

# Revised Local 2018-2033 Development Plan

December 2018

Draft Pre-Deposit Preferred Strategy  
Tests of Soundness: Self Assessment

## Introduction

The fundamental requirement for a Local Development Plan (LDP) to be 'sound' is prescribed in the Planning and Compulsory Purchase Act 2004 and set out in national Planning Policy. As part of the process of establishing soundness the Council is required undertake a self-assessment of its own LDP's soundness. In this respect this document represents a double-check as the Plan progresses that it complies with the preparation requirements and that it is considered that the plan meets the 3 tests of soundness.

The soundness of the LDP will be assessed at an independent examination by a Planning Inspector. The examination will assess whether the Plan's preparatory requirements have been followed and will determine whether the it is 'sound', namely that it meets all 3 soundness tests as set out below<sup>1</sup>.

The LDP Manual Ed.2 (2015) 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.

### Preparation Requirements:

- Has preparation complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc?)

### Soundness Tests:

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

#### Questions

- Does it have regard to national policy and WSP
- Does it have regard to Well-being Goals
- Does it have regard the Welsh National Marine Plan
- Is it consistent with regional plans, strategies and utility programmes?
- Is it compatible with the plans of neighbouring authorities?
- Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?

**Test 2: Is the plan appropriate?** (i.e. is the plan appropriate for the area in the light of the evidence?)

#### Questions

- Is it locally specific?
- Does it address the key issues?

<sup>1</sup> Planning Policy Wales: Edition 9 – paragraph 2.7.2

- Is it supported by robust, proportionate and credible evidence?
- Can the rationale behind plan policies be demonstrated?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and the strategy positive and sufficiently aspirational?
- Have the 'real' alternatives been properly considered?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?
- Is it clear and focused?

**Test 3: Will the plan deliver** (i.e. is it likely to be effective?)

**Questions**

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will development be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible? Are there appropriate contingency provisions?
- Is it monitored effectively?'

In undertaking the self-assessment the following tables use the template of questions provided in relation to each test to consider the Plans soundness to date. It should be noted that this self-assessment reflects the Revised Carmarthenshire LDP as at Draft Pre-Deposit Preferred Strategy (hereafter referred to as Draft Preferred Strategy) stage. As such the self-assessment will be further developed as the Revised LDP progresses through the Plan making process. In this respect the nature of some of the responses to the questions posed through the tests of soundness will become more definitive in content at subsequent plan making stages notably Deposit LDP.

### **Preparation Requirements:**

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

Yes. The Plan has been prepared in accordance with the procedural requirements. Notable reference should be had to the publication of the Sustainability Appraisal /Strategic Environmental Assessment and the Habitat Regulations Assessment Screening Report which have been published as supporting documents to the Draft Preferred Strategy.

### **Test 1: Does the plan fit?**

(i.e. is it clear that the LDP is consistent with other plans?)

Yes. The formulation of the Pre-Deposit Preferred Strategy 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 the Preferred Strategy but also within the Review report and Topic papers and SA/SEA Scoping Report etc.

The SA/SEA Scoping 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 Carmarthenshire. These are subsequently reflected throughout the Preferred Strategy and have informed the vision, strategic objectives and strategic policies.

*Does it have regard to national policy and WSP?*

Yes. In having regard to the Wales Spatial Plan Update (2008) the provisions of the Pre-Deposit Preferred Strategy recognises the role Carmarthenshire plays within the 3 spatial areas within the County. It seeks to reflect its content recognising the diversity of the County and its strategic importance within the region.

In underpinning the settlement hierarchy the role and function Topic Paper reflects on the content of and status of settlements within the context of the updated WSP.

Carmarthenshire's location at the heart of its region is recognised and forms an important component of the Pre-Deposit Preferred Strategy.

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

Yes. The Pre-Deposit Preferred Strategy 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 early conversations held regarding Plan preparation with a range of stakeholders. The Pre-Deposit Preferred Strategy through its identification of issues (as supplemented through the Issues, Vision and Strategic Objectives Topic Paper) relates them back to the national well-being goals grouping them under each heading.

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, Appendix 1 of the Pre-Deposit Preferred Strategy seeks to assess each policy in respect of its compatibility with the Local Well-being Goals with links back to the respective Strategic Objective which in turn relate directly back to the identified issues.

The Annual Monitoring Reports in terms of the current adopted LDP undertake a Well-being Objectives/Goals compatibility analysis<sup>2</sup>. Whilst representing an initial high level review, this forms a useful evidential baseline as part of the LDP Review process.

