>TAN15 Defended Zones show areas that benefit from Risk Management Authority managed and maintained flood defences with the following minimum Standard of Protection:</p> <ul style="list-style-type: none"> <li>• 1 in 100 year (present day) for rivers</li> <li>• 1 in 200 year (present day) for the sea</li> </ul> <p>Flood defences built from 2016 onwards, must include an allowance for climate change as part of its design 'standard of protection' to meet the TAN15 defended zone criteria. It is unlikely defences will account for climate change over a whole development lifetime. Government funding for new defences follows a managed adaptive approach and as such, even where new defences include an allowance for climate change, this will only be for a period of around 30 years.</p> <p>Defences constructed before 2016 do not have to include climate change to meet the TAN15 Defended Zone criteria. However, they are recognised in the Flood Map for Planning as they offer a good present-day standard of protection.</p> <p>TAN15 Defended Zones should not be considered as a presumption for development. They indicate areas where risk management authority managed and maintained defences offer a good present-day level of protection.</p>

	<p>They enable a FCA to be undertaken to determine whether development can be safe both now and in the future. These areas would otherwise be mapped as zone 2 or 3 which could restrict the type of development that could be considered.</p>
<p><b>Development Vulnerability Categories</b></p>	
<p>Some development types are not defined within Figure 4 – Development Vulnerability Categories.</p>	<p>The list in Figure 4 is not exhaustive therefore decision makers should apply professional judgement when considering development categories not explicitly listed based on the risks posed to lives and livelihoods in the event of a flood. The list is however the basis for the type of development captured by the Notification Direction.</p>
<p>TAN15 does not define what constitutes a large or small development.</p>	<p>Reference to large and small development is included in Paragraph 9.6 and 9.7 acknowledging that it may not be appropriate to regard some parts of a development under a single vulnerability category. It is acknowledged that the TAN does not explicitly define what constitutes a large or small development. Decision makers should however apply professional judgement on what is appropriate considering development type, size and flood risk.</p>
<p><b>Implementing TAN15 requirements when making Development Plans and Development Management Decisions</b></p>	
<p>How should flood event frequency thresholds and tolerable conditions for different types of flooding be applied when assessing acceptability of flooding consequences?</p>	<p><b><u>Acceptability criteria for flooding consequences</u></b></p> <p>Para 11.3 – 11.6 provides requirements and conditions in relation to acceptability of flood risk.</p> <p>To inform their planning decision, the planning authority will need to arrive at a judgement on the acceptability of the flooding consequences, and they should only permit development where the developer has demonstrated the risks and consequences of flooding are manageable.</p> <p><b><u>Flood Event Frequency Thresholds</u></b></p>

Figure 5 in Section 11, provides design standards for development to be free from flooding from rivers and seas. Whilst it is acknowledged that Figure 5 does not explicitly define thresholds for small water course and surface water flooding, thresholds relating to river flooding can be applied.

The thresholds may be applied with more flexibility for redevelopment, changes of use, conversions and extensions, where the ability to substantially redesign a development is limited. In those circumstances the thresholds are a guide. If they cannot reasonably be met, the planning authority should seek the views of the relevant risk management authorities on the resilience measures proposed to help it reach a decision.

#### **Flood Event Tolerable Conditions**

Figure 6 indicates the tolerable flood depth and velocity conditions for HVD and LVD when assessing against the 0.1% extreme flood event, including an allowance for climate change. Tolerable limits apply to new and redevelopment proposals.

In some instances, subject to site specific circumstance, the local planning authority may consider that some flexibility to tolerable conditions is appropriate and should seek the views of the relevant risk management authorities to help it reach a decision. Decisions on allocating and approving development must be on the basis that the risk of flooding is acceptable.

The flood hazard matrix in Figure 7 can also help planning authorities assess how hazardous a flood event may be to different people. The matrix can be used to assess the levels of danger inside and outside buildings located in flood risk areas, by plotting the expected water depths and velocities during the flood event.

