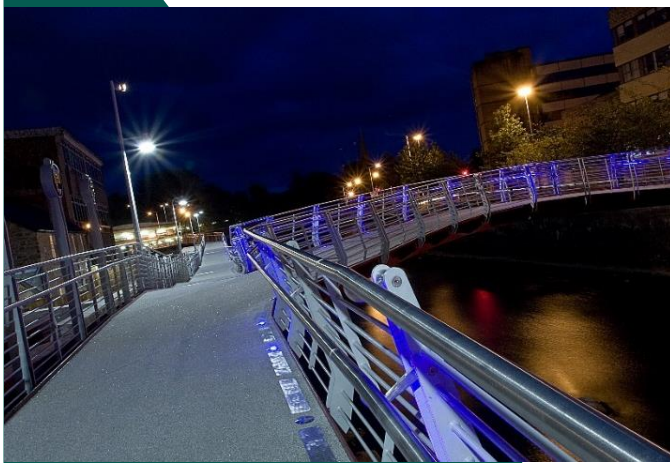




Bridgend Replacement Local Development Plan 2018-2033



Tests of Soundness

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Soundness Tests and Checks

1. Introduction

- 1.1 Section 64(2) of the 2004 Act specifically provides that an LPA must not submit an LDP unless it considers the plan is ready for examination. This means that 'unsound' plans should not be submitted for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness set out in Table 27 of the Development Plans Manual. The questions listed under each test are intended to assist in indicating the matters that may be relevant for each test. The list is not exhaustive and may not apply in every case. LPAs should also have regard to the PINS examination guidance which sets out the process and issues to consider regarding submission and examination.
- 1.2 The Welsh Government will monitor consistency with national policy throughout the LDP preparation process, and is likely to discourage submission if there is a fundamental conflict. If a plan is considered to be fundamentally unsound this will be drawn to the attention of the LPA so that any necessary action (i.e. withdrawal) is taken before submission. If the Welsh Government makes an objection based on soundness in the normal way, it will be considered at the examination.
- 1.3 The Development Plans Manual in elaborating on the above identifies a series of questions to assist in indicating those matters that may be relevant under each test of soundness.

2. Preparation Requirements:

2.1 *Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)*

- 2.1.1 The Plan has been prepared in accordance with the procedural requirements. Reference should be had to the publication of the Sustainability Appraisal /Strategic Environmental Assessment and the Habitat Regulations Assessment. This is further considered against the respective LDP Regulations:
- 2.1.2 **Regulation 5 Community Involvement Scheme Preparation:** The community involvement scheme (CIS) sets out how the Council intends to consult and engage with stakeholders and partners in a meaningful way throughout the LDP process. Contained within the DA it contains lists of those groups, bodies and individuals that will be consulted during the LDP preparatory process. The Council has engaged and consulted widely on the preparation of the community involvement scheme (CIS) and as part of the preparation of the LDP. Further details can be found in the Initial Consultation report.
- 2.1.3 **Regulation 6 Content of Community Involvement Scheme (CIS):** The CIS sets out: a) General and specific consultation bodies b) Principles of the participation strategy for preparing the Plan c) The timing and method of participation at each stage and response by the Council d) How responses will be used in developing the content of the LDP.
- 2.1.4 **Regulation 7 Timetable Preparation:** The relevant consultation bodies, groups and individuals were consulted as part of the preparation of a timetable in the Delivery Agreement as agreed by the Welsh Government.

- 2.1.5 **Regulation 8 Timetable:** The timetable within the Delivery Agreement identifies the timeline for the production of the Plan and the key stages in its preparation. This includes definitive and indicative dates for the preparation of the Plan.
- 2.1.6 **Regulation 9 and 10 Delivery Agreement:** The Delivery Agreement has been approved by Welsh Government in accordance with the Regulations. The Delivery Agreement has been published and made available at the locations specified.
- 2.1.7 **Regulation 11 Form and content of the LDP:** The Revised LDP is clear in containing the necessary information relating to the name of the area, that it is an LDP and the stage reached. Deposit Carmarthenshire Revised Local Development Plan 2018 - 2033 4 Tests of Soundness Self-Assessment The policies of the LDP both strategic and specific are supported by an appropriately clear and distinguishable supporting text.
- 2.1.8 **Regulation 12 Proposals Map:** The Proposals Map has been produced in electronic format on the Council's website and is also available in hard copy form at the relevant Deposit locations.
- 2.1.9 **Regulation 14 Pre-Deposit Participation:** An extensive period of engagement and consultation was undertaken including sessions as part of the preparation of the Pre-deposit Preferred Strategy. Consultation and engagement was undertaken across a range of consultation bodies as well as the Key Stakeholder Forum. Further details can be found in the Initial Consultation report.
- 2.1.10 **Regulation 15 and 16 Pre-Deposit public consultation:** The Replacement LDP Deposit Plan builds upon the Preferred Strategy, which was consulted on between 30th September 2019 and 8th November 2019 in accordance with Regulation 15 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. In doing so, the Deposit Plan provides an updated strategic framework to underpin the Replacement LDP.

