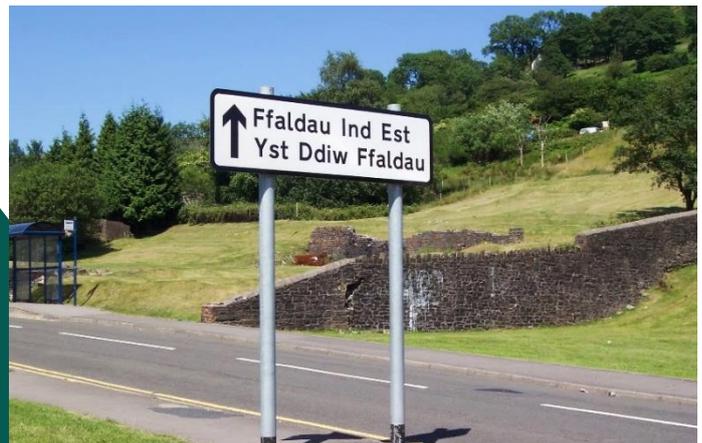
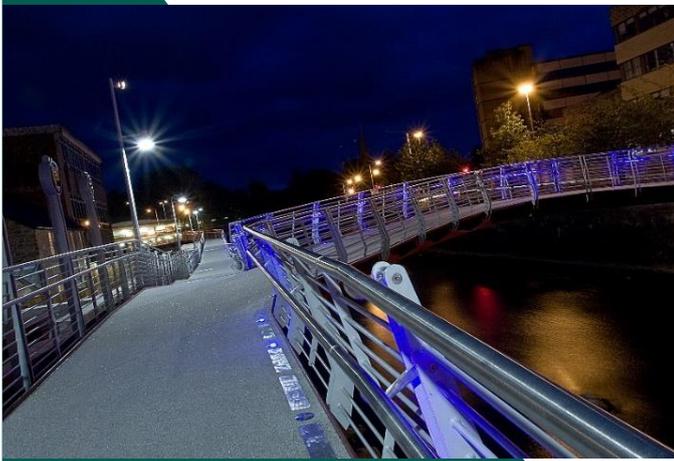


Bridgend Replacement Local Development Plan 2018-2033



Tests of Soundness
Self-Assessment

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BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (LDP) 2018-2033

TESTS OF SOUNDNESS SELF-ASSESSMENT

1. Purpose of the Report

1.1 The Local Planning Authority (LPA) must demonstrate that the Replacement Local Development Plan (LDP) meets the soundness tests as set out in national planning policy and guidance prior to submitting the Plan for examination. This paper therefore undertakes a self-assessment of the Replacement LDP's soundness to ensure that it meets the 3 tests as specified in Planning Policy Wales (PPW). These soundness tests are:

1. Does the plan fit? (Is it clear that the LDP is consistent with other plans?)
2. Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (Is it likely to be effective?)

2. Introduction

2.1 Edition 3 of the Development Plans Manual clearly outlines the importance of demonstrating a sound LDP. Welsh Government (WG) emphasises,

Section 64(2) of the Planning and Compulsory Purchase Act 2004 Act specifically provides that an LPA must not submit an LDP unless it considers the plan is ready for examination. This means that 'unsound' plans should not be submitted for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness set out in Table 27 of the Development Plans Manual. The questions listed under each test are intended to assist in indicating the matters that may be relevant for each test. The list is not exhaustive and may not apply in every case. LPAs should also have regard to the PINS examination guidance which sets out the process and issues to consider regarding submission and examination.

The Welsh Government will monitor consistency with national policy throughout the LDP preparation process, and is likely to discourage submission if there is a fundamental conflict. If a plan is considered to be fundamentally unsound this will be drawn to the attention of the LPA so that any necessary action (i.e. withdrawal) is taken before submission. If the Welsh Government makes an objection based on soundness in the normal way, it will be considered at the examination (WG, 2020, paras 6.26-6.27).

2.2 The Development Plans Manual, in elaborating on the above, identifies a series of questions to help identify those matters that may be relevant under each test of

soundness. This is preceded by several preparation requirements. The remainder of this paper is framed around each of these tests and questions accordingly.

