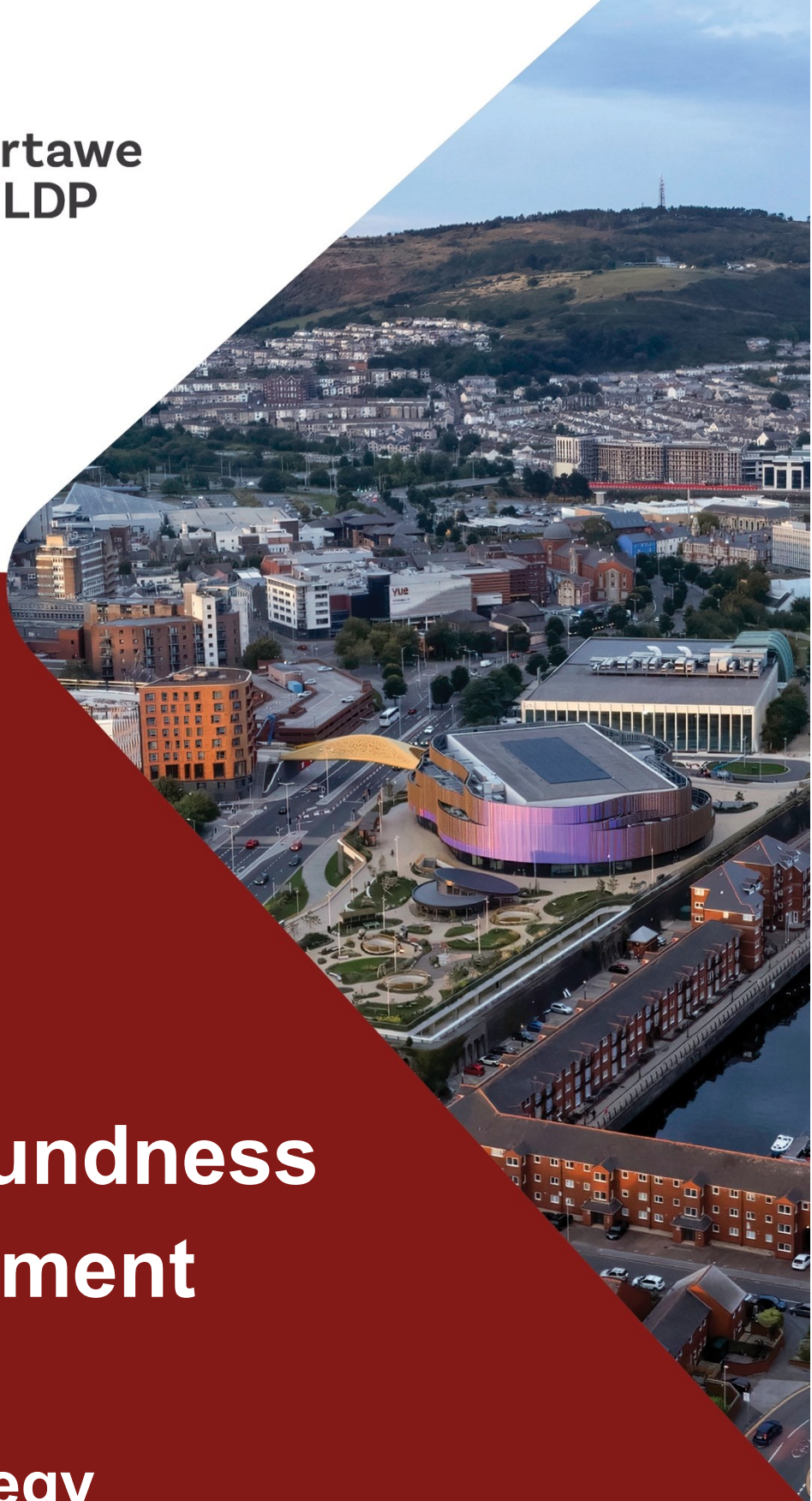




CDLI Abertawe Swansea LDP 2023-2038



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Swansea Council



Tests of Soundness Self Assessment

Preferred Strategy

December 2024

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1.0 Introduction

1.1 The [Swansea Local Development Plan \(LDP\) 2023-2038](#) (known as 'LDP2') will provide the new basis for determining planning applications for proposed development in Swansea. In essence, LDP2 is a new planning blueprint for the whole County and, once adopted, it will replace the current Swansea LDP 2010-2025.

