

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No. 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198,</p> <p>Date received: 3/3/15 2022</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

Data Protection

How your representation and the information that you give us will be used. All information submitted will be seen in full by the Joint Planning Policy Unit staff dealing with the Joint Local Development Plan (Joint LDP). Your name and comments as set out in your representation form will be published together with the Councils' response. This helps to show that the consultation was carried out properly. Please note that this form may also be made available to any Public Examination on the Joint LDP.

We would prefer that you submit your representations directly online. Alternatively, an electronic version of this form can be completed online at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp Separate forms should be completed for each comment that you wish to make.

Additional representation forms can be obtained from the Joint Planning Policy Unit on 01286 685003 or may be downloaded from the Council's web site at: www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp or you may photocopy this form. When making comments please use additional sheets as required clearly numbering each consecutive sheet.

PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	[REDACTED]	
Address	WELSH WATER [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	
Email address	[REDACTED]	

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

If you want changes made to the Deposit Plan, please be as specific as you can. For example, if you want new text added, please set out the new text and explain where you would like it to go in the Deposit Plan and why. Similarly, if you want to add a new or amend a policy or a paragraph, please set out clearly the new text and explain where you think it should go in the Deposit Plan and why.

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You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

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Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

Enwan Hebydd (Abodhad 4)

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	TAI 17 HOUSING IN LOCAL, RURAL
Paragraph number (please specify)	+ COASTAL VILLAGES
Proposals/ Inset Map (please specify ref no.)	
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input type="checkbox"/>	Supporting	<input type="checkbox"/>

2c. Please provide details of your representation on the Deposit Plan.
<p style="text-align: right;">Please use additional sheet if necessary. Please state how many additional sheets have been used.....</p>

Part 3: What Happens Next?

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3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.



I want to speak at a hearing session.



3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination



Publish Inspector's report



Plan's adoption



If additional documents have been provided to support your representations, please list below:

Signed:



Dated:

31/3/15

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

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BY EMAIL – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of "*showing good judgement*" and "*able to be trusted*". To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector's job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the 'consistency' and the 'coherence and effectiveness' tests.

Llandegfan

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- The total growth being promoted within the catchment area of Treborth Wastewater Treatment Works (WwTW) would necessitate improvements to the treatment works which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

Llanddaniel Fab

- Llanddaniel Fab is served by Gaerwen Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

Llanfachraeth

- Llanfachraeth Wastewater Treatment Works (WwTW) can accommodate the foul flows from from the proposed growth figure allocated for this catchment area.

Llanfaethlu

- No additional growth is anticipated in Llanfaethlu as the indicative housing growth is provided for by completed units and the existing landbank.

Llanfechell

- There are isolated incidents of flooding in the public sewerage system that, depending on the location of the development, may need to be resolved to allow development to proceed. Potential developers can either wait for DCWW to resolve the flooding, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991 or S106 of the Town & Country Planning Act 1990.
- Llanfechell Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

Llanfihangael yn Nhowyn

- Llanfihangael yn Nhowyn is served by Holyhead Wastewater Treatment Works (WwTW) which can accommodate the foul flows from the proposed growth figure allocated for this catchment area.

