

Flintshire Local Development Plan 2015 - 2030

Preferred Strategy  
Consultation Document  
Tests of Soundness  
Self-Assessment

November 2017



## Introduction

It is a fundamental principle that a Local Development Plan (LDP) meets the soundness tests as set out in national planning policy and guidance. Part of this process requires the local planning authority to undertake a self-assessment of the soundness of their LDP and therefore a self-assessment of the LDP Preferred Strategy has been undertaken in order to ensure that this meets the 3 soundness tests as specified in Planning Policy Wales (PPW) which are:

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

The table below sets out the Council's assessment of the three tests of soundness to date.

1. <b>Does the plan fit?</b> (i.e. Is it clear that the LDP is consistent with other plans?)	
a) Does it have regard to national policy and the Wales Spatial Plan?	<p>Yes. The Preferred Strategy has had regard to national policies and guidance. The Preferred Strategy and supporting documents set out the national policies and plans that have been taking into account in the preparation of the Plan. Each of the strategic policies is supported by a 'policy context' section which sets out the relevant sections of PPW'.</p> <p>It has also had regard to the Wales Spatial Plan Update 2008 which identifies Flintshire as making an important contribution to the Welsh economy, and also to its importance in a regional context in conjunction with Chester and the North West of England.</p> <p>Flintshire's location and regional economic importance underpins the Preferred Strategy in terms of economic growth, job creation and new homes and reflects the aspirations of the Wales Spatial Plan.</p>
b) Does it have regard to Well-Being Goals – as specified in the Well-being of Future Generations (Wales) Act 2015?	<p>Yes. The Preferred Strategy includes objectives that link into the well-being goals, and each strategic policy sets out which of the well-being goals it meets. The</p>

	<p>preferred level of growth and the location of new development identified in the LDP will facilitate the three elements of Sustainable Development - Community, Economy (which is further subdivided into employment growth and housing growth) and the Environment.</p> <p>A separate Sustainability Appraisal has been undertaken. The Scoping Report has been revisited to have regard to the national Well-being goals. The SA (and SEA) demonstrate that the LDP has a significant positive impact on sustainable development.</p>
<p>c) Does it have regard to the Welsh National Marine Plan?</p>	<p>The Preferred Strategy recognises through strategic policies 13 and 14 a number of issues which will complement the Marine Plan. These include protecting open countryside and the undeveloped coastline, protecting and enhancing green infrastructure and networks, recognising the environmental quality of the Dee Estuary and directing development away from areas of flood risk. The strategic policies, combined with subsequent detailed policies will ensure that the LDP complements the Marine Plan.</p>
<p>d) Is it consistent with regional plans, strategies and utility programmes?</p>	<p>Yes. The context of the Preferred Strategy was developed taking into account the relevant regional plans, strategies and utility programmes. These were also taken into account in drawing up the LDP strategic policies, the growth ambition, strategic objectives, spatial strategy and settlement hierarchy.</p> <p>The preferred strategy and associated topic papers set out the regional plans, strategies and utility programmes that have been taken into account.</p> <p>The initial SA and Habitat Regulations Appraisal show that the preferred strategy is in line with both regional and local environmental protection objectives.</p>

	Utility companies, who sit on the Key Stakeholder Forum, have been involved from an early stage in the development of the preferred strategy and the plan is consistent with their programmes.
e) Is it compatible with the plans of neighbouring authorities?	<p>Yes. The Preferred Strategy takes into account regional strategies and studies, including cross-border ones, and the work on these undertaken with neighbouring authorities e.g. The Council has engaged with the neighbouring authorities of Wrexham and Chester &amp; Cheshire West throughout the Plan process.</p> <p>In terms of minerals and waste Flintshire acts as lead authority for the collaborative approach across North Wales under the name 'North Wales Minerals and Waste Joint Planning Service'.</p>
f) Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?	Yes. The Preferred Strategy has had regard to the Single Integrated Plan for Flintshire where there are land use, development and sustainability implications. The Preferred Strategy also has regard to the Well-being Plan for Flintshire.