1.2 LDP2 will set out how, and where, development should come forward to match the Council's ambitions and objectives. The overarching aim of the Plan is to ensure that place-led development happens in the right location at the right time, benefitting communities and the local economy, and that our natural and built heritage is afforded protection and enhancement.

1.3 It is a key requirement of development plan formation to ensure, at each key stage, that the Plan is 'sound'. This Background Paper presents the findings of an assessment of the Preferred Strategy ('Pre-Deposit Plan') against the tests of soundness set out by the Welsh Government as detailed in the [Development Plans Manual \(Edition 3 – March 2020\)](#).

1.4 Chapter 2 below sets out the results of the Self-Assessment and confirms that the Preferred Strategy, and the processes followed to reach this stage, are demonstrated to be 'sound'.

1.5 The soundness of LDP2 will continue to be assessed against these tests as the Plan progresses, including to support preparation of the Deposit Plan. The overall soundness of the Plan will eventually be considered at an Examination in Public by the appointed Planning Inspector or Inspectors

2.0 Self Assessment (December 2024)

Development Plans Manual (Edition 3, March 2020) Requirements / Tests	Demonstration of Soundness
<p>Preparation Requirement:</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.?) 	<p>Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?)</p> <p>1 Yes. The Preferred Strategy has been prepared in accordance with the necessary procedural requirements. Notable reference should be made to the publication of the Integrated Sustainability Appraisal (ISA) (December 2024) and the Habitats Regulations Assessment (HRA) Preferred Strategy Screening Report (December 2024), which have been published as supporting documents. This builds upon the work undertaken to accompany the earlier stages of the LDP2 process, including the publication of the Draft ISA Scoping Report (August 2024) and the call for Candidate Sites (August 2023).</p> <p>2 All consultation arrangements and associated documents have been prepared and delivered in accordance with the LDP Regulations (2005 as amended 2015). The scope and method of consultation, as well as outcomes and reporting mechanisms, are consistent with the Community Involvement Scheme as set out in the Council’s Delivery Agreement (DA). This process has included engagement with a range of stakeholders including Elected Members, statutory consultees, the public, the Public Services Board (PSB) and relevant Council departments amongst others. These engagement methods have provided stakeholders the opportunity to engage with the LDP2 consultation in a virtual manner through the use of an innovative virtual consultation room alongside face to face ‘drop-in’ sessions and social media publications.</p>

	<p>3 Prior to the statutory formal consultation on the LDP2 Preferred Strategy, a wide ranging 'starting the conversation on LDP2' public engagement exercise was undertaken to inform the Council's development of key issues, overarching vision, objectives and options for growth . Comments received during these consultations have informed the development of the Vision and Objectives, as well as the selected Spatial and Growth Options for the Preferred Strategy. Full details of this consultation are set out in the Starting the Conversation on LDP2 Engagement Report (December 2024)</p>
<p>Preparation Requirement:</p> <ul style="list-style-type: none"> • Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? (when published or adopted respectively) 	<p>Is the plan in general conformity with the NDF (now referred to as Future Wales: The National Plan 2040) and/or SDP? (when published or adopted respectively)</p> <p>4 Yes. In February 2021, the Welsh Government published Future Wales - the National Plan 2040, which is a national development framework that sets the direction for development in Wales to 2040 and provides the policy framework for SDPs and LDPs, with a requirement for the lower tier plans to be in general conformity with Future Wales. Upon publication, it came into force with immediate effect and now forms part of the development plan system in Wales. It must be considered alongside LDPs or extant Unitary Development Plans in development management decisions. In noting that the preparation of a Strategic Development Plan (SDP) for South West Wales has yet to formally commence, the Strategy reflects Swansea's position within the Swansea Bay and Llanelli National Growth Area and its importance to both the wider city region and nationally for Wales.</p> <p>5 The Preferred Strategy is considered to be in general conformity with the policy aims of Future Wales, with many common policy themes running through both. Examples of this include Placemaking (Policy 2), Delivering Affordable Homes (Policy 7), Active Travel (Policy 12), Town Centre First (Policy 6) and Creating Resilient Ecological Networks and Enhancing Green Infrastructure Provision (Policy 9) and Delivering Renewable and Low Carbon Energy and Associated Infrastructure (Policy 17). In this respect, the Preferred Strategy is considered to set the strategic framework for delivering the policy objectives of Future Wales at a local level.</p>

