

**Proposed development by Hazrem Environmental Limited at
Nine Mile Point Industrial Estate, Cwmfelinfach NP11 7HZ**

Application Ref 15/0601/FULL

Representations on behalf of Mollertech Limited ("Mollertech").

Introduction

Mollertech Limited is a major employer at Nine Mile Point, and its' premises is situated next to the current application site. As noted in the applicant's Community Involvement Statement, Mollertech was informed of the intention to deposit an application a short time prior to its deposition. However, insufficient time and information was provided at that stage, so the 'so-called' community involvement was, in effect, meaningless.

In common with other industrial and commercial users of the estate, Mollertech and indeed the Council are only too aware of the access, parking and traffic congestion difficulties experienced in the past, particularly at the entrance to the estate where the proposed development would be located. Although the Council and other parties have attempted to resolve matters, much remains to be done.

Mollertech understands that local development plan policy is not inimical to developments of this nature in this location. Its main concerns are related to the operation of the proposal, in particular, that it should not exacerbate the extant problems experienced in relation to access, parking and congestion. However, the company is also concerned with issues relating to layout, appearance and odours.

Access & parking

4. The applicant has produced a Transport Assessment (TA) and an indication is provided therein (at Table 5.1 and paragraph 5.4.2) of the Operational Traffic Generation of the site. This suggests an inward flow of commercial vehicles of between 16-38 vehicles per day, depending on the capacity

But this predicted level of traffic generation is at odds with other information provided by the applicant. Paragraph 1.4 of the Odour & Air Quality says:

It is predicted that the facility will receive up to four HGV deliveries per hour during the hours of operation (Monday to Friday 07:30 – 18:00; and Saturday 07:30 – 13:00). This equates to a worst-case total of up to 88 HGV movements per day.

This has clear implications not only on traffic generation, but also on the capacity of the plant. Although presented as a proposal for a facility with a capacity of

100,000tpa, there is nothing to prevent this capacity from being exceeded, unless measures were put in place by the public authorities.

There is no immediately apparent indication in the documentation that the applicant would agree to a limitation on capacity. Such a limitation would be easily enforced, given that a weighbridge is to be provided.

Whilst the TA provides information on the proposed HGV/commercial vehicle movements, it is silent as to whether the applicant intends to use his own vehicles to transport products in and out of the site, or whether independent contractors are to be used. If, as is usual with similar businesses, his own lorries would be predominantly used, where would they park overnight? If at the site, where would their drivers park their own vehicles when driving the HGVs? This requires clarification.

The car parking provision appears to be dictated more by the physical constraints of the site than likely demand, and is considered inadequate. In this respect, the applicant proposes a total of 12 spaces, including 2 disabled spaces.

No indication or information is provided as to how the proposed staffing levels compare with other facilities of the same type and capacity. The LPA should not rely on assumptions, but should satisfy itself that the 'assumed' staffing levels are realistic (TA Fig 4), since they appear to be wholly underestimated, particularly with regard to operational staff for this type of operation.

No apparent allowance is made in the car park's capacity for turnover when staff are changing shift.

Although not strictly a matter for the applicant, the LPA will need to be aware that this site is currently used for informal parking. To where will these cars be displaced?

Layout and design

It is apparent from paragraphs 5.1 & 5.2 of the Arboricultural Report, that the layout plan was produced prior to any advice been sought on trees or landscaping. The layout plan, in fact, calls for the wholesale removal of all the trees at the site's main frontage, which were planted as part of a landscaping scheme so as to improve local amenity.

The new planting, largely comprised of shrubs, would do little to landscape the building - the landscaping 'strategy' is an obvious misnomer - it is clearly an afterthought!

The layout shows the proposed building and machinery being sited virtually at the back of footpath. The machinery and other equipment at the front facing the main access to the estate would prove extremely unsightly.

It is beyond comprehension why this unsightly and ugly aspect of the scheme was not sited in a more inconspicuous position to the rear, away from the public

realm. It appears that operational requirements have dictated the design and layout, with little thought being given to visual amenity. The LPA should attempt to persuade the applicant to 'hand' the building, or otherwise refuse planning permission.

The constrained nature of the site becomes apparent in the HGV swept paths shown in the TA appendix 2. Manoeuvring in and out of the building is entirely reliant on the external areas being kept free of parked vehicles, and stored materials including refuse, bales and skips. The LPA should satisfy itself as to whether this is a reasonable expectation.

The site layout in terms of the removal of trees, inadequate parking, buildings and machinery built to the site's boundaries, and the tightness of HGV manoeuvring patterns are all factors symptomatic of an overdeveloped site. Should the business grow or its staffing levels have been underestimated or understated, it is inevitable that it would have effects outside the confines of the site, where conditions are already congested at certain times of the day.

Odours & smells

The submitted material on odours and smells has been noted. We would request that the LPA satisfy itself on this aspect not only by taking advice from its own expert Environmental Health staff, but by enquiring of other LPAs where such proposals have been established, as to whether difficulties in this regard have been experienced.

Mollertech request that they be kept informed of any new material that may be submitted.

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October 2015**