

MEMORANDUM / COFNOD

The Vale of Glamorgan Council
The Alps, Wenvoe, CF5 6AA



To / I:	Mr. Robert Lankshear
Dept / Adran:	Planning
Date / Dyddiad:	21/03/2023
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Subject / Testyn: **Planning Application No. 2020/01170/OUT Land at Upper Cosmeston Farm, Lavernock Road, Penarth**

Proposal: **Outline application for residential development, a primary school, community space and public open space with all matters reserved other than access**

With regards to the amended or additional information submitted for the above site in July 2022 where they relate to flood, drainage and coastal erosion matters we would comment as follows.

This application remains subject to SAB approval of which a pre-application has previously been submitted and commented upon. It should be noted that the revised proposals have been further modified since the SAB pre-application was received and our previous comments, including the endorsement of various conditions proposed by Shared Regulatory Services, remain unchanged in this regard.

The revised Masterplan still includes a drainage basin at the northern boundary of the site, adjacent to Whitcliffe Drive. The proximity of the proposed basins to a known flood risk area in conjunction with trial pits making water during testing raise concerns as to the position of the basins in relation to the properties at Whitcliffe Drive. As such our comments relating to the appropriate consideration of flood risk being demonstrated in support of the final drainage strategy also remain unchanged.

In response to the LLFA's comments of 22nd February 2021 and subsequent liaison with the developer's agent, a topographic survey of the cliff face was undertaken in July 2021 and the data supplied in March 2022. A number of technical queries relating to the dataset are currently being addressed by the original surveyors. An initial check of the data against independently collected datasets indicates that the survey is fit for purpose but further information (metadata) will be required to enable a meaningful comparison with other datasets going forward. This dataset was subsequently used to derive the latest available position for the cliff-top in July 2021.

The July 2021 cliff top position was compared to the cliff edge line used in the new submission and found to be in general agreement, with the majority of the revised plans showing a cliff edge line slightly inland - a more conservative position for planning purposes - of the position derived from the topographic survey discussed above. One exception was noted at a discontinuity in the cliff face in line with a field boundary approximately 130m south of the north-east corner of the development (ST 18613 69333). At this location an approx. 15m length of the cliff was identified a maximum of 4m out of position generally seaward of the upper cliff edge position when compared to the available survey data. The cliff edge position matches the seaward edge of an area of vegetation established halfway down the cliff face, as shown in the top centre plate in Figure 2 of the Geological Inspection of cliffline and footpath produced by Earth Science Partnership. Overlaying the correct cliff top position over the new masterplan all engineered structures appear to remain more than 20m inland from the current cliff face. Given the above, it is again requested

that the developer confirms the current position of the cliff edge matches the mapped cliff position used as a basis for any erosion estimates submitted in the future.

No additional evidence has been submitted attempting to quantify the actual erosion rates fronting the development. As per our previous comments, it is therefore requested that a further survey of the cliff face and an assessment of erosion rates in the intervening period be submitted in support of the submission of reserved matters relating to any development adjacent to the coast. Further cliff surveys and erosion assessment should be undertaken a minimum of every 2 years during construction, following any significant cliff falls and within 12 months of completion of the development. The survey specification and form of assessment shall be agreed by the LPA.

Section 9.5.35 of the Environmental Statement continues to recommend a 10m buffer between the cliff edge and any critical infrastructure. Once again we concur with this statement but also note that the 10m buffer should be dynamic and adequate allowance should be made for the cliff to recede during the life of the development. We would therefore reiterate our previous recommendation that a conceptual assessment of the impact of coastal erosion on the final development layout is undertaken to identify the potential risks of future increases in erosion rates on the sustainability of the development.

As per our previous comments, given the potential for changes to the location, form and performance of SuDS features as the development design is finalised a means of assessing the potential impact on coastal erosion is therefore required. As such, where infiltration-based SuDS features are proposed within the development an appropriate assessment of the potential impact on cliff erosion rates will be required. No additional information has been submitted in relation to our previous comments on this matter.

Given the above and with regards to our previous comments we remove our objection to approval of the proposed development. Should outline planning be granted we would request the following conditions are applied.

Conditions:

A programme of topographic surveys of the cliff face and subsequent assessment of erosion rates shall be undertaken with the specification, deliverables and timing of surveys to be agreed in advance by the LPA. At least one additional survey shall be undertaken and compared to the baseline survey in support of any reserved matters application for development adjacent to the coast.

An assessment of the potential impact of future erosion on the sustainability of critical infrastructure as erosion starts to impact on the development shall be undertaken in support of subsequent reserved matters relating to the layout of the development and position of critical infrastructure.

A long-term programme of cliff monitoring shall be established in consultation with the Council and Wales Coastal Monitoring Centre.

Any structures falling within 10m of the cliff edge throughout the life of the development shall be removed, unless agreed otherwise with the Council acting as Coast Protection Authority.

Advisory:

New developments of more than one dwelling or where the area covered by construction work equals or exceeds 100 square metres as defined by The Flood and Water Management Act 2010 (Schedule 3), will require SuDS Approval Body (SAB) approval prior to the commencement of construction.

Further information of the SAB process can be found at our website or by contacting our SAB team: sab@valeofglamorgan.gov.uk

Clive Moon
Engineering Manager – Environment

for Operational Manager Highways and Engineering
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