<p>Test 1: Does the plan fit? (i.e. 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 and Future Wales)? • Does it have regard to 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? • Is the plan in general conformity with relevant SDP (when adopted)? • Is it consistent with regional plans, strategies and utility programmes? • Is it compatible with the plans of neighbouring authorities? • Does it reflect the Single Integrated Plan (SIP) Well-being Plan or the National Park 	<p>6 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 as part of an iterative approach. The national, regional and local plans are, where relevant, identified within the Preferred Strategy but also within the background and supporting documents – notably the review of Plans, Policies and Programmes within the ISA.</p> <p>Each of the Test 1 questions are discussed in turn:</p> <p>Does it have regard to national policy (PPW12) and Future Wales?</p> <p>7 Yes. The Preferred Strategy has regard to the provisions of national policy. It should be noted that with reference to PPW12, the Preferred Strategy does not seek to repeat national policy seeks to be reflective of it. The Transport Hierarchy for Planning and the importance placed on connectivity is clearly reflected in terms of the chosen spatial approach for LDP2. The Preferred Strategy also reflects national policy with regard to flood risk, whilst the embedding of placemaking principles in the Preferred Strategy reflects the fact that the Council is a signatory to the Placemaking Charter. The Preferred Strategy also reflects the importance of Green Infrastructure as set out in national policy supported by a Green Infrastructure Assessment.</p> <p>8 In respect of Future Wales, a review has already been previously outlined above. However, it is worth noting again that there is a clear recognition within the Preferred Strategy of the identification of Swansea Bay and Llanelli as a National Growth Area and Swansea’s role at the heart of that. Reference should be made to the ‘Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies’ Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance.</p>
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<p>Management Plan (NPMP)?</p> <ul style="list-style-type: none"> • Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base? 	<p>Does it have regard to the Well-being Goals?</p> <p>9 Yes. The Well-being of Future Generations (Wales) Act 2015 is a central interwoven theme in the preparation of the Preferred Strategy. Of note is the fact that the key issues are grouped thematically under the appropriate national well-being goals within a Swansea context. Reference should be made to the ‘Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies’ Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance. Due regard has been given to the 5 ways of working, noting the importance in particular of collaboration and involvement with an extensive non statutory consultation and engagement undertaken on the generation of issues, vision, objectives and options for growth.</p> <p>Does it have regard to the Welsh National Marine Plan?</p> <p>10 Yes. The Preferred Strategy, and/or its supporting evidence/background papers, reflects the provisions of the Marine Plan. Opportunities to recognise the importance of the Marine Plan were taken as part of responding to the consultation on the draft key issues, vision, objectives and options in May/June 2024. As a result, key issue 13 contains specific reference to “<i>sustainable planning of the coastal and marine environments</i>”, whilst there is a clear recognition also of the issues associated with erosion in key issue 14.</p> <p>Does it have regard to the relevant Area Statement?</p> <p>11 Yes. The Preferred Strategy, and/or its supporting evidence/background papers including the Green Infrastructure Assessment, reflects the provisions of the South West Wales Area Statement. Further opportunities to recognise the Statement’s importance were taken as part of responding to the consultation on the draft key issues, vision, objectives and options in May/June 2024. Of note also in this regard is the recognition of the State of Natural Resources Report (SoNaRR) for Wales 2020. Reference should be made to the ‘Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and</p>
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Strategic Policies' Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance.