<b>2. Is the plan appropriate?</b> (i.e. is the plan appropriate for the area in the light of the evidence?)	
g) Is it locally specific?	Yes. Evidence has been collated specific to Flintshire on a range of subjects to ensure that the Plan reflects the local area and seeks to meet local needs and aspirations.
h) Does it address the key issues?	Yes. The Preferred Strategy clearly identifies the key issues relating to Flintshire. It 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 LDP vision and objectives and the principles of sustainability and Well-being. The associated Topic Papers and evidence base

	provide further information on the key issues.
i) Is it supported by robust, proportionate and credible evidence?	Yes. A number of studies have been undertaken as part of the evidence base for the LDP. These include the Flintshire and Wrexham Local Housing Market Assessment, Flintshire and Wrexham Employment Land Review, the Flintshire Further Employment Growth Scenario Assessment, the Deeside Plan, the annual housing land survey and the Topic Papers. Additional studies are currently being undertaken and commissioned. An initial Viability Study in conjunction with Wrexham will be revisited in preparing the Deposit Draft Plan. Further research may be undertaken during the LDP process as deemed necessary.
j) Can the rationale behind the plan policies be demonstrated?	Yes. The evidence gathered has informed the strategic policies, which need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Plan. Each strategic policy has reasoned justification and a summary table which how it relates to the relevant LDP objectives, national policy, and Well Being Goals as well as the key evidence.
k) Does it seek to meet assessed needs and contribute to the achievement of sustainable development?	Yes. The Preferred Strategy is based on the evidence collated and an assessment of need as identified within this. These needs and the aspirations for the area are addressed within the Preferred Strategy which clearly seeks to meet these needs.  The strategic policies are grouped according to the three elements of Sustainable Development and the Preferred Strategy has been subject to an SA/SEA and HRA to ensure it contributes to the achievement of sustainable development.
l) Are the vision and strategy positive and sufficiently aspirational?	Yes. The Plan seeks to respond to the needs of a growing population and regionally important economy whilst at the same time creating high quality sustainable places in both urban and rural areas. The

	Preferred Strategy takes a positive yet realistic approach to achieving growth.
m) Have the 'real' alternatives been properly considered?	Yes. A number of different alternative growth and spatial options were considered as part of the Strategic Options document. The assessment of these options is identified in Chapter 3 of the Preferred Strategy and in more detail in a Background paper. The Strategic Options were also considered through the SA/SEA process. The Preferred Strategy is therefore considered to be realistic and appropriate, having taken into account a number of alternatives.
n) Is it logical, reasonable and balanced?	The Preferred Strategy is considered logical, realistic and balanced having given due consideration to the alternatives. It is based on a logical and credible evidence base from which the policies are logically derived.
o) Is it coherent and consistent?	The Preferred Strategy sets out a coherent strategy from which its strategic policies flow. The strategy is guided by, and consistent with, the Plan vision and objectives, the principles of sustainability set out in national planning guidance, the growth and spatial options and the evidence base.
p) Is it clear and focussed?	Yes. The Preferred Strategy is set out in a way which clearly shows the links between the various elements of the Plan. It concentrates on the main strategic issues identified and shows how the detailed policies will relate to these.

<b>3. Will the plan deliver? (i.e. is it likely to be effective?)</b>	
q) Will it be effective?	Yes. The Preferred Strategy is based on a sound and logical evidence base and seeks to meet the needs of the area in a realistic way. It will therefore be effective in meeting its objectives.
r) Can it be implemented?	Yes. The Preferred Strategy has been written in such a way that it can be readily implemented.

<p>s) Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?</p>	<p>Yes. The main infrastructure providers have been involved in the development of the Preferred Strategy from an early stage and will continue to be involved as the Plan process progresses.</p>
<p>t) Will development be viable?</p>	<p>Yes. Initial work on viability has been undertaken on a joint basis with Wrexham. Further, more detailed work will be continued as the plan progresses to ensure that the Plan's development proposals are viable.</p>
<p>u) Can the sites allocated be delivered?</p>	<p>At this stage, other than with the exception of two key strategic sites, there are no site specific allocations. The key strategic sites both have outline planning consent. The re-allocation of land at Northern Gateway will re-focus delivery of the site. A broader range of land uses at Warran Hall will help ensure delivery.</p>
<p>v) Is the plan sufficiently flexible? Are there appropriate contingency provisions?</p>	<p>The Preferred Strategy has been designed to provide a flexible policy framework which is capable of dealing with unexpected and unforeseen changes in circumstances. 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.</p>
<p>w) Is it monitored effectively?</p>	<p>The plan will be effectively monitored. The Annual Monitoring Report will be the main way in which the implementation of the policies will be measured and assessed. Further information on the monitoring of the LDP will be contained within the Deposit Plan. The Preferred Strategy itself will not be monitored in this way as it does not contain detailed policies.</p>



