

## **Flood Consequences Assessment**

**Change of use of existing Nursing Home (Class C2) into a mixed use of Cafe (Class A3), Crèche (Class D1), 5 Nos shops (Class A1), 9 Nos Industrial units, (Class B1& B8), managers' office, plant room, roofing of internal courtyard and parking**

**Min yr Afon Nursing Home Cwmavon**

Rev A March 2022

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## 1.0 Introduction

- 1.1 This statement has been prepared to accompany a planning application. The application seeks consent for the change of use of existing nursing home (Class C2) into a mixed use of Cafe (Class A3), 5 Nos shops (Class A1), 10 Nos Industrial units, (Class B1& B8), managers' office, plant room, roofing of internal courtyard and parking
- 1.2 The purpose of the document is to provide the Local Planning Authority (LPA) with relevant background information that will assist in the proper determination of the application.

## 2.0 Planning History - Planning Context

### 2.1. Planning History

2.2 Pre App – Q2018-0244

### 2.3 Planning Context

- 2.4 The development plan for the site is the *Neath Port Talbot Local Development Plan 2011-2026*. The Council adopted the plan on January 2016.<sup>1</sup>

### 2.5 Policy

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<sup>1</sup> <https://www.npt.gov.uk/7328>

Policy EC2 - Existing Employment Areas  
 Policy EC3 - Employment Area Uses  
 Policy EN7 - Important Natural Features  
 Policy BE1 – Design

### SPG Guidance

Parking Standards (October 2016)

### National Policy

Planning Policy Wales *PPW* (Edition 11 Feb 21)<sup>2</sup>

Technical Advice Note (TAN) 15 Development and Flood risk<sup>3</sup>

## 3.0 Application site

- 3.1 The application site has an area of 3965 sqm and consists of a Nursing Home with a floor area of 1141 sqm (excluding internal courtyard) and associated car park.

## 4.0 The Application

- 4.1 This application is for the change of use of the site into a mixed use of Cafe (Class A3), 5 Nos shops (Class A1), 10 Nos Industrial units, (Class B1& B8), managers' office, plant room, roofing of internal courtyard and parking

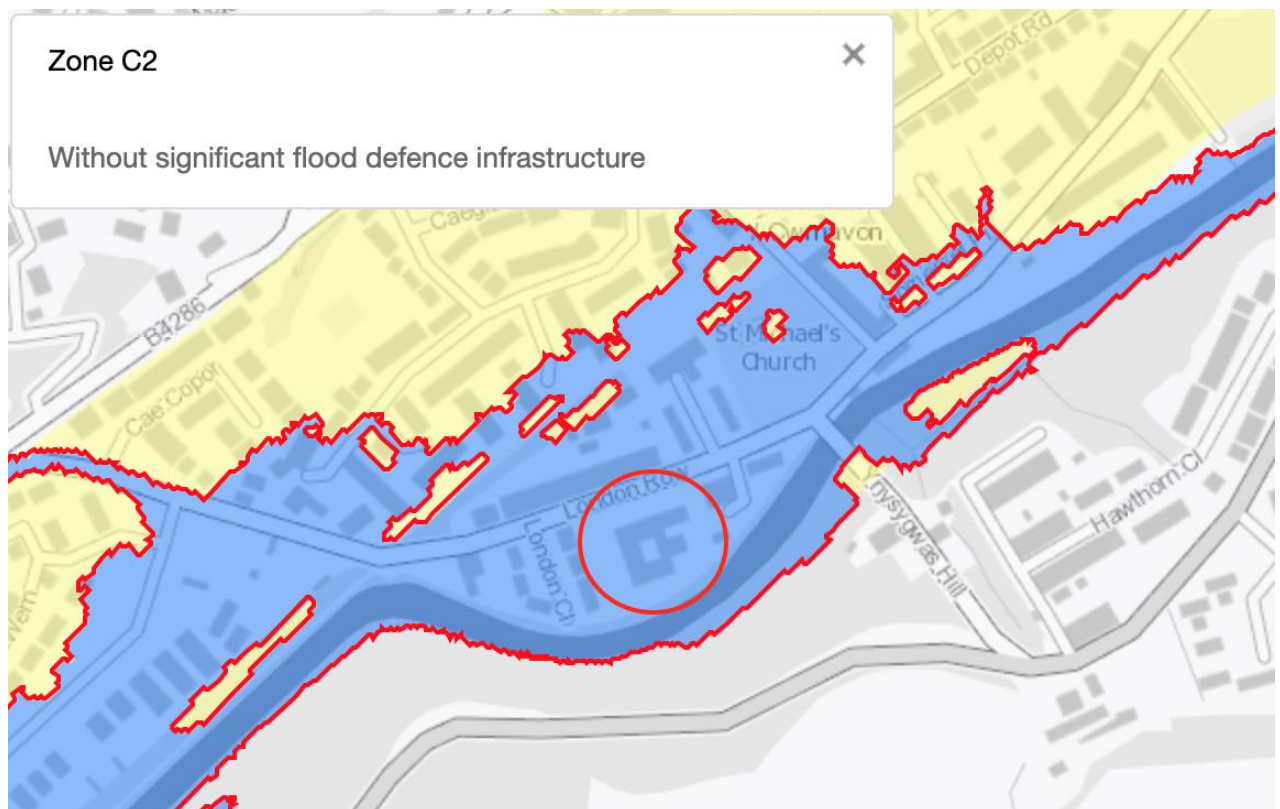
<sup>2</sup> [https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

