

Hi Rhodri,

Re: P2024/0673 - The Butchers Arms Alltwen Hill Alltwen Pontardawe

Thanks for your emails. We agree to your requested extension of time until 30th January 2025.

As requested, please find attached amended drawing 10.94.104C with visibility splays added (*we have illustrated these at 43m x 2.4m in both directions, albeit we note highways comments that manual for streets is not required and of course the 20mph reduced speed limit needs to be accounted for - so what we have illustrated is a worse case scenario*), together with a note requiring any structures and vegetation to be maintained below 600mm within this splay.

We are providing this information to maintain the continued smooth progress of the application as we still maintain that the proposals (*even without this requirement*) will provide a significant betterment to highway safety over the status quo by virtue of the vast reduction of vehicles using this already lawful access. The existing access and its lawful frequency of existing vehicular use is a material planning consideration, which in our opinion should be given due weight.

We do not agree that a SAB application will be required for this application, as the proposal does not add more than 100m² of hard surfacing. Any areas of grass proposed will remove existing hard surfacing and by default improve existing water run off not make it worse. Therefore how could the implementation of grass cause increased risk of surface water run off and flooding to other properties? It's just not possible. The 'Welsh Government Advice Note: SAB Applications for Single Dwellings, Extensions, and Parking and Access Areas (2022)' (copy attached) sets out clearly in our opinion when a SAB application is required.

Page 1 sets out that SAB applications are required for any construction plan areas adding up to 100 square metres or more. It also sets out that this can include new buildings, driveways, patios, conservatories, extensions, demolition and re-building. Turfing an area is not listed and is not considered construction. More importantly, page 8 (*Drainage Implications*) of this document provides more clarity. This states ***"To have 'drainage implications' and therefore count towards the 100 square metre SUDS requirements threshold, a development must cover land and effect the ability of the land to absorb water"***. Turfing a portion of land would clearly not affect the ability of the land to absorb water. Page 8 therefore is quite clear in our opinion in that a SAB application would not be required in this particular case.

Notwithstanding the above, drainage is controlled by other legislation and involves a separate application process (*if indeed required*).