3. Tests of Soundness Preparation Requirements

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

3.1.1 The Plan has been prepared in accordance with the procedural requirements. The Replacement LDP's accompanying SA Report (incorporating SEA) assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous SA reporting including an SA Scoping Report (2018) and an Interim SA Scoping Report (2019) which accompanied the Replacement LDP Preferred Strategy. The SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Replacement LDP, including the incorporation of recommended changes. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in the Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).

3.1.2 All substantive components of the Deposit Plan, and thus the emerging Replacement LDP, have also been subject to Habitat Regulations Assessment (HRA) in accordance with statutory requirements. The HRA (2021) was published to accompany the Deposit Plan, building on previous stages of HRA. This documented the findings of an Appropriate Assessment carried out to identify any likely significant effects on the integrity of European Sites in the context of their conservation objectives. The HRA concluded that the Replacement LDP is not likely to have significant effects on any of the identified European sites, either alone or in combination with other plans or projects. The policies, proposals and measures incorporated into the LDP are considered appropriate to sufficiently protect European sites from development contained within the Plan and provide improvements in air quality.

3.1.3 The Plan's Preparation Requirements are further considered in the context of the respective LDP Regulations below.

3.1.4 **Regulation 5 Community Involvement Scheme (CIS) Preparation:** The 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 lists 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 and Deposit Consultation Report.

- 3.1.5 **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.
- 3.1.6 **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.
- 3.1.7 **Regulation 8 Timetable:** The timetable within the DA identifies the timeline to produce the Plan and the key stages in its preparation. This includes definitive and indicative dates for the preparation of the Plan.
- 3.1.8 **Regulation 9 and 10 DA:** The DA has been approved by Welsh Government in accordance with the Regulations. The DA has been published and made available at the locations specified.
- 3.1.9 **Regulation 11 Form and content of the LDP:** The Revised LDP contains the name of the area, indicates that it is an LDP and details the stage reached. The policies of the LDP, both strategic and specific, are supported by appropriately clear and distinguishable supporting text.
- 3.1.10 **Regulation 12 Proposals Map:** The Proposals Map has been produced in electronic format on the Council's website and is also available in hard copy form at the relevant Deposit locations. It shows the proposals for the development and use of land in the County Borough, using an Ordnance Survey base map with National Grid lines and reference numbers. The Proposals Map also identifies the scale to which it has been prepared and includes an explanation of the symbol and notations used via the key.
- 3.1.11 **Regulation 14 Pre-Deposit Participation:** A period of engagement was undertaken including focussed sessions with certain specific consultation bodies, as considered appropriate, to consider a range of strategies and options, whilst gaining further insight into their different implications. The purpose of this period of engagement was to receive feedback on the general thrust and direction of the Plan at this early stage of preparation, whilst recognising the implications for different strategic growth and spatial options.
- 3.1.12 **Regulation 15, 16 and 16A Pre-Deposit Public Consultation:** The Preferred Strategy statutory consultation period took place between 30th September 2019 and 8th November 2019, in accordance with LDP Regulation 15 and the DA. Copies of the

pre-deposit proposals documents, supporting documents and a statement of the pre-deposit matters were made available for inspection, published on the Council's website and sent to bodies identified under regulation 14(a) and (b). Local advertisements provided notice of the pre-deposit matters and the fact that the pre-deposit proposals documents were available for inspection and the places and times at which they could be inspected. The Initial Consultation Report was published and reported to Council and on 22nd January 2020 in accordance with LDP Regulation 16A. That Report identified the steps taken to publicise plan preparation in conformity with the CIS; the bodies involved, notified or consulted at the pre-deposit stage; a general summary of comments together with the LPA's response; and the main issues raised and how they influenced the Deposit LDP.

3.1.13 Regulation 17, 18, 19 and 20 Deposit of Proposals and Representations: In accordance with the Replacement DA and LDP Regulation 17, the Deposit Replacement LDP was published and subject to public consultation from 1st June 2021 to 27th July 2021. Copies of the LDP proposals documents, supporting documents and a statement of the LDP matters were made available for inspection, published on the Council's website and sent to bodies identified under regulation 14(a) and (b). Local advertisements provided notice of the deposit matters and the fact that the LDP documents were available for inspection and the places and times at which they could be inspected. As soon as reasonably practical, the LPA published a Deposit Plan Representations Register on its website, which contained details of all representations received together with a statement of how they can be inspected. A Consultation Report was also prepared to update and expand upon the Initial Consultation Report, thereby fulfilling the LPA's legislative requirements as set out in LDP Regulation 22(2). That Consultation Report comprehensively documents how the LPA considered all representations made on the Deposit Plan and represents a key pre-requisite to submission of the Replacement LDP in accordance with the latest Replacement DA.