<sup>3</sup> <https://gov.wales/technical-advice-note-tan-15-development-and-flood-risk>

## 5.0 Appraisal

- 5.1 The site is within Zone C2 of the Development Advice Maps (DAM).  
**Figure 1.**

**Figure 1**



- 5.2 From data provided by NRW *Flood Risk Assessment Wales Map*<sup>4</sup> the site is at High - low risk of flooding from rivers, and no risk from sea, surface water and small watercourses as set out in **Table 1** below

**Table 1**

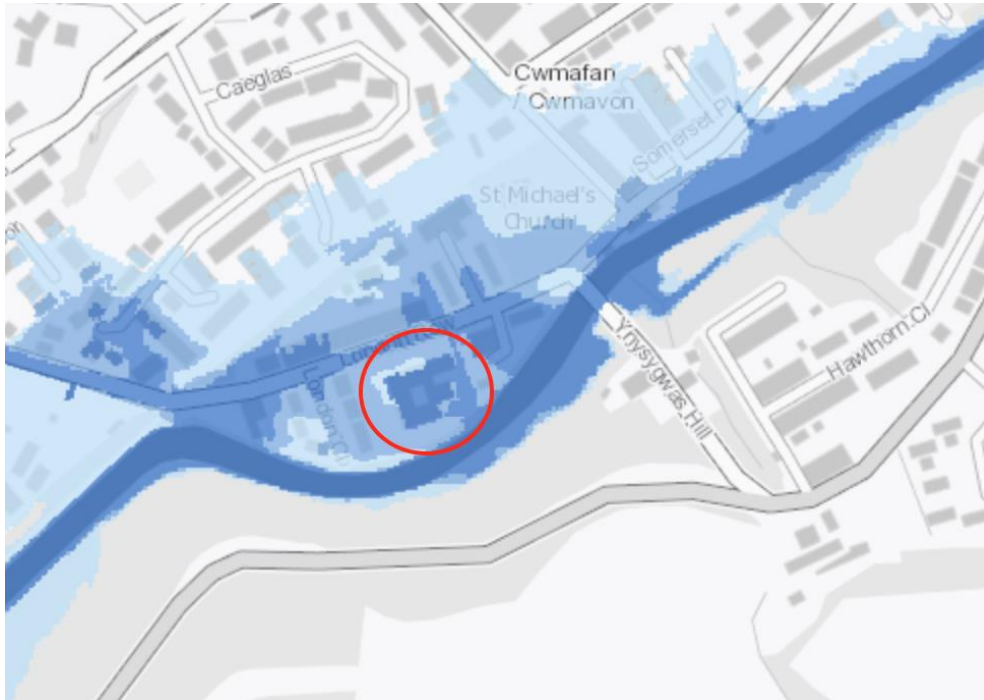
**Summary of flood risk- NRW Flood Risk assessment Wales map**