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

12 Yes. Whilst formal work is yet to commence on the South West Wales Strategic Development Plan (SDP), the Preferred Strategy recognises the established (and emerging) regional framework within which Swansea sits. The South West Wales Corporate Joint Committee (CJC) has been constituted. Where appropriate, there is scope for ongoing and proposed collaboration within the region to be reported through to the CJC Strategic Planning Sub-Committee. In the absence of an SDP, Future Wales provides the regional framework for identifying key strategic spatial issues that require a larger than local policy response. In this regard, it is considered that the Preferred Strategy has taken into account Future Wales's regional policies. The Preferred Strategy (including the Vision and Objectives), and its evidence base, acknowledges the fact that Future Wales identifies Swansea Bay and Llanelli as a National Growth Area (NGA). Reference should be made to the 'Regional Collaboration' Paper (December 2024) prepared in support of the Preferred Strategy.

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

13 Yes. The Preferred Strategy, and/or its supporting evidence/background papers, recognises a range of relevant considerations in this regard. The emerging Swansea Bay and West Wales Metro proposals are noted, whilst the positions with regards to proposed investments (Celtic Freeport) and disinvestments within the region (TATA Steel Port Talbot) are recognised and captured within the key issues, challenges and opportunities for LDP2. The South West Wales Regional Energy Strategy and South West Wales Regional Economic Delivery Plan are noted. A proactive approach towards engaging with utility providers, including Dwr Cymru Welsh Water, will continue. An Infrastructure Delivery Plan will be prepared for the Deposit Plan.

Is it compatible with the plans of neighbouring authorities?

14 Yes. Reference should be made to the ‘Regional Collaboration’ Paper (December 2024) prepared in support of the Preferred Strategy. The Council is developing LDP2 in close dialogue with neighbouring authorities. Joint commissions have been undertaken on key pieces of evidence – including a Regional SFCA. Meetings are held to discuss emerging cross boundary issues and sharing best practice on study methodologies. In this regard, whilst ensuring that Swansea meets its own housing need, the Council recognises the need to demonstrate suitable alignment to the national / regional policy context, with due reference to the Tests of Soundness. Due regard has been given to the stages that neighbouring Authorities are currently at LDP preparation. Regional working will continue in the preparation of the Deposit Plan and any emerging work on the preparation of the South West Wales SDP.

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

15 Yes. The Swansea Public Service Board has produced the [Swansea Local well-being plan 2023-2028](#). This provides a blueprint for how stakeholders can work together to improve well-being and is based on a full Assessment of local well-being in Swansea undertaken in 2022. LDP2 is not only driven by the Well-Being Plan 2023-2028, but moreover provides a means to deliver upon its content, most notably those elements that have a spatial / land use component. The Preferred Strategy is firmly concerned with the local well-being objectives, with the LDP2 objectives grouped under the relevant PSB local well-being Plan objectives. The ‘One Swansea’ PSB well-being plan ethos is recognised within the ‘Abertawe 2038’ Vision. Reference should be made to the ‘Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies’ Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance.

	<p>Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?</p> <p>16 Yes. Swansea, along with regional constituent authorities of Carmarthenshire, Pembrokeshire and NPT commissioned consultants to undertake a comprehensive assessment of the Swansea Bay and Llanelli National Growth Area (NGA), which is illustrated at only a high level of detail in Future Wales. This Swansea Bay and Llanelli NGA Definition Project Research Report (January 2023) assessed the constraints and opportunities across the area to refine the spatial extent of it to help inform the production of new LDPs ahead of the CJC defining the extent of the NGA as part of the preparation of a future SDP. This Report has directly influenced the Preferred Strategy.</p> <p>17 Regional working is also evident in the evidence base. Examples include the production of a regional Stage 1 Strategic Flood Consequences Assessment and a Regional Viability Study (which resulted in the output of a regional viability model and high-level assessment and site-specific viability tool which has been used to support viability appraisals for sites. The Economic and Housing Growth Assessment 2024, which underpins the growth strategy, has been prepared in partnership with NPT Council. Further opportunities to explore joint working in specific fields (e.g. minerals) and environmental considerations (e.g. Burry Inlet) can be embraced as necessary as part of the preparation of the deposit Plan.</p>
<p>Test 2: Is the plan appropriate? (i.e. 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? 	<p>Is it locally specific?</p> <p>18 Yes. As outlined, the Preferred Strategy recognises that its role is to contribute towards the delivery of the Swansea Local Well-being Plan. Reference should also be made to the Key issues, vision and objectives Background Paper for further information on issues identification. In this regard, the issues set out in the Preferred Strategy recognise and reflect the local context in social, economic, environmental and cultural terms – including key declarations by the Council e.g. nature and climate emergencies. The LDP2 Vision is consistent with the Well-being Plan for Swansea, recognising the ‘key message’ in</p>

