

Tests of Soundness

Profion Cadernid



Replacement Local Development Plan 2018-2033
Cynllun Datblygu Lleol Newydd 2018 - 2033

January / Ionawr 2020



Contents		Page Number
1.0	INTRODUCTION	1
2.0	TESTS OF SOUNDNESS	2
3.0	SELF-ASSESSMENT	4

1.0 INTRODUCTION

1.1 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 to undertake a self-assessment of the soundness of the RLDP. 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.

1.2 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 Plan is sound, namely that it meets all 3 soundness tests as set out below.

2.0 TESTS OF SOUNDNESS

2.1 The draft LDP Manual Edition (June 2019) 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.

Tests of Soundness
<p>Preparation Requirements:</p> <ul style="list-style-type: none"> • Has preparation of the plan 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)
<p>Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)</p> <ul style="list-style-type: none"> • Does it have regard to national policy (PPW) & the WSP (NDF when published)? • Does it have regard to the Well-being Goals? • Does it have regard 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 have regard to 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?
<p>Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)</p> <ul style="list-style-type: none"> • Is it locally specific? • Does it address the key issues? • Is it supported by robust, proportionate and credible evidence? • Can the rationale behind the plan's 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?
<p>Test 3: Will the plan deliver (Is it likely to be effective?)</p> <ul style="list-style-type: none"> • 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?

3.0 SELF ASSESSMENT

3.1 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 Blaenau Gwent RLDP Preferred Strategy stage. As such the self-assessment will be further developed as the RLDP 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 the deposit plan stage.

Preparation Requirements:

Has preparation of the plan 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. The Engagement Report sets out how the plan has been prepared in accordance with the Community Involvement Scheme as set out in the Delivery Agreement. However, it should be noted that the executive members and corporate leadership team group was not established. However, the preferred strategy was approved following the formal council process of which the corporate leadership are part of.

An integrated Sustainability Appraisal Report and Habitat Regulation Assessment have been published for consultation alongside the Preferred Strategy.

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

No Strategic Development Plan has been prepared. A draft National Development Framework has been published for consultation which has no weight. However, it is considered that the draft Preferred Strategy for Blaenau Gwent is in conformity with this.

Test 1: Does the plan fit?

Is it clear that the LDP is consistent with other plans?

Yes. The formulation of the 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 plans are where relevant identified within the Preferred Strategy but also within the background and supporting documents.

The SA/SEA Scoping Report Appendix 1 provides a review of plans, policies and programmes at international/European, national, regional and local level in order to take account of the relationship between the LDP and other relevant policies, plans and programmes.

The influence of the above is also reflected in the key challenges and drivers for Blaenau Gwent. 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 (PPW) & the WSP (NDF when published)?

Yes. The Plan has full regard to Planning Policy Wales Edition 10. An assessment of the strategic policies (see Appendix 4 of the Preferred Strategy) against the gateway test and national sustainable placemaking outcomes has been undertaken. In addition all strategic policies have been cross referenced to the key planning principles set out in PPW10.

Does it have regard to the Well-being Goals?

Yes. The draft Preferred Strategy has full regard to the provisions of the Well-being of Future Generations Act 2015 and the well-being goals.

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 addition, the relevant well-being goals are cross referenced in each of the strategic policies. A supporting document entitled Compatibility of the LDP Vision, Objectives and Strategic Policies against the Well-being Goals has been prepared. This document assesses each strategic objective and policy in respect of its compatibility with the well-being goals.

Does it have regard to the Welsh Marine Plan?

No this is not relevant to Blaenau Gwent.

Does it have regard to the relevant Area Statement?

The Area Statements have not been published and are expected in March 2020 therefore regard will be had to these area statements in the draft deposit plan.

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

Yes. Although it should be noted that the NDF has only been published in draft form.

The draft NDF requires growth and new development to be in the right place, undertaken in the right way and make more efficient use of our natural resources to achieve the NDF outcomes.

The draft NDF sets out strategies for the three regions of Wales. Blaenau Gwent is in the South East Region where it identifies growth in the Valleys area of which Blaenau Gwent falls. The Welsh Government supports co-ordinated regeneration and investment in the Heads of the Valleys area to increase prosperity and address social inequalities. The draft Preferred Strategy conforms to this.

The focus of NDF policy is around achieving sustainable urban growth in towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Growth in the Preferred Strategy is planned according to the

sustainable settlement assessment background paper and ensures that growth is directed to the most sustainable locations.

The NDF also identifies Blaenau Gwent as a priority area for solar and wind energy where there is a presumption in favour of development and where the principle of landscape change is acceptable. This policy stance together with an assessment of the potential for renewable energy generation, using the Welsh Government Toolkit and the Blaenau Gwent Energy Prospectus (2019), will inform the deposit plan in terms of identifying areas of search or the potential for particular types of renewable and low / zero carbon energy.

