



DESIGN
COMMISSION
FOR WALES
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DYLUNIO
CYMRU

28th February 2023

Dear Colleagues,

Welsh Government Consultation: Technical Advice Note 15

The Design Commission for Wales welcomes the proposed amendments to TAN 15. The increased flexibility proposed to allow appropriate regeneration and redevelopment in flood risk areas is supported. Many of our towns and cities are in areas at risk flooding, and the policy rightly recognises these places need to continue to grow and evolve whilst minimising the risk of flooding.

The Design Commission supports the emphasis given to directing new development within existing town and cities. Development of previously developed land can avoid the need to build on greenfield land which, as well as helping to reduce flood risk, can support our towns and cities become more compact.

Paragraph 10.5 states that 'redevelopment schemes should be of similar scale to the existing use to avoid increasing exposure to flood risk'. We suggest consideration should be given to whether the policy could further support urban intensification within our towns and cities. Vertical redevelopment, with medium-rise and mixed-use buildings, can increase the population density without the need to expand our town and cities horizontally. With active ground floor uses, and residential on the upper floors, the policy can minimise the risk of flooding whilst supporting the vibrancy of our towns and cities. Risk of exposure should be one consideration amongst all design considerations in the design of the proposed form and scale of any redevelopment.

We support the recognition of the importance of good design in increasing flood resilience. In relation to paragraph 13.3, the design interventions to manage potential flood risk should be balanced against other considerations, including access, the relationship with the street and public realm, and how the building is used. Good design will be a key factor to the success of development in areas at risk of flooding.

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Overall, the Design Commission believes the proposals strike an appropriate balance between enabling our towns and cities to continue to grow, evolve, diversify and flourish, whilst protecting people from the risk of flooding.

Yours sincerely

A handwritten signature in black ink, appearing to read 'CAD', with a long horizontal stroke extending to the right.

Carole-Anne Davies

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Ar gyfer ac ar ran y Bwrdd Cyfarwyddwyr - For and on behalf of the Board of Directors