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

3.2.1 Yes: the Replacement LDP is considered to be in general conformity with Future (NDF), as detailed within Background Paper 17: Conformity with Future Wales 2040 (NDF). As part of their representation on the Deposit Plan, Welsh Government confirmed that, in their opinion, "Bridgend's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework (NDF): Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Mana Manual (Edition 3)".

3.2.2 There is currently no Strategic Development Plan (SDP) within the South East Wales region. Regional Corporate Joint Committees (CJCs) will undertake strategic development and regional transport planning in the future, including preparing SDPs.

Although Bridgend County Borough Council is proceeding with a Replacement LDP, simultaneous collaborative working will be undertaken with neighbouring authorities and the broader region to prepare an SDP. A joint evidence base will also be shared wherever possible to this end.

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

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

4.1.1 Yes: the Replacement LDP has had regard to national policies and guidance. The Pre-Deposit Preferred Strategy was originally prepared in the context of PPW 10, with the Deposit LDP, its policies, proposals and subsequent revisions having since been reviewed to ensure consistency with PPW 11. The LDP has also been prepared in tandem with development of the NDF, and as detailed in Background Paper 17, the Replacement LDP is considered to be in general conformity with the NDF. The Replacement LDP and supporting documents clearly reference the national policies and plans that have been taken into account throughout LDP preparation. Each of the strategic policies is supported by a 'policy linkage' section which sets out how the policy delivers the relevant LDP Objectives in the context of Future Wales, PPW and the Well-being Goals, along with references to supporting evidence.

4.2 B) Does it have regard to the Well-being Goals?

4.2.1 Yes: the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 assesses each policy in respect of its compatibility with the Local Well-being Goals. The SA (and SEA) demonstrate that the LDP has a significant positive impact on sustainable development.

4.3 C) Does it have regard to the Welsh National Marine Plan (WNMP)?

4.3.1 Yes: The Replacement LDP has regard to and the WNMP. SP4 (in recognising the fundamental challenges posed by climate change) complements the Marine Plan on matters including flood risk and the LDP has sought to direct development away from areas of unmitigated flood risk. Equally, Policies DNP5-DNP9 respond to issues such as adaptability, green infrastructure and connectivity and the LDP strongly protects open countryside from inappropriate development. The strategic policies, combined with subsequent detailed policies will ensure that the LDP complements the WNMP.

4.4 D) Does it have regard to the relevant Area Statement?

4.4.1 Yes: in the context set out by the Environment Act, Natural Resources Wales (NRW) have published Area Statements, which increase the understanding of the considerations around the natural resources in an area, the pressures on them and the benefits they provide. They provide information required to better manage natural resources, which has been duly considered by the LPA and the Replacement LDP has been prepared in the light of consultation with NRW. In their Deposit Consultation Representation, NRW acknowledged that the LPA has taken on board advice from previous correspondence, “which has enabled positive provisions in the Deposit Plan both in policy terms and with regard to allocation of sites”. This period of consultation provided NRW the opportunity to identify any incompatibilities with the Area Statements. No incompatibilities were identified in this respect and NRW confirmed, “we support the intent of the plan’s policies and proposals to enable the delivery of sustainable development and ensure social, economic, environmental and cultural well-being goals are all suitably balanced in the decision-making process, so the right development occurs in the right place”.

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

4.5.1 Yes: the Replacement LDP is considered to be in general conformity with Future (NDF), as detailed within Background Paper 17: Conformity with Future Wales 2040 (NDF). As part of their representation on the Deposit Plan, Welsh Government confirmed that, in their opinion, “Bridgend’s Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework (NDF): Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Mana Manual (Edition 3)”.

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

4.6.1 There is currently no SDP within the South East Wales region. CJsCs will undertake strategic development and regional transport planning in the future, including preparing SDPs. Although Bridgend County Borough Council is proceeding with a Replacement LDP, simultaneous collaborative working will be undertaken with neighbouring authorities and the broader region to prepare an SDP. A joint evidence base will also be shared wherever possible to this end.

