# Technical Advice Note (TAN)15: Development and Flood Risk

**ENVIRONMENT AGENCY GUIDANCE FOR STAFF**

| **Purpose:** | This document will help and inform Development Control and Planning Liaison staff when they deal with development proposals involving flood risk in Wales.  
This is an internal Environment Agency document. |
<table>
<thead>
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<tbody>
<tr>
<td><strong>Scope:</strong></td>
<td>This document should be used in conjunction with the Welsh Assembly Government’s Planning Policy Wales (PPW) and Technical Advice Note 15 (TAN15).</td>
</tr>
</tbody>
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1. **INTRODUCTION**

Flooding can cause substantial damage to people and communities, including deaths in some circumstances. Flooding may also have considerable economic impact. We therefore welcome the Assembly’s aim of reducing current and future risk and impacts by restricting or discouraging further development in areas liable to flooding.

Technical Advice Note 15 (TAN15) gives effect to the Assembly’s aim by providing technical guidance to supplement the policy set out in Planning Policy Wales (PPW) 2002 in relation to development and flooding. It advises on development and flood risk. It provides a framework within which risk arising from river and coastal flooding, and/or from additional run-off from development in any location can be considered appropriately when assessing planning applications.

1.1 **Environment Agency Wales’s Role**

Environment Agency Wales’s main role is to advise applicants and planning authorities on the assessment of the flooding consequence in terms of risks to people and property in accordance with Section 7 and Appendix 1 of TAN15. We will where reasonable and practicable make data available to assist developers in undertaking assessments and where appropriate advise on any mitigation measures proposed by the developers.

1.2 **Purpose of Document**

This document provides internal guidance to Environment Agency staff who are responding to consultation on development applications from local planning authorities. It is intended to clarify and offer consistent interpretation of a number of difficult queries that have arisen since the introduction of TAN15. The aim is to ensure a proportionate “common sense” interpretation of the TAN15 guidance.

TAN15 is the primary document and is Assembly Government planning policy. This note must therefore be read in conjunction with the full text of TAN15. It does not stand alone from TAN15.

Situations will occur which will not be covered. In this case Technical Specialists should refer to SUW planning staff for their advice to ensure consistency of our responses. We will then update this guidance as appropriate to take account of new examples and circumstances.

1.3 **Policy Principles**

This document is based on the Environment Agency’s "modern regulation" principles, particularly the risk-based approach. Our interpretation of TAN15 is therefore intended to focus our input on the issues that pose the greatest risk to people, communities and the economy. This is consistent with the aims and spirit of the Welsh Assembly Government’s guidance.
1.4 **The Development Advice Map**

TAN15 contains a development advice map (DAM). This is the Assembly Government’s map, based on Environment Agency and British Geological Survey mapping as of 2003/04.

The DAM shows three development advice zones, A, B, C. Zones A and B are areas of generally low risk (i.e. outside the main river flood plain). Zone C represents the extreme flood outline, and is further subdivided into two zones. These are:

- **C1**: described as “Areas of the floodplain which are developed and served by significant infrastructure, including flood defences.”
- **C2**: described as “Areas of the floodplain without significant flood defence infrastructure.”

Our mapping is continually being updated and it is therefore inevitable over time that the extent of our extreme flood outline will differ from the published DAM. Our response should be based upon the latest, most robust data. In practice, therefore, if our data, or additional evidence based information provided by a developer, demonstrate that a site shown within zone C lies outside of the extreme flood outline, we will treat it in the same way as we treat zone A (see below).

1.5 **Nature of Development or Land Use** (Sections 5 & 9 of TAN15)

TAN15 categorises most developments in the following way:

- emergency services
- highly vulnerable development
- less vulnerable development
- other

Section 9 of TAN15 summarises how these development categories are combined with the risk zone to determine planning requirements (see Annex 1, which is a table taken directly from TAN15).

1.6 **De minimis Exceptions**

There are exceptions to the requirements detailed in TAN15 based on a ‘de minimis’ approach, for example, minor development such as householder extensions and small scale ‘like for like’ replacement. We should as far as possible, provide standing advice on flood resilience for inclusion in such applications. However we would not normally object or comment further.

