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Our Ref: CB/BD/18.266

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Dear Robert,

Application Ref. 2020/01170/OUT
Land at Upper Cosmeston Farm, Lavernock Road, Penarth

Further to the comments received from the Vale of Glamorgan Council's Education and Highways Department on 1st July in regard to application ref. 2020/01170/OUT, I write to set out the Applicant's response to these comments, which have been complied following detailed consideration by the Design Team.

Education

It is understood that the Council's Education Department have expressed concern that as the design of the new school would need to be sympathetic to the adjacent listed building, this would potentially increase the costs of the school development. Thorough consideration has been given to the positioning of the school as part of the iterative masterplanning process and influenced by the listing of the farmhouse complex in October 2021 – the positioning of the school building as proposed is informed by placemaking considerations, allowing for a façade to both the access road and farm buildings. As the application before the LPA is for 'outline' planning permission only, the level of detail provided at this stage is appropriate to the 'outline' nature of the proposals (with the outline application comprising an 'illustrative' masterplan and 'parameter' plans as required). The Design Team consider the proposed positioning of the school building to be optimal in relation to the achievement of placemaking objectives, notwithstanding the matter of potential build costs, which would be considered at the detailed design stage as and when a Reserved Matters Application is prepared.

Clarification is requested as to whether the community sports pitch for the allocation is counted within the 1 ha allocation for the school. The sports pitch which is included within the 1 ha school site will be available for use by the local community after school opening hours, as discussed and agreed with the Authority. However, as required by the LDP allocation, Policy MG28 (10) requires the provision of 1.0ha of Public Open Space on the site. In accordance with this requirement, the scheme proposals provide for extensive Public Open Space provision, incorporating a wide range of formal and informal play space; outdoor gym; equipped play areas; coastal park; community garden and orchard; coastal path; and a wide-ranging network of interconnected green open space. It should be noted that the outdoor space and sports provision associated with the proposed Primary School has been designed so as to ensure accordance with relevant the standards set out in the Building Bulletin.

The comments from Education also raise concern regarding the shape of the proposed school building, stating that the school building is an irregular shape which is not a reflection of the school building model used in the Vale of Glamorgan. As stated above, the application as submitted is for 'outline' permission, and accordingly full details (including the detailed design of the school building) are to be provided and agreed with the Authority at the reserved matters stage. It is therefore considered unnecessary to amend the masterplan at this stage. The Design Team can confirm however, that the standard school building model (as per the example supplied within the consultation response) can fit within the site layout.

Highways

Primary Access Route

The Highways comments (dated 24th May, received by email 1st July) raise a number of issues in regards to the primary access route. The primary access route forms a key feature of the masterplan forming the 'Main Boulevard' through the site, with the form and alignment of this route taking precedent from the characteristic boulevards of Penarth. The masterplan is based on a placemaking approach, which aims to create well-defined streets and public spaces which value the positive distinctive qualities of the surrounding area. The proposed masterplan has not evolved from the basis of a highways driven scheme – the highway layout and alignment of the Main Boulevard is considered to present a well thought out and distinctive response to the development of the site. The Design Team considers that there are softer ways to achieve a reduction in vehicle speeds (which have a more positive impact in placemaking terms than amending the geometry of the road). This includes the incorporation of parking bays along the route, as well as areas of landscaping to either side of the road (which are included within the current scheme).

The Highways response also raises concern in relation to traffic speeds being exasperated by the carriageway widths and lack of direct frontage. It is the case that the proposed masterplan has incorporated active frontage along the Main Boulevard as a key design feature – primary frontage and accentuated buildings at corners along the boulevard are incorporated, which along with the variety of softer features (swales; parking bays; front gardens; landscaping and street trees) will act to make the scheme a pedestrian focused development, rather than being driven by highways concerns.

Specific/Detailed Highways Design Matters & Standards

In regards to the concern regarding the "confusing junction to the Northeast of the site", the Design Team has given further consideration to this junction and within the amended scheme proposals (as submitted on 30th June 2022), this junction arrangement has been redesigned to ensure safer solution within this area of the site (as illustrated below).