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

4.7.1 Yes: the Replacement LDP was prepared within the context of the relevant regional plans, strategies and utility programmes. These were also considered when preparing the LDP strategic policies, the growth strategy, strategic objectives, spatial strategy and settlement hierarchy. The Replacement LDP, associated evidence base

and background papers set out how regional plans, strategies and utility programmes have been taken into account. Proactive engagement has been key to this exercise and the LPA has consulted with a range infrastructure and utility providers throughout plan preparation as detailed in the Infrastructure Development Plan.

4.8 H) Is it compatible with the plans of neighbouring LPAs?

4.8.1 Yes: the Replacement LDP has been prepared following close dialogue with all neighbouring LPAs (Vale of Glamorgan, Neath Port Talbot and Rhondda Cynon Taf County Borough Councils) as well as other essential organisations. This dialogue has been conducted both on an individual and topic basis, but also through the South East Wales Strategic Planning Group and other topic-based forums. The Replacement LDP's Spatial Context Chapter references the adopted Plans of the neighbouring LPAs, which have all been considered throughout LDP preparation to ensure compatibility.

4.8.2 Bridgend Education Department have liaised throughout the process with their respective partners at Rhondda Cynon Taf to discuss and ensure positive outcomes on cross-boundary education issues. The Economic Evidence Base Study considered and details cross-boundary employment provision between Bridgend and Rhondda Cynon Taf . Meaningful engagement will be facilitated between Bridgend, Rhondda Cynon Taf , Vale of Glamorgan and Neath Port Talbot to discuss the outcomes of the Strategic Transport Assessment (when finalised).

4.8.3 On matters of minerals and waste, Bridgend has been grouped with Cardiff, the Vale of Glamorgan, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park. A Statement of Sub Regional Collaboration (SSRC) is currently being prepared by the Cardiff City Authorities as part of the evidence base needed to support each LDP. The purpose of the SSRC is to confirm that all constituent LPAs within a particular RTS sub-region accept the individual apportionments for aggregates for their individual Authority areas, as set in the latest Review of the RTS, and that (*as a minimum*) the RTS requirements for that sub-region as a whole will therefore be met.

4.9 I) Does it regard the Well-being Plan or the National Park Management Plan?

4.9.1 Yes: the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 assess each policy in respect of its compatibility with the Local Well-being Goals.

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

4.10.1 Yes: at the start of the Replacement Local Development Plan process, Rhondda Cynon Taf and Caerphilly LPAs were not progressing with LDP reviews (although this position has now changed) and therefore review timescales did not align. In addition, Vale of Glamorgan and Neath Port Talbot LPAs were not at their review stages, which meant there were no opportunities to commission shared evidence base studies. However, Bridgend has utilised the evidence base methodologies prepared by SEWSPG in the formulation of its evidence base to ensure consistency with other future LDPs and Plans.

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

5.1 A) Is it locally specific?

5.1.1 Yes: a comprehensive and thematically wide-ranging body of evidence has been collated specific to Bridgend County Borough, set in the context of the wider regions. This has directly informed development of the Replacement LDP to ensure that the Plan, its policies and allocations are specific to the local area and seek to meet local needs and aspirations.

5.2 B) Does it address the key issues?

5.2.1 Yes: the key issues and drivers identified through the plan preparation process have directly informed the development of the LDP Vision, Objectives to ensure the LDP addresses the key issues. This has been guided by an understanding of the context of the local area and its needs, opportunities and constraints. It is also guided by the principles of sustainability and Well-being. The associated Background Papers and evidence base studies provide further information on the key issues, which the Replacement LDP seeks to address.

5.3 C) Is it supported by robust, proportionate and credible evidence?

5.3.1 Yes: the preparation of the Plan has involved the development of a comprehensive evidence base. This includes research and data gathering as well as the collation of studies already available. The evidence base studies are referenced along with their roles and purposes in Chapter 1 of the Replacement LDP.

5.4 D) Can the rationale behind the plan's policies be demonstrated?

5.4.1 Yes: the Key Issues and Drivers identified through the Replacement LDP preparation process have directly informed the development of the LDP Vision and Objectives. The LDP Vision has been developed to take into account the Bridgend Local Well-being Plan with the specific characteristics and key issues affecting the County Borough. It ultimately defines what the LDP is working towards and will be delivered through the achievement of 4 Strategic Objectives, underpinned by 35 Specific Objectives. This provides an overarching framework to underpin all other components of the Replacement LDP and has been devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes.