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1 The ‘other’ category comprises uses that should be considered to be exceptions to the general rule, because they are required in fluvial, tidal or coastal locations by virtue of their nature. These include, for example, boatyards, marinas, essential works at mooring basins and development associated with canals. These developments are not subject to the first part of the justification test in Section 6 but are subject to the acceptability of consequences part of the test.
2. OUR APPROACH

2.1 Zones A and B (Figure 1 - TAN15)

There is little or no risk of fluvial or tidal / coastal flooding in these zones. When consulted on applications for development, we will not normally object or provide bespoke advice.

There are two exceptions:

- Where we are aware that there is a material flood risk (based on evidence such as a recorded history of flooding, or improved flood risk information). This might be caused, for example, by an un-mapped ordinary watercourse or improved flood risk modelling.

- Where there are reasonable grounds to believe that the development could exacerbate flooding elsewhere. This needs to be determined on a case by case basis, but routinely we will only review large developments i.e. those greater than 1.0 hectare.

In either of these exceptional cases, we will request an appropriate Flood Consequence Assessment that is proportionate to the risk and the nature and scale of the development (Paragraph 11.1 TAN15).

Where we are unaware of a material flood risk, but an ordinary watercourse is located within or adjacent to the site, we should advise the local planning authority to consult the local drainage authority for comment in relation to surface water disposal and whether there may be flooding from an un-mapped floodplain.

2.2 Zone C (Figure 1- TAN15)

This zone is based upon the outline of a flood with 0.1% chance of happening in any year (sometimes called a 1:1000 year or 0.1% annual probability event).

2.2.1 Justifying the Location of Development (Section 6, TAN15)

Justifying the location of development is entirely a matter for the local planning authority. If a local planning authority holds the view that there are over-riding reasons to consider planning applications contrary to Welsh Assembly Government planning policy, we will not normally challenge the application on the grounds of principle alone.

2.3 Assessing Flooding Consequences (Section 7 and Appendix 1 TAN15)

The most important part of our role, identified in the TAN, is to evaluate the Flood Consequence Assessment and advise local planning authorities and developers / applicants on the assessment of flooding consequences, based on Welsh Assembly Government advice, as defined in Section 7 and Appendix 1 of TAN15.

Our view will be derived from the best information available, irrespective of the DAM zone.
In accordance with the requirements of TAN15, we will expect an appropriate Flood Consequence Assessment to accompany planning applications in zone C, except those categorised as de-minimis, where standard/standing advice will be provided. Where there is reason to believe that proposed developments in zones A or B would be prone to flooding, or that such developments could impact on other people or their property, we may also require a Flood Consequence Assessment (see Section 2.1 above for more detail).

In assessing development proposals, we will apply the following approach:

- The information that is required from developers/applicants in a Flood Consequence Assessment is set out in Section 7 and Appendix 1, TAN15, with a minimum requirement identified in paragraph A1.17. The Flood Consequences Assessment should be proportionate to the scale and nature of the development. We will adopt a pragmatic approach to the information requirements, particularly when the site is known and records are available that show that a less onerous Flood Consequence Assessment is appropriate.

- Developers/applicants will be encouraged to discuss the scope and content of Flood Consequence Assessments with us before starting work on their Flood Consequence Assessment. As well as specifying what should be covered commensurate with scale and nature of the proposal where we have information that could assist, we will share this with applicants.

- Where a Flood Consequence Assessment is necessary and an application is received without one, we will advise the local planning authority and developers/applicants that one is required in accordance with TAN15.

- Where a Flood Consequence Assessment is necessary, the developer/applicant must demonstrate that the consequences of flooding can be managed to an acceptable level. We will, without prejudice to our subsequent advice to local planning authorities, work with the developer/applicant to establish the consequences of a flood event and offer advice on the mitigation measures proposed by the developers.

- Developers/applicants must also demonstrate that the development, including any proposed flood mitigation/alleviation measures, will not have significant flood risk implications on or off site.

- Assessment of proposals will be based on guidance in Appendix 1 of TAN15 (supplemented by Table 2 in Annex 1 of this document), and will be necessary for a range of flood events up to and including the 0.1% event (see sections A1.2, A1.5, A1.9 TAN15).

- Guidance on estimating the 0.1% event is now available as a technical note (1000yr flow technical note) and will be issued to applicants upon request.

