

Objection: Ref: 24/1046 (19 Milman Street, NP20 2HR)

On behalf of my dear residents of Pill, I formally object to the proposal due to the following concerns:

1. Fire safety risk:

The proposal poses significant fire safety risks, particularly concerning two of the bedrooms. One bedroom is classified as an inner room, while the other is located on the first floor. Both scenarios necessitate an escape route through a kitchen, which is recognized as a high-risk area during a fire. Additionally, the staircase design for one of the bedrooms raises further safety concerns. There is no supporting and weighty evidence provided in the proposal that mitigates these risks or offers a safe and adequate escape route for occupants.

Furthermore, the ceiling heights in the proposed design fall below the required standards, exacerbating the fire safety concerns.

Given that this property is intended use of shared accommodation, fire safety measures should be of utmost priority.

These objections are substantiated by the statutory consultee response provided by Environmental Health, further underscoring the severity of the concerns outlined above.

2. Lack of sustainable drainage systems compliance and its impact on residents

The proposal does not provide evidence to show that the design of the change of use satisfies sustainable drainage system (SuDS) requirements. This omission could significantly impact residents in the following ways:

- **Increased risk of surface water flooding:**
Without adequate SuDS in place, rainfall and surface water may not be managed effectively. This could lead to water pooling or flooding in and around the property, creating safety hazards and disrupting access to the property.
- **Damage to property and infrastructure:**
Poor drainage design may result in water seeping into the building's foundations, leading to structural damage, mould growth, and damp conditions that could adversely affect the health and well-being of residents.
- **Environmental Impacts:**
Inefficient drainage can contribute to waterlogging, increased pressure on local sewer systems, and pollution of nearby water bodies, ultimately degrading the surrounding environment and impacting the quality of life for residents.
- **Inadequate future-proofing:**
As climate change exacerbates extreme weather patterns, including heavy rainfall, it is essential that the design incorporates sustainable drainage solutions. Failure to do so puts current and future residents at greater risk of experiencing severe weather-related disruptions.

The absence of any evidence to show compliance with SuDS requirements raises serious concerns about the suitability and long-term sustainability of the proposal. There is no evidence of a SAB application which is likely required due to the scale of the works.

Highways:

The proposed development would result in a net parking loss of seven spaces. This shortfall would exacerbate the already high demand for parking in this area, placing further strain on existing residents.

The applicant references underused parking spaces on the south of Mendalgief Road as a justification for the proposal; however, there is no parking survey or evidence provided to support this claim. A comprehensive parking survey, including both off-street and on-street data is essential to assess parking trends and determine actual needs.

The plan fails to demonstrate provisions for safe, secure and suitable bicycle storages. This omission is critical given the local context, where sustainable transport options is considered to mitigate existing parking pressures.

The lack of evidence addressing these issues raises concerns about the impact of the proposal on the local community, particularly the increased pressure on parking availability and the absence of alternative solutions.

As the current plan stands, the use of the garage is not considered safe, as it may impact visibility and pose a risk to safety.

Flood risk:

Developments in zone C1 should pass the justification test and provide a flood consequences assessment by an appropriately qualified person, in accordance with TAN 15 requirements. This assessment should include modelling data to show the velocity, rate of rise, and depth of flooding across identified escape or evacuation routes in all flood events, along with associated analysis and this has not been presented to mitigate risk of flood.

The applicant has failed to present a proper Flood Consequence Assessment (FCA). This is critical, as it would present the elements of safety, sustainability and ensure that it does not exacerbate flood risks for the site or surrounding areas. Therefore, this proposal can potentially present risk to human life, property and the environment.

Lastly, experiencing recent storms locally underscores the heightened flood risk, making a FCA even more critical.

Please note: Should you be inclined to consider approving this application at any stage, I kindly request that it be referred to the planning committee.