5.4.2 A suite of derived Strategic Policies was identified in the Replacement LDP Preferred Strategy. These Strategic Policies have been modified to take account of representations received and extended to provide a more comprehensive Strategic Policy Framework. The updated suite of 18 Strategic Policies is also supported by 56 accompanying Development Management Policies, which address a range of detailed thematic issues and forms the basis to deliver the Vision and Strategic Objectives.

5.4.3 The Strategic Policies, which have been informed by the LDP's comprehensive evidence base, need to be read in conjunction with one another to gain an understanding of the overall policy direction of the Replacement LDP. As with all other components of the LDP, all strategic policies are complementary in terms of supporting the achievement of the national Wellbeing Goals, local Wellbeing Objectives and sustainable development. Each strategic policy has reasoned justification and a summary table to document how it relates to the relevant LDP Objectives, national policy, and Well-being Goals along with the key evidence. All strategic policies have also been subject to SA, incorporating SEA.

5.4.4 The Strategic Policies, and the more detailed Development Management Policies, are intended to ensure that development proposals can achieve positive economic, social, environmental and cultural outcomes, and can minimise adverse ones. They will form the basis of all planning decisions, and indicators have been developed as part of the Plan's monitoring framework to show the effectiveness of the policies. The rationale behind the plan's policies can therefore be clearly demonstrated.

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

5.5.1 Yes: the Replacement LDP is based on the evidence collated and an assessment of needs as identified within the evidence base. The Replacement LDP addresses

these needs and aspirations for the area and sets a clear framework to enable them to be met. The Plan proposes a balanced and sustainable level of growth on this basis, considered most appropriate to support economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development. This is based on the relevant evidence and reflects the needs and ambitions of local, regional and national plans and strategies.

5.5.2 Sustainable development is a central component of the Replacement LDP, and the Plan has been subject to an SA/SEA and HRA to ensure it contributes to the achievement of sustainable development. The SA/SEA has played an integral and iterative role in plan preparation in this respect. It has informed incorporation of appropriate mitigation and enhancement measures into the Replacement LDP to ensure avoidance of likely significant adverse effects and to enhance the plan's effectiveness.

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

5.6.1 Yes: informed by the identification of relevant LDP Issues and Drivers in Chapter 3 of the Replacement LDP, Chapter 4 of the document sets out a new LDP Vision statement to underpin the emerging Replacement LDP. This Vision covers the plan period 2018-2033 and is designed to integrate the Bridgend Replacement LDP with the Bridgend Local Wellbeing Plan, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government's National Sustainable Placemaking Outcomes and thematic priorities within 'Future Wales' (NDF) and Planning Policy Wales (PPW). In consequence, the proposed LDP Vision is based around using placemaking to achieve economic and spatial outcomes in tandem.

5.6.2 The Replacement LDP Vision explains that the County Borough is undergoing incremental, long-term socio-economic renewal, such that the Bridgend Replacement LDP should support existing regeneration efforts and further growth without imposing fundamental change. The Vision appropriately addresses the key spatial challenges and opportunities facing the County Borough, including existing economic strengths in advanced manufacturing and the need for improved infrastructure, new employment opportunities and the decarbonisation of key sectors, each of which will have spatial implications, to deliver sustainable economic growth. The proposed LDP Vision also calls for Bridgend, Porthcawl, Maesteg and the Llynfi Valley to accommodate the majority of growth and have distinct roles within a coherent network of settlements. In addition to supporting economic growth, the proposed LDP Vision recognises that this approach will maximise positive wellbeing outcomes and help to protect environmentally sensitive areas.

5.6.3 As a high-level statement focused around using placemaking to achieve regeneration and economic growth, the LDP Vision supports a greater emphasis on the delivery of a refreshed spatial strategy and place-based policies within the Replacement LDP than the existing adopted LDP, which enhances local distinctiveness and the ability

to meet the differential needs of communities. The proposed LDP Vision is therefore considered to be appropriate and compatible with achieving sustainable development. Further detail is provided in Background Paper 1: Vision and Objectives.