- If the Flood Consequence Assessment has insufficient detail to enable a proper assessment of the consequences, we will ask the local planning authority and developer/applicant for the additional information, specifying what additional work is required.
• If our review of the Flood Consequences Assessment suggests that the Flood Consequence Assessment would be acceptable with modifications to the design or other changes, we may advise the necessary changes to both the local planning authority and the developer / applicant.

• Where the Flood Consequence Assessment shows that the consequences of flooding can be acceptably managed, but that management requires the inclusion of conditions within the planning consent, we will advise the local planning authority of the necessary conditions.

• The provision, construction and long term maintenance or replacement of any mitigation measures (on or off site) will need to form part of a planning condition and / or Section 106 agreement (paragraph 11.10, TAN15).

• It may be appropriate to consider going upstairs as an acceptable escape route. However, this will depend on the specific circumstances of the development and its intended use.

• TAN15 states that the Environment Agency will provide advice to Local Planning Authorities on Flood Consequence Assessments. We will normally provide that advice, in accordance with the guidance in TAN15, whether or not we wish to sustain an objection.

2.3.1 Surface Water (Section 8 and Appendix 4, TAN15)

Surface water drainage from developments can, if not properly controlled, significantly increase the frequency and size of floods in the watercourses that receive the surface water drainage. Development must not materially increase flood risk for other people or property - irrespective of the zone.

TAN15 (paragraph 8.4) promotes the use of sustainable drainage systems (SuDS). It states that if sustainable drainage systems cannot be implemented, a conventional drainage system will need to improve on the status quo.

The provision of attenuation measures or sustainable drainage systems within a scheme should be subject to a planning condition and / or a Section 106 agreement that addresses the financial responsibility for long-term maintenance.

Where surface water disposal would materially increase flood risk for other people or property and this cannot be satisfactorily managed through planning conditions, we will normally object to the proposed development (see section 3 below).

3. OBJECTIONS

This section specifically describes our response in respect of TAN15 and flooding. It does not affect our position in respect to objection on the grounds of our other statutory duties (e.g. on grounds of inadequacies in arrangements for waste disposal, sewerage, water supply infrastructure or other matters).

In circumstances where consideration is being given to highly vulnerable / emergency services development in zone C2, we will not normally object on those
grounds alone. We will draw this to the attention of the local planning authority when, for example, submitting comments in respect of a Flood Consequence Assessment.

Although we would always wish to see full compliance with Appendix 1 of TAN15, in considering the requirements of table A1.15, some flexibility will be considered for certain development types. Table 2 in Annex 1 of this document provides examples of circumstances where it may be appropriate to adopt such an approach. It is important to note that where numeric compliance with table A1.15 is not achieved, the emergency plans for evacuating the development during flood events must be agreed by the local planning authority, in consultation with their Emergency Planners and where appropriate, the Emergency Services.

3.1 Change of Use (see paragraph 11.20 TAN 15)

Small-scale change of use or proposals that reduce vulnerability will normally be treated as de-minimis (see section 1.6 above). Change of use proposals, which result in increased risk, such as the conversion of warehouses to residential properties, will be treated as new development (see 3.2 below).

3.2 New developments

For new developments, circumstances where we will normally object include:

- The local planning authority intends to approve an application in the absence of a Flood Consequence Assessment where one is necessary.
- The local planning authority intends to approve an application when the Flood Consequence Assessment is inadequate or incomplete (Section A1.17 TAN15) and despite specifying what further work is required it is not forthcoming.
- The local planning authority intends to approve an application where flood risks cannot be acceptably managed in terms of the risk to people and property. The main basis for this judgement is laid out in Section 7 and Appendix 1 of TAN15. Table 2 in this document provides risk-based supplementary criteria to ensure a pragmatic and consistent approach.
- Where development is proposed on previously undeveloped areas of the 1% fluvial or 0.5% tidal floodplain that need to be retained to accommodate floodwater / flood flows.
- The local planning authority intends to approve an application that has an unacceptable impact on third parties (people and property).
- Where mitigation works and subsequent maintenance costs are necessary and the local planning authority have not addressed this in a condition or Section 106 agreement.

