Inspector’s Note to Council following receipt of ED027.7 – Council’s Response to LDP Shortfall of 274 Units.

1) I note the Council’s proposal that the identified housing shortfall of 274 units should be met in part by the allocation of a 7ha site at Celtic Springs, to accommodate 200 units.

2) The site is allocation EM1(iii) in the submitted LDP, identified as primarily for B1 business use. The Council considered, on the strength of its evidence base, this allocation to be sound. I am concerned that a decision at this juncture to delete this employment allocation from the Plan would undermine the credibility of the evidence base on which the Plan is founded, and would also potentially weaken the Plan’s stance in relation to resisting the loss of allocated EM1 sites to other forms of development (policy EM3 as amended).

3) The site was allocated as employment land following a review of the Council’s anticipated needs over the Plan period and the available sites best placed to meet that need. The submitted Plan notes that the site benefits from excellent strategic connectivity and that B1 business uses would integrate well with existing uses. Whilst the Council states that an application has been made to develop the site for housing, supported by information that the site has been marketed for office use over the past 6 years without success, this application has not yet been determined. The Council was aware of the lack of marketing success when it assessed and rejected the alternative site submission made in June 2013. Lack of marketing success over recent years in the general economic climate which has prevailed does not, of itself, demonstrate that the site is inherently unviable for the purpose proposed in the submitted Plan.

4) Whilst the Council also points to the existence of the strategic employment allocation nearby at Duffryn, that land is evidently designated as B1 and B2 land for single large user projects of at least 10 ha at a time; it therefore would appear to cater for a different kind of employment user to the Celtic Springs site.

5) Overall, on the evidence available to me, I find the rationale put forward for this abrupt change to the land’s employment designation in the Plan unconvincing and inadequately supported by evidence.

6) Accordingly, I invite the Council to reconsider this matter.

Alwyn Nixon
Examination Inspector