Llangaffo

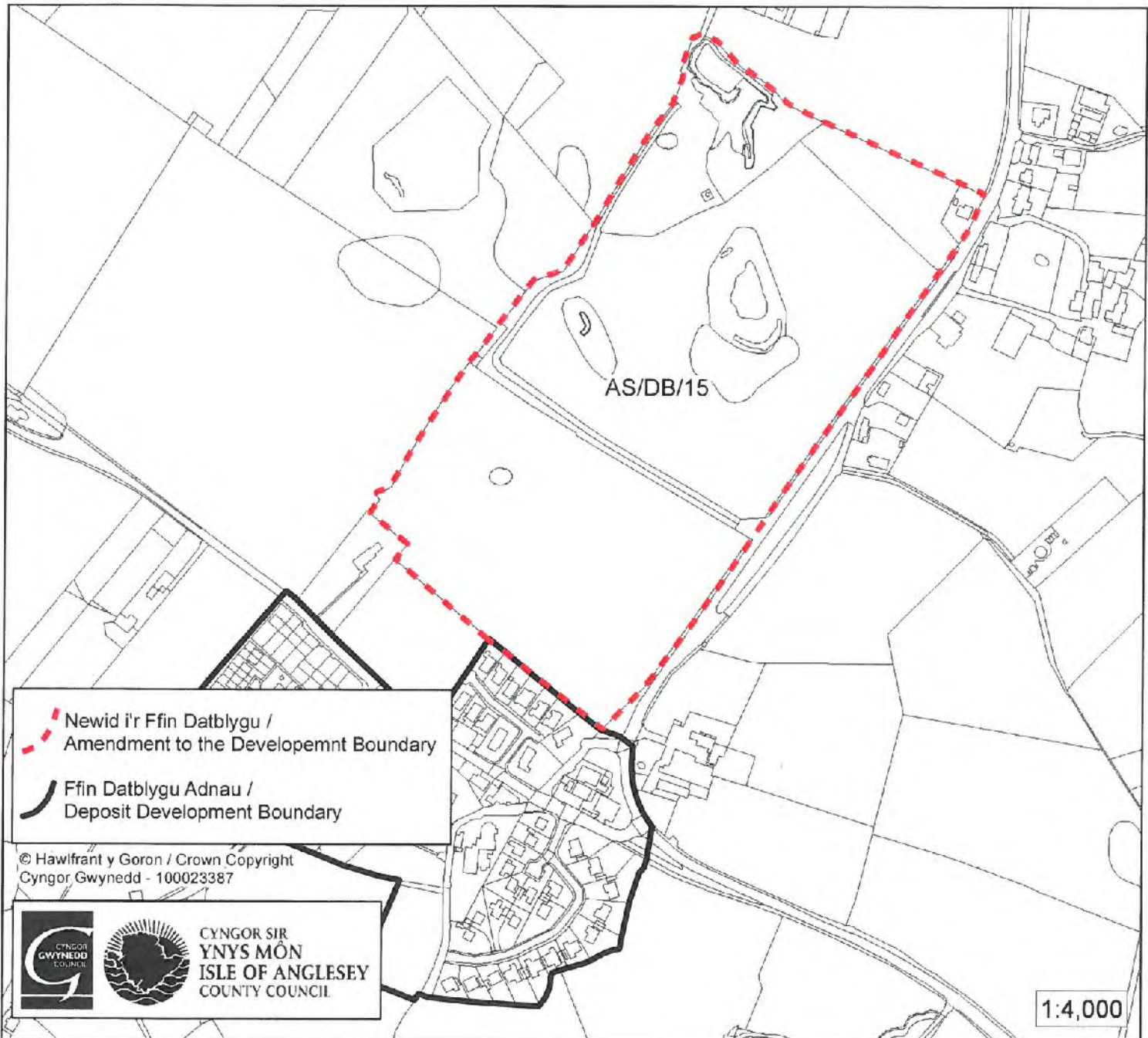
- The proposed growth being promoted for this settlement would require improvements at Llangaffo Wastewater Treatment Works (WwTW) which would need to be funded through our Asset Management Plan or potentially earlier through developer contributions.

Llangristiolus

- No additional growth is anticipated in Llangristiolus as the indicative housing growth is provided for by completed units and the existing landbank.