| Flood Risk                           | Risk Level                                                                   |
|--------------------------------------|------------------------------------------------------------------------------|
| Rivers                               | Building- High<br>Carpark/service area- Medium to low<br>( <b>Figure 2</b> ) |
| Seas                                 | None                                                                         |
| Surface Water and small watercourses | None                                                                         |

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[https://maps.cyfoethnaturiolcymru.gov.uk/Html5Viewer/Index.html?configBase=https://maps.cyfoethnaturiolcymru.gov.uk/Geocortex/Essentials/REST/sites/Flood\\_Risk/viewers/Flood\\_Risk/virtualdirectory/Resources/Config/Default&layerTheme=2](https://maps.cyfoethnaturiolcymru.gov.uk/Html5Viewer/Index.html?configBase=https://maps.cyfoethnaturiolcymru.gov.uk/Geocortex/Essentials/REST/sites/Flood_Risk/viewers/Flood_Risk/virtualdirectory/Resources/Config/Default&layerTheme=2)

**Figure 2**



- 5.3 The application site consists of a 33 bed nursing home. This type of development, having regard to the current advice within TAN 15 would be deemed unacceptable given the highly vulnerable use **Figure 3**.

**Figure 3**

| Development category          | Types                                                                                                                                                                                                                                                   |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Emergency services            | hospitals, ambulance stations, fire stations, police stations, coastguard stations, command centres, emergency depots and buildings used to provide emergency shelter in time of flood                                                                  |
| Highly vulnerable development | all residential premises (including hotels and caravan parks), public buildings (e.g. schools, libraries, leisure centres), especially vulnerable industrial development (e.g. power stations, chemical plants, incinerators), and waste disposal sites |
| Less vulnerable development   | General industrial, employment, commercial and retail development, transport and utilities infrastructure, car parks, mineral extraction sites and associated processing facilities, excluding waste disposal sites                                     |

- 5.4 Unfortunately, there are no sub categories set out within the highly vulnerable development definition contained within TAN 15. Despite this it must be accepted that within the broad highly vulnerable definition certain uses will pose a higher risk than others. This will be discussed further in the assessment.

- 5.5 The application site is approximately 10 metres west of the river Afan. Available flood data indicates that in a flood event water will extend to a distance of over 100 m west of the application site. On the basis of the publicly available information it is likely that an FCA will not be able to demonstrate compliance with the requirements set out in the table within Appendix 1, paragraph A.1.15 of TAN 15(**Figure 4**) Notwithstanding the above it is considered that there is sufficient justification to support the application.

**Figure 4**

| Type of development           | Maximum depth of flooding (mm) | Maximum rate of rise of floodwaters (m/hr) | Maximum speed of inundation of flood risk area (hrs) | Maximum velocity of floodwaters (metres/sec) |
|-------------------------------|--------------------------------|--------------------------------------------|------------------------------------------------------|----------------------------------------------|
|                               | Property Access                |                                            |                                                      | Property Access                              |
| Residential (habitable rooms) | 600<br>600                     | 0.1                                        | 4                                                    | 0.15<br>0.3                                  |
| Commercial & Retail           | 600<br>600                     | 0.3                                        | 2                                                    | 0.15<br>0.3                                  |
| Industrial                    | 1000<br>1000                   | 0.3                                        | 2                                                    | 0.3<br>0.45                                  |
| Emergency Services            | 450<br>600                     | 0.1                                        | 4                                                    | 0.15<br>0.3                                  |
| General Infrastructure        | 600<br>600                     | 0.3                                        | 2                                                    | 0.3<br>0.3                                   |

- 5.6 The basic principles of TAN 15 are to minimise flood risk. In this case the application seeks to change the use of the premises from a highly

vulnerable 33 bed nursing home, to a mixed use of wholly non-vulnerable activities.

