



# PENARTH TOWN COUNCIL CYNGOR TREF PENARTH

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Town Clerk/Clerc Y Dref

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Via email: mail@asbriplanning.co.uk

11<sup>th</sup> October 2019

Dear Sir,

**Town and Country Planning (Development Management Procedure) (Wales)  
Order 2012 SCHEDULE 1 Article 4. (4) SCHEDULE 1B Articles 2C & 2D Outline  
application for up to 576 units, a primary school, community space and 1ha of  
public open spaces with all matters reserved other than access  
Land at Upper Cosmeston Farm, Lavernock Road, Penarth**

Further to your letter of 16<sup>th</sup> September in this matter and the request for a response by 14<sup>th</sup> October 2019.

Penarth Town Council notes the extremely thorough exercise undertaken both in terms of urban design analysis and preparatory work to satisfy European environmental legislation. Despite this, however, whilst it has enabled you to advance in planning terms to an outline application (and indicative master plan), all matters save for two external access points are reserved. This leaves some uncertainty as to the product on offer.

The Town Council was grateful that you attended to give it advanced notification of your intentions and ambitions, which of course gain greater cogency through being on land presently owned by Welsh Government. Many of the issues aired at your presentation with Penarth Town Council are indeed incorporated in your plans and written material, but, not all self-build, for example. This goes to the heart of the problem i.e. the method of procurement, selection and enforcement.

Both Welsh Government and the Local Planning Authority will have evidence of the procurement issue and the extent to which this can be secured through planning legislation. A nearby example is Caversham Park adjacent to Cosmeston Park. This development was also built on Welsh Government land. The scheme incorporated green corridors and community facilities neither of which, despite best endeavours were wholly secured. Specifically, dwellings overlooking the main green corridor which had close boarded fences erected by the developers to aid sales which could not be enforced against. A community shopping allocation was abandoned to housing through lack of commercial demand. These are two examples of the danger of wishing places to exist without the mechanism to secure them. It is hoped that in further revisions, albeit perhaps beyond your remit, but central to your case, such issues can be covered.

The Town Council also considers that as this is Welsh Government land, and only part of the land holding, how is this best used for Future Generations. The indicative master plan is very conventional in demonstrating defensive boundaries (to the south), in terms of the present LDP. That Plan will be reviewed shortly. There is a new planning regime in prospect including strategic development plans and potential devolution of functions. It is at least possible that further development will occur. For example, although you mention the possibility of an extension of the tram along the previous railway alignment your whole consideration is given over to provisions for cyclists and pedestrians. It is not conceivable that Future Generations are best served through such an extension and a park and ride facility, and this is identified only as a contingency and planned for approach.

In addition to this, the Town Council was struck by the Design Commission for Wales's response to the proposal, in that it holds "concerns that the development could become a standard, suburban housing estate falling short of requirements set out in the legislation and the ambition of national planning policy".

Penarth Town Council also shares the Commission's view and in light of The Town Council recently requesting this area be brought into the Penarth Town Council boundary and jurisdiction as part of the Boundary Commission's Review, the final development is very significant to the town and will have a serious and consequential impact upon Penarth in the use of its services, facilities and infrastructure, including secondary schools, GP surgeries, and shops. Access to existing secondary schools for new families living on this development will require safe routes to be incorporated into existing routes in Penarth.

As the current plans stand, the Council remain to be convinced that the application and plans address its concerns.

The current approach of a development of this scale that will create a "village" of 576 homes, housing circa 2000 people, without providing any reliable information regarding any other aspect of the development, is not considered acceptable at this stage.

The Council feels that decision makers are at a stage with this development where they can safeguard exemplar standards and demonstrate an example of how Wales should excel in housing standards.

There are three key documents that the Council feels need to be addressed in the application prior to any level of detail being addressed or agreed.

1. PPW10 – Energy & Sustainability (March 2019)
2. Prosperity for All: Low Carbon Wales (March 2019)
3. UK Housing: Fit for the Future, Committee on Climate Change (February 2019)

All aspects of these three documents should reasonably be expected to apply and the Council sees no reason why a full application should be made until the issues in these documents are addressed fully.


Policy states that new build homes will be Zero Carbon built by 2030. It is evident that retrofitting these homes in 10 years' time is more expensive and uneconomical than building them now as very energy efficient homes. Houses being built now will still be in existence in 2030 and in an "exemplar" development should be built to Zero Carbon standard now.

Though sustainability is frequently spoken about in Austin Smith Lord's Design and Access statement, it does not refer to nor provide any objective measure or methodology to prove that, 'sustainability', has been achieved.

Building homes with east and west elevations (as opposed to north and south) promotes climate change issues rather than address them.

Penarth Town Council does not support the outline application and believes that a full application in which its concerns have been addressed should be required.

Yours sincerely



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