**Cynllun Datblygu Lleol ar y Cyd Gwynedd a Môn
Anglesey and Gwynedd Joint Local Development Plan
2011- 2026**

COFRESTR SAFLEOEDD AMGEN / ALTERNATIVE SITES REGISTER



**Math o Safle Amgen / Alternative Site Type: NEWID I'R FFIN DATBLYGU /
AMENDMENT TO DEVELOPMENT BOUNDARY**

Cyfeirnod / Reference: AS/DB/15

Enw'r Safle / Site Name: Tir i'r gogledd Ystad/ Land north of Bryn Llwyd Estate

Lleoliad / Location: Llanfaethlu

Cyngor Cymuned / Community Council: Llanfaethlu

Maint (ha) / Size (ha): 10.24

DR
AS/15

	 <p>CYNGOR SIR YNYS MÔN ISLE OF ANGLESEY COUNTY COUNCIL</p>	<p>For office use only:</p> <p>Representor No.</p> <p>Date received: 31/3/15 (elomb)</p> <p>Date acknowledged:</p>
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**Anglesey and Gwynedd Deposit Joint Local Development Plan 2011-2026
Representation Form**

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PART 1: Contact details

	Your details/ Your client's details	Agent's details (if relevant)
Name	Mr Tom Carpenter	Cadnant Planning Ltd
Address		
Postcode		
Telephone Number		
Email address		

Guidance Note.

Please set out your comments in Part 2 of this form. Use additional sheets of paper where necessary. **Separate forms should be completed for each comment** that you wish to make.

Question 2dd and 2e seeks your views on the soundness of the Joint Deposit Plan. The tests of soundness and additional information on how they are applied are detailed on the last page of this form.

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PART 2: Your Comments and Suggested Changes. *(Please use one Part 2 section for each comment that you wish to make)*

2a. Which part of the Deposit Plan are you commenting on?	
Policy number <i>(please specify)</i>	The Strategy-Settlement Boundaries, TAI17
Paragraph number <i>(please specify)</i>	
Proposals/ Inset Map <i>(please specify ref no.)</i>	49
Constraints Map	
Appendices <i>(please specify)</i>	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

2c. Please provide details of your representation on the Deposit Plan.

We wish to object to the Deposit Local Development Plan’s development boundary for Llanfaethlu. It is proposed that land to the north of Bryn Llwyd Estate should be included within the village development boundary (as outlined in red on the attached plan). The site is the preferred site for a new area primary school which will serve the current catchment of the 3 “Llannau” schools. As such the village of Llanfaethlu will become the sustainable hub for the North West of Anglesey. It is considered that the development boundary for the village should be extended beyond the school site to allow for moderate growth in market and affordable housing and potentially allow the development of further community facilities such as the local shop and post office, alongside the new school.

The site is within a sustainable location alongside the A5025, a key public transport route which will link the village with the planned Wylfa Newydd Nuclear Power Station and also with the larger settlements of Holyhead and Valley to the west where there are accessible links to the national public transport network via the mainline railway stations.

Local business such as The Black Lion Public House has been transformed after years of being vacant, securing rural employment and the protection of the Listed Building. It is only through a balanced strategy which also delivers rural housing that such businesses can be maintained and remain sustainable in the longer term.

The inclusion of the land to the north of Bryn Llwyd Estate would ensure that Llanfaethlu could accommodate the new area primary school together with additional housing ensuring that the level of housing is maintained over the plan period.

This objection also covers Policy TAI17 which advises that only local need housing and affordable housing will be permitted over the plan period. This makes the Plan’s housing strategy as a whole unsound and undeliverable as there is an acknowledged need for both market housing and affordable housing. The plan’s strategy will fail in its delivery on viability ground as it is inevitable that the affordable housing required cannot be delivered without cross-subsidy from open market housing.

*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

We wish to object to the Deposit Local Development Plan's development boundary for Llanfaethlu. The inclusion of the land to the north of Bryn Llwyd Estate would ensure that Llanfaethlu could accommodate the new area primary school together with additional housing ensuring that the level of housing is maintained over the plan period. The site is within a sustainable location alongside the A5025, a key public transport route which will link the village with the planned Wylfa Newydd Nuclear Power Station and also with the larger settlements of Holyhead and Valley to the west where there are accessible links to the national public transport network via the mainline railway stations.

