

## **WELSH GOVERNMENT**

### **Position Statement**

**Examination Hearings: June/July 2012**

**Hearing Session 16: Delivering  
Infrastructure**

**Blaenau Gwent Local Development Plan**

## **SESSION 16 DELIVERING INFRASTRUCTURE**

### **Question 1.**

**Is there a clear delivery and implementation plan including funding arrangements to guide the policies and delivery of site allocations set out in the Plan?**

We note that:

- Deposit Plan policy DM4 (infrastructure provision) refers to the use of planning obligations and CIL.
- Deposit Plan - section 9 Delivery & Implementation: includes, for all allocations, some information on infrastructure needs, phasing information, funding sources and responsibility for delivery.
- Housing Delivery Paper Feb2012 (doc SD44) – aimed at evidencing deliverability.
- There is no infrastructure background paper.

**CIL & s106:** Our Deposit Rep.B.i(ii). Deliverability: Infrastructure Provision (LPA Ref: 3D.128) has not been met as Proposed Change MC15 provides limited clarification in relation to CIL. Our response to the FCs advised that MC15 fails to provide clarity on what mechanism is to be used for infrastructure delivery. The key question is whether it can be delivered by s106 planning obligations without falling foul of the CIL Regulations.

### **Question 2.**

**2.1 What measures are in place for the Council and its partners to deliver the infrastructure pledges in the Plan?**

**2.2 Are delivery mechanisms and responsibilities clearly defined between partners?**

No further comment

### **Question 3.**

**3.1 Are there any “show stoppers” that would jeopardise the spatial strategy and the implementation of policies to support it if they were delayed or not delivered through a lack of funding?**

**3.2 Are the dependencies and the implications of any delay understood and provided for?**

**3.3 What contingency measures are in place?**

No further comment

### **Question 4.**

**4.1 Is it always viable to impose requirements on developers for contributions that will add to the cost of development (e.g., affordable housing, provision of open space) on top of other site costs associated with the redevelopment of brownfield land?**

Viability should be a consideration in determining the content of the Plan. Where funding of related necessary infrastructure requirements is to be sought through planning obligations the Plan should specify the Council's

priorities to inform the situation where of provision of all required infrastructure by a prospective developer deem the development unviable. It would be through the Development Management process that viability is considered at planning application stage, with determination of appropriate planning obligations guided by the adopted LDP.

**4.2 Should the Council prioritise where it will seek to secure S106 contributions where such contributions put into doubt the viability of a development?**

Yes.

Policy DM4 (Infrastructure Provision) includes, in its justification at para 7.33, the various possible planning obligations, and Section 9 of the Plan specifies where affordable housing provision is required. However, no indication of priorities is provided by the Plan; whilst the information at section 9 indicates the outcome of site analysis work, it only broadly specifies what is required without indicating priorities.

The Draft SPG on Planning Obligations (doc SD128 –para 4.8) advises that priorities will be on a case by case basis informed by “the Council Service Areas taking into account the site specific circumstances of the development and corporate priorities set out in the Council’s Community Scheme”.

This position does create uncertainty; the LDP should set the framework that the Council wants and the Council Service Areas can then decide the detail.

**Question 5.**

**How does the Plan cater for the county’s need for telecommunications development?**

No comment

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