2.2 ***Is the plan in general conformity with the NDF and/or SDP? (When published or adopted respectively)***

- 2.2.1 Yes: the Deposit Plan is in general conformity with Future Wales (NDF) – refer to Background Paper 17.
- 2.2.2 There is currently no Strategic Development Plan within the South East Wales region.

3. **Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)**

- 3.1 Yes: the Pre-Deposit Preferred Strategy was primarily prepared in the context of Planning Policy Wales (PPW). However, the preparation of the Deposit LDP and its policies and proposals have been prepared within the context of PPW 10 and reviewed and it consistent with PPW 11. The formulation of the Deposit LDP has been prepared with full regard to the relevant Plans and strategies, whilst recognising that it will need to respond and develop as it progresses through its preparatory process. The national, regional and local context (including those of adjoining areas) is (where relevant) identified within Chapter 2 of the Plan and within the Plan's supporting evidence, the Review Report, Background Papers and the SA/SEA

Report etc. The SA/SEA Report reviews the relevant plans and policies at international/European, national, regional and local level in order to take account of the relationship between the LDP and other relevant policies, plans, programmes (PPP) and sustainability objectives. This identifies implications in relation to the LDP. The influence of the above is also reflected in the identification of key issues for the County Borough of Bridgend. These are subsequently reflected throughout the Plan and have informed the vision, strategic objectives and strategic policies.

3.2 *Does it have regard to national policy (PPW) and the WSP (NDF when published)?*

3.2.1 The National Development Framework (NDF) considers the issues significant to Wales's prosperity and well-being, such as the economy, housing, transport, energy, and the environment. It identifies where national developments should take place, where the key growth areas are and what infrastructure and services are needed. The NDF is set in the context of a vision that will help deliver sustainable places across Wales by 2040, by supporting placemaking and ensuring our choices direct development to the right places, making the best use of resources, creating and sustaining accessible healthy communities, protecting our environment and supporting prosperity for all. The Council has prepared the LDP in tandem with various iterations of the NDF. As such and detailed in Background Paper 17 the Deposit Plan is considered to be in general conformity with the NDF. The Deposit Plan is consistent with Planning Policy Wales (PPW).

3.3 *Does it have regard to the Well-being Goals?*

3.3.1 Yes: the Deposit Plan has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the well-being goals. The promotion and recognition of well-being was interwoven into the early conversations held regarding Plan preparation with a range of stakeholders via the Public Service Board (PSB). The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the local well-being goals in framing the strategic objectives and the strategic policies. Background Paper 9 assess each policy in respect of its compatibility with the Local Well-being Goals.

3.4 *Does it have regard the Welsh National Marine Plan?*

3.4.1 Yes: the first Welsh National Marine Plan (WNMP) was published by the Welsh Government on the 12th November 2019. The WNMP contains plans and policies which will:

- support our vision for clean, healthy, safe and diverse seas;
- guide future sustainable development;
- support the growth of marine space and natural resources ('blue growth').

3.4.2 The Deposit Plan has regard to the content of the WNMP. Strategic Policy SP4 (in recognising the fundamental challenges posed by climate change) complements the Marine Plan on matters including flood risk whilst policies DNP5-DNP9 respond to issues such as adaptability and green infrastructure and connectivity.

3.5 *Does it have regard to the relevant Area Statement?*

3.5.1 Yes: in the context set out by the Environment Act, NRW have published Area Statements, which set out:

- the natural resources in each area and the benefits they provide;
- the key challenges and opportunities at a local level; &
- a common evidence base with information, data and evidence.

3.5.2 Area Statements will increase the understanding of the considerations around the natural resources in an area, the pressures on them and the benefits they provide. They will provide information required to better manage natural resources. The Plan has been prepared in the light of consultation with NRW and this would have provided NRW the opportunity to identify any incompatibilities with the Area Statements.