These are general principles that will normally apply. However, there may occasionally be specific local situations where these criteria do not result in a common sense outcome. In these circumstances case by case decisions should be referred to Area Managers who will consult with the Regional Planning Team (SUW Manager) prior to coming to a decision.
3.3 Reconstruction / Regeneration

We recognise that for practical reasons it may be necessary to consider development proposals on previously developed sites, which can include former residential, commercial or industrial sites within the floodplain. For these situations we will normally advise the local planning authority on the flood consequence assessment as we would with new development, and follow the principles in 3.2 above.

However, there may be some cases where the numeric standards and acceptability criteria in TAN15 cannot be fully met, but the proposals would result in a substantial reduction in pre-existing flood risk.

Consideration of such cases will be very dependent on the facts - for example the viability of alternatives which fully meet TAN15 requirements; the level of improvement compared to any new risk; the consequences of flood events should they occur – including risk to life – and specific design issues.

These case by case decisions should be referred, via the Area Planning and Corporate Services Manager, to Area Managers who will consult with the Regional Planning Team (SUW Manager) prior to coming to a decision.

3.4 Application for Reserved Matters

Where planning permission (outline) already exists for the development, an application for reserved matters cannot disturb the principle established by the outline permission. The TAN says it is reasonable that the consequences of flooding should be considered but in the strict legal sense a reserved matters application covers those matters previously reserved at the outline stage for further consideration. Where flood risk has subsequently been identified as a material consideration we should ask that an appropriate Flood Consequence Assessment (paragraph 11.3 TAN15) accompany such applications.

Based on the outcome of the Flood Consequence Assessment, developers / applicants will need to acknowledge the risk and demonstrate how they will manage the consequences of flooding to an acceptable level. In extreme circumstances, where this cannot be achieved, for example where risk to life cannot be acceptably managed, we may consider recommending that the local planning authority revoke the original outline permission. Prior consultation with the relevant Area Manager and the Regional Planning team (SUW Manager) is required.

4. WELSH ASSEMBLY GOVERNMENT ‘CALL-IN’

Welsh Assembly Government may themselves call-in applications for determination. In certain situations Environment Agency Wales may request call-in. However this should be regarded as the last resort and would only be considered on a case by case basis when we have significant concerns.
For example, we may request call-in:

- Where a Flood Consequences Assessment is required, but has not been provided, or is in our view seriously deficient or

- Where the Flood Consequences Assessment demonstrates that consequences cannot be managed and the application is for a high-risk situation in accordance with risk based principles.

All requests for call-in must be discussed with the Regional Planning Team and agreed with Director Wales

5. DEVELOPMENT PLANS (Section 10, TAN15)

Planning Policy Wales, March 2002, (Paragraph 13.2.4) states that “Local planning authorities should take a strategic approach to flood risk and consider the catchment as a whole. They should ensure that new development is not exposed unnecessarily to flooding, therefore, by considering flood risk in terms of the cumulative impact of the proposed development in the locality, on a catchment wide basis (river catchment and coastal cell), and, where necessary, across administrative boundaries. Development proposals should seek to reduce, and certainly not increase, flood risk arising from river and/or coastal flooding or from additional run-off from development in any location”.

TAN15 and Development Advice Maps give substance to Planning Policy Wales by identifying zones where certain types of development are discouraged. TAN15 requires Local Planning Authorities to take account of the Development Advice Maps when developing strategy and determining land allocations in a Local Development Plan.

Getting this ‘right’ is important to avoid future conflict. We will therefore encourage local planning authorities to develop strategic flood consequence assessments, including assessments of key flood risk areas to underpin their plans – both to support allocations within zone C and to evaluate the wider impacts of major developments in zones A and B. It must be recognised that allocations should not be considered within the floodplain unless the site meets the definition of previously developed land set out in Planning Policy Wales. Subject to resources, we will provide data and assist with scoping and technical advice in as far as it is practicable to support the work.

