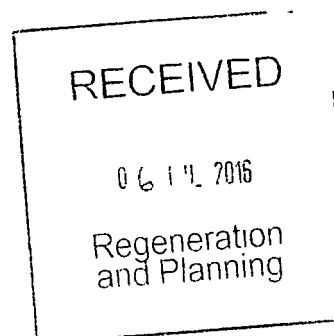
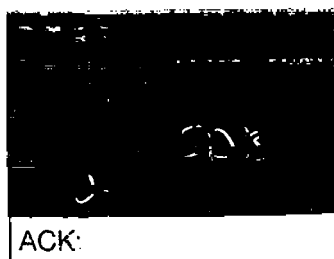


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3 July 2016

Dear Sir / Madam



Ref : Application No. 2015/00843/FUL/SDB

Proposal : Amended Hybrid application proposing development of Sully Sports and Social Club, and the construction of up to 200 dwellings at South Road, Sully

Ref your letter dated 20 June 2016

Having read most of the relevant amended documentation, I have the following concerns that do not appear to be addressed

1. Over development and loss of valuable green space. 2 to 2½ storey high dwellings are not in character with this coastal area and will dwarf and dominate the adjacent bungalows. Still no elevation details or drawings.
2. Drainage infrastructure for foul water and storm water. No allocated areas shown on any plan for surface water run-off treatment facilities. No assessment of the capacity of the Welsh Water pumping station
3. Finance for the development of the sports facilities will not be available till the latter stages of the dwellings development, and is uncertain. This could lead to under funding of the sports facilities.

Item 1 - Over development

The open nature of the site is one of Sully's greatest assets, and is a valuable green space, providing pleasing and extensive views over the open grassland to the Bristol Channel! This is worth protecting.

The proposed development would demonstrably harm these amenities enjoyed by local residents. In particular, the safe and available off-road parking, open and accessibility to all areas, and the privacy and the right to enjoy a quiet and safe residential environment.

In my opinion, the proposed housing density of 2 and 2½ storey dwellings with declared ridge heights of 8.65m and 9.80m respectively, does not respect the scale and proportions of the site and would dominate the adjacent single storey dwellings to the west, which have a ridge height in the region of 5 to 5.5m.

I suspect the ridge heights of the proposed dwellings have been exaggerated in order accommodate mostly 3 storey units, and there is a distinct danger that the proposal would lead to over-development of the site which would be entirely out of the character, and to the detriment of this coastal area, and would not result in any benefit in environmental and landscape terms.

Typical heights to ridge of 2 storey dwellings should be in the region of 7.5m, not 8.65m.

Residential housing – further comments

The report focuses on the supposed benefits of the sport and caravan / camping facilities and areas, whereas, the most contentious items are the proposed dwellings, with the associated impact on the village.

Proposed Elevation drawings – Still no views relating to this development. These should show clearly how the proposed development will look from all aspects: north, south, east and west. They should include finishes, roofing types, wall colours, etc. and they should give an idea of how the development will look, and how it could affect the area and other properties.

The only pictures of the proposed dwellings are shown in sample photographs on page 2 and 64 of the Design and Access Statement which are not specific to this site and may be misleading.

Elevation details are an important part of any Outline Planning Application, which can raise other points that should be considered. Other potential issues may only become obvious when the proposal is seen in a pictorial form.

There are elevation details and graphics provided for the sports and leisure buildings, so why not something similar for the dwellings ?

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Item 2 - Surface and storm water drainage, Foul water and foul water discharge

I refer to the 'Drainage and strategy' Report :-

Section 4. Conclusions

The Report is quite specific in its conclusions and recommendations for adequate surface and foul water treatment.

Ref - Surface and storm water. It makes the point that a positive drainage system will be required to convey surface water to the coastal outfall.

The local authority has advised that at least one surface water treatment stage should be provided prior to discharge to manage the initial flush of pollutants from the site. This will require the use of SuDS and could take the form of vegetated channels or basins or a variety of filtration methods such as permeable paving or filter trenches.

Continuing...

Ground investigation has identified that bedrock at the site is at shallow depths and therefore it is not suitable for infiltration of large volumes of surface water.

Ref – Foul Water Drainage Strategy

An additional peak foul load of 21.1l/s is estimated to be generated due to the proposed residential and sports developments, thereby requiring the detailed design of a new foul sewer system. This new system is expected to connect to the existing foul network and outfall into the existing Welsh Water Pumping Station, situated adjacent to the south west corner of the site.

Continuing...

The existing foul water drainage system should be checked for capacity to cater for the additional foul load generated from the new development. Furthermore, the capacity of the Welsh Water Pumping station to accommodate the additional foul flows should be investigated.

It is vital to identify opportunities and constraints in the early stage of any drainage assessment, and design and engineer to satisfy these requirements.

I cannot find any reference to show that the required engineering work has been considered, and has been included in this application. If it has, then filtration beds, and possible new sewers should appear on plan drawings.

My point here is – this report has been prepared for the benefit of the developer, to produce and engineer satisfactory drainage systems for surface and foul water. It should not be assumed by the Planning dept that the requirements of the Report will be met until details are included in the Planning application.

The developer must be aware of this, so why are drainage details not included.

Surface water filtration beds will require specific space requirements, which may now be occupied by dwellings and caravans. The capacity of the Pumping Station may have to be increased to deal with the additional foul water, requiring an additional pump, enlarged pipe diameters, and possibly a building extension.

It is my opinion that drainage details have been intentionally left in this vague state, possibly due to cost implications, in the hope that requirements will be relaxed once Outline Planning has been approved.

Item 3 - Finance for the development of the sports facilities

The sports facilities will not be developed until the latter stages of the housing development, when capital from sales start to accrue.

This can only happen if the cash flow analysis, building costs and profits are correct.

We are all aware of how cost estimates can go wrong for any number of reasons, e.g. extended completion times, rising costs, specification changes, prolonged bad weather, labour disputes, etc. In project managing nothing goes exactly to plan, particularly final cost, and completion time.

So, there are obvious risks involved here if profits are below expectation then something has to give. In this case the development of the sports facilities will suffer, either by reducing specifications to meet available funds, or in the extreme will be severely delayed, or not delivered.

This scenario may not be part of the Planning consideration, but if the facilities proposed cannot be delivered or are at risk of changing, then it must have some bearing on the planning decision.

The costs of the sports facilities, at this stage, can be assumed to be reasonably accurate, but relying on the profits from the housing development alone, means accepting risks. Some form of guarantee or insurance should be in place to protect the sports development finance.

Final comment

There are important key issues and major items still to be finalized as outlined above, and are still not included in this amended Planning Application, and because of these omissions, in my opinion the application although Hybrid, is not complete, and should not be approved

Surely, it is not correct to proceed further until any outstanding items, such as the residential housing and drainage systems, any other outstanding details, are evaluated and engineered and included in the masterplan.

To approve this Hybrid application will open the door to a more relaxed approach, easier acceptance, and a less critical examination of unevaluated items, which could easily lead to over development or sub standard installations.

Yours Faithfully

Graham Shep

Please confirm receipt, email -

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