- 5.6.4 The Replacement LDP is based on a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region. Future Wales identifies Bridgend and the valley areas as being within a National Growth Area, clarifying this area is to be the focus for strategic economic and housing growth within the region. The level of household growth proposed in the Replacement LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a National Growth Area. This is supported by 71.7ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF.
- 5.6.5 Maintaining this trajectory will lead to more established households remaining within and moving into the County Borough, coupled with less outward migration across other economically active age groups. This will encourage a more youthful, skilled population base to counterbalance the ageing population, resulting in an overall population increase of 9.4% or 13,681 people over the plan period. This level of growth will also enable delivery of x affordable homes, thereby maximising delivery in combination with other sources of affordable housing supply in the context of plan-wide viability.
- 5.6.6 The planned level of housing growth is neither constrained in a manner that could frustrate economic development or promoted in such a way as to encourage inward commuting. Rather, the underlying projection promotes sustainable forms of growth that will help minimise the need for out-commuting and promote more self-contained, inter-connected communities in accordance with the LDP Vision. The Growth Strategy is considered most conducive to achieving an equilibrium between the number of homes provided and the job opportunities expected, a balance that is required by PPW. This is justified within the Strategic Growth Options Background Paper and reasonable alternatives have also been duly assessed under the SA process.

5.7 Have the 'real' alternatives been properly considered?

- 5.7.1 Yes: several different alternative growth and spatial options were considered during formulation of the Preferred Strategy (refer to the Strategic Growth Options and Spatial Strategy Options Background Papers). The Candidate Site Assessment considered all reasonable alternatives to the proposed allocations. The strategic, growth and site options were also considered as reasonable alternatives through the

SA/SEA process. The Replacement LDP is therefore considered to be realistic and appropriate, having taken into account a number of alternatives.

5.8 Is it logical, reasonable and balanced?

5.8.1 Yes: the Replacement LDP has emerged from a clear understanding of the issues at the national, regional and local level. It is considered logical, realistic and balanced having given due consideration to the alternatives. It flows and is presented in a logical manner from the evidence base through to issues, objectives and policies. It takes a balanced view of the County Borough in land use planning terms and is based on a robust and credible evidence base from which the policies are logically derived. Where appropriate, it integrates with other plans and strategies whilst ensuring it is reflective of national policy, with sustainable and deliverable placemaking as its core. The Plan is grounded in effective engagement and evidence and as such is logical, reasonable and balanced.

5.9 Is it coherent and consistent?

5.9.1 Yes: the Replacement LDP meets the requirements relating to coherency and consistency, demonstrated by its logical flow. The Key Issues and Drivers have clearly informed the Vision, which defines what the LDP is working towards. This will be delivered through the achievement of 4 Strategic Objectives, underpinned by 35 Specific Objectives. This provides an overarching framework to underpin all other components of the Replacement LDP and has been devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes. A suite of 18 derived Strategic Policies and 56 accompanying Development Management Policies completes a comprehensive Strategic Policy Framework. This represents a coherent strategy from which its strategic policies flow.

5.10 Is it clear and focused?

5.10.1 Yes: the Deposit Plan is set out in a clear and logical form, which shows linkages between the various elements of the Plan. This ensures a clear understanding of its content, but also critically its core purpose and objectives. This structure highlights the main strategic issues identified, shows how the detailed policies and proposals relate and demonstrates how they will be addressed as part of the LDP's strategic approach to sustainable development.

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

6.1 Will it be effective?

6.1.1 Yes: the Replacement LDP's Objectives have emerged from an understanding of the issues and needs of Bridgend as well as a sound, logical and robust evidence base.

The strategy seeks to integrate and reflect other Plans and strategies as part of an integrated approach to delivery, thereby maximising opportunities for effective 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 a clear, rational growth strategy which is reflective of current delivery rates and the strategic ambitions of the Council and that of the Cardiff Capital City Region.

6.2 Can it be implemented?

6.2.1 Yes: the Plan has been prepared to ensure it is implementable and that its policies and proposals can be delivered within the Plan period. It sets out a deliverable level of strategic growth and sets a clear spatial framework that aligns with sustainability principles and is responsive to the needs of Bridgend's communities. The policies and proposals provide the framework for the Plan's objectives to be implemented and the decision-making process to be undertaken. An effective and appropriate monitoring framework has been developed and included within the Replacement LDP. This will form the basis for undertaking the Annual Monitoring Report (AMR), which will measure and assess the Replacement LDP's implementation .

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

6.3.1 Yes: the LPA has consulted with a range infrastructure and utility providers throughout plan preparation and these stakeholders will continue to be involved as the Plan progresses and is implemented. The Replacement LDP is supported by an Infrastructure Delivery Plan and site-specific viability assessments which have factored in appropriate costs and timescales for supporting infrastructure to be provided.