A guidance note detailing the benefits, principal objectives and deliverables of strategic flood consequence assessments is currently being prepared.
## ANNEX 1

### Table 1 Summary of Policy Requirements (from Section 9.0 of TAN15) (This is copied from TAN15)

<table>
<thead>
<tr>
<th>DAM</th>
<th>Development Type [Section 5]</th>
<th>Planning Requirements [Section 4]</th>
<th>Acceptability Criteria [Section 7 &amp; Appendix 1]</th>
<th>Development Advice [Section 5,6,7 &amp; Appendix 1]</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Emergency services</td>
<td></td>
<td></td>
<td>No constraints relating to river or coastal flooding, other than to avoid increasing risk elsewhere</td>
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<tr>
<td></td>
<td>Highly vulnerable development</td>
<td>Justification test not applicable</td>
<td>No increase in flooding elsewhere</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Less vulnerable development</td>
<td>Refer to surface water requirements</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Emergency services</td>
<td>If site levels are greater than the flood levels used to define adjacent extreme flood outline there is no need to consider flood risk further</td>
<td>Acceptable consequences for nature of use</td>
<td>Generally suitable for most forms of development. Assessments, where required, are unlikely to identify consequences that cannot be overcome or managed to an acceptable level. It is unlikely, therefore, that these would result in a refusal of planning consent on the grounds of flooding</td>
</tr>
<tr>
<td></td>
<td>Highly vulnerable development</td>
<td>Refer to surface water requirements</td>
<td>Occupiers aware of flood risk</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Escape/evacuation routes present</td>
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<td></td>
<td></td>
<td></td>
<td>Effective flood warning provided</td>
<td></td>
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<td></td>
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<td></td>
<td>Flood emergency plans and procedures</td>
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<td></td>
<td>Flood resistance design</td>
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<td></td>
<td></td>
<td></td>
<td>No increase in flooding elsewhere</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Less vulnerable development</td>
<td></td>
<td>Occuipiers aware of flood risk</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>Refer to surface water requirements</td>
<td>No increase in flooding elsewhere</td>
<td></td>
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<tr>
<td>C1</td>
<td>Emergency services</td>
<td>• Application of justification test [section 6], including acceptability of consequences [section 7 and appendix 1] &lt;br&gt;• Refer to surface water requirements</td>
<td>• Acceptable consequences for nature of use &lt;br&gt;• Flood defences adequate &lt;br&gt;• Agreement for construction and maintenance costs secured &lt;br&gt;• Occupiers aware of flood risk &lt;br&gt;• Escape/evacuation routes present &lt;br&gt;• Effective flood warning provided &lt;br&gt;• Flood emergency plans and procedures &lt;br&gt;• Flood resistant design &lt;br&gt;• No increase in flooding elsewhere</td>
<td>Plan allocations and applications for all development can only proceed subject to justification in accordance with section 6 and acceptability of consequences in accordance with section 7 and appendix 1</td>
</tr>
<tr>
<td></td>
<td>Highly vulnerable development</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Less vulnerable development</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td>• Application of acceptability of consequences [section 7 and appendix 1] &lt;br&gt;• Refer to surface water requirements</td>
<td>• Acceptable consequences for nature of use &lt;br&gt;• Occupiers aware of flood risk &lt;br&gt;Desirable if effective flood warning and evacuation routes/procedure provided depending on nature of proposal &lt;br&gt;• No increase in flooding elsewhere</td>
<td>Plan allocations and applications for development should only be made if considered acceptable in accordance with section 7 and appendix 1</td>
</tr>
<tr>
<td>DAM</td>
<td>Development Type [Section 5]</td>
<td>Planning Requirements [Section 4]</td>
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</tr>
<tr>
<td>C2</td>
<td>Emergency services</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Highly vulnerable development</td>
<td>The flooding consequences associated with Emergency Services and highly vulnerable development are not considered to be acceptable. Plan allocations should not be made for such development and planning applications not proposed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
|     | Less vulnerable development  | ▪ Application of justification test [section 6], including acceptability of consequences [section 7 and appendix 1]  
▪ Refer to surface water requirements | ▪ Acceptable consequences for nature of use  
▪ Flood defences adequate  
▪ Agreement for construction and maintenance costs secured  
▪ Occupiers aware of flood risk  
▪ Escape/evacuation routes present  
▪ Effective flood warning provided  
▪ Flood emergency plans and procedures | Plan allocations or applications for less vulnerable development can only proceed subject to justification in accordance with section 6 and acceptability of consequences in accordance with section 7 and appendix 1 |
|     | Other                       | ▪ Application of acceptability of consequences [section 7 and appendix 1]  
▪ Refer to surface water requirements | ▪ Flood resistant design  
▪ No increase in flooding elsewhere | Plan allocations and applications for development should only be made if considered acceptable in accordance with section 7 and appendix |
Table 2 - Supplementary Guidance (which must be read in conjunction with the main text of this document)

Although we would always wish to see full compliance with TAN15, some flexibility in applying the requirements of table A1.15, Appendix 1 of TAN15 will be considered. Table 2 below provides examples of circumstances where it may be appropriate to adopt such an approach. Exceptions to the use of this table are identified within the text of this document, for example the replacement of existing structures.