3.6 *Is the plan in general conformity with the NDF (when published)?*

3.6.1 The National Development Framework (NDF) considers the issues significant to Wales's prosperity and well-being, such as the economy, housing, transport, energy, and the environment. It identifies where national developments should take place, where the key growth areas are and what infrastructure and services are needed. The NDF is set in the context of a vision that will help deliver sustainable places across Wales by 2040, by supporting placemaking and ensuring our choices direct development to the right places, making the best use of resources, creating and sustaining accessible healthy communities, protecting our environment and supporting prosperity for all. The Council has prepared the LDP in tandem with various iterations of the NDF. As such and detailed in Background Paper 17 the Deposit Plan is considered to be in general conformity with the NDF.

3.7 *Is the plan in general conformity with relevant SDP (when adopted)?*

3.7.1 There is currently no Strategic Development Plan within the South East Wales region.

3.8 *Is it consistent with regional plans, strategies and utility provider programmes?*

3.8.1 Yes: the Deposit Plan was prepared within the context of the relevant regional plans, strategies and utility programmes. The Plan and its supporting evidence identifies how it has been prepared in the light of regional plans, strategies and any investment programmes. Engagement has taken place with a range of infrastructure and utility providers as detailed in the Infrastructure Development Plan.

3.9 *Is it compatible with the plans of neighbouring LPAs?*

3.9.1 Yes: the preparation of the Deposit Plan reflects the close contact with all neighbouring authorities (as well as other essential organisations) both on an individual and topic basis but also through SEWSPG. The neighbouring authorities involved are:

- Vale of Glamorgan Council;
- Neath Port Talbot Council; and
- Rhondda Cynon Taf (RCT).

3.9.2 On matters of minerals and waste, Bridgend has been grouped with Cardiff, the Vale of Glamorgan, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park. A Statement of Sub Regional Collaboration is currently being prepared by the Cardiff City Authorities as part of the evidence base needed to support each Local Development Plan (LDP). The purpose of the SSRC is to confirm that all constituent Local Planning Authorities (LPA) within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set in the latest Review of the RTS, and that (*as a minimum*) the RTS requirements for that sub-region as a whole will therefore be met. Bridgend Education Department have liaised throughout the process with their respective partners at RCT to discuss and ensure positive outcomes on cross-boundary education issues. The Economic Evidence Base Study considered and details cross-boundary employment provision between Bridgend and RCT. Meaningful engagement will be facilitated between Bridgend, RCT, VOG and NPT to discuss the outcomes of the Strategic Transport Assessment (when finalised).

3.10 *Does it regard the Well-being Plan or the National Park Management Plan?*

3.10.1 The Deposit Plan has full regard to the provisions of the Well-being of Future Generations Act 2015 and with full reference to the well-being goals. The promotion and recognition of well-being has been interwoven into the plan. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is reflected in the use of the local well-being goals in framing the strategic objectives and the strategic policies. In this respect, Background Paper 9 seeks to assess the plan's compatibility with the Local Well-being Goals.

3.11 *Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?*

3.11.1 Yes: At the start of the Replacement Local Development Plan process RCT and Caerphilly were not progressing with their review (although this position has now changed). In addition, VOG and NPT Councils were not at their review stage, therefore there was not any opportunity to commission shared evidence base studies. However, to ensure consistency with other LDPs and Plans that will be prepared in the future, Bridgend has utilised the evidence base methodologies prepared by SEWSPG in the formulation of its evidence base.

4. Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)

4.1 *Does it address the key issues?*

4.1.1 Yes: the Deposit Plan clearly identifies the key issues relating to the County Borough of Bridgend. It has been guided by an understanding of the context of the local area and its needs, opportunities and constraints. It is also guided by the LDP vision and objectives and the principles of sustainability and Well-being. The associated Background Papers and evidence base provide further information on the key issues.

4.2 *Is it supported by robust, proportionate and credible evidence?*

4.2.1 Yes: the preparation of the Plan has involved the development of a comprehensive evidence base. This includes research and data gathering as well as the collation of studies already available. The evidence base is referenced along with their role and purpose in Chapter 1 of the Deposit Plan.

4.3 *Can the rationale behind the plan's policies be demonstrated? & is it locally specific?*

4.3.1 Yes: the key issues and drivers identified through the Replacement LDP preparation process have directly informed the development of the LDP Vision, Objectives and Deposit LDP.