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

Yes. The strategic policies, combined with subsequent detailed policies, will ensure that the LDP complements the Marine Plan.

Strategic Policy SP15 in recognising the fundamental challenges posed by climate change complements the Marine Plan on matters including flood risk whilst SP13 and SP11 respond to issues such as adaptability and green infrastructure and connectivity.

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

Yes. The Pre-Deposit Preferred Strategy was prepared within the context of the relevant regional plans, strategies and utility programmes. These will further inform and guide the preparation of the specific policies and land use allocations as part of the Deposit LDP.

Specific reference is made to the importance of the Swansea Bay City Deal in respect of the region. In this regard, the Pre-Deposit Preferred Strategy has factored its considerations into all aspects of the Plan formulation recognising its importance economically and socially. Reference is made to strategic policy SP5 which identifies the two principal projects in the area as strategic sites. It is also directly referenced within the Vision and Strategic Objectives.

<sup>2</sup> Annual Monitoring Report 2017 – 2018 (<https://www.carmarthenshire.gov.wales/media/1216076/annual-monitoring-report-2017-2018-web-003.pdf>)

*Is it compatible with the plans of neighbouring authorities?*

Yes. The preparation of the Pre-Deposit Preferred Strategy reflects the close contact with all neighbouring authorities (as well as other essential organisations) both on an individual and topic basis but also through regional frameworks. The neighbouring authorities involved are:

- Brecon Beacons National Park Authority;
- Ceredigion County Council;
- City and County of Swansea;
- Neath Port Talbot County Council;
- Pembrokeshire County Council;
- Pembrokeshire Coast National Park Authority; and
- Powys County Council.

As part of our recognition of the value of working with neighbouring authorities, and in response to the Cabinet Secretary's emphasis on collaborative working, we are working with on a number of evidential undertakings. These include a Strategic Flood Consequences Assessment with Pembrokeshire County Council, a Regional Housing Market Assessment, a Regional Employment Study and a Regional Housing Viability Model. The nature of the co-operation within authorities and sharing of approaches including comparable thematic policy areas will be developed as the Plan's preparatory process continues.

In terms of matters on minerals and waste, Carmarthenshire operates a number of service level agreements with authorities across the region and beyond. It also is responsible for co-ordinating and undertaking the annual Regional Waste Monitoring Report for South West Wales on behalf of the Welsh Government.

Regard will also be had to the emphasis on regional working in light of future provisions around Strategic Development Plans (SDP) and the content of the National Development Framework (NDF) as it emerges.

*Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?*

Carmarthenshire had an integrated document in 2011 in the form of the Integrated Community Strategy (ICS) for Carmarthenshire 2011-16. In recognition of the Well Being of Future Generations Act of 2015, the Public Service Board (PSB) turned to working on the Wellbeing Plan which was approved in 2018. The Council also has well-being objectives which are contained within its corporate strategy.

The Pre-Deposit Preferred Strategy builds on the Council's and PSB commitments in relation to well-being as set out both within the corporate strategy and the Well-being Plan.

**Test 2: Is the plan appropriate?** (i.e. is the plan appropriate for the area in the light of the evidence?)

Yes. The formulation of the Pre-Deposit Preferred Strategy is underpinned by evidence and the identification of locally specific Issues, Vision, Strategic Objectives and Strategic Policies.

The emphasis has been on undertaking a series of conversations about the sort of County that Carmarthenshire is at present and the sort of County that stakeholders want it to become. The foundation for undertaking these discussions was the fact that the “Carmarthenshire We Want” process has already been undertaken as part of the preparation of the PSB Well-being Plan.

The Well-being Plan, well-being objectives and local corporate strategies have provided a basis for a Pre-Deposit Preferred Strategy that is specific to Carmarthenshire and not generic. The development a spatial awareness is implicit, particularly in terms of recognising the rural-urban contrast within the County. The Vision seeks to set the context for a “One Carmarthenshire” approach and plays a unifying role in this regard.

A key piece of evidence to link the issues, vision and objectives with the growth and spatial strategy is the role and function topic paper. This provides a vital link between these pieces of work by providing a spatial context and it therefore demonstrates a locally distinctive approach.

Further evidence including that in respect of the Role and Function of settlements and population and household demographics has been undertaken and published alongside the Pre-Deposit Preferred Strategy.

