

## Appendix 2: Consultation Representations, Responses and Resultant Action

Section 5: On-Site Provision of Affordable Housing	
<b>Organisation</b>	Redrow
<b>Representation</b>	It is considered that the suggested clustering of 10 affordable housing units is too low and that 15, more akin to other LPAs, would be appropriate.
<b>Local Planning Authority Response</b>	Large concentrations of mono-tenure affordable housing can lead to stigmatisation, social disintegration and unstable communities. A 10 unit cluster is considered the maximum appropriate size for a sustainable cluster of affordable housing on major, mixed-tenure housing developments. This limit has been informed by routine discussions with RSL housing managers that operate across the region. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities. This issue was considered as part of Hearing Session 3 during the RLDP Examination. The policy position was deemed sound by the independent Planning Inspector and adopted as part of the suite of RLDP policies and supporting text to those policies (Policies COM3 and PLA1-5 refer).
<b>Resultant Action</b>	No action necessary – the SPG provides supplementary information and guidance in respect of the adopted RLDP policy framework, but it cannot introduce new policies or change the policies in the adopted RLDP.
<b>Organisation</b>	Redrow
<b>Representation</b>	<p>Notwithstanding the first point above it is considered that the wording of a <b>maximum cluster</b> of affordable housing units is too restrictive in some scenarios and more flexible wording should be utilised to take account of:-</p> <ul style="list-style-type: none"> <li>- The inclusion of flatted accommodation should be an example of whereby clusters of more could be appropriate.</li> </ul>

	<ul style="list-style-type: none"> <li>- If more than a policy compliant affordable housing requirement is delivered on-site (e.g. mixed tenure delivery by RSL or private developer partnering with an RSL) then clusters would likely be larger to enable good placemaking to take place.</li> <li>- From a management perspective RSLs would often prefer to see affordable units delivered through S106 to be in limited clusters as can limit overheads and ease of maintenance.</li> </ul>
<b>Local Planning Authority Response</b>	<p>The RLDP does not seek to promote large concentrations of mono-tenure affordable housing for the aforementioned reasons and it is beyond the scope of the SPG to change the adopted policy framework in this respect. Adopted Policies PLA1-5 state that affordable housing delivered as part of strategic sites is “to be integrated throughout the development in sustainable clusters of no more than ten units”. Equally, supporting paragraph 5.3.28 to adopted Policy COM3 states, “Where affordable housing is provided, it should be constructed to Development Quality Requirement Standards and integrated into the overall development through separate clusters of no more than ten affordable units”. The use of the term ‘maximum cluster’ in the SPG therefore accurately reflects this adopted policy framework. In response to the three examples provided:</p> <ul style="list-style-type: none"> <li>- Firstly, the inclusion of flatted accommodation within a proposed development is not considered to provide a suitable exception to the adopted policy framework alone.</li> <li>- Secondly, the affordable housing policy requirements detailed in COM3 are minimum requirements and assume no availability of grant. The percentage of affordable housing on a mixed-tenure site could be boosted if, for example, grant was secured to ‘top up’ the minimum policy requirements. It is acknowledged that 10 unit clusters may be not prove feasible to deliver completely in instances where the affordable housing ratio increases significantly with grant support. An addition to the SPG would helpfully clarify a degree of flexibility may be warranted in such circumstances and where justified by the applicant.</li> </ul>