4.3.2 The LDP sets out the overarching Vision to ultimately define what the LDP is working towards. The LDP Vision has been developed to take into account the Bridgend Local Well-being Plan with the specific characteristics and key issues affecting the County Borough.

4.3.3 The LDP Vision will be delivered through the achievement of 4 Strategic Objectives, which will be underpinned by 35 Specific Objectives. These seek to reflect updated national policy and legislation and address the issues facing the County Borough. The development of the Objectives has also been informed by the SA/SEA process, particularly the succinct set of key sustainability issues which should be addressed in the Replacement LDP. These identified issues have been carried forward to underpin the SA process, thereby shaping the following four Strategic Objectives, which are central to the LDP:

- **SOBJ1: To Create High Quality Sustainable Places (Placemaking)**
- **SOBJ2: To Create Active, Healthy, Cohesive and Social Communities**
- **SOBJ3: To Create Productive and Enterprising Places**
- **SOBJ4: To Protect and Enhance Distinctive and Natural Places**

4.3.4 The Strategic Objectives have been defined to reflect identified key issues, align with national policy and ensure an appropriate balance between the different elements of sustainability. They are cross-cutting in their nature and also cross-reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and Bridgend Local Well-being Plan (LWBP). Acting together, the Vision and Strategic Objectives provide an overarching framework to underpin all other components of the Replacement LDP. Reflecting their importance, the Strategic Objectives have been subject to iterative testing and refinement through the SA process in tandem with preparing the Deposit Plan. Whilst necessarily high level, the resulting Strategic Objectives provide good coverage of all key sustainability issues which the Replacement LDP needs to address.

4.3.5 In turn, the Vision and 4 Strategic Objectives are supported by 35 Specific Objectives. These have been devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes. The objectives will also form part of the basis for monitoring the implementation of the Plan, once adopted and operational.

4.3.6 The Vision and Strategic Objectives provide an overarching framework to underpin all other components of the Replacement LDP, devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes. Chapter 5 sets out the remaining Strategic and Development Management Policies, which are derived from

the Strategic Framework and form the basis to implement and deliver the Vision and Strategic Objectives. As with all other components of the LDP, all strategic policies are complementary in terms of supporting the achievement of the national Wellbeing Goals, local Wellbeing Objectives and sustainable development. Linkages between each strategic policy and relevant wellbeing goals have therefore been identified and all strategic policies have been subject to SA, incorporating SEA.

4.3.7 All policies are inter-related in their nature and need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Replacement LDP. Each section highlights the relevant strategic policy, supporting justification and cross-references with the LDP's Objectives. A 'delivery and monitoring section' is also included at the end of each policy. The Strategic Policies, and the more detailed Development Management policies, are intended to ensure that development proposals can achieve positive economic, social, environmental and cultural outcomes, and can minimise adverse ones. They will form the basis of all planning decisions, and indicators have been developed as part of the Plan's monitoring framework to show the effectiveness of the policies. A 'delivery and monitoring section' is also included at the end of each policy to this end.

4.3.8 A suite of Strategic Policies were identified in the Replacement LDP Preferred Strategy. These Strategic Policies have been modified to take account of representations received and extended to provide a more comprehensive Strategic Policy Framework. The updated suite of 18 Strategic Policies is also now supported by 56 accompanying Development Management Policies which address a range of detailed thematic issues.

4.4 *Does it seek to meet assessed needs and contribute to the achievement of sustainable development?*

4.4.1 Yes: The achievement of sustainable development is a central component of the Plan. The Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) process provided a sound platform for the preparation of the Plan. The SA/SEA has an integral and iterative role in the preparation of an LDP. In this respect, its use in testing or measuring the performance of the LDP from its inception through to the preparation of the Deposit LDP is indicative of the iterative feedback between the SA and the LDP as work progresses.

4.4.2 The Plan seeks to meet an evidenced and sensible economic growth strategy. This is based on the relevant evidence and reflects the ambitions of Plans and strategies of the Council but also those at a regional level. The Plan embraces growth, set within the broader context of the Cardiff Capital City Deal. The provision of housing whilst higher than the Welsh Government derived projections are supported through evidence. The Plan seeks to propose a balanced and sustainable level of growth. The focus of growth approach is consistent with the National Development Framework. In this respect it recognises the role of the centres for growth and the importance of sustaining rural communities. The hierarchy of settlements has been developed taking account of the respective sustainability credentials of each settlement which define settlements and how they can contribute in their wider communities. This hierarchy recognises and acknowledges the availability of services and facilities, accessibility issues and other considerations. Reference should be made to relevant evidence base.

