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# Revised 2018-2033 Local Development Plan

## Tests of Soundness: Self Assessment



2nd Deposit  
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County Council



## Introduction

The Council is in the process of preparing a Revised Local Development Plan (LDP) for Carmarthenshire (excluding that area contained within the Brecon Beacons National Park). The Plan will set out planning policies and the allocation of sites for different types of development. Once adopted, the Council will use the Plan for assessing planning applications through until 2033. The Council will continue to monitor and review the Plan's content to ensure it remains relevant and is working as intended. The Plan will guide and manage development by providing the foundation for consistent and clear decision making.

This paper sets out the self-assessment as to how and why the Council considers the Plan to have satisfied the Tests of Soundness, specified by the Welsh Government. This document represents a double-check that the Plan complies with the preparatory requirements and that it meets the 3 tests of soundness (as identified below).

## Tests of Soundness

The fundamental requirement for a Local Development Plan (LDP) to be 'sound' is prescribed in the Planning and Compulsory Purchase Act 2004 and in national Planning Policy. As part of the process of establishing soundness, the Council is required to undertake a self-assessment of its own LDP's soundness.

The soundness of the LDP will be assessed at an independent examination in public by a Planning Inspector appointed by the Welsh Government. The examination will assess whether the Plan's preparatory requirements have been followed and will determine whether it is 'sound' - namely that it meets all 3 soundness tests as set out below.

The LDP Manual Ed.3 (March 2020) identifies a series of questions to assist in indicating those matters that may be relevant under each test of soundness<sup>1</sup>.

### Preparation Requirements:

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

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

### Soundness Tests:

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<sup>1</sup> Development Plans Manual (Edition 3) pending finalisation having been published for consultation in the summer 2019.

**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 (PPW) and the WSP (NDF when published)?
- Does it have regard to the Well-being Goals?
- Does it have regard to the Welsh National Marine Plan?
- Does it have regard to the relevant Area Statement?
- Is the plan in general conformity with the NDF (when published)?
- Is the plan in general conformity with relevant SDP (when adopted)?
- Is it consistent with regional plans, strategies and utility provider programmes?
- Is it compatible with the plans of neighbouring LPAs?
- Does it regard the Well-being Plan or the National Park Management Plan?
- Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?

**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?
- 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 questions identified above in relation to each test. This template allows it to consider the Plan's soundness to date.

## **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. Reference should be had to the publication of the Integrated Sustainability Appraisal /Strategic Environmental Assessment and the Habitat Regulations Assessment.

This is further considered against the respective LDP Regulations:

### **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 Delivery Agreement (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 CIS and as part of the preparation of the LDP. Further details can be found in the Initial Consultation Report.

### **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

### **Regulation 7 Timetable Preparation:**

The relevant consultation bodies, groups and individuals were consulted as part of the preparation of a timetable in the DA as agreed by the Welsh Government.

### **Regulation 8 Timetable:**

The timetable within the DA 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.

### **Regulation 9 and 10 Delivery Agreement:**

The DA has been approved by Welsh Government in accordance with the Regulations.

The Delivery Agreement has been published and made available.

### **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.

The policies of the LDP both strategic and specific are supported by an appropriately clear and distinguishable supporting text.

**Regulation 12 Proposals Map:**

The Proposals Map has been produced in electronic format on the Council's website and is also available in to view at the relevant Deposit locations.

**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.

**Regulation 15 and 16 Pre-Deposit public consultation:**

The Pre-Deposit Preferred Strategy was published for consultation in December 2018. The responses received as part of the consultation to the Pre-Deposit Preferred Strategy were reported to Council on the 15<sup>th</sup> May 2019 and have been considered and where appropriate incorporated in the preparation of the Deposit Plan.

Further details are available within the Initial Consultation Report.

**Regulation 17 Deposit of Proposals:**

The Deposit LDP consultation has complied with the Regulations in terms of publishing and making documents available to view and consulting relevant bodies.