<ul style="list-style-type: none"> • 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? 	<p>relation to 'One Swansea' as well as the contribution and distinctive features of the County's component parts. It captures the contrasting rural, urban, beach and waterfront spatial juxtaposition and is considered to provide a concise, land use relevant statement that emphasises the distinctiveness and diversity of Swansea. In the same manner as the Vision, the LDP Objectives have been influenced by priorities identified in national policy, the aims of other Council plans and strategies, and the key issues, opportunities and challenges facing the County.</p> <p>19 Also, a proactive approach to engagement and consensus building has also helped ensure that the Preferred Strategy is locally specific. Consultation and engagement have taken place with a range of stakeholders including statutory consultees, the public, developers, topic specific audiences – e.g. tourism forum, the Public Services Board (PSB) operational group and relevant Council departments amongst others. Elected Members have been involved via the Members Engagement Group and have ownership of the Plan. Further detail on engagement is set out in the 'Starting the Conversation on LDP2 Engagement Report' (December 2024).</p> <p>20 During 2023, the Council sought comments on the Review Report, ISA Scoping Report and invited candidate submissions. The Council 'started the conversation' on LDP2 during 2024 and published two key papers for public consultation, namely:</p> <ul style="list-style-type: none"> • 'Starting the Conversation on LDP2' – Key Issues, Vision and Objectives (May 2024), and • 'Starting the Conversation' on LDP2 - Growth Scenarios and Spatial Approaches' (May 2024). <p>21 Together these two papers aimed to initiate conversations and stimulate debate and inputs from interested parties, to ultimately inform decisions about the most appropriate overall strategic approach for LDP2. Opportunities to engage were via the use of an innovative virtual consultation room alongside face to face 'drop-in' sessions and social media publications.</p>
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22 Finally, a comprehensive and robust and locally specific range of evidence base has been prepared to support LDP2 specific to Swansea and set in the context of the wider region. This ensures that the Preferred Strategy and associated policies address the locally specific issues and meet local needs and aspirations but are reflective of the regional context

Does it address the key issues?

23 Yes. The Preferred Strategy will tackle a series of key issues that have been robustly defined. The key issues the Plan needs to consider have been identified and tested through consultation and these have informed the development of the LDP Vision and Objectives to ensure these address the key issues. Reference should be made to the 'Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies' Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance. This Report sets out an exploration of the linkages between the issues, through to the objectives and confirmation that the content is of relevance to land use planning and 'S.M.A.R.T.' – Specific, Measurable, Achievable, Relevant, and Time-Bound.

24 The Objectives provide the basis for the identification of a 'Placemaking Strategy for Swansea 2038', which is made up of 11 key components. Furthermore, a suite of 21 strategic policies is included within the Preferred Strategy.

25 In accordance with the guidance set out in the Development Plans Manual, due regard can be given to the formulation of a De-risking Plan Checklist in due course.

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

26 Yes. The Preferred Strategy is supported by an extensive evidence base which supports and informs its preparation. It should be noted that many evidential facets will be further developed as the Plan making process proceeds towards deposit. Reference should be made to Appendix 1 of the Preferred Strategy where such evidence is set out.

Can the rationale behind plan policies be demonstrated?