4.5 *Are the vision and the strategy positive and sufficiently aspirational?*

- 4.5.1 Yes: Informed by the identification of relevant LDP Issues and Drivers in Chapter 3 of the LDP Deposit Plan, Chapter 4 of the document sets out a new LDP Vision statement to underpin the emerging Replacement LDP. This Vision covers the plan period 2018-2033 and is designed to integrate the Bridgend Replacement LDP with the Bridgend Local Wellbeing Plan, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government's National Sustainable Placemaking Outcomes and thematic priorities within 'Future Wales' (National Development Framework NDF) and Planning Policy Wales (PPW). In consequence, the proposed LDP Vision is based around using placemaking to achieve economic and spatial outcomes in tandem.
- 4.5.2 The proposed LDP Vision explains that the County Borough is undergoing incremental, long-term socio-economic renewal, such that the Bridgend Replacement LDP should support existing regeneration efforts and further growth without imposing fundamental change. However, a new LDP Vision is set out which appropriately addresses the key spatial challenges and opportunities facing the County Borough, including existing economic strengths in advanced manufacturing and the need for improved infrastructure, new employment opportunities and the decarbonisation of key sectors, each of which will have spatial implications, to deliver sustainable economic growth. The proposed LDP Vision also calls for Bridgend, Porthcawl, Maesteg and the Llynfi Valley to accommodate the majority of growth and have distinct roles within a coherent network of settlements. In addition to supporting economic growth, the proposed LDP Vision recognises that this approach will maximise positive wellbeing outcomes and help to protect environmentally sensitive areas.
- 4.5.3 As a high-level statement focused around using placemaking to achieve regeneration and economic growth, the LDP Vision supports a greater emphasis on the delivery of a refreshed spatial strategy and place-based policies within the Replacement LDP than the existing adopted LDP, which enhances local distinctiveness and the ability to meet the differential needs of communities. The proposed LDP Vision is therefore considered to be appropriate and compatible with achieving sustainable development. Further detail is provided in Background Paper 1: Vision and Objectives.
- 4.5.4 This LDP is based on a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region. The **proposed growth level of 505 dwellings per annum** is derived from a POPGROUP Scenario that Uses an ONS 2019 Mid-Year Estimate base year and calibrates its migration assumptions from a 6-year historical period (2013/14–2018/19). This period witnessed sustainable population growth, in part linked to the number of dwelling completions across the County Borough, which the Replacement LDP seeks to continue. Maintaining this trajectory will lead to more established households (particularly around the **35-44 age group**) both remaining within and moving into the County Borough, coupled with less outward migration across other economically active age groups. This will encourage a more youthful, skilled population base to **counter-balance the ageing population**, resulting in an overall population increase of 9.4% or 13,681 people over the plan period. This level of growth will also enable delivery of x affordable homes, thereby maximising delivery in combination with other sources of affordable housing supply in the context of plan-wide viability. This Growth Strategy is deemed the most appropriate, sustainable means to deliver

the LDP Vision and Objectives as justified within the Strategic Growth Options Background Paper. All reasonable alternatives have also been duly assessed under the SA process.

4.5.5 The projected increase in the working age population and the linked dwelling requirement underpinning this LDP will provide significant scope for residents to live and work in the area, supporting growth of up to 500 jobs per annum. The planned level of housing growth is neither constrained in a manner that could frustrate economic development or promoted in such a way as to encourage inward commuting. Rather, the underlying projection promotes sustainable forms of growth that will help minimise the need for out-commuting and promote more self-contained, inter-connected communities in accordance with the LDP Vision. This level of growth is considered most conducive to achieving an equilibrium between the number of homes provided and the job opportunities expected, a balance that is required by PPW.

4.5.6 The Growth Strategy can be succinctly explained by the acronym '**CARM**', which summarises the Strategy's intentions to **Counter-balance** the ageing population by **Attracting** skilled, economically active households, **Retaining** skilled, economically active households and rendering the County Borough a **Magnet** for employers to expand within or move into.

4.6 *Have the 'real' alternatives been properly considered?*

4.6.1 Yes: The Plan is considered to be realistic and appropriate having been developed through and from a number of 'real' alternatives. A number of different alternative growth and spatial options have been considered and are further detailed in Background Papers 2 and 3 on Strategic Growth Options and Spatial Options.