*Is it locally specific?*

Yes. This Pre-Deposit Preferred Strategy is a product of effective engagement and consensus building. Since the commencement of the review in January 2018, there have been:

- 2 meetings of the LDP Key Stakeholder Forum;
- LDP workshop / seminar for Town and Community Councils;
- 2 meetings of the Developer Forum;
- A number of meetings and presentations with political groups.

An online consultation was undertaken to support to inform the identification the Plan’s issues vision and objectives, whilst consultation has been undertaken on the Sustainability Appraisal Scoping Report.

In terms of Elected Members, this Strategy has been shaped by cross party input. There have been seven meetings of the LDP Advisory Panel since November 2017. This Panel is drawn up from Elected Members and its primary purpose is to take political ownership of the Revised LDP.

The issues have been transparently sourced. It should be noted that they are grouped under the national well-being goals to ensure that they are framed within the context of the Well-being of Future Generations (Wales) Act 2015. This allows for the appreciation of social, economic and environmental matters to be embedded into the Plan and well-being to be interwoven into the Plan from the outset.

The Issues Vision and Objectives Topic paper identifies where the issues have been sourced from. Notable sources include policy reviews, LDP review report outcomes, town and community council workshop outcomes, key stakeholder forum outcomes, county councillor engagement, well-being plan “at a glance” section, draft sustainability appraisal / strategic environmental assessment scoping report and public consultation. Reference is also made to the other suite of evidence in place to support the Strategy – notably the role and function topic paper.

*Does it address the key issues?*

Yes. The strategic objectives contain a commentary section that links them back to the key issues that they are intended to address. This is further supplemented by a SMART analysis review process.

Also, and as noted above, the emphasis has been on seeking to shape the discussion around those issues that have already emerged through the well-being plan with a view to trying to understand their land use relevance and whether they could be capable of being addressed through the planning system.

A key diagram demonstrates the process flow between the identification of the issues through to the vision and then the objectives and strategic policies that will address the issues.

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

Yes. Those notable pieces of evidence (in addition to the consensus building and stakeholder conversations undertaken as outlined above) that underpin the Strategy include:

- 3 Adopted LDP Annual Monitoring Review reports since adoption in 2014;
- LDP Review Report;
- Population and Household Demographics – produced by Edge Analytics;
- Topic Paper on Development Limits;
- Topic Paper on Issues Vision and Objectives;
- Topic Paper on Role and Function;
- Topic Paper on Spatial Options
- Topic Paper on Population and Household Projections;
- SA/SEA Scoping Report;
- Initial SA/SEA Report;
- Habitats Regulations Assessment Screening Report.



The above is supplemented by a range of documents and evidential baselines including the annual Employment Land Reviews, The Carmarthenshire Retail Study, and Town Centre Audits.

Further studies and pieces of evidence are currently being undertaken and commissioned, including at a local and regional level. Further work will be undertaken during the Revised LDP preparatory process as appropriate and necessary.

*Can the rationale behind plan policies be demonstrated?*

Yes. The Pre-Deposit Preferred Strategy's Issues, Vision, Strategic Objectives, Strategy and Strategic Policies have been informed by evidence, engagement and other plans and strategies. The strategic policies are elaborated upon through supporting text and are tagged to the local wellbeing goals and in turn to the LDP objectives, key issues and national well-being goals.

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

Yes. The Pre-Deposit Preferred Strategy is derived from (and based upon) evidence which will be further developed and added to as the Plan progresses through its preparatory processes.

The achievement of sustainable development is a central component of the Plan. It is noted that the Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) process has provided an invaluable sounding board in the preparation of the Preferred Strategy.

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.

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 Role and Function Topic Paper.

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

Yes. The vision seeks to reflect the corporate strategy which is based around the wellbeing plan as well as those keynote regeneration priorities within the County – notably in the form of the Transformations Strategy.

The vision also sets the framework for the recognition of the City Deal and the potential opportunities that this presents to Carmarthenshire as an ambitious and well connected County.

In building upon the vision, the strategic objectives contain a commentary section that reviews the extent to which they are sufficiently ambitious and aspirational.

Reference is made to the Issues, Vision and Objectives Topic Paper.

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

Yes. The Pre-Deposit Preferred Strategy 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 the topic papers on Strategic Growth Options and Spatial Options.

