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Ffairfach  
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Dated: 5<sup>th</sup> February 2021

Planning ref: PL/00915

Please accept this letter as our very strong objection to the planning application (ref above) to develop the old gasworks site in Ffairfach. Our reasons are listed below.

I understand this application is for outline planning and is therefore seeking approval in principle to build properties on this site. It is not a suitable piece of land for residential (or business) purposes. Many people have tried over the years to get planning on this piece of land and all have failed, to my knowledge the decisions were based on access and flood risk. Nothing has changed, access is still an impossible issue, as is the flood risk. In fact as stated in the Technical Advice Note 15: Development, flooding and coastal erosions document the UK Committee on Climate change who provide independent advice to the government expect that the climate in Wales will become warmer and wetter.

Natural Resources Wales (NRW) have quite rightly refused planning on this piece of land in the past and they are refusing it again. Their letter dated 29<sup>th</sup> Jan in response to this application states;

- a) *.. it is evident that the planning application proposes highly vulnerable development of 8 new houses. Our flood risk map confirms the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15*
- b) *We refer you to Section 6 of TAN15 and the Chief Planning Officer letter from Welsh Government, dated 9 January 2014, **which affirms that highly vulnerable development and emergency services should not be permitted in Zone C2** (paragraph 6.2 of TAN15). The justification tests in paragraph 6.2 of TAN15 do not apply to highly vulnerable development or emergency services in Zone C2.*
- c) *... we do not intend to review the submitted flood consequences assessment (FCA) and we would advise that your authority **should refuse the planning application** on planning policy grounds*

We fail to see that there can be justifiable reasons why this application should be approved, given the objection from NRW and all documented evidence around the risk of flooding and the impact this all poses on people's lives. This land is in a zone C2 as stated by NRW which means we are 'without significant flood defence infrastructure'. This alone proves that this piece of land is not suitable for development against any justification criteria.

In addition to the above, we have outlined under your criteria the negative and direct impact this development will have if approved

## 1. Effect on traffic, access, road safety and parking

- The exit out of Parc Cawdor is a safety issue given the potential volume of additional cars would be directly opposite the entrances of vulnerable establishments
  - a Primary School
  - a Cylch Meithrin Ffairfach
  - a Residential Home
- Exiting from Parc Cawdor, to the right, the road goes under a restricted view bridge – the increased volume of traffic would exacerbate this
- For a number of years there has been an issue of parking outside Ffairfach primary school which gets worse each year. The traffic congestion (already of great concern) would be further exacerbated with an additional potential 16 cars using this entrance (on the basis that you would have 2 cars per household)
- In addition to the cars above, an increase of home delivery services such as Yodel, amazon, DPD etc which are not small vehicles delivering items from internet shopping, grocery shopping etc – this seems to be the new norm since Covid began and it is not anticipated that this will change when life resumes some ‘normality’
- This is a very quiet residential cul-de-sac that is occupied by mostly elderly/retired people and families with small children/grandchildren, the additional traffic would have a detrimental and dangerous impact on their safety and wellbeing
- Waste Disposal: although Parc Cawdor already has weekly waste collections, the new development would not have room for a bin store to keep their waste/recycling in and neither would a lorry be able to drive up the road and turn around sufficiently... therefore where would they put their bins for collection? At the entrance to their road which is directly outside mine and my neighbours property and in the middle of the cul-de-sac – this is not acceptable at all and would also have an impact on the cul-de-sac in terms of appearance
- The proposed entrance/exit to the development site is only 3.9m wide from kerb to kerb, this is not wide enough for two vehicles to pass, therefore how will traffic flow be controlled? The plan drawing (as insufficient as it is) shows a blind bend to access the newly built properties, therefore drivers will not be able to see oncoming traffic and if they meet someone on that road one of them will need to reverse to allow the other through. This would be a regular occurrence given the volume of cars/vehicles using this route

- Emergency Services: Fire engines and ambulances would not be able to access those houses as they have no ability to turn around which is an incredible risk to life. It is also a risk to the surrounding properties and residents – another health and safety issue
- According to building regulations B5, new developments have to make provision for access routes and hardstanding's, a dead-end access route longer than 20 metres require turning circles that are a minimum of 16.8m between kerbs and between walls 19.2m.
- Also according to the same regulations, the access roads need to be able to have a minimum carrying capacity of 12.5 tonnes. The average family car weighs 1.4 tonnes. The lane (suggested entrance/exit) is not built for this.
- As an additional note: there have been rumours that potentially a one-way system will be created, making the entrance to the site from the A483 Heol Cennen road and the exit from Parc Cawdor. Please note that this is not possible, partly as this is a privately owned lane but also building regulations state that the width of the access road must allow for emergency service access and must be a minimum of 3.7metres wide and it is only 3.1.

## **2. Scale, appearance and impact on surrounding area and adjoining neighbours**

- The potential development site plans shows that each property has only 1 designated parking space. We are in 2021 and the majority of households have 2 cars, we live in semi-rural area and most people have to drive to work. Where will they all park if there one space is already full? We suspect on Parc Cawdor, making it difficult for current residents, potentially causing neighbourly disputes, unhappy residents all round and making the cul-de-sac really congested - this is not acceptable and neither is it enforceable to stop them from parking in Parc Cawdor without further impact on current residents
- We are concerned about the potential increase in insurance premiums due to the increased risk of flooding and also the potential for future mortgages either on the new development site or the existing properties in Parc Cawdor. If this application is given the green light, the new development would be built on land that Natural Resources Wales has strongly advised the council to refuse the planning application. This could be flagged up in searches and mortgage lenders may not be prepared to take the risk. This impacts greatly on the future sales/purchase of the cul-de-sac properties let alone anyone purchasing/selling the new ones or indeed anyone currently living in Parc Cawdor who may want to re-mortgage