4.7 *Is it logical, reasonable and balanced?*

4.7.1 Yes: the Deposit Plan has emerged from a clear understanding of the issues both nationally and also critically those affecting Bridgend. It flows and is presented in a logical manner from the evidence base through to issues, objectives and policies, supported where necessary and relevant, by evidence and supporting documents. It takes a balanced view of the County Borough in land use planning terms. Where appropriate, it integrates with other plans and strategies whilst ensuring it is reflective of national policy and the need for a sustainable and deliverable Plan. The Plan has emerged from engagement and evidence and as such is both logical and reasonable and based on a balanced outlook.

4.8 *Is it coherent and consistent?*

4.8.1 Yes: the Deposit Plan meets the requirements relating to coherency and consistency as demonstrated by a logical flow through from the issues through to the strategic policies. The preparation of the Plan has allowed an opportunity to evaluate a number of alternative growth and spatial options. Each option has been fully considered through the SEA process.

4.9 *Is it clear and focused?*

4.9.1 Yes: the Deposit Plan is set out in a clear and logical form allowing a clear understanding of its content, but also critically its core purpose and objectives. It provides a clear focus on its purpose, with a logical narrative underpinning its components from the identification of issues, through to how these will be addressed as part of its strategic approach, as well as its policies and proposals.

5. Test 3: Will the plan deliver? (Is it likely to be effective?)

5.1 *Will it be effective?*

5.1.1 Yes: the Deposit Plan's objectives have emerged from an understanding of the issues and needs of Bridgend as well as a sound, logical and robust evidence base. The strategy seeks to integrate and reflect other Plans and strategies as part of an integrated approach to delivery maximising its opportunities to be effective in its implementation. The Plan will deliver its vision and objectives in addressing key issues through a series of strategic and detailed policies as well as land use allocation. The Plan has set out growth strategy which is reflective of current delivery rates and the strategic ambitions of the Council and that of the Cardiff Capital City Region.

5.2 *Can it be implemented?*

5.2.1 Yes: the preparation of the Plan is with the clear intention that it will be implementable and that its policies and proposals be delivered within the Plan period. It sets out a deliverable spatial framework and strategic growth which is based on sustainability principles and is responsive to the needs of the communities of Bridgend. The policies and proposals provide the framework through which the Plan's objectives will be implemented and the decision-making process undertaken. As part of the Deposit LDP, an effective and appropriate monitoring framework has been developed and included within the Plan. This will form the basis for undertaking the Annual Monitoring Report (AMR). The AMR will represent the main method for measuring and assessing the progress in the implementation of the policies and proposals of the adopted Replacement LDP.

5.3 *Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?*

5.3.1 Yes. The Plan is supported by an Infrastructure Plan and viability assessments which will be continually developed throughout the Plan making process.

5.4 *Will development be viable?*

5.4.1 Yes: the Plan is supported by a 'plan-wide' and detailed 'site specific' viability assessments that used the Development Viability Model for the County Borough, which was developed by Burrows-Hutchinson Ltd on behalf of the South East Wales Strategic Planning Group (SEWSPG). The Development Viability Model is essentially an enhanced version of the well-received model developed by the same consultant team in a similar commission for the Mid and South West Wales Strategic Planning Group (MSWWSPG). The Viability Steering Group have endorsed the outcomes of this testing that concludes that the proposed allocations are financially viable and can be delivered.

5.5 *Can the sites allocated be delivered?*

5.5.1 Yes: the allocation of sites is supported by robust technical and viability evidence. In this respect the allocation of sites has been informed by input from technical and infrastructural partners. The Plan is accompanied by a housing trajectory which indicates the delivery of sites across the Plan period. This indicates that there are a number of sites available for early delivery. The trajectory will be an iterative document which develops through to, and post LDP adoption.

5.6 *Is the plan sufficiently flexible? & Are there appropriate contingency provisions?*

5.6.1 The Deposit Plan has been designed to provide a flexible policy framework which is capable of dealing with unexpected and unforeseen changes in circumstances such as the Covid-19 pandemic. Refer to Background Paper 11 – Covid-19 Policy Review.

5.6.2 The Plan, in taking forward this requirement, has incorporated an appropriate level of flexibility of 20% or 1,632 homes. Similarly the level of employment growth whilst consistent with other plans and strategies identifies circa 71.7ha of employment land reflecting evidence demand.

5.7 *Is it monitored effectively?*

5.7.1 The Plan contains a monitoring framework, which sets out how the Plan's Strategy, Objectives, Policies and Proposals will be monitored against appropriate indicators and trigger points for action (linked to plan review/revision).