The assessment of the Spatial options identified a hybrid option incorporating aspects from others put forward for consideration. This hybrid option emerged as part of engagement, notably via the Key Stakeholder Forum. The Growth Options were also considered in this manner and are underpinned by specialist evidence.

The Strategic Options were also considered through the SA/SEA process.

*Is it logical, reasonable and balanced?*

Yes. The Pre-Deposit Preferred Strategy emerged from a clear understanding of the issues both nationally and also critically those affecting Carmarthenshire. It takes a balanced view of the County 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 Pre-Deposit Preferred Strategy has emerged from engagement and evidence and as such is both logical and reasonable and based on a balanced outlook.

*Is it coherent and consistent?*

Yes. The 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 Pre-Deposit Preferred Strategy has allowed an opportunity to evaluate a number of alternative strategic options. Each option has been fully considered - including through the Key Stakeholder Forum.

The Topic Paper on Issues Vision and Objectives has informed the preparation of the Pre-Deposit Preferred Strategy. The Pre-Deposit Preferred Strategy provides clear and transparent cross referencing between the issues strategic objectives, and the 18 Strategic policies.

There has been demonstrable links with the Well-being Plan and the Council's well-being goals with the LDP closely aligned with such corporate priorities.

The Draft Preferred Strategy has evolved through engagement including with the Key Stakeholder Forum.

*Is it clear and focused?*

Yes. The Pre-Deposit Preferred Strategy is set out in a clear and logical form allowing a clear understanding of its form, 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.

**Test 3: Will the plan deliver** (i.e. is it likely to be effective?)

Yes, see answers below.

*Will it be effective?*

Yes. The Pre-Deposit Preferred Strategy's objectives have emerged from an understanding of the issues and needs of Carmarthenshire 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.

This self-assessment will be further developed to broaden the expression of the Plan's effectiveness as its progresses through the preparatory process and as the specific policies and site based allocations etc. are developed.

*Can it be implemented?*

Yes. The preparation of the Plan is with the clear intention that it be implementable and that its policies and proposals be delivered within the Plan period.

The Pre-Deposit Preferred Strategy 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 Carmarthenshire. The policies and proposals (both strategic and eventually specific within the future Deposit LDP) will provide the framework through which the Plan's objectives will be implemented and the decision-making process undertaken.

As part of the preparation of the Deposit LDP an effective and appropriate monitoring framework will be 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 Revised LDP.

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

Yes. Infrastructure providers are an important component in developing the LDP and form a key consultee. In this respect have and will continue to be engaged throughout the Plan making process. Notably further consultation will be undertaken in the preparation of the Deposit LDP to ensure the Plan delivery is fully evidenced.

It should be noted that representatives of infrastructure bodies such as Dwr Cymru Welsh Water are members of the Key Stakeholder Forum.

*Will development be viable?*

Yes. The need for development to be viable will be an important aspect in the preparation of the Plan from the future development of evidence through to the identification of sites or the development of specific policies.

Work is currently being developed at a regional level to establish a robust and consistent methodology for assessing viability across authorities in the region. This work will be supplemented as appropriate to ensure that any viability is appropriately informed by local conditions and that the implications of viability on a developments potential to come forward is fully informed and robustly evidenced.

*Can the sites allocated be delivered?*

Yes. With the exception of two Strategic Sites, the Pre-Deposit Preferred Strategy does not identify specific allocations. Allocations will be identified as part of the Deposit LDP with their deliverability evidenced accordingly.

The strategic sites identified within the Pre-Deposit Preferred Strategy are of regional significance. They are part of the Swansea Bay City Deal and are both making notable steps in their delivery. In respect of Yr Egin in Carmarthen, part of this facility has recently been completed and will house the new head-quarters of S4C. The Wellness and Life Sciences Village in Llanelli is progressing in terms of the consideration of its planning application.

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

Yes. The preparation of the Pre-Deposit Preferred Strategy has sought to reflect the need for flexibility. This will be further developed as part of the Deposit LDP to provide a framework which is able to respond as appropriate to changes in circumstances.

The identification of the household requirement incorporated a number of assumptions recognising specific aspects of Carmarthenshire - including its housing vacancy rates. The Pre-Deposit Preferred Strategy, in taking forward this requirement, has incorporated an appropriate level of contingency of 6%.

*Is it monitored effectively?*

As part of the preparation of the Deposit LDP an effective and appropriate monitoring framework will be developed and included within the Plan and 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 Revised LDP.

The Pre-Deposit Preferred Strategy, does not contain a monitoring framework.