Where the development has a significant flood risk and consequence, then apply criteria for C1 for that category of development, regardless of actual DAM zone.

<table>
<thead>
<tr>
<th>Development Type</th>
<th>TAN15 Category</th>
<th>Numeric compliance with A1.14? (Y/N)</th>
<th>Numeric compliance with A1.15? (Y/N)</th>
<th>Acceptability criteria above those identified for zone C1 in Section 9 of TAN15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency services, including civil emergency infrastructure</td>
<td>Emergency Services</td>
<td>Y</td>
<td>Y</td>
<td>No additional requirements</td>
</tr>
<tr>
<td>Residential development</td>
<td>Highly Vulnerable</td>
<td>Y</td>
<td>Y</td>
<td>No additional requirements</td>
</tr>
<tr>
<td>Schools, Nurseries, Colleges, Nursing Homes, Hotels, Doctors surgery</td>
<td>Highly Vulnerable</td>
<td>Y</td>
<td>Y</td>
<td>No additional requirements</td>
</tr>
<tr>
<td>Power stations / Switch gear / Strategic telecommunications / Water infrastructure / Chemical plants</td>
<td>Highly Vulnerable</td>
<td>Y</td>
<td>Y</td>
<td>No additional requirements</td>
</tr>
<tr>
<td>Caravan parks</td>
<td>Highly Vulnerable</td>
<td>Y</td>
<td>Y</td>
<td>Local planning authority should be advised to consult with their Emergency Planners and where appropriate, the Emergency Services.</td>
</tr>
<tr>
<td>Development Type</td>
<td>TAN15 Category</td>
<td>Numeric compliance with A1.14? (Y/N)</td>
<td>Numeric compliance with A1.15? (Y/N)</td>
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</tr>
<tr>
<td>------------------------------------------------------</td>
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<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Library, Museum, Leisure centres, Law courts</td>
<td>Highly Vulnerable</td>
<td>Y</td>
<td>N</td>
<td>Where numeric compliance with A1.15 is not achieved then the emergency plans for evacuating the development during flood events must be agreed by the local planning authority, in consultation with their Emergency Planners and where appropriate, the Emergency Services. We will normally object if we do not receive confirmation that satisfactory evacuation plans will be implemented.</td>
</tr>
<tr>
<td>General Industrial, Employment (offices), Commercial and retail</td>
<td>Less Vulnerable</td>
<td>Y</td>
<td>N</td>
<td>Where numeric compliance with A1.15 is not achieved then the emergency plans for evacuating the development during flood events must be agreed by the local planning authority, in consultation with their Emergency Planners and where appropriate, the Emergency Services. We will normally object if we do not receive confirmation that satisfactory evacuation plans will be implemented.</td>
</tr>
<tr>
<td>Car parks</td>
<td>Less Vulnerable</td>
<td>Y</td>
<td>N</td>
<td>Where numeric compliance with A1.15 is not achieved then the emergency plans for evacuating the development during flood events must be agreed by the local planning authority, in consultation with their Emergency Planners and where appropriate, the Emergency Services.</td>
</tr>
<tr>
<td>Mineral extraction sites</td>
<td>Less Vulnerable</td>
<td>Y</td>
<td>N</td>
<td>Where numeric compliance with A1.15 is not achieved then the emergency plans for evacuating the development during flood events must be agreed by the local planning authority, in consultation with their Emergency Planners and where appropriate, the Emergency Services. We will normally object if we do not receive confirmation that satisfactory evacuation plans will be implemented.</td>
</tr>
</tbody>
</table>

**Emergency services:**
Described as facilities that need to be operational and accessible at all times.

**Highly vulnerable:**
Describes 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. It also includes those industrial uses where there would be an attendant risk to the public and the water environment should the site be inundated.

**Less vulnerable**
Describes development where the ability of occupants to decide on whether they wish to accept such risks is greater than that in the highly vulnerable category.