



David Cross  
Merthyr Tydfil County Borough  
Council  
Planning Department  
Unit 5, Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ  
[david.cross@merthyr.gov.uk](mailto:david.cross@merthyr.gov.uk)

Our Ref: BD/26D-15071 (BR13)  
Your Ref: P/22/0064  
Date: 20 June 2022  
Contact: Station Manager B. Dickinson  
Tel: 07887 632355  
E-mail: [firesafety@southwales-fire.gov.uk](mailto:firesafety@southwales-fire.gov.uk)

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990  
PROPOSAL: PLASTICS RECYCLING AND PROCESSING FACILITY,  
INCLUDING TWO WAREHOUSE UNITS WITH INTERNAL OFFICE AND  
WELFARE FACILITIES, EXTERNAL STORAGE AREA, COMBINED HEAT AND  
POWER UNIT, CAR PARKING, WEIGHBRIDGE, SURFACE WATER LAGOON,  
ASSOCIATED INFRASTRUCTURE, LIGHTING AND LANDSCAPING  
LOCATION: LAND TO THE EAST OF GOAT MILL ROAD, DOWLAIS**

I acknowledge receipt of the notification to the South Wales Fire and Rescue Authority in relation to the above application.

The proposed site plan in relation to the above has been examined and the Fire and Rescue Authority wish the following comments to be brought to the attention of the committee/applicant. It is important that these matters are dealt with in the early stages of any proposed development.

Changes to our climate and weather patterns will have a significant impact on the well-being of both current and future generations. In line with the **Well-being of Future Generations (Wales) Act 2015 and the Future Wales – the national plan 2040 framework document**, the following areas should be considered early in the planning process:

The climate emergency is likely to increase the risk of flooding as a result of sea-level rises, more frequent severe weather systems and more intense rainfall. Planning authorities should adopt a precautionary approach of positive avoidance of building developments in areas of flooding from the sea or from rivers. Surface water flooding will affect the choice of location and the layout and design of schemes and these factors should be considered at an early stage in formulating any development proposals.

Wildfires are a significant potential threat particularly in populated areas adjoining green spaces such as mountains or forestry. Therefore, it is critical that new developments are designed with this in mind. Where a new development is proposed in an area which is at risk of a wildfire, consideration should be given on how to mitigate the spread of wildfires. For example, sustainable land management could assist with prevention measures.

The site plan/s of the above proposal has been examined and the Fire and Rescue Authority would wish the following comments to be brought to the attention of the planning committee/applicant. It is important that these matters are dealt with early on in any proposed development:

- The following concerns are identified, in relation to the proposed developments, together with suggestions as to how these can be addressed.

**A comprehensive fire strategy should be provided which indicates the package of fire safety measures that are proposed to satisfy The Building Regulations and should address any variations to current guidelines.**

The developer should consider the need for the provision of:-

- a. adequate water supplies on the site for firefighting purposes; and
- b. access for emergency firefighting appliances.

Should the applicant require further information in relation to these matters they should contact the above named fire safety officer.

Yours faithfully,

**Duly signed and authorised by**



**For Assistant Chief Fire Officer**

**Cc:** [WATERGEN@southwales-fire.gov.uk](mailto:WATERGEN@southwales-fire.gov.uk)  
**Enc:** BR13 Appendix

## Appendix

### 1.0 Access For Fire Appliances

Typical vehicle access route requirements:

| Appliance Type           | Min Width Road       | Min Width Gate      | Min Turning Circle between Kerb |
|--------------------------|----------------------|---------------------|---------------------------------|
| Pump                     | 3.7m                 | 3.1m                | 16.8m                           |
| Aerial Appliance         | 3.7m                 | 3.1m                | 26.9m                           |
| Min Turning between Wall | Min Height Clearance | Min Capacity Tonnes |                                 |
| 19.2                     | 3.7m                 | 12.5                |                                 |
| 29.0                     | 4.0m                 | 23                  |                                 |

#### Pedestrian Priority

Pedestrian schemes must take into account the need for permanent and unobstructed access for firefighting appliances. The siting of ornamental structures such as flower beds, must take account, not only of the access requirements of the fire appliances but the need to be able to site them in strategic positions; in particular, account must be taken of the working space requirements for aerial appliances. Consultation must take place with the Fire Authority during the earliest planning stages of any development to ensure adequate access for fire appliances, their siting and use.