2d. Please detail the changes you wish to see made to the Deposit Plan.

We wish to seek the following changes:

1. The development boundary of Llanfaethlu be reviewed and altered to include land to the north of Bryn Llwyd Estate.
2. Policy TAI17 should be reviewed and altered to provide a mix of affordable and open market housing within Local, Rural and Coastal Villages.

2dd. Is the Deposit Plan sound?

Yes No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). *More details are provided at the back of this form.*

Procedural		Consistency				Coherence & Effectiveness													
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

We wish to test the Council's reasoning for the development boundary of Llanfaethlu and for the requirements of Policy TAI17 through discussion and clarification at the hearing.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination

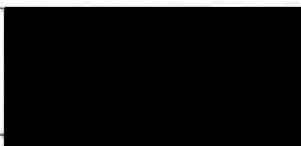
Publish Inspector's report

Plan's adoption

If additional documents have been provided to support your representations, please list below:

Location Plan

Signed:



Dated: 31.03.15

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

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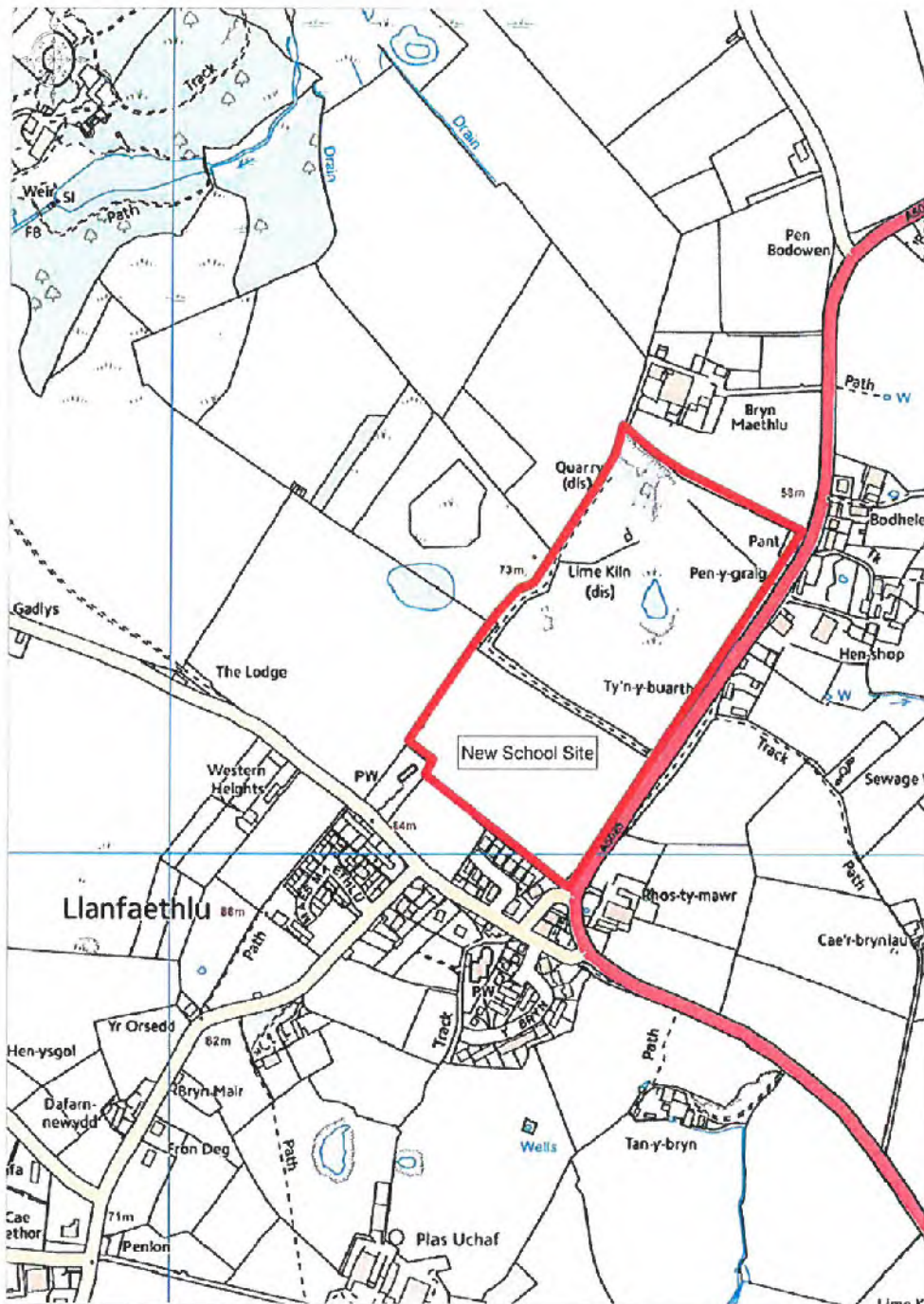
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Test of Soundness