**Regulation 18 Representations on the Deposit LDP:**

The variety of methods through which to participate on the content of the Deposit LDP (including using the on-line consultation portal) have been made available to view at the specified locations.

**Regulation 19 Handling of Deposit representations:**

As soon as reasonably practicable, the representations will be made available for inspection. The Council will publish on its website details of all representations received together with a statement of how they can be inspected.

**Strategic Environmental Assessment Regulations – European Directive 2001/42/EC Sustainability Appraisal - The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004:**

The Council has prepared a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) of the Revised LDP. The SA/SEA also considers health impact. The SA/SEA has played an iterative role in the plan making process. SA/SEA reports have been prepared at Scoping, Initial and now at Deposit Stage. Whilst the requirement for consultation with specific consultation bodies is noted, the Council has taken the step of making the SA/SEA reports available for public consultation.

The above has been prepared as part of an Integrated Sustainability Appraisal of the Deposit LDP.

**Habitats Regulations Assessment – Planning and the Conservation (Natural Habitats etc.) Regulations 1994:**

A Habitats Regulations Screening Report was published for consultation alongside the pre-deposit (Preferred Strategy) consultation. A Habitats Regulations Assessment Report is also being made available for consultation as part of the consultation on the Deposit LDP.

**Equalities Impact Assessment:**

An Equalities Impact Assessment was undertaken as part of the preparation of the Pre-Deposit Preferred Strategy and published to accompany the document. The Deposit LDP has also been subject to an Equalities Impact Assessment which is available as part of the Integrated Sustainability Appraisal.

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

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

Yes, the Pre-Deposit Preferred Strategy was primarily prepared in the context of Planning Policy Wales (PPW) Edition 9. However, the preparation of the 2<sup>nd</sup> Deposit LDP and its policies and proposals have been prepared within the context of PPW Edition 11 which was published in February 2021. The Strategic policies each have an accompanying Policy Context table which cross references to the relevant sections of PPW Edition 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 Appendix 2 of the Plan and within the Plan's supporting evidence, the Review report, Topic papers and the Integrated SA Report etc.

The Integrated SA 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 Plan and have informed the vision, strategic objectives and strategic policies.

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

Yes. Note: the commencement of the Plan and the pre-deposit preferred strategy was prior to the adoption of Future Wales: the national plan 2040. Initial reference was had to the content of the Wales Spatial Plan Update (2008) with the provisions

of the Plan recognising the role Carmarthenshire plays within the 3 spatial areas within the County. It sought 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) the County's settlements within the context of the updated WSP. However it is recognised that the WSP will be replaced by the National Development Framework (NDF) upon adoption.

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

Yes. The Deposit LDP 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. The Deposit Plan through its identification of issues (as supplemented through the Issues, Vision and Strategic Objectives Topic Paper – updated December 2019) 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 6 of the Deposit Plan 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 first *Welsh National Marine Plan* (WNMP) was published by the Welsh Government on the 12<sup>th</sup> November 2019. It should be noted that the publication date was one day before the publication of the 1st Deposit LDP. Its content has however been considered through the preparation of the 2nd Deposit Plan.

<sup>2</sup> Annual Monitoring Report 2018 – 2019 (<https://www.carmarthenshire.gov.wales/media/1216076/annual-monitoring-report-2017-2018-web-003.pdf>)



As part of the Marine and Coastal Access Act (MCAA), the Welsh Government must produce a Marine Plan.

- inshore region (out to 12 nautical miles)
- offshore region (12 to 200 nautical miles)

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').

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.

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

In the context set out by the Environment Act, NRW has prepared the South-west Wales Area Statement.

The area statement sets 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.

The South-west Area Statement identifies the key risks, opportunities and priorities that we all need to address to build the resilience of our ecosystems and support sustainable management of the natural resources..