Original Submission (September 2020)



Updated Submission (June 2022)

It is reiterated that the application is submitted in 'outline' and as such, fully worked up details including specific aspects of junction design can be appropriately considered (in detail) as part of the reserved matters submissions (the 'illustrative' nature of the masterplan and the 'parameters' outlined on the accompanying parameters plans are considered to be adequate to allow for the Authority's assessment/determination of an outline scheme – which will be required to be implemented in accordance with the detailed Design Code as any detailed/reserved matters scheme progresses).

In relation to this, the comments contained within the Highways consultation response in regards to minimum carriageway widths for home-zone type streets are acknowledged. Home Zones are identified as a potential way in which to create play-friendly streets within the heart of the development areas, which will be smaller in scale with more intimate character. It is confirmed that at the reserved matters stage, the widths of all roads (including any 'home-zone' type streets) will be designed in detail (as appropriate to a reserved matters application) to ensure compliance with VoGCC standards for highway widths. This will also be the case at reserved matters stage in

regards to the compliance of all junctions with visibility splays; alignment radius for forward visibility; refuse vehicle access; and all other detailed highways layout requirements.

The Design Team can confirm that, as above, at the reserved Matters stage as appropriate, the detailed design of the scheme will ensure that turning facilities are provided within the confines of the school site for school transport, and that a drop off facility and onsite parking for staff and visitors is provided (in accordance with VoGCC standards).

Parking Standards

The Highways response notes that the parking ratios shown on the submitted Parameter Plans range from 1.6 spaces per dwelling to 2.0 spaces per dwelling, which falls below the VoGCC parking standards. As the outline application is prepared and submitted on behalf of Welsh Government, it is the case that Welsh Ministers will not promote the provision of maximum parking standards on the site. As the Authority will be aware, Welsh Government have a clear commitment to a modal shift to sustainable forms of transport. The Welsh Government's Transport Strategy advocates a move towards 45% of journeys being made by cycling, public transport or walking by 2040.

The Application Site is located within a highly sustainable location being positioned within the settlement limits of the existing 'Service Settlement' of Penarth (i.e. the second tier of the Authority's settlement hierarchy). The development of housing at this location can therefore deliver a community which is not dependent upon the private car for travel, and which can promote the use of sustainable forms of travel through active travel linkages to existing locally-based facilities and services. Bus services within the vicinity of the site are of a good standard in terms of route destinations and service frequencies, providing access throughout Penarth and destinations across the wider bus network such as Barry and Cardiff. Currently, the closest bus stops to the site are located along Lavernock Road approximately 220m to the north of the site's northern boundary. Convenient options are therefore available for future residents to utilise sustainable forms of transport. The proposed development will provide substantial active travel infrastructure within the site to promote and encourage residents to walk and cycle as well as linking with the existing pedestrian/cycle links along Lavernock Road, Railway Walk and the coastal footpath. Within the site itself, a sustainable community will be created that promotes active travel and positively connects with its immediate context giving priority to pedestrian movement. A pedestrian route linking the National Coastal Path and Cosmeston Lakes will also be established. Further enhancements include the extension of the existing NCN88 route through the site providing a direct active travel corridor from the site to Penarth Town Centre. In light of the above, it is clearly inappropriate to consider 'maximum' parking standards on this site.

Summary

In summary, we would reiterate that as the application before the LPA is for 'outline' planning permission only, the level of detail provided at this stage is appropriate to the 'outline' nature of the proposals (with the outline application comprising an 'illustrative' masterplan and 'parameter' plans as required). It is considered that the Illustrative Masterplan and Parameter Plans as submitted to the LPA on 30th June 2022 provide more than a sufficient level of outline detail on which to determine the acceptability of an outline scheme (with further detailed information coming forward as the detailed/reserved matters scheme is progressed, and with the implementation of the detailed scheme being governed by the overarching Design Code).

We trust that the above comments address the concerns raised within the consultation comments raised by Education and Highways Departments (as provided by email on 1st July 2022), and provide reassurance that all detailed design considerations can be appropriately resolved.

Yours faithfully,

A black rectangular redaction box covering the signature of Catherine Blyth.

Catherine Blyth
Associate