27 Yes. There is a coherent and logical flow behind the structure of the Preferred Strategy. The Key Issues are grouped under the national well-being goals within a Swansea context. The Objectives are grouped under the relevant local well-being objectives. The Strategic Policies are in turn grouped under key components which are again aligned to the Plan objectives. Reference should be made to the 'Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies' Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance. There is an inevitable overlap between themes and policies and as such they should be read in conjunction with one another and no part of the Plan operates in isolation. Each strategic policy is accompanied by explanatory text.

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

28 Yes. In terms of need, the Preferred Strategy is based on an extensive evidence base, including:

- Employment Land Review (December 2024);
- Initial High-Level Viability Assessment (December 2024);
- Economic and Housing Growth Assessment (July 2024), and
- Draft Local Housing Market Assessment (LHMA) (2023).

29 A Settlement Assessment (December 2024) has been prepared in accordance with guidance issued with the Development Plans Manual. This Assessment, when taken alongside wider evidential work in respect of role and function, sets out a review of social-economic and environmental considerations as part of a Place based review of sustainability credentials and developmental considerations.

30 The Preferred Strategy recognises the need to achieve sustainable development and has been underpinned by Sustainability Appraisal (incorporating Strategic Environmental Assessment) as part of the Initial Integrated Sustainability Appraisal Report. There is a reference to sustainability within the Vision. Also, of note is Objective 8 ‘Sustainable Development’.

31 A Placemaking strategy for Abertawe 2038’ has been identified to deliver 9,510 dwellings over the plan period to support employment growth of 10,238 jobs. This scenario includes positive adjustments based on local knowledge of the latest economic impact forecasts for pipeline projects regarded as having a realistic level of certainty of coming to fruition, while also balancing this optimism with wider uncertainty and risks. It represents a positive and ambitious job creation target reflective of local planned investments including strategic opportunities recognising Swansea’s strategic location at the heart of the national growth area. It also represents an ambitious yet deliverable level of housing growth representing an uplift on past building rates to contribute to market and significant affordable housing needs. A ‘hybrid’ spatial approach has been selected which draws strongly on strategic scale placemaking for sustainable neighbourhoods and delivering highly connected communities.

32 The 'Placemaking Strategy for Abertawe 2038' sets out how the LDP2 Vision, Objectives and preferred level of growth and spatial approach will be delivered. The detailed policies and proposals to be set out in the LDP2 Deposit Plan will be formulated on the Preferred Strategy's 'core components'.

33 The ISA process has played a critical and key iterative role in the preparation of the Preferred Strategy. A number of options have been tested against the ISA framework. The ISA allows for a number of key considerations to be evaluated within a sustainable development context – not just environmental matters but also social and economic facets. It also allows for consideration to be given to matters relating to The Welsh language, Equalities and Health impact. A further notable consideration has been the preparation of the HRA Screening Report.

Are the vision and the strategy positive and sufficiently aspirational?

34 Yes. In reflecting the Well-being Plan's emphasis on 'One Swansea', the Vision expresses an aspirational but deliverable future for 'Abertawe 2038'. It provides a positive statement about how Swansea is envisaged to develop, change and be enhanced considering the Plan's strategy, policies and proposals. It sets a locally distinctive statement of intent for the objectives and policies to deliver upon and for the key issues to be addressed. It sets a route map for the achievement of a number of priorities, with specific references to net zero and placemaking. Furthermore, the reference to climate reliance and resilient ecosystems are important foundations for the Preferred Strategy to respond to. A further important component of the Vision which drives the ambition of the Preferred Strategy is the reference to the Swansea Bay and Llanelli National Growth Area.

Have the 'real' alternatives been properly considered?

35 Yes. A number of growth scenarios and spatial approaches have been considered. Due regard should be given to the Growth and Spatial Approaches Background Paper (May 2024) which set out the options consulted on during April -June 2024. The

subsequent 'Options for Growth and Spatial Approaches' Paper (December 2024) should also be referred to. Importantly, the Integrated Sustainability Appraisal provides a robust sustainability assessment of the different options to inform this process as part of the iterative ISA of LDP2.

