



Direct line / *Deialu Uniongyrchol*: 01656 643165

Our Ref / *Ein cyf*:

Your Ref / *Ein cyf*:

Ask for / *Gofynnwch am* : Mr S A Ingram

Date / *Dyddiad*: 15th October 2012

**Mrs Nicola Gandy
Programme Officer
Bridgend Local Development Plan Examination
Innovation Centre
Bridgend Science Park
BRIDGEND
CF31 3NA**

Dear Mrs Gandy

**Bridgend Local Development Plan Examination
Retailing Sessions**

Thank you for your letter dated 15th October 2012 regarding the retailing issues Examination session relating to the Bridgend LDP, and for giving me the opportunity to respond.

In the first instance, I think it would be pertinent to update you and the Insepctor on the Council's position on the representations on retail need and the South Wales Police Headquarters site raised on behalf of Waterstone Estates (representation 1258 and Alternative Site AS053 refer).

CACI Ltd, who produced the original and updated Retail Needs Assessment reports to support the Bridgend LDP no longer offer this service to local authorities and, due to changes in personnel, are not able to support the Council in responding to representations, and your specific questions, at the LDP examination.

However, in light of the comments made at the Pre Hearing Meeting and in acknowledging both the evidence it has before it in terms of the CACI Retail Need Reports and the representations from Waterstone Estates, the Council has taken swift action in response to this situation. It has appointed RPS Group to undertake an assessment of the assumptions made by CACI in their report with particular attention to those areas which have been challenged by Waterstone Estates. They will also examine the realism of the alternative assumptions put forward by Waterstone Estates, which lead them to conclude the need for additional convenience goods floorspace in the Bridgend catchment area during the Plan period.

The results of the RPS work will be available in time for the Council's position to be clarified in its statements to the Examination. This may enable the Council to produce a Statement of Common Ground on some of the issues, subject to acceptance by the representor.

In terms of the issues relating to the sequential test and impact on existing centres, the Council is confident that even if a need is identified there will be no requirement for the plan to change as it can be satisfactorily accommodated on the existing sites identified by Policy REG5 of the Plan (which have not been objected to by Waterstone Estates) and other sequentially preferable sites.

In relation to the Examination sessions themselves, the Council would welcome a separate session on 6th December 2012 on these issues where they may be explored further. However it would question the need to hold them in a formal fashion with cross-examination of witnesses and the use of advocates.

The Council notes that Planning Inspectorate guidance on LDP examinations state that formal cross examination will only be used in exceptional circumstances. It is of the opinion that the circumstances surrounding these issues do not fall into this category.

As CACI will not be appearing, specific questions regarding methodology will not be able to be directly answered. Rather the Council would rely on interpretation by RPS Group on these issues. Similarly, Waterstone Estates has not submitted detailed evidence which would require such a level of scrutiny.

Furthermore, Waterstone Estates do not appear to be challenging the validity of the entire evidence, and focus on three separate areas of the methodology which, in the Council's opinion, could be dealt with at informal session. This would allow a constructive discussion of issues back and forth, allowing the Inspector to form his own view on this issue.

Whilst enabling a more efficient resolution of these issues, this approach would not, in the Council's opinion, require legal representation at the session; thereby significantly reducing costs for both parties.

Alternatively, the Inspector may wish to give consideration to the option of conducting the session on the issue of convenience retail need only and then seeking to come to a preliminary view (similar to that which he proposes on population growth and housing and employment requirements which could additionally impact upon retail need) on this issue. The Council could then consider how it wishes to proceed with this issue and put forward its preferred sites for development, should the Inspector indicate that a site/s are needed.

If this is not the case, and the Inspector wishes to focus on the suitability of the South Wales Police HQ site for convenience goods retailing, he may also wish to invite South Wales Police (142) to the session who, as you will note, as landowners have supported the deposit LDP position in allocating the site for residential development (Policy COM1(5) refers) and have, indeed, sought to increase the area of the residential site through Alternative Site AS056.

I look forward to hearing the Inspector's final view on this matter.

Yours sincerely,



Susan Jones
Development Planning Manager

cc. RPS Group, Cardiff