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

An SDP has not commenced for the region.

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

Yes. The Preferred Strategy has been prepared within the context of the relevant regional plans, strategies and utility provider programmes. These will further inform and guide the preparation of the development management policies and land use allocations as part of the deposit plan.

Specific reference is made to the Cardiff Capital Region, the South Wales Valleys Taskforce and Tech Valleys in the strategy. In this regard, the Preferred Strategy has factored its considerations into all aspects of the Plan formulation recognising its importance economically and socially. Reference is made to these in Strategic Policy 4: Employment and Skills.

Is it compatible with the plans of neighbouring LPAs?

Yes. The preparation of the Preferred Strategy reflects the close contact with all the neighbouring authorities both on an individual and topic basis. 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 on a number of pieces of evidence together. These include a: Larger than Local Employment Study, Population and Household Projections, Integrated Sustainability Appraisal, Habitat Regulation Assessment and Renewable Energy Assessment. The nature of the co-operation with authorities and sharing of approaches including comparable thematic policy areas will be developed as the Plan's preparatory process continues.

Regard will also be had to the emphasis on regional working in light of future provisions around Strategic Development Plans and the National Development Framework.

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

Yes. The Blaenau Gwent Local Well-being Plan was endorsed in April 2018 and is a long term vision for the area over the next 35 years. The Plan outlines five objectives for improving well-being in Blaenau Gwent and meeting duties under the Well-being and Future Generations Act 2015.

The RLDP will be an integral means of maximising the well-being of Blaenau Gwent's residents and its communities; thereby ensuring that these five objectives are balanced and integrated into the core of the Plan, whilst shaping each stage of plan preparation.

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

As demonstrated above, a significant amount of evidence base has been commissioned on a joint basis with Monmouthshire and Torfaen and on a regional basis with Monmouthshire, Torfaen, Caerphilly and Newport. The neighbouring local authorities were also involved and engaged in Blaenau Gwent's pre deposit participation workshops (issues and vision and spatial strategy options workshops). We have also held regular joint meetings to ensure there is a consistency of approach.

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

Yes. The formulation of the Preferred Strategy is underpinned by evidence and the identification of locally specific issues, vision, objectives and strategic policies.

The emphasis of the pre deposit stage has been on undertaking a series of engagement workshops and meetings to identify what the key issues are that the RLDP needs to address. Further detail on this is set out in the Engagement Background Paper.

A key piece of evidence to link the issues, vision and objectives with the growth and spatial strategy is the sustainable settlement assessment. This provides a link between these pieces of work by providing a spatial context and it therefore identifies a locally distinctive approach.

Further evidence including that in respect of the Sustainable Settlement Assessment and population and household projections have been undertaken and published alongside the Preferred Strategy.

Is it locally specific?

Yes. The Preferred Strategy is a product of effective engagement and consensus building. Since the commencement of the review in October 2018, there have been:

- A series of issues and vision workshops which was repeated twice for stakeholders; twice for members; internally and with the Children's Grand Council.
- A series of spatial strategy options workshops which was repeated three times for stakeholders; once for Members; once for internal officers and the youth forum.
- Several Member briefing sessions.
- A meeting with the business community.

An Engagement Background Paper has been prepared which sets out in more detail the findings of this engagement.

Does it address the key issues?

Key challenges have been identified for the RLDP to address. These have been influenced by stakeholders at a series of engagement events, the Council's review report and other supporting documents. At the engagement event, the current LDP challenges for the adopted plan were evaluated and reviewed. A full report of consultation of the issues and vision workshops is available.

The key challenges have been grouped under the headings of economic, environmental, social and cultural aspects which are illustrative of the broad spectrum of areas where the Plan can affect change.

Is it supported by robust, proportionate and credible evidence?

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

- LDP Annual Monitoring Reports since 2013;
- LDP Review Report;
- Population and Household Demographics – Edge Analytics;
- Growth Options Background Paper;
- Spatial Strategy Options Background Paper;
- Sustainable Settlement Assessment Background Paper;
- Employment Land Review Background Paper;
- Housing Supply Background Paper;
- Compatibility Assessment of the RLDP Vision and Objectives against the Well-being of Future Generations Act;
- Initial Integrated Sustainability Appraisal Report;
- Habitat Regulation Assessment;
- SA/SEA Scoping Report;
- Habitat Regulation Assessment Screening Report; and
- Local Housing Market Assessment.

The above is supplemented by a range of documents and evidential baselines including the housing land availability study, open space, employment and town centre surveys.

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 the plan's policies be demonstrated?

Yes. The Preferred Strategy's Challenges, Vision, Objectives, Strategy and Strategic Policies have been informed by evidence, engagement and other plans and strategies. The strategic policies are elaborated upon by supporting text and a cross reference is made to the objectives, national well-being goals, local well-being objectives and key planning principles from PPW10. A policy assessment of the strategic policies against the national sustainable placemaking outcomes is also set out in Appendix 4 of the Preferred Strategy.