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CYNGOR SIR
YNYS MÔN
ISLE OF ANGLESEY
COUNTY COUNCIL

For office use only:

Representor No.

Date received:

Date acknowledged:

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	Your details/ Your client's details	Agent's details (if relevant)
Name	Mr Tom Carpenter	Cadnant Planning Ltd
Address		[REDACTED]
Postcode		
Telephone Number		
Email address		

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You should include all your comments on the Deposit Plan and set out your full case on the official form, using accompanying documents where necessary. If you seek more than one change and consider that the Deposit Plan fails to meet more than one test of soundness **separate forms should be completed for each representation**. Similarly, if your representation is in support of the Deposit Plan or individual elements of the Deposit Plan it would be helpful if separate representations were made. Please indicate if you are submitting other material to support your comments.

You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you have made in response to previous consultations. If you do not consider the Deposit Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Deposit Plan to meet one or more of the tests of soundness, please tell us which one(s).

Where a group shares a common view on how it wishes the Deposit Plan to be changed, the Councils will accept a signed petition. In submitting a representation form on behalf of a group, the representation form should include the contact details of a lead individual at Section 1 and the comments should be clearly set out on the representation form. The signed petition should state clearly how many people are being represented and how the representation has been authorised. Signing a petition does not prevent the submission of individual forms.

PART 2: Your Comments and Suggested Changes. (Please use one Part 2 section for each comment that you wish to make)

2a. Which part of the Deposit Plan are you commenting on?	
Policy number (please specify)	The Strategy-Settlement Boundaries, TAI17
Paragraph number (please specify)	
Proposals/ Inset Map (please specify ref no.)	49
Constraints Map	
Appendices (please specify)	

2b. Are you objecting or supporting the Deposit Plan?			
Objecting	<input checked="" type="checkbox"/>	Supporting	<input type="checkbox"/>

2c. Please provide details of your representation on the Deposit Plan.

We wish to object to the Deposit Local Development Plan’s development boundary for Llanfaethlu. It is proposed that land to the north of Bryn Llwyd Estate should be included within the village development boundary (as outlined in red on the attached plan). The site is the preferred site for a new area primary school which will serve the current catchment of the 3 “Llannau” schools. As such the village of Llanfaethlu will become the sustainable hub for the North West of Anglesey. It is considered that the development boundary for the village should be extended beyond the school site to allow for moderate growth in market and affordable housing and potentially allow the development of further community facilities such as the local shop and post office, alongside the new school.

The site is within a sustainable location alongside the A5025, a key public transport route which will link the village with the planned Wylfa Newydd Nuclear Power Station and also with the larger settlements of Holyhead and Valley to the west where there are accessible links to the national public transport network via the mainline railway stations.