Those growth scenarios considered were:

- Baseline economic forecast;
- Long-term population growth trend;
- WG population projection, and
- Higher economic growth.

The spatial approaches considered were:

- Urban/Brownfield focus;
- Strategic Placemaking focus;
- Dispersal focus;
- Highly Connected Communities focus, and
- Housing Need Clustering focus.

36 The Strategic Placemaking approach is reflective of the current strategy and therefore continuation of existing approach has been considered as part of the assessment. A rationale for the chosen approach from the range of options considered has been provided. A number of different approaches to growth and spatial distribution were considered, consulted upon, and assessed (including through the ISA process). The preferred overall approach has emerged from such deliberations, and offers a robust and sound approach that will deliver the Plan's objectives whilst also offering a suitable level continuity from the approach that was set out within the Adopted LDP. The ISA process has played a key iterative role in this regard, and has confirmed that the preferred overall approach (both in terms of growth and spatial distribution) is the most appropriate.

Is it logical, reasonable and balanced?

37 Yes. The Preferred Strategy is sound in terms of compliance with national and regional planning policy and reflects emerging issues at national and regional level, but it also provides a framework that reflects local nuisances that are unique to Swansea. This is achieved by a detailed understanding of role and function at a local level and the capturing of key issues as well as extensive engagement and consensus building. The ISA framework also plays a key role in ensuring a locally distinctive approach in this regard.

38 The Preferred Strategy flows logically from the identification of key issues through to the Vision, Objectives and Strategic Policies. In this regard, a clear binding and interwoven theme is the need to deliver upon the priorities set out within the Well-being Plan for Swansea 2023-2028. It is therefore considered to offer a balanced approach in delivering an ambitious, yet deliverable sustainable placemaking approach for Swansea up to 2038.

Is it coherent and consistent?

38 Yes. The issues, vision and objectives provide the building blocks for the Preferred Strategy and its Strategic Policies to address. In this regard, there is a logical and coherent flow in place from the issues right through to the Strategic Policies. The Preferred Strategy is also informed by extensive engagement as well as a robust evidence base. It has due regard to key policy guidance – including Future Wales 2040.

Is it clear and focused?

39 Yes. In noting that the Preferred Strategy is coherent and consistent in its format, efforts have been made to ensure that it is concise and wherever possible detailed information is set out within background evidence / documentation. It should be noted that innovative approaches to engagement will underpin the consultation on the Preferred Strategy, including use of an animation and virtual room, whilst clear language will be used wherever possible.

<p>Test 3: Will the plan deliver (i.e. 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? 	<p>Will it be effective?</p> <p>40 Yes. The Preferred Strategy will respond by addressing a series of key issues that have been robustly defined. Reference should be made to the ‘Compatibility Analysis and Alignment of Key Issues, Vision, Objectives and Strategic Policies’ Report (December 2024) for more information on the strategic linkages that exist both within the Preferred Strategy itself, as well as with those wider strategies and Plans of relevance. This Report sets out an exploration of the linkages between the issues, through to the objectives and confirmation that the content is of relevance to land use planning and ‘S.M.A.R.T.’ – Specific, Measurable, Achievable, Relevant, and Time-Bound. The Preferred Strategy is also closely aligned to a number of local, regional and national policy drivers, this further confirming its implementation potential.</p> <p>41 A robust evidence base allows the Preferred Strategy to clearly communicate a route map for delivery and implementation. Reference should be made to Appendix 1 of the Preferred Strategy.</p> <p>42 The Preferred Strategy’s policy framework also sets out a strategic framework for criteria/sectoral based approaches in terms of retail/commercial and tourism growth. The preparation of the deposit LDP will allow for such matters to be considered in further detail in due course, including the formulation of detailed policies as appropriate.</p> <p>43 Whilst the Preferred Strategy does not contain a monitoring framework, the preparation of the Deposit LDP will allow for this to be developed. This will form the basis for undertaking the Annual Monitoring Report (AMR).</p> <p>Can it be implemented?</p> <p>44 Yes. The Preferred Strategy is a deliverable and credible framework which sets out the levels and broad location of growth in Swansea up to 2038. It should also be noted that the Council is not starting from a blank sheet of paper with LDP2 and as such the Preferred</p>
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Strategy seeks to build upon the Adopted LDP, responding as appropriate to the recommendations of the Statutory Review Report, along with the key issues for LDP2. Furthermore, the ISA and HRA (December 2024) do not indicate any insurmountable issues in terms of implementation. The policies and proposals will provide the framework through which the Plan's objectives will be implemented and the decision-making process undertaken.