	<p>It should be noted that risk management authorities can provide factual feedback on relevant proposed resilience measures, and whether the flood free frequency thresholds and tolerable conditions can be met based on the evidence submitted. A decision on allocating and approving development is however the responsibility of the LPA and must be on the basis that the risk of flooding is acceptable over its lifetime.</p>
<p>What assessment of risk is required for small watercourses and surface water flood risk?</p>	<p>TAN15 introduces more detailed advice in relation to surface water and small watercourse flood risk. This is in response to consultation feedback and owing to the ever-increasing importance attributed to assessing this type of flood risk. A core principle of the TAN is that risks can be mapped and presented on a national basis, but the understanding of the nature of those risks will be local. Surface water flood risk should be considered in local planning policies, on the basis of evidence from a SFCA / FCAs and the views of technical experts including the LLFA. The approach provides planning authorities with the flexibility to be able to apply the consideration of surface water flood risk appropriately to their areas.</p> <p>A FCA is required to accompany a planning application for any development proposal located fully or partly in Surface Water and Small Watercourses - Zone 2 &amp; 3. Local Authorities may exercise some discretion for householder applications where the risk may be lower due to the nature of the development being proposed and the requirements should be proportionate to the development proposal.</p> <p>Section 5, 6 &amp; 11 provides guidance on SFCA &amp; FCAs to enable a full assessment of flooding consequences to inform decision making. Decisions on allocating and approving development must be on the basis that the risk of flooding is acceptable.</p>
<p>Does a Defended Zone override requirements of Flood Zone 2 and 3?</p>	<p>Yes, if the development is located in a Defended Zone for a source of flooding, the requirements for this zone apply</p>
<p>If identified as a Defended Zone for one source of flooding but not the other, does it need to be</p>	<p>Yes, if source of flooding is not identified within Defended Zone, then requirements for Flood Zone 1, 2 or 3 apply.</p>

assessed under requirements of Flood Zone 1, 2 or 3?	
How is the flood risk assessed when sites are located in two or more flood zones?	Where a site falls into two or more flood zones the planning authority must make an assessment of the proposal, taking into account each of its proposed land uses, against each of the flood zones to which it applies, in accordance with the criteria requirements of the TAN.
How should flood risk be assessed when development is located in Flood Zone 1?	The TAN sets requirements for assessment of flood risk for development located in Zone 1. Whilst Zone 1 is considered the least risk from flooding, a core principle of the TAN is that whilst risks can be mapped and presented on a national basis, the understanding of the nature of those risks will be local. An assessment of any local recorded flooding extents should be undertaken in all areas to ensure any local flood risk is assessed.
Can redevelopment schemes Local Authorities wish to support in Zones 2 and 3, proceed ahead of the adoption of an LDP?	<p>In such a circumstance, Local Authorities must consider the flood risks associated with the redevelopment and identify appropriate flood mitigation measures which would provide protection sufficient to move it into the Defended Zone. In doing this they must accept that flood defences do not guarantee protection from flooding and the risks associated with proposed redevelopment must be fully assessed and be acceptable to the decision maker.</p> <p>The provision of flood mitigation measures should take place ahead of, or at the same time as the redevelopment proposals. Local authorities who permit schemes before the flood mitigation infrastructure is in place have decided that the risk of flooding is acceptable and will be publicly accountable for their decisions.</p>
Does Less Vulnerable Development within a Defended Zone need to be assessed against the acceptability considerations of Section 11?	Yes, the acceptability considerations, including the frequency thresholds and tolerable conditions in Section 11 applies to HVD & LVD in Defended Zone, Zones 2 and 3. 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.