### 2.0 Water Supplies for Firefighting

The existing output of the statutory water supply network may need to be upgraded in certain parts of the local plan area to cater for firefighting needs of new developments. It is recommended that this provision be a condition of planning consent.

#### Access to Open Water Supplies

Where development of water front sites takes place, the need for permanent and unobstructed access for firefighting appliances to the water should be made a condition of any planning consent.

Consultation must take place with the Fire Authority during the earliest planning stages of any development to ensure access for fire pumping appliances is satisfactory.

## **2.1 Housing**

Minimum main size 100mm. Housing developments with units of detached or semi-detached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any hydrant on the development.

Housing developments with units of more than two floors should have a water supply capable of delivering a minimum of 20 to 35 litres per second through any hydrant on the development.

## **2.2 Transportation**

Lorry/Coach Parks - Multi-Storey Car Parks-Service Stations

Minimum main size 100mm. All of these amenities should have a water supply capable of delivering a minimum of 25 litres per second through any hydrant on the development or within a vehicular distance of 90 metres from the complex.

## **2.3 Industry**

In order that an adequate supply of water is available for use by the Fire Authority in case of fire, it is recommended that the water supply infrastructure to any Industrial estate is as follows:

Light Industrial

Minimum Main Size 100mm  
Up to one hectare, 20 litres per second

Commercial/Industrial

Up to two hectares, 35 litres per second - Minimum Main Size 150mm

High Risk Industrial

Two to three hectares 50 litres per second - Minimum Main Size 150mm.  
Over three hectares, 75 litres per second.

In rural areas it may not be possible to provide sufficient mains water. To overcome this, static or river supplies would be considered on site at the above flow rates for at least one hour.

The Fire Authority should be consulted at the outline planning stage of any proposed projects to ascertain the exact requirements, as high risk units may require a greater flow.

## 2.4 Shopping, Health and Community Facilities

### **Village Halls**

Should have a water supply capable of delivering a minimum of 15 litres per second through any hydrant on the development or within a vehicular distance of 100 metres from the complex.

### **Primary Schools and single storey Health Centres**

Should have a water supply capable of delivering a minimum of 20 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

### **Secondary Schools, Colleges, Large Health and Community Facilities**

Should have a water supply capable of delivering a minimum of 35 litres per second through any hydrant on the development or within a vehicular distance of 70 metres from the complex.

## 2.6 Distances Between Fire Hydrants

The distance between fire hydrants should not exceed the following:

|                                                   |   |                    |
|---------------------------------------------------|---|--------------------|
| Residential areas                                 | - | 200 metres         |
| Industrial Estates (Subject to operational needs) | - | 150 metres         |
| Town centre areas                                 | - | 90 metres          |
| Commercial (Offices & Shops)                      | - | 100 metres         |
| Residential Hotels                                | - | Adjacent to access |
| Hotels                                            | - | Adjacent to access |
| Institutional (Hospitals & Old Persons Homes)     | - | Adjacent to access |
| Old Persons Homes                                 | - | Adjacent to access |
| Educational (Schools & Colleges)                  | - | Adjacent to access |

## 2.7 Conclusion

Developers should hold joint discussion with Dwr Cymru - Welsh Water or the National Rivers Authority and the Fire Authority to ensure that adequate water supplies are available in case of fire. the Fire Authority reserve the right to ask for static water supplies for firefighting on site as a condition of planning consent, if the supply infrastructure is inadequate for any given risk.