6.4 Will development be viable?

6.4.1 Yes: the Plan is supported by 'plan-wide' and detailed 'site specific' viability assessments that have used the Development Viability Model, which was developed by Burrows-Hutchinson Ltd on behalf of SEWSPG.

6.4.2 The Plan-Wide Viability Assessment (2021) assessed broad levels of development viability across eight Housing Market Areas within the County Borough. Viability was tested for a range of different site typologies, reflecting appropriate s106 contributions and locally derived housing mixes. All appraisals were undertaken to reflect costs and values at a fixed point in time, having been informed based on a series detailed discussions with a local representative steering group. This Plan-Wide Assessment duly informed development of the spatial strategy alongside a range of other key pieces of evidence including the Settlement Assessment and LHMA. On this basis,

the Replacement LDP was prepared to maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites and seek to minimise pressure on BMV agricultural land.

6.4.3 Site-specific testing for strategic sites and smaller housing allocations was also conducted to capture more nuanced development viability factors. These site-specific assessments are fundamental to delivery of the Plan and demonstrated the viable level of planning contributions, infrastructure provision and affordable housing deliverable on each proposed allocated site. This directly informed detailed policy development within the Replacement LDP. The Council has maintained continuous dialogue with respective site promoters to demonstrate that these sites can be delivered through analysis of more specific costs, constraints and site requirements.

6.4.4 This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. Robust viability and deliverability evidence is therefore a key element of the Replacement LDP's evidence base and has been duly considered in planning for realistic levels of strategic growth across the County Borough. The LPA has carefully considered how different market areas and site-specific nuances can affect the viability of delivering private and affordable housing as well as associated infrastructure to support the level of development proposed. This has ensured formulation of realistic targets and policies when preparing a deliverable Replacement LDP.

6.5 Can the sites allocated be delivered?

6.5.1 Yes: each proposed allocation is supported by robust technical and viability evidence. The individual site-specific viability appraisals that accompany each proposed allocation are distinct in nature and consider detailed contextual intricacies regarding development viability. These site-specific assessments have been periodically updated throughout plan preparation to ensure they capture the latest costs, values and planning obligation requirements. The latest round of site-specific viability appraisals reaffirmed that the proposed allocations are deliverable, financially viable and can accommodate the Plan's policy requirements.

6.5.2 The Replacement LDP is also accompanied by a housing trajectory, which demonstrates the phasing and delivery of housing over the lifetime of the plan. This has ensured realistic phasing and delivery rates have been taken into account, appreciating the time it will take to bring all elements of the provision forward to ensure the anticipated annual build rate can be achieved. The Infrastructure Delivery Plan also demonstrates how infrastructure provision has been considered in tandem to support the housing trajectory.

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

6.6.1 The Replacement LDP has been designed to provide a flexible policy framework which can deal with unexpected and unforeseen changes in circumstances such as the Covid-19 pandemic. Refer to Background Paper 11 – Covid-19 Policy Review.

6.6.2 The dwelling requirement contains a flexibility allowance, whilst the settlement hierarchy and spatial approach are designed to deliver a flexible and sustainable approach to development. As evidenced through the housing trajectory, this level of flexibility comfortably demonstrates delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period. The flexibility allowance has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered.

6.6.3 All viability work underpinning the plan has factored in suitable contingencies to avoid planning to the margins of viability. This will allow the Replacement LDP to respond to changing markets, de-risk the plan and ensure there is room to accommodate any further changes in economic circumstances and/or site-specific issues.

6.6.4 In order to support the Council's Employment Land Strategy, 71.7 hectares of available employment land is allocated for employment development. Achieving a wide and balanced portfolio of employment uses is central to the economic strategy. This will allow the local economy to attract higher value-added intensive employment uses including, life sciences, construction, energy and decarbonisation, and telecommunications sectors. This is in addition to supporting and maintaining the significant manufacturing base and traditional B class uses that are an important facet and driver of growth for the local economy. The Plan also encourages and supports the redevelopment, refurbishment and rationalisation of the existing stock of larger industrial buildings to improve the quality of employment floorspace suited to modern day needs for Small Medium Enterprises (SMEs) that are so important to the Welsh and Bridgend economy.

5.7 Is it monitored effectively?

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