	<ul style="list-style-type: none"> <li>- Thirdly, and contrary to the representor's statement, the 10 unit cluster policy was devised following routine discussions with RSL housing managers as to the appropriate size for a sustainable cluster of affordable homes. These discussions indicated the optimal size of a cluster is 6-8 affordable units and 10 units is therefore considered to represent the upper limit of sustainability in this respect. This approach was considered sound by the independent Planning Inspector and forms part of the adopted RLDP policy framework.</li> </ul>
<b>Resultant Action</b>	Add a clarifying sentence to paragraph 5.7 that states, "In instances where development proposals exceed Policy COM3's minimum affordable housing requirements, due to grant support or otherwise, a more flexible approach to clustering may be acceptable where justified, providing this does not jeopardise sustainable integration of affordable units".
<b>Organisation</b>	Redrow
<b>Representation</b>	<p>Paragraph 12.4 of Technical Advice Note 2 (TAN 2) states "Local planning authorities should not seek to prescribe through planning conditions or planning obligations which partners developers should use to provide affordable housing, but rather should aim to ensure practical arrangements that will deliver their policy".</p> <p>The proposed wording in paragraph 5.14 of the draft SPG stating "The Process for nominating an RSL will be determined and managed by the LHA (Local Housing Authority)" is considered to contract to TAN 2 advice. It is considered wording of "the LHA can suggest its preferred RSL..." would be more appropriate. The LHA cannot enforce which RSL is ultimately used providing that a developer enters a contract with an RSL (suitably defined to meet Welsh Government (WG) requirements) that operates in the area.</p>
<b>Local Planning Authority Response</b>	As drafted, the SPG does not seek to prescribe a nominated RSL through conditions or planning obligations. Paragraph 5.13 currently states, "no particular RSL will be named within any s106 agreement". This is for several reasons including the future possibility that the RSL first nominated

	<p>by the LHA does not complete the transfer of the affordable housing units or the units need to be transferred to another RSL for a certain reason.</p> <p>Paragraph 3.1 of Technical Advice Note (TAN) 2 states its purpose “is to provide practical guidance on the role of the planning system in delivering” (affordable housing) and emphasises the “need to work collaboratively” to this end. Paragraph 13.1 of TAN 2 also states that “an effective way of achieving control over occupancy is to involve a registered social landlord”.</p> <p>The draft SPG sought to remove ambiguity from the RSL nomination process and this was intended to ensure practical arrangements to deliver the RLDP’s affordable housing policies in accordance with paragraph 5.14 of TAN 2.</p> <p>However, in light of the representor’s comments and the need to work collaboratively as specified within TAN 2, more emphasis will be placed on consultation with the developer to inform the RSL nomination process.</p>
<b>Resultant Action</b>	Paragraphs 5.13, 5.14 and 8.2.4 will be amended to include references to consult with the developer to inform the RSL nomination process.
<b>Organisation</b>	Home Builders Federation
<b>Representation</b>	<p>Para 5.7 HBF suggest that the 10 unit cluster should not be described as a maximum, as on larger housing developments including a number of strategic sites allocated in the plan a larger number may be acceptable. Considering that this cluster could be a mix of tenure types, social rented/low-cost home ownership, this further reduces any perceived impact.</p> <p>HBF would suggest the following alternative wording:</p>

	Although in most cases a 10-unit cluster is considered to be the maximum appropriate size for a sustainable cluster of affordable housing on a mixed-tenure housing development each site will be considered on its own merits.
<b>Local Planning Authority Response</b>	<p>Adopted Policies PLA1-5 state that affordable housing delivered as part of strategic sites is “to be integrated throughout the development in sustainable clusters of no more than ten units”. Equally, supporting paragraph 5.3.28 to adopted Policy COM3 states, “Where affordable housing is provided, it should be constructed to Development Quality Requirement Standards and integrated into the overall development through separate clusters of no more than ten affordable units”. The use of the term ‘maximum cluster’ in the SPG therefore accurately reflects this adopted policy framework.</p> <p>However, it is acknowledged that in certain limited instances, it may be appropriate to abut several discrete tenure clusters of up to ten affordable housing units (such as one discrete cluster of social rented units alongside one discrete cluster of Low Cost Home Ownership units). This may be necessary to facilitate sustainable high density development, while still seeking to avoid undue concentrations of mono-tenure affordable housing, providing this does not jeopardise sustainable integration of affordable units.</p>
<b>Resultant Action</b>	Add a clarifying sentence to paragraph 5.7 that states, “where proposals demonstrate they have sought to deliver sustainably high residential densities in accordance with Policy COM6, it may be considered appropriate to abut limited discrete affordable tenure clusters. This may include, for example, one cluster of social rented units abutted to one cluster of Low Cost Home Ownership units, providing the affordable units are sustainably integrated into the wider development”.
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	With regard to the overall delivery of affordable housing, we have a general concern over the availability of suitable sites and the lack of windfall sites within Bridgend to meet the evidenced need.
<b>Local Planning Authority Response</b>	The SPG clarifies the adopted policy framework although cannot change the adopted affordable housing target, suite of housing allocations or settlement boundaries.