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

45 Yes. There is ongoing liaison with key stakeholders – including Dwr Cymru Welsh Water, Transport for Wales and Natural Resources Wales. Due reference should be given to the evidence base prepared in support of the Preferred Strategy – including Role and Function/Settlement Assessment, Growth and Spatial Approaches and Urban Capacity. The cost of site-specific infrastructure such as highways improvements and education provision will be identified as part of the ongoing candidate site and viability work.

46 Furthermore, An Infrastructure Delivery Plan will be prepared as part of the preparation of the Deposit LDP.

Will development be viable?

47 Yes. The recognition of the importance of viability is a key consideration both at a strategic and site level. In this regard, reference should be made to the evidence base prepared in support of the Preferred Strategy, together with the call for candidate sites and associated methodology. It should be noted that the Council has worked in partnership with other Councils across the region, alongside Town Planning and Development consultants Burrows-Hutchinson Ltd, to establish the Development Viability Model (DVM) assessment tool.

48 Due regard should be given to the 'Initial High-Level Viability Assessment' (December 2024) prepared in support of the Preferred Strategy. Further detailed viability work will be undertaken to demonstrate site viability and deliverability of the allocated sites to be included in the Deposit Plan. This will be based on any infrastructure improvements needed at the site level and on policy requirements set out in the Replacement LDP.

Can the sites allocated be delivered?

49 Yes. Whilst there are no allocations set out within the Preferred Strategy, there is strong confidence that it provides a strong foundation for the Deposit Plan. Due regard should be given Strategic Policy 8, and the SPRA opportunities identified. Those notable evidential facets prepared to date include:

- 'Options for Growth and Spatial Approaches' (December 2024);
- 'Analysis of Housing Supply' (December 2024);
- 'Starting the Conversation on LDP2 - Growth Scenarios and Spatial Approaches' (May 2024);
- 'Initial High-Level Viability Assessment' (December 2024);
- 'Settlement Assessment' (December 2024);
- 'Economic and Housing Growth Assessment' (July 2024);
- 'Draft Local Housing Market Assessment (LHMA)' (2023), and
- 'Swansea Bay and Llanelli National Growth Area (NGA) Definition Project' (January 2023)

50. It should be noted that there are a sizable number of housing commitments and/or Plan period completions already in the landbank which provide a high degree of certainty and confidence in this regard. The assessment of candidate sites is being undertaken in accordance with a robust candidate site assessment methodology, with due liaison undertaken with consultees – e.g. highways and ecology – in this regard.

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

51 Yes. The Preferred Strategy is underpinned and informed by an extensive evidence base which informs the identified growth requirement. However, the Preferred Strategy also has an element of flexibility to allow for certain sites not coming forward as anticipated. It includes an additional 20% flexibility to account for such circumstances. This allows for the plan to remain effective should any unforeseen circumstances arise during the plan period that may lead to the non-delivery of sites. This flexibility allowance recognises representations made during the initial conversations held in May/June 2024, most notably on growth and spatial approaches. Also, further work can be undertaken on such aspects as part of the preparation of the Deposit LDP.

Is it monitored effectively?

52 Yes. Whilst the Preferred Strategy does not contain a monitoring framework, the preparation of the Deposit LDP will allow for this to be developed. This will form the basis for undertaking the Annual Monitoring Report (AMR). There is already an Adopted LDP in place with supporting evidence, including a proactive approach to Planning delivery and monitoring – including AMRs and these will continue to be reported to WG by 31 October each year. Furthermore, a Review Report has been published on the Adopted LDP. Such information continues to provide key contextual and evidential information.