

## Planning Application No: 2020/01170/OUT (RL)

There is already significant public opposition to this development. The strongest justifications in support are that it addresses the housing need, and that the quality of design and construction meets the highest standards and the requirements of the Well Being and Future Generations Act 2015.

We attach a copy of our letter to Asbri Planning, (11.10.2019), in which we note the extremely thorough exercise undertaken in terms of urban design analysis, but express our concern regarding the procurement process and the extent to which this can be secured through planning legislation.

This is a very comprehensive application in terms of background detail. That this is an outline is mitigated by the use of the Design Code which holds out the prospect of reflecting the material in the Design and Access Statement. It should be included in a Planning Agreement to be effective. A planning condition will not be acceptable as it can be appealed against.

Some of the issues identified in the Pre-Application work still exist.

### Design Code

We assume there will be a phased disposal following the phases/sub phases identified in the Code and on the basis of competitive tender incorporating quantitative and qualitative elements. This is also the opportunity to include stakeholder involvement which is integral to the Government's Future Generation's provisions and the Local Government and Elections Bill.

We assume also that the social housing content will not be negotiable given this is Government land. We also note that the Government is keen to support smaller firms.

As the Code is comprised of Mandatory and Discretionary elements, we presume that this will be reflected in the selection process. In some instances the discretionary element is integral to the Character Area assessment.

Although we appreciate that procurement is not necessarily a matter for the LPA we hope this will be included in the Committee Report and that these questions can be pursued with the applicant.

### Details

#### Eastern Gateway

As shown the connection to the existing Coastal Path is weak. Some consideration should be given to the maintenance of the path without altering its nature but to account for the increased use and potential to deteriorate.

#### Transport

There have been many objections to increased traffic. The Design and Access Statement whilst built around active travel and Sustrans N88 as a principle design element pays little attention to monitoring this through. model shift. This is developed more in the Transport Assessment. Neither does the Design and Access Statement provide any mention of potential change in behaviour post Covid 19.

There is little mention made of any Metro extension into Lower Penarth in the D&A Statement although it is referred to in the Transport Assessment to argue for reduced car traffic.

Provision is said to be made for safeguarding a route but if implemented would undermine much of other design and active travel provisions. More information is required to assess the likelihood and the impact if it became a potential option. The applicant is in a good position to provide this.

**Recommendation: No Objection, subject to the following: A Planning Agreement including the Design Code should be a part of this consent.**

Please note that the Code for Sustainable Homes remains a requirement for new housing funded or built on land disposed by Welsh Government and requires a pre assessment to support a planning application.