The initial stages of the Plans preparation including the Pre-Deposit Preferred Strategy and 1<sup>st</sup> Deposit LDP were prepared prior to the finalisation of the Area Statement. However the 2<sup>nd</sup> Deposit has been informed not only by its content but also by the duties under the Environment Act. Specific reference is made to the declaration of the Climate and Nature Emergencies by the Council which the Plan seeks to reflect – this has a clear synergy with the Area Statements themes on reversing the decline of, and enhancing, biodiversity and mitigating and adapting to a changing climate.

*Is the Plan in general conformity with the emerging NDF (when published)?*

The Consultation Draft of the NDF was published on 7th August 2019 for formal consultation. It was published at a point when the 1<sup>st</sup> Deposit LDP was advanced in terms of its preparation and consequently it was not possible to have full regard to the NDF in that version of the Plan.

However, in preparing the 2<sup>nd</sup> Deposit has sought to ensure compatibility with its content whilst recognising that the premise of the 2<sup>nd</sup> Deposit was not to review or change the Plan's strategy.

As part of regional working, we have sought to further our understanding of the spatial extent of the Swansea Bay and Llanelli National Growth Areas as defined within Future Wales. This will be published as part of the Plan's evidence base.

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

There is currently no Strategic Development Plan within the South-west Wales region.

Note: the formation of the Corporate Joint Committees and the progress towards the preparation of an SDP for the South-west Region will continue to be monitored.

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

Yes. The Deposit LDP was prepared within the context of the relevant regional plans, strategies and utility programmes.

The Plan, its supporting document, topic papers and its 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 – notably Dŵr Cymru Welsh Water (DCWW).

Specific reference is made to the importance of the Swansea Bay City Deal in respect of the region. 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. Regard is also had to the South-west Wales Regional Economic Delivery Plan.

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

Yes. The preparation of the Deposit LDP 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 including (where applicable) discussions associated with the formation of the CJC and its duties to prepare a SDP for the region. 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 the Council's recognition of the value of working with neighbouring authorities, in particular collaborative working has been at the heart of evidence gathering in relation to the preparation of the following regional commissions:

- Strategic Flood Consequences Assessment,
- Regional Housing Market Assessment,
- Sub Regional Two Counties Employment Study,
- Phosphate and Nutrient Credit Trading Feasibility Study,
- National Growth Area Study and a
- Regional Housing Viability Model.

The nature of the co-operation between authorities and sharing of approaches (including comparable thematic policy areas) will be further developed as the Plan's preparatory process continues and as part of the preparatory work associated with the CJs.

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 Planning Monitoring Report (WPMR) for South West Wales on behalf of the Welsh Government.

Appendix 2 of the Deposit LDP identifies the regional position and the compatibility with the plans of neighbouring authorities.

Does it have regard to the Well-being Plan or the National Park Management Plan?

Carmarthenshire produced 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 Plan 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.

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

As identified above the LPA has been actively undertaking collaborative working with Neighbouring authorities. This will continue and further develop as work progresses on the Revised LDP but also on the SDP. This collaborative working will also further develop as the authorities within the region and beyond (including other partners seek to respond to the challenges posed by phosphates in protected riverine SACs as well as other anticipated nutrient and water quality issues.

The 2nd Deposit Revised LDP considers opportunities for joint working on Plan preparation. In this respect the timelines associated with the preparation of LDPs for neighbouring authorities does not allow for ready alignment of Plan preparation.

**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 Plan 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 Plan that is specific to Carmarthenshire and not generic. The development of 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 reference should be had to the suite of documents which form part of the evidence base including the Role and Function paper and Housing and Growth Paper.

*Is it locally specific?*

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

- Meetings of the LDP Key Stakeholder Forum;
- LDP workshop / seminar for Town and Community Councils;
- Meetings of the Developer Forum;
- Drop-in sessions and public exhibitions;
- Public consultations;
- A number of meetings and presentations with political groups.

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

In terms of Elected Members, this Strategy has been shaped by cross party input. There have been eleven 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 (updated December 2019) identifies where the issues have been sourced. 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 across a range of themes.

*Does it address the key issues?*

Yes. The strategic objectives are linked 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.