Local business such as The Black Lion Public House has been transformed after years of being vacant, securing rural employment and the protection of the Listed Building. It is only through a balanced strategy which also delivers rural housing that such businesses can be maintained and remain sustainable in the longer term.

The inclusion of the land to the north of Bryn Llwyd Estate would ensure that Llanfaethlu could accommodate the new area primary school together with additional housing ensuring that the level of housing is maintained over the plan period.

This objection also covers Policy TAI17 which advises that only local need housing and affordable housing will be permitted over the plan period. This makes the Plan’s housing strategy as a whole unsound and undeliverable as there is an acknowledged need for both market housing and affordable housing. The plan’s strategy will fail in its delivery on viability ground as it is inevitable that the affordable housing required cannot be delivered without cross-subsidy from open market housing.

*Please use additional sheet if necessary.
Please state how many additional sheets have been used.....*

2ch. If your response to 2c above exceeds 100 words, please provide a summary (no more than 100 words).

We wish to object to the Deposit Local Development Plan's development boundary for Llanfaethlu. The inclusion of the land to the north of Bryn Llwyd Estate would ensure that Llanfaethlu could accommodate the new area primary school together with additional housing ensuring that the level of housing is maintained over the plan period. The site is within a sustainable location alongside the A5025, a key public transport route which will link the village with the planned Wylfa Newydd Nuclear Power Station and also with the larger settlements of Holyhead and Valley to the west where there are accessible links to the national public transport network via the mainline railway stations.

2d. Please detail the changes you wish to see made to the Deposit Plan.

We wish to seek the following changes:

1. The development boundary of Llanfaethlu be reviewed and altered to include land to the north of Bryn Llwyd Estate.
2. Policy TAI17 should be reviewed and altered to provide a mix of affordable and open market housing within Local, Rural and Coastal Villages.

2dd. Is the Deposit Plan sound?

Yes No

2e. If you think that the Deposit Plan is unsound which test of soundness do you think that it fails? (Please tick below). More details are provided at the back of this form.

Procedural				Consistency				Coherence & Effectiveness											
P1	<input type="checkbox"/>	P2	<input type="checkbox"/>	C1	<input type="checkbox"/>	C2	<input checked="" type="checkbox"/>	C3	<input type="checkbox"/>	C4	<input type="checkbox"/>	CE 1	<input checked="" type="checkbox"/>	CE 2	<input checked="" type="checkbox"/>	CE 3	<input type="checkbox"/>	CE 4	<input checked="" type="checkbox"/>

Part 3: What Happens Next?

At this stage of the Joint LDP process, you can only make comments in writing (these are called 'written representations'). However, the Inspector may call on those who want to change the Plan to appear and speak to the Inspector at a 'hearing session' during the Public Examination. You should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session.

3a. Do you want your comments to be considered by 'written representations' or do you want to speak at a hearing session of the Public Examination? (Please tick one of the following)

I do not want to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

I want to speak at a hearing session.

3b. If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing.

We wish to test the Council's reasoning for the development boundary of Llanfaethlu and for the requirements of Policy TAI17 through discussion and clarification at the hearing.

3c. Would you like to be informed about the following (Please tick the relevant boxes)

Submission of documents and evidence to the examination

Publish Inspector's report

Plan's adoption

If additional documents have been provided to support your representations, please list below:

Location Plan

Signed:



Dated: 31.03.15

THANK YOU FOR YOUR COMMENTS ON THE DEPOSIT PLAN

Please do not forget to enclose any relevant documentation (e.g. a Sustainability Appraisal) with this form.

Completed representation forms should be returned to the Joint Planning Policy Unit at:

ONLINE – By completing the electronic form at www.gwynedd.gov.uk/ldp or www.anglesey.gov.uk/ldp

BY EMAIL – planningpolicy@gwynedd.gov.uk

BY POST – By sending to: Joint Planning Policy Unit, 1st Floor, Bangor City Council Offices, Ffordd Gwynedd, Bangor, Gwynedd LL57 1DT