<p>In Flood Zone 2, is Less Vulnerable Development appropriate on greenfield land if not allocated in development plan?</p>	<p>Yes, in principle, however they must be accompanied by a FCA which clearly describes the flood risk. Decisions on allocating and approving development must be on the basis that the risk of flooding is acceptable over its lifetime.</p>
<p>Will redevelopment proposals with residential uses on the ground floor be permitted in Zones 2 and 3 if the site can be demonstrated to be flood free?</p>	<p>The TAN confirms that residential development shouldn't occur on the ground floor in Zone 2 and 3. This is owing to the risk to ground floor properties in the event of a flooding event. If a flood event was to occur overnight occupants of the ground floor property could be at risk of inundation with little or no warning and have no means of escaping.</p> <p>Whilst the intent of national planning policy is clear, it cannot address every conceivable circumstance. A core principle of the TAN is that whilst risks can be mapped and presented on a national basis, the understanding of the nature of those risks will be local. An assessment of flood risk must therefore be informed by robust local evidence and through engagement with key stakeholders. Decisions on allocating and approving development must be on the basis that the risk of flooding is acceptable over its lifetime.</p>
<p><b>Flood Consequences</b></p>	
<p>Are SCFA / FCAs required to support LDP allocations?</p>	<p>A SFCA and infrastructure plan is essential to a sound and deliverable LDP. Whilst a FCA is not a requirement at LDP stage, a sufficient understanding of the potential flood risks, consequences and necessary mitigation measure will be required to demonstrate deliverability of a site over the plan period. LPAs may therefore consider that FCAs for individual allocations is necessary to enable a full assessment of flood risk and demonstrate deliverability at LDP Examination.</p>
<p>Are FCAs required for development in Defended Zones?</p>	<p>Yes, the allocation of sites for new development in Defended Zones, needs careful consideration as the failure of flood defences can lead to catastrophic flooding for areas behind those defences. The presence of formal flood defences does not guarantee that land in the Defended Zone will remain free from flooding in the future, they simply lower the risk of exposure to flooding. Breaches and/or over-topping of even the most modern flood defences are possible resulting in significant flood events. The level of flood protection provided by defences that</p>

	<p>meet the TAN15 Defended Zone criteria is the most accurate estimate available, based on the most recent data. However, this data might be several years old. As such, the level of protection needs to be assessed as part of the FCA. The FCA will also need to consider latest Climate Change allowance over the development lifetime.</p>
<p>Can Local Planning Authorities request FCAs on other grounds not stipulated in the TAN?</p>	<p>A core principle of the TAN is that the FMfP identifies and maps the risks on a national basis. The FMfP also doesn't map risks such as wave overtopping, historic flooding, and increased risk from blockage, overtopping and breach of defences.</p> <p>A full assessment of flood risk must therefore be informed by robust local evidence, the level of which is a matter for planning authorities considering local circumstances and through engagement with key stakeholders. Decisions on allocating and approving development by planning authorities must be on the basis that the risk of flooding is acceptable.</p>
<p>What TAN15 acceptability criteria needs to be assessed to consider risk from overtopping, breach and blockage?</p>	<p>TAN15 highlights that risks associated with overtopping, blockage and breaching of protection measures including flood defences need to be assessed. Where appropriate, FCAs should demonstrate that in the event of overtopping, breach or blockage the consequences of flooding can be managed to an acceptable level. NRW should be consulted for advice on breach and blockage scenarios to be assessed for flood defences and structures which may influence flooding locally. Where an assessment is required for the breach of a defence or blockage of a structure, this should be considered as the 'design event'.</p> <p>NRW have guidance (GN043) on overtopping, breach and blockage of defences and how an assessment of this risk should be applied.</p>
<p>Should FCAs include an assessment of wave action and what should this information be used for?</p>	<p>Consideration should be given to the risk posed from extreme waves that break over land during intense storms. Wave action can cause an increased and substantial risk to a development. Any 'recorded flood extents' of this nature need to inform assessment of flood risk and decision making.</p>

<p>Will new public flood defence infrastructure be designed to account for future development?</p>	<p>New flood defences funded through the public purse are intended to protect existing communities. Flood mitigation including building new / enhanced defences to cover new development would need to be primarily funded through private contributions. 10.6 is clear that there should be no expectation that the WG or other bodies will be able or prepared to fund all proposals.</p> <p>Private flood defences are unlikely to meet the TAN15 Defended Zone criteria unless they are formally adopted by risk management authorities. Funding mechanisms should also be agreed for long term management and maintenance of such a defence and not only its construction.</p>
<p><b>Insurance</b></p>	
<p>Sections 2.9 and 13.3 do not appear realistic, robust or effective in relation to insurance. Whilst welcome Sections 2.7-2.10, note properties built after 2009 are purposefully excluded from Flood RE to avoid supporting inappropriate developing in areas of flood risk.</p>	<p>The affordability of insurance, and the associated costs of dealing with flooding consequences, reinforces the overall principle of avoiding development in areas where the consequences of flooding will be unacceptable. The TAN encourages engagement with insurers through the planning process to allow consideration for higher premiums or risks to uninsurable development. Effective design features within development can demonstrate that flood risks are being actively reduced helping to lower insurance premiums during construction and for the eventual occupiers of new developments.</p>
<p>A strategic approach to monitoring installation and effectiveness of design features is needed to demonstrate flood risks are being actively reduced.</p>	<p>Consideration is being given to how the implementation of TAN15 is monitored including the effectiveness of mitigation and design features post construction.</p>
<p><b>Other Matters</b></p>	
<p>When will other technical guidance that supports the TAN be updated?</p>	<p>Alongside the publishing of these FAQs, Welsh Government have also published an update to <a href="#">Climate change allowances and flood consequence assessments</a> and <a href="#">Flood and coastal erosion risk management: adapting to climate change</a> reflecting the latest climate change projections.</p>