The Issues, Vision and Objectives (current iteration (Version 3) January 2023 is available as part of the evidence base) sought to develop and inform the consideration of key issues building upon the content of the existing adopted LDP. In so doing it has reflected the outcomes of the annual monitoring reports associated with the current adopted Plan as well as that of the Review Report and the SA scoping report.

The key issues were also informed through the consultation and engagement which informed the preparation of the Pre-Deposit Preferred Strategy – notably the Key Stakeholder Forum.

The Plan contains a key diagram that 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. 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 Council has wherever possible sought to enter into the preparation of joint studies with its neighbours or across the region. Such work has included the:  
Two County Economic Study for Carmarthenshire and Pembrokeshire  
Local Housing Market Assessment (Prepared across the Region)  
Strategic Flood Risk Assessment  
Regional Viability Model

The Council's website has a section which sets out evidence base and lists those available. At each subsequent stages, more specific and updated evidence will be produced as necessary to support the preparation and implementation of the Plan.

The Council will continue to work with neighbouring authorities and those across the region to ensure shared interests and policy areas are explored and as part of a commitment to regional collaboration.

*Can the rationale behind plan policies be demonstrated?*

Yes. The Plan flows from the identification of the issues through to the Vision, the strategic objectives and to the preferred strategy and then on to strategic policies. These strategic policies set the context for the more detailed area and topic based policies. Both the strategic and detailed policies are grouped according to themes to ensure consistency across the Plan.

Each strategic policy is accompanied by supporting text or reasoned justification and is supported by the policy assessment set out within the appendices of the Deposit LDP. This assessment links the policy specifically to its relevant strategic objective (which in turn can be linked back to the relevant issue(s)). It also references the policy to the relevant local well-being goal, monitoring indicator and aspect of PPW.

Each Strategic Policy is accompanied by a series of specific policies which are also accompanied by supporting text or reasoned justification. Where relevant and necessary, links to supporting documents, evidence and Supplementary Planning Guidance is included in order to further explain the particular policy approach and its implementation.

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

Yes. The Plan 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 Integrated Sustainability Appraisal and Strategic Environmental Assessment (ISA) process has provided an invaluable sounding board in the preparation of the Plan.

The ISA has an integral and iterative role in the preparation of an LDP. In this respect, the SA/SEA as prepared for the 1<sup>st</sup> Deposit and ISA for the 2<sup>nd</sup> Deposit this process has been central in testing or measuring the performance of the LDP from its inception through to the preparation of the 1<sup>st</sup> Deposit LDP and the subsequent

2<sup>nd</sup> Deposit. This indicative of the iterative feedback between the ISA and SA/SEA and the preparation of the LDP.

The Plan seeks to meet an evidenced but ambitious provision for growth whilst recognising and making provision for the rich environmental diversity across the County. This is based on the relevant evidence and reflects the ambitions of Plans and strategies of the Council but also those within the regional level.

The Plan embraces growth, set within the broader context of Swansea Bay City Deal. The provision of housing whilst higher than the Welsh Government derived projections is supported through evidence. The Plan seeks to propose a balanced and sustainable level of growth. The focus of growth approach is consistent with Future Wales and seeks to direct it across the settlement hierarchy with the focus on Llanelli, Ammanford/Cross Hands and Carmarthen. This reflects the provisions of Future Wales with both Llanelli and Ammanford/Cross Hands forming part of the National Growth Area (reference is made to regional evidence in defining the spatial extent of the NGA) and Carmarthen as a regional centre. The Plan also recognises the importance of sustaining rural communities and their contribution to the economy, environment and culture of the County.

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.

*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. It should be noted that the Vision has been updated from that which was contained with the pre deposit Preferred Strategy as a result of representations to the Strategy and the recommendations of the Sustainability Appraisal.

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 (updated December 2019).

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

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 the evidence base and topic papers on Strategic Growth Options and Spatial Options. The 2<sup>nd</sup> Deposit sets out the options received as part of an introductory narrative to the Plan's preparation.