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

Yes. The 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. Population and Household Demographic evidence has been undertaken which provided demographic evidence, including a suite of population, housing and economic growth outcomes to inform the spatial strategy options. An Employment Land Review has also been undertaken to quantify the future employment land requirements based on the Welsh Practice Guidance for Economic Development.

Open Space and Green Infrastructure assessments will be undertaken for the deposit plan.

The achievement of sustainable development is a central component of the Plan. It should be noted that the Integrated Sustainability Appraisal (ISA) process has provided an invaluable sounding board in the preparation of the Preferred Strategy.

The ISA has an integral and iterative role in the preparation of an LDP. In this respect, its use in testing or measuring performance of the LDP from its inception through to the preparation of the deposit plan 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 contribute in their wider communities. The hierarchy recognises and acknowledges the availability of services and facilities, accessibility issues and other considerations. Reference should be made to the Sustainable Settlement Assessment Background Paper.

Are the vision and the strategy positive and sufficiently aspirational?

Yes. An exciting and challenging Vision of what the area should look like in 15 years time has been developed and will guide the future development of Blaenau Gwent. The LDP Vision has been developed to take into account the policy context, key challenges and drivers for change.

The strategy encourages growth based on a clear understanding of the population and household changes over the plan period. The strategy has had to consider deliverability by reviewing what has been delivered in the past and identifying what can be delivered in the future. The housing requirement figure has been set at a deliverable level though the flexibility allows the plan to be more aspirational.

Reference should be made to Strategic Growth Options Background Paper.

Have the 'real' alternatives been properly considered?

Yes. The 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 Strategic Growth Options and Spatial Options Background Papers.

The Strategic Options were also considered through the ISA process and an appraisal of them can be found in the ISA Report.

Is it logical, reasonable and balanced?

Yes. The Preferred Strategy emerged from a clear understanding of the issues both nationally and also critically those affecting Blaenau Gwent. 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 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 from identifying the key challenges for the LDP to address, identifying where we want to be by 2033 in the form of a Vision and how do we get there in the form of developing a strategy.

The preparation of the Preferred Strategy has allowed an opportunity to evaluate a number of alternative strategic options. Each variant of the strategy option has been fully considered – including through engagement with stakeholders.

The Preferred Strategy provides clear links with the national well-being goals, local well-being plan and key planning principles. A policy assessment of the strategic policies against the national sustainable placemaking outcomes is also set out in Appendix 4 of the Preferred Strategy.

The Preferred Strategy has evolved through significant engagement as demonstrated in the Engagement Background Paper.

Is it clear and focused?

Yes. The 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 challenges through to how these will be addressed as part of its strategic approach.

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

Will it be effective?

Yes. The Preferred Strategy's objectives have emerged from an understanding of the challenges and needs of Blaenau Gwent 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 it 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 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 Blaenau Gwent. The policies and proposals (both strategic and eventually specific within the future deposit plan) 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 Replacement 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 plan to ensure the Plan delivery is fully evidenced.

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 three Strategic Sites, the Preferred Strategy does not identify specific allocations. Allocations will be identified as part of the deposit plan with their deliverability evidenced accordingly.

The Works Mixed Use Strategic Site benefits from planning permission for the business hub and one of the parcels of land has already been sold for residential development. The Masterplan for the site will need to be updated to reflect the current position of development at the site.

The Ebbw Vale Northern Corridor Mixed Use Strategic Site benefits from planning permission for 100 homes where construction is underway, another parcel of land also benefits from planning permission for 250 homes subject to the signing of section 106 agreement. Planning permission has also been permitted on land at Rhyd y Blew for employment use. Development of the site is currently guided by the Ebbw Vale Sustainable Development Framework Supplementary Planning Guidance document. This will be reviewed to ensure that it is up to date and reflects current guidance.

A masterplan is being prepared for the former Nantyglo Comprehensive School site to create a well-designed, aspirational place to live with leisure space and good pedestrian / active travel linkages throughout. The site can accommodate in the region of 220 new homes but the exact figure and mix of uses will be identified in the deposit plan.

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

Yes. The preparation of the Preferred Strategy has sought to reflect the need for flexibility. The Preferred Strategy makes provision for 2,115 homes to enable the delivery of 1,755 this equates to a 21% flexibility to enable sites that do not come forward or to enable the higher aspirations for the area if all of the sites were to be delivered.

Is it monitored effectively?

As part of the preparation of the deposit plan 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 Preferred Strategy, does not contain a monitoring framework.



Planning Policy Team

Blaenau Gwent County Borough Council
Municipal Offices, Civic Centre
Ebbw Vale, NP23 6XB

Tel: 01495 354740

Email: planningpolicy@blaenau-gwent.gov.uk

Website: www.blaenau-gwent.gov.uk

