

**Nicola Gandy**

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**From:** Stuart Ingram  
**Sent:** 22 November 2012 09:38  
**To:** programme.officer  
**Cc:** 'Ross Bowen'; Chris Tookey; ldp  
**Subject:** Session 8: Convenience Goods Retailing  
**Importance:** High

Dear Nicola

I refer to the submissions by Mango Planning on behalf of Waterstone Estates Ltd relating to the session on Bridgend Convenience Goods retailing.

The Council believe that the submissions made do not meet the guidelines for participants as outlined by the Inspector and Planning Inspectorate.

The guidelines state that representations already made at the Deposit or Alternative Sites consultation stages should **have included all the points, documents and evidence to substantiate representors' cases**. Representors should **not submit any further material based on the original representations**. Submissions by Representors should be related to the representations previously submitted by that Representor at the Deposit stage and **should not seek to introduce new representations**

The response introduces new material. The original representations raised several key issues in the relation to the CACI study methodology which the Council has addressed in its evidence. The representor is now seeking to go back to 'first principles' for example with issues as fundamental as population and expenditure per capita estimates. This is utterly perplexing given the first item original raised related to 'Special Forms of Trading' – a later stage of any quantitative exercise. We do not consider new evidence should be accepted at this stage. The introduction of further technical evidence also goes against the opinion that both parties expressed that the submissions could be examined by way of a hearing session rather than a formal session.

The guidelines also states that further written submissions should only be made **where needed to respond to the questions posed** in the circulated Hearing session Agenda.

The representor seeks to go beyond answering the questions raised by the Inspector. By their own admission Question Qn6a is directed solely at the LPA and requires a response to the 'specific criticisms of the retail report in relation to need'. The Council have responded in our original statement with the assistance of RPS.

The guidelines also require that submissions should be **brief**. They **should focus on the issues/matters identified and on the tests of soundness**. Any requested submissions should be as concise and to the point as possible. Submissions **should otherwise certainly not exceed 3,000 words**

The response is not brief. It is over 7,000 words long with 60 pages of appendices.

Taking all the above into account, the Council consider that the representor has acted unreasonably in respect of their submission which seeks to introduce new material and evidence. In order to rebut these last minute submissions the Council would have to incur considerable further costs. It respectfully points out to the fact that this piece of evidence has been in the public domain in its original form since 2007 and in an updated form since 2010; which has afforded ample time for any significant concerns regarding its contents to be raised.

The Council would request that the Inspector deals with this issue expeditiously as you will appreciate that LPA resources are currently at a premium, given that the examination sessions have commenced.

I look forward to hearing from you shortly.

best wishes

23/11/2012

Stuart

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