### **3. Loss of light, Overlooking and loss of privacy**

Our property 8 Parc Cawdor is directly affected by this development in a number of ways, in addition to bullet points above:

- The lane to the right of our home which is the proposed entrance/exit is not currently built for all this traffic and we are concerned about the impact this may have on the close proximity of the two properties, ours and number 9
- The new properties would be completely overlooking our house from both side and front elevation. We would lose all of our current privacy as they would be able to see in to the kitchen, living area, bathroom and 2 bedrooms – this is not acceptable especially as the development site is already 1 metre higher than our garden and on top of that the developer intends to elevate the properties further making them tower over our house/garden completely as they will be a minimum height of 10.2metres to the ridge. This, including the height of the land would put this property over 3 metres higher than ours
- This will block out our natural sunlight to the rear of the house and will shadow our rear garden– this is a major impact on our health and wellbeing
- Rainwater run off – given that the development land is elevated 1 metre above our garden/house at the lowest point increasing to 1.2 metres towards the rear boundary, we are very concerned about the effect this would have on our property, particularly given our comments regarding the zone C2 area and no flood defence infrastructure
- Joining our boundary fence is a garden bank which is made up of compacted soil, we are very concerned that building properties, undertaking groundworks etc on the site, close to our boundary will impact on the ground and undermine our garden bank and potentially cause our fence to come down and what if our child was in the garden playing at the time?
- I'd also like to mention here that our neighbour who lives opposite would have car lights directly into his living area every single time a car went in or out of the new road

### **4. Noise and disturbance resulting from development**

- This is a very quiet residential cul-de-sac that is occupied by mostly elderly/retired people and families with small children/grandchildren, the addition of 8 properties and up to 34 occupants living in a very small space appears to be overcrowded and would not make for a comfortable living space. This will also create a lot of noise and disturbance which the current residents of Parc Cawdor are not used to and should not be expected to get used to

- There would be considerable noise and disturbance from up to 16 cars going in and out of the cul-de-sac every day and would entirely change the environment we live in. This would not be satisfactory for people's health and wellbeing
- The document provided by Environmental Health; Planning and Noise, pg 5, point 1 states that (on the response from June McClung) *'The rating level of the noise emitted from the proposed development shall not exceed the existing background noise level'*. As we have already stated this is a very quiet cul-de-sac and having 8 properties, 16 cars, 34 people will certainly create a lot of noise and disturbance for the residents of Parc Cawdor that is far greater than existing background noise.

## 5. Clarification is required

We are not happy with some of the documents submitted and therefore seek clarity on the following:

- The location plan – only highlights the land and the lane that adjoins the A483 Heol Cennen. It doesn't show the lane in Parc Cawdor being the primary vehicular access/exit route. The A483 is a privately owned lane and is not owned by the developer. We would like to see this plan amended to truly show the vehicular access/exit route as being the lane in Parc Cawdor
- The layout plan – this shows the lane in Parc Cawdor is the vehicular access and the lane joining the A483 is pedestrianised. This needs to be clarified.
- Also on the layout plan, the application is for 8 properties however the developers documents state: *'The PREFERRED layout, is for 8 number ~ 2 bed/4-person, semi-detached houses and 2 number ~ 3 bed/5-person houses*. This is questionable as the application mentions 8 properties in total but this statement totals 10 properties – this is not in line with the site plan and should be clarified and corrected
- The factual validation report was produced in Nov 2004, some 16 years ago... where is the more up-to-date report that matches 2021 standards in terms of contaminated land and the laws surrounding the safe removal of such items from a former gas works and the guarantee that no risk remains with this? Again this needs clarity

## Consideration of the adopted Carmarthenshire Local Development Plan policies

### TR3: Highways in Developments – Design Considerations

- a) Proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted.
- b) Proposals which will not result in offsite congestion in terms of parking or service provision or where the capacity of the network is sufficient to serve the development will be permitted. Developers may be required to facilitate appropriate works as part of the granting of any permission.
- c) Appropriate parking and where applicable, servicing space in accordance with required standards

The first two points do not apply as this proposed development plan will generate significant levels of traffic and congestion in a small cul-de-sac and outside a primary school, meithrin and residential home. The impact of this is significant and has a high potential of causing harm to the amenity of residents and school children. The third point is also not achievable as we have already outlined in this document.

### GP4: Infrastructure and New Development

- a) Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development.
- b) Proposals where new or improved infrastructure is required but does not form part of an infrastructure provider's improvement programme may be permitted where it can be satisfactorily demonstrated that this infrastructure will exist, or where the required work is funded by (or an appropriate contribution is provided by) the developer.
- c) Access to, and availability of, appropriate waste management should also be considered an important element in infrastructure provision for new developments.

The development does not meet the requirements stated above. As we have already mentioned, Zone C2 is without significant flood defence infrastructure and the developer would not be able to give any assurance that this would be put in place under an improvement programme as it would incorporate a very large area. The concerns we have already raised with regards to waste management/access also show that this criteria cannot be met.

## **GP1: Sustainability and High Quality Design**

- a) would not have a significant impact on the amenity of adjacent land uses, properties, residents or the community
- b) An appropriate access exists or can be provided which does not give rise to any parking or highway safety concerns on the site or within the locality

As mentioned in this objection, this development will have a significant impact on the residents of the cul-de-sac and there isn't an appropriate access in existence. An access route cannot be provided and parking and safety concerns would be significant.

We are sure there are more elements within your policy showing that the development site does not meet your approved criteria, however these stood out to us and we wanted to mention them following the comments in the letter from NRW