	Please note that the latest climate change projection figures included in these documents should be used when producing SFCA / FCAs.
Who should be contacted to further discuss proposed development and TAN 15 requirements?	As the decision maker in LDP and planning application processes, any site-specific or policy related queries should be directed towards the Local Planning Authority.  Any technical flood risk or FMfP matters should be directed towards NRW.

## Appendix 1 – Development Plans Decision Tree

Development Location and FMfP Zone



Flood Zone 1

Prioritise all types of development  
Allocations must be fully justified and should support delivery of the strategy

Flood Zone 2

Provided SFCA has identified an acceptable level of risk, Plan may allocate sites for new development and redevelopment of any vulnerability that is necessary to,

- Implement strategy of Plan, to regenerate or revitalise existing settlements or achieve key economic or environmental objectives.
- Or addressing national security, energy security, public health, mitigate climate change.

Flood Zone 3

Greenfield / New development

Brownfield / Redevelopment

HVD

LVD

Allocations must not be made

Allocations only in exceptional circumstances (i.e. addressing national security, energy security, public health, mitigate climate change and cannot be located elsewhere).

Allocations only in exceptional circumstances where it is essential to the plan strategy (or addressing national security, energy security, public health, mitigate climate change).  
HVD must not be allocated unless clear commitment that flood mitigation measures will protect and set out in Infrastructure Plan