	<p>The RLDP's affordable housing target of 1,711 affordable dwellings has been robustly determined by considering the housing need identified in the Local Housing Market Assessment (LHMA) alongside rigorous viability testing to ensure formulation of viable affordable housing policy thresholds and proportions.</p> <p>The affordable housing target will primarily be delivered on allocated sites and existing sites with planning permission together with windfall sites within the settlement boundaries. There are a range of housing supply components within and to balance the housing trajectory. The affordable housing target and components of supply were both deemed sound at independent examination by the appointed Planning Inspector and form part of the RLDP's adopted policy framework. It is beyond the scope of an SPG to alter the settlement boundaries or allocate additional sites beyond those allocated as part of the recently adopted RLDP.</p>
<b>Resultant Action</b>	No action necessary – the SPG provides supplementary information and guidance in respect of the adopted RLDP policy framework, but it cannot introduce new policies, new allocations or change the policies in the adopted RLDP.
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	The affordable housing requirements for housing allocations and windfall sites are considered to be conservative as a target and more ambitious targets may encourage higher delivery, particularly as these requirements are often eventually reduced. It is appreciated however that this will be dictated by viability on each individual scheme.
<b>Local Planning Authority Response</b>	The SPG clarifies the adopted policy framework although cannot change the adopted affordable housing requirements detailed within Policy COM3, which were subject to independent examination and deemed sound by the appointed Planning Inspector.

	<p>The scale of affordable housing need and spatial distribution thereof were key considerations when determining the overall level and location of housing in the adopted RLDP. During the RLDP period (2018-33), development proposals are expected to deliver a target total of 1,711 affordable dwellings across Bridgend County Borough. The Plan's contribution to affordable housing provision has been robustly determined by considering the housing need identified in the LHMA alongside rigorous viability testing to ensure formulation of viable affordable housing policy thresholds and proportions. The affordable housing target only relates to sources of supply that are funded and delivered through the planning system and the Plan has made provision to deliver the affordable housing target within the designated settlement boundaries. As such, this target represents the added value the RLDP will contribute to affordable housing supply alongside a range of other delivery mechanisms. These include, although are not limited to, Social Housing Grant, other capital/revenue grant funded schemes, RSL self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>In summary, the RLDP is one mechanism to increase affordable housing supply. It has maximised nil-grant affordable provision as far as possible by setting robust affordable housing policies although cannot address all affordable housing need identified across the County Borough alone. Viability testing undertaken as part of RLDP preparation demonstrated the affordable housing policies cannot be increased further without grant intervention.</p>
<b>Resultant Action</b>	No action necessary – the SPG provides supplementary information and guidance in respect of the adopted RLDP policy framework, but it cannot introduce new policies or change the policies in the adopted RLDP.
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	It is hoped that the Council will take a pragmatic approach to limiting affordable housing to clusters of no more than 10 units. Whilst the reasoning is understood, limiting to clusters of 10 may not always be appropriate and it would seem reasonable to have this as a target rather than an upper limit and

	for planning officers to have the flexibility to determine what is appropriate for individual sites and locations.
<b>Local Planning Authority Response</b>	<p>The RLDP does not seek to promote large concentrations of mono-tenure affordable housing for the aforementioned reasons and it is beyond the scope of the SPG to change the adopted policy framework in this respect. Adopted Policies PLA1-5 state that affordable housing delivered as part of strategic sites is “to be integrated throughout the development in sustainable clusters of no more than ten units”. Equally, supporting paragraph 5.3.28 to adopted Policy COM3 states, “Where affordable housing is provided, it should be constructed to Development Quality Requirement Standards and integrated into the overall development through separate clusters of no more than ten affordable units”. The use of the term ‘maximum cluster’ in the SPG therefore accurately reflects this adopted policy framework. However, and as aforementioned, further clarity will be added to the SPG to account for situations where:</p> <p>A) More flexibility may be required where the percentage of affordable housing exceeds Policy COM3’s minimum affordable housing requirements, due to grant support or otherwise.</p> <p>B) It may be appropriate to abut several discrete tenure clusters of up to ten affordable units (such as one discrete cluster of social rented units alongside one discrete cluster of Low Cost Home Ownership units) in order to facilitate sustainable, high density development in accordance with Policy COM6.</p>
<b>Resultant Action</b>	<p>Add clarifying sentences to paragraph 5.7 that state,</p> <p>“In instances where development proposals exceed Policy COM3’s minimum affordable housing requirements, due to grant support or otherwise, a more flexible approach to clustering may be</p>