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. Recognising the contextual changes that had occurred since the publication of the 1<sup>st</sup> Deposit Plan a revised set of evidence in relation to Housing and Economic Growth has been prepared. This includes updated projections and scenarios on population and household change. The rationale and reasoning behind the choice of growth option and spatial option is set out in the 2<sup>nd</sup> Deposit Plan written statement and evidence base.

The Strategic Options were also considered through the SA/SEA and subsequent ISA preparatory process.

The consideration of sites has been informed by the candidate site process and the responses received by both proponents and those commenting on the proposed site as part of the subsequent consultation exercise. This information along with the Site Assessment Methodology and the feedback from Technical consultees and the evidence base has informed the selection of sites for inclusion within the Deposit Revised LDP.

*Is it logical, reasonable and balanced?*

Yes. The Plan has emerged from a clear understanding of the issues both nationally and also critically those affecting Carmarthenshire. 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 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.

*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 Plan has allowed an opportunity to evaluate a number of alternative strategic options. Each option has been fully considered - including through the Key Stakeholder Forum and/or democratic process including the LDP Advisory Panel.



The Topic Paper on Issues Vision and Objectives informed the preparation of the Pre-Deposit Preferred Strategy. The Plan as a result 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 Plan has evolved through extensive engagement, including formal public consultation.

The Plan is clearly structured and presented and is considered to sit together with background papers and supplementary planning guidance in a coherent manner.

*Is it clear and focused?*

Yes. The 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.

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

Yes, see answers below.

*Will it be effective?*

Yes. The Plans 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 – it seeks to maximise 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 led strategy which is reflective of current delivery rates and the strategic ambitions of the Council and that of the City Region.

*Can it be implemented?*

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 Carmarthenshire. 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 Revised LDP.

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

Yes. The Plan includes a list of housing, employment and mixed use sites. It also includes two strategic sites which reflect the ambitions set out through the Swansea Bay City Deal.

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. The Plan is supported by an Infrastructure Plan which will be continually developed throughout the Plan making process.

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

Carmarthenshire is also a member of the all Wales Planning Phosphate Sub Group and sit on the Special Area of Conservation Rivers Oversight Group (SACROG) along with representatives from WG and other partners including infrastructure providers relating to issues of Water quality. We have and continue to work collaboratively in addressing the challenges posed by the NRW guidance on phosphates and have taken a proactive and solution focused approach to addressing the issue. Nutrient Management Boards for the Tywi, Teifi and Cleddau have also been established with Dwr Cymru Welsh Water a full member. The work of the boards will also be supported by a Technical Group aimed at driving solution finding and delivery of mitigation.

*Will development be viable?*

Yes. The need for development to be viable is 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.

A robust and consistent methodology for assessing viability across authorities in the region as been developed and is being utilised by the authority. This model

represents an important tool for the assessment of viability in a consistent and accessible way. 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.

As the Plan progresses through to submission developers, landowners or proponents of sites will be required to provide additional information as appropriate including in relation to any evidential viability gaps.

A Carmarthenshire specific Affordable Housing Viability Study has been commissioned with updated findings presented as evidence in support of the 2<sup>nd</sup> Deposit LDP.

*Can the sites allocated be delivered?*

Yes. The allocation of sites is supported by a housing topic paper with each allocated site also accompanied by a proforma in line with the Site Assessment Methodology. This identifies deliverability issues and supports the inclusion of the site and links to their consideration as part of the ISA.

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. The trajectory will be an iterative document which develops through to, and post LDP adoption.

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

Yes. The preparation of the Plan has sought to reflect the need for flexibility. The identification of the household requirement incorporated a number of assumptions recognising specific aspects of Carmarthenshire - including its housing vacancy rates. The Plan, in taking forward this requirement, has incorporated an appropriate level of flexibility of 10% or 882 homes.

Similarly the level of employment growth whilst consistent with other plans and strategies identifies circa 71ha of employment land.

*Is it monitored effectively?'*

The Plan has incorporated a Monitoring and Implementation Framework which sets out the arrangements for monitoring the Plan's performance.