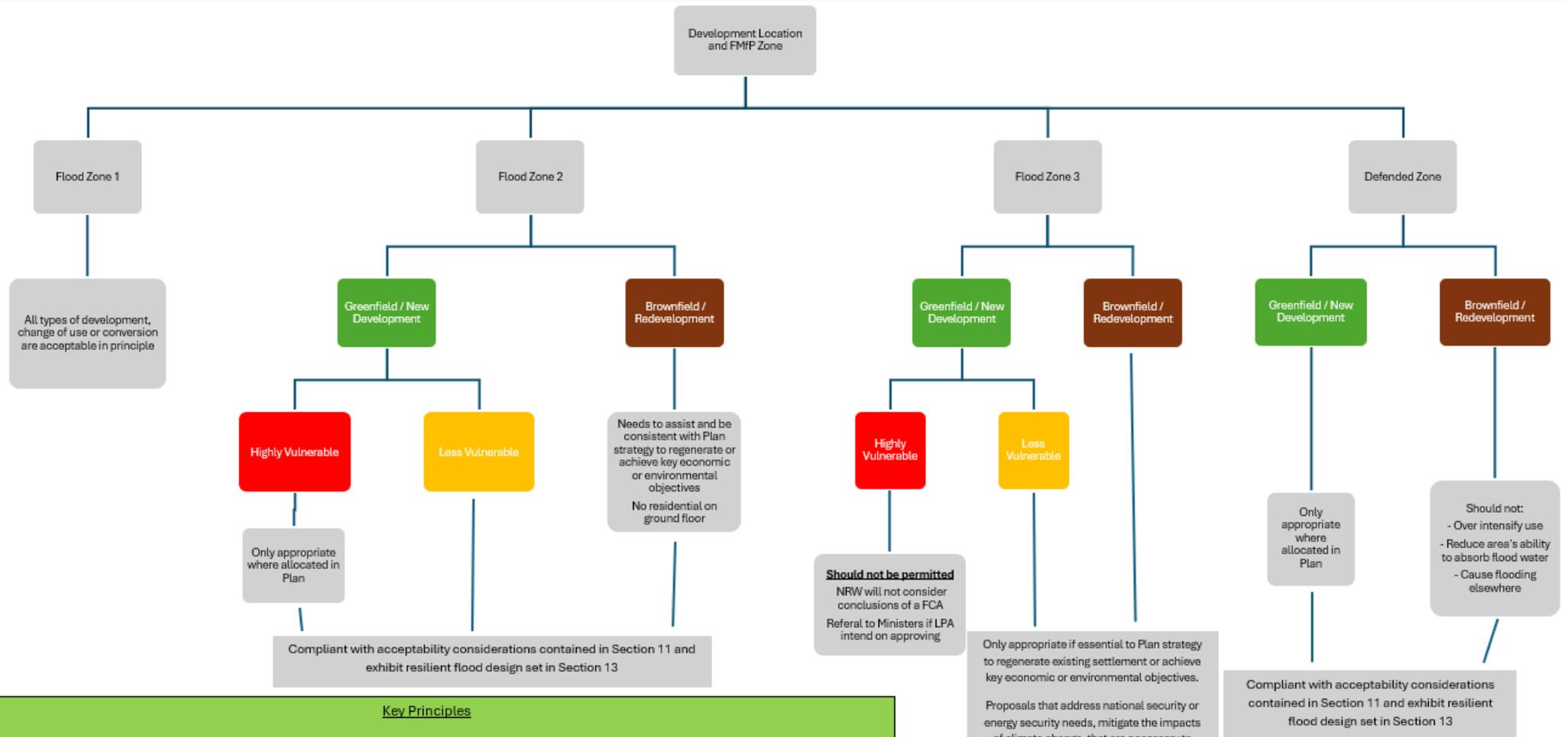
Defended Zone

- LPAs must understand fully the quality and condition of existing flood defences and the level of protection they afford now and in future
- Full SFCA required and other additional studies if necessary, to understand probability and potential consequences of flooding in the area
- LPAs must understand the risk from all sources
- Greenfield sites should not be built on unless they are replaced by suitable alternative sites which clearly contribute to flood management enhancement
- Based on evidence LPAs should seek to prioritise redevelopment to areas of lower flood risk
- Avoid intensification of uses.
  - Replacement buildings or redevelopment schemes should broadly be the same as existing uses
- Detailed consideration for flood resilient design important - Section 13

### Key Principles

- Essential that plans fully recognise the risks from flooding and principles of TAN are used to determine the location and nature of new development proposals.
- A SFCA must be undertaken to provide evidence to inform policies and site selection.
- Where the strategy is affected by flood risk the Plan must contain appropriate measures to mitigate and defend areas at highest risk informed by SFCA.
- Any plan that includes policies or proposals affected by flood risk must be supported by an Infrastructure Plan which incorporates appropriate flood mitigation measures.
- SFCAs should identify ways of reducing flood risk for existing communities.
- LPAs should develop locally specific planning policies for areas at risk of flooding against which planning applications can be assessed.
- See para 9.6-9.7 for guidance on consideration for development with land uses from more than one vulnerability category.
- See para 15.5 for guidance on sites in two or more flood zones.

## Appendix 2 – Planning Application Decision Tree



### Key Principles

- Water compatible development acceptable in all flood zones
- Zone 2, 3 and DZ – developers must undertake a FCA proportionate to the nature and scale of the proposal, include an assessment of Recorded Flood Events and future flood risk considering a range of climate change scenarios including upper end estimates referencing Welsh Government's guidance on climate change allowances.
- Planning Authorities must understand fully the quality and condition of existing flood defences and the level of protection they afford both now and in the future.
- In the absence of flood defences or LDPs that are some way off adoption, LPAs who permit schemes before flood mitigation infrastructure is in place have accepted that the risk of flooding is acceptable.
- See para 9.6-9.7 for guidance on consideration for development with land uses from more than one vulnerability category.
- See para 15.5 for guidance on sites in two or more flood zones.
- See para 10.26 for guidance on an assessment of breach / blockage scenarios in relation to flood defences or structure.
- If source of flooding is not identified within Defended Zone, then requirements for Flood Zone 1, 2 or 3 apply.