- 5.7 The proposed development does not increase the footprint of the existing building. Whilst, for the purposes of calculating the planning fee, there is an increase in floor area of 160 m<sup>2</sup>, this has arisen as a result of placing a roof over existing internal courtyard. So far as increasing flood risk and the possibility of additional flooding the third-party land it is submitted that the provision of a roof over the existing internal courtyard will not result in additional flood risk or result in additional flooding to third-party land.
- 5.8 TAN 15 seeks to avoid the development of highly vulnerable uses within such areas unless there is justification. In this case the development is for wholly non-vulnerable use. Whilst as indicated previously an FCA will not be able to demonstrate compliance with the requirements set out in the table within Appendix 1, paragraph A.1.15 of TAN 15(**Figure 4**) this development will lead to a substantial reduction in flood risk.
- 5.9 The proposal seeks a mixed use of wholly non-vulnerable development which will replace the existing lawful use as a nursing home. Within the vulnerable class set out in TAN 15, the use as a nursing homes is likely to be the highest risk given that occupiers are typically elderly, not able bodied and reside permanently on the site. As such the removal of the lawful use and replacement with a non-vulnerable use will lead to a significant reduction of risk.

- 5.10 In summary, TAN 15 does not seek to sterilise sites which already have a lawful use. Whilst the development not likely to comply with Appendix 1, paragraph A.1.15 of TAN 15 the development will lead to a significant reduction of risk associated with flooding.
- 5.11 The proposal does not seek to increase the levels on the site. There are internal and external alterations proposed however, these are not likely to lead to an increased risk of flooding.
- 5.12 Given the type of development proposed it is considered that the development will not lead to additional flood risk. Moreover, the development will result in a substantial reduction in flood risk.
- 5.13 The application site is within a Flood Alert Zone and Flood Warning Area. It is recommended that registering with Floodline will assist in mitigating against flood risk. Notices should also be placed within the building advising of flood risk and steps to be undertaken in the event of a flood event.
- 5.14 It is also recommended that any internal works should seek to be flood resilient as set out below
- **Skirtings'** fit water resistant skirting boards or varnish wooden ones.
  - **Walls** use horizontal plasterboard or lime-based plaster to dry-line [LSEP] (instead of gypsum). Get special draining system for cavity walls.
  - [LSEP] **Internal Doors** fit synthetic or waxed doors to minimise damage from flood water, or make sure wooden doors are easy to remove before a flood so that they do not have to be replaced afterwards.

- **Commercial Kitchens and Bathrooms** use water-resistant materials such as stainless steel, plastic, or solid wood rather than chipboard. Wherever possible, raise fridges and other appliances on plinths to limit damage
- **Electrical Works** shallow flooding raise electrical sockets, fuse boxes, controls and wiring to 1.5m above ground level. If re-wiring, bring <sup>[1]</sup><sub>SEP</sub> cables down the wall to the raised sockets so that cabling is not affected by flood water.
- **External doors and windows** install synthetic or waxed windows and doors, or varnish wooden ones.

## 6.0 Summary

- 6.1 The application, by removing the existing lawful highly vulnerable use as a nursing home, will reduce flood risk.
- 6.2 The proposed use is not likely to increase flood risk or additional third party flooding.
- 6.3 Registering with flood line will assist in reducing risk
- 6.4 Internal works will be flood resilient.
- 6.5 The applicant accepts the risks associated with the flooding of the site.