	<p>acceptable where justified, providing this does not jeopardise sustainable integration of affordable units”.</p> <p>And</p> <p>“Where proposals demonstrate they have sought to deliver sustainably high residential densities in accordance with Policy COM6, it may be considered appropriate to abut limited discrete affordable tenure clusters. This may include, for example, one cluster of social rented units abutted to one cluster of Low Cost Home Ownership units, providing the affordable units are sustainably integrated into the wider development”.</p>
<b>Section 6: Off-Site Provision of Affordable Housing and Commuted Sums</b>	
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	No comment – this policy is supported.
<b>Local Planning Authority Response</b>	Noted.
<b>Resultant Action</b>	No amendments necessary.
<b>Section 7 and Appendix A: Funding Arrangements and Transfer Values</b>	
<b>Organisation</b>	Redrow
<b>Representation</b>	<p>Redrow acknowledges that the approach/methodology proposed is following on that undertaken on a regional basis with the Vale of Glamorgan having already adopted their updated transfer values.</p> <p>From the adoption date of the SPG Redrow would strongly suggest that the values are updated ideally every 6 months or as a minimum every 12 months and commitment made to this. This is to ensure that contracts with RSLs can be entered into reflecting up-to-date information.</p>

<b>Local Planning Authority Response</b>	The proposed methodology seeks to provide an annual uplift to the transfer values in Appendix A in line with the WG's maximum published social rent inflation. The rent cap is published by WG annually so it will not be possible to update the values every 6 months. However, the original intention was to allow for indexation linked to annual social rental increases. The representor's suggestion to update the values annually is therefore supported. This will provide a reference point for use in s106 agreements.
<b>Resultant Action</b>	No amendments necessary. Council approval will be sought to update the transfer values within Appendix A on an annual basis to ensure they remain current.
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	These changes are supported as they enable transparent conversations to be held with housebuilders and limit the opportunity to reduce on-site deliverability through viability arguments, thereby encouraging the delivery of affordable housing.
<b>Local Planning Authority Response</b>	Noted.
<b>Resultant Action</b>	No amendments necessary.
<b>Section 8: Section 106 Agreements</b>	
<b>Organisation</b>	Redrow
<b>Representation</b>	As commented on under section 5 above, the Council should not have a definitive say on the Nominated RSL and this be stipulated within the S106 agreement. It is suggested that paragraph 8.2.4 of the draft SPG be re-worded to reflect the previous comments made under section 5 above.
<b>Local Planning Authority Response</b>	As drafted, the SPG does not seek to prescribe a nominated RSL through conditions or planning obligations. Paragraph 5.13 currently states, "no particular RSL will be named within any s106 agreement". This is for several reasons including the future possibility that the RSL first nominated

	<p>by the LHA does not complete the transfer of the affordable housing units or the units need to be transferred to another RSL for a certain reason.</p> <p>Paragraph 3.1 of TAN 2 states its purpose “is to provide practical guidance on the role of the planning system in delivering” (affordable housing) and emphasises the “need to work collaboratively” to this end. Paragraph. 13.1 also states that “an effective way of achieving control over occupancy is to involve a registered social landlord”.</p> <p>The draft SPG sought to remove ambiguity from the RSL nomination process and this was intended to ensure practical arrangements to deliver the RLDP’s affordable housing policies in accordance with paragraph 5.14 of TAN 2.</p> <p>However, in light of the representor’s comments and the need to work collaboratively as specified within TAN 2, more emphasis will be placed on consultation with the developer to inform the RSL nomination process.</p>
<b>Resultant Action</b>	Paragraphs 5.13, 5.14 and 8.2.4 will be amended to include references to consult with the developer to inform the RSL nomination process.
<b>Organisation</b>	Home Builders Federation
<b>Representation</b>	Para 8.2.1 HBF question the need for the S106 to include the ‘standard of affordable Homes’ as this is already set by WG in the Welsh Housing Quality Standard (WHQS).
<b>Local Planning Authority Response</b>	Planning Policy Wales (para 4.2.30) requires all affordable housing, including that provided through planning obligations and planning conditions to meet WG’s Development Quality Requirements. This is equally referenced in RLDP supporting paragraph 5.3.28 to Policy COM3. Inclusion of this requirement within s106 agreements will ensure these obligations are complied with by means of a legal agreement under s106 of the Town and Country Planning Act 1990, thereby providing clarity to

	the owners and any successive owners of the land. It will also provide certainty to the nominated RSL or Council when surveying dwellings prior to handover.
<b>Resultant Action</b>	No amendments are considered necessary.
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	<p>We are generally supportive of this guidance.</p> <p>We would welcome a mechanism whereby grant funded additional social housing could be facilitated through Section 106 Agreements.</p> <p>We would also encourage a suite of standard Section 106 conditions.</p>
<b>Local Planning Authority Response</b>	<p>The affordable housing policy requirements detailed in COM3 are minimum requirements. The percentage of affordable housing on a mixed-tenure site could be boosted if, for example, grant was secured to 'top up' the minimum policy requirements. As drafted, the SPG would not prevent additional grant funded social housing from coming forward. Equally, s106 agreements are utilised to secure the RLDP's minimum policy requirements in this respect and would not prevent additional grant funded social housing from coming forward. The LPA would work collaboratively with the developer and/or RSL in such instances.</p> <p>A standard s106 template is in development to complement this SPG; for use in the drafting of future s106 agreements involving affordable housing contributions. While this process is related to the SPG it is ultimately a separate exercise.</p>
<b>Resultant Action</b>	No amendments are considered necessary to the SPG itself, although comments are noted in respect of s106 working practices.

Section 9: Affordable Housing Exception Sites	
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	<p>We agree in principle with this guidance.</p> <p>In terms of restricting exception sites to proposals of no more than 10 dwellings, this will not always be appropriate, and it may be that some sites outside of Tier 1 and Tier 2 locations could be suitable for a larger number of units, particularly where this has a positive impact on viability. It is considered that this should be a target rather than an upper limit and we would encourage the onus to be placed on planning officers to determine what is appropriate for individual sites.</p> <p>We are supportive of the flexibility for larger exception sites within and adjoining Tier 1 and Tier 2 settlements.</p>
<b>Local Planning Authority Response</b>	<p>The SPG clarifies the adopted policy framework although cannot change adopted Policy COM5: Affordable Housing Exception Sites, which was subject to independent examination and deemed sound by the appointed Planning Inspector.</p> <p>The RLDP seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. COM5 is intended to act as a 'pressure valve' to meet very pressing housing need that is both small in scale and exceptional in circumstance and clearly cannot be accommodated within settlement boundaries. It is not intended to be a mechanism to deliver significant quantities of affordable housing within inappropriate or unsustainable countryside locations.</p>

	<p>Policy COM5 will facilitate delivery of small affordable housing schemes within or adjoining existing settlements where it can be clearly demonstrated that there is a pressing local need and this need cannot otherwise be accommodated within the respective settlement boundary. Affordable Housing Exception Sites must typically comprise of no more than ten units, which is the appropriate size for a sustainable cluster of affordable housing. However, Policy COM5 recognises that the Tier 1 (Bridgend) and Tier 2 (Llynfi Valley, Porthcawl, Pencoed and Pyle, Kenfig Hill and North Cornelly) Settlements are the most sustainable in the settlement hierarchy. Proposals for more than 10 affordable units may be acceptable within or adjoining Tier 1 and Tier 2 Settlements where justified in accordance with Policy COM5. This issue was considered as part of Hearing Session 3 during the RLDP Examination and the resultant policy position was deemed sound by the independent Planning Inspector.</p>
<b>Resultant Action</b>	No action necessary – the SPG provides supplementary information and guidance in respect of the adopted RLDP policy framework, but it cannot introduce new policies or change the policies in the adopted RLDP.
<b>Section 10 and Appendix B: Development Viability</b>	
<b>Organisation</b>	Home Builders Federation
<b>Representation</b>	HBF request that some additional wording is added to indicate that other viability models can be used, but it is suggested that the model to be used is agreed with the Council prior to its use.
<b>Local Planning Authority Response</b>	There is no objection to the proposed amendment. While the LPA is able to make the Development Viability Model available to applicants, the SPG does not seek to prohibit the use of certain alternative viability models subject to prior agreement with the LPA. Clarification will be added to the SPG.
<b>Resultant Action</b>	Add a clarifying sentence to paragraph 10.7 that states “alternative viability models can be used subject to prior agreement with the LPA”.

Other Comments	
<b>Organisation</b>	Wales and West Housing Association
<b>Representation</b>	We are generally supportive of the SPG and have no further comments.
<b>Local Planning Authority Response</b>	Noted.
<b>Resultant Action</b>	No amendments necessary.

## **Proposed SPG Changes as a Result of the Consultation**

The paragraphs proposed for amendment following the consultation are detailed below, for the reasons explained in the previous table. Strikethrough text is used to indicate proposed deletions from the SPG, whereas blue text is used to indicate proposed additions to the SPG. Only paragraphs proposed for amendment are included below, there are no proposed changes to the remainder of the draft SPG following consultation. The final draft version of the SPG (**Appendix 1**) incorporates the proposed amendments below.

- 5.7 A 10-unit cluster is considered to be the maximum appropriate size for a sustainable cluster of affordable housing on a mixed-tenure housing development. This has been informed by routine discussions with RSL housing managers that operate across the region. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities. Clusters of affordable housing should be carefully dispersed throughout the development to avoid over-concentration of single tenures in any part of the layout plan and avoid obvious tenure segregation. *In instances where development proposals exceed Policy COM3's minimum affordable housing requirements, due to grant support or otherwise, a more flexible approach to clustering may be acceptable where justified, providing this does not jeopardise sustainable integration of affordable units. Equally, where proposals demonstrate they have sought to deliver sustainably high residential densities in accordance with Policy COM6, it may be considered appropriate to abut limited discrete affordable tenure clusters. This may include, for example, one cluster of social rented units abutted to one cluster of Low Cost Home Ownership units, providing the affordable units are sustainably integrated into the wider development.*
- 5.13 Details of the nominated RSL will be provided by the LHA to the developer prior to commencement of development. The LHA ~~will reserves the right to~~ nominate the RSL for all affordable housing secured through the planning system or take *direct* ownership of such dwellings *directly in consultation with the developer.* ~~On this basis,~~ No particular RSL will be named ~~with~~ in any s106 agreement. The LHA will manage the nomination process *in consultation with the developer.* This arrangement will also provide flexibility to safeguard delivery of affordable housing in the future should the ownership of the site *or the RSL need to* change prior to completion of the development.
- 5.14 RSLs should not assume they have been or will be nominated to purchase nil-grant affordable housing secured through the planning system on any



particular development [site](#) unless this has been confirmed in writing in advance by the LHA. The process for nominating an RSL will be determined and managed by the LHA [in consultation with the developer](#). Proportionate distribution of nil-grant s106 dwellings will be sought across RSL partners over the RLDP period.

**8.2.4 Transfer arrangements to a Nominated RSL or the Council.** Provisions will be included in the s106 agreement to confirm when details of the Nominated RSL or the Council (if the Council is to acquire any affordable dwellings), will be provided to the developer in writing [by the Council](#) (normally prior to commencement of development [and following consultation with the developer](#)). Details of the transfer price will be included in accordance with the guidance in Chapter 7 of this SPG. The point(s) by which the developer must enter into a contract for the sale of the affordable dwellings to the nominated RSL or [to the Council \(as applicable\)](#) will also be specified in the s106 Agreement.

10.7 The preliminary fee does not allow for any further time that an applicant might wish to spend debating the findings of the LPA's initial high-level review. It also does not allow for any officer time necessary to re-appraise subsequent submissions of the model and supporting evidence, which will be re-chargeable. [Alternative viability models can be used subject to prior agreement with the LPA](#). In the event of any unresolvable disputes, the LPA may need to draw upon expertise from a third party to act as an independent arbitrator. The costs associated with this must be met by the developer/applicant. For larger sites (of several hundred units), mixed-use developments or sites of a strategic scale, it may be more appropriate for an applicant to commission an independent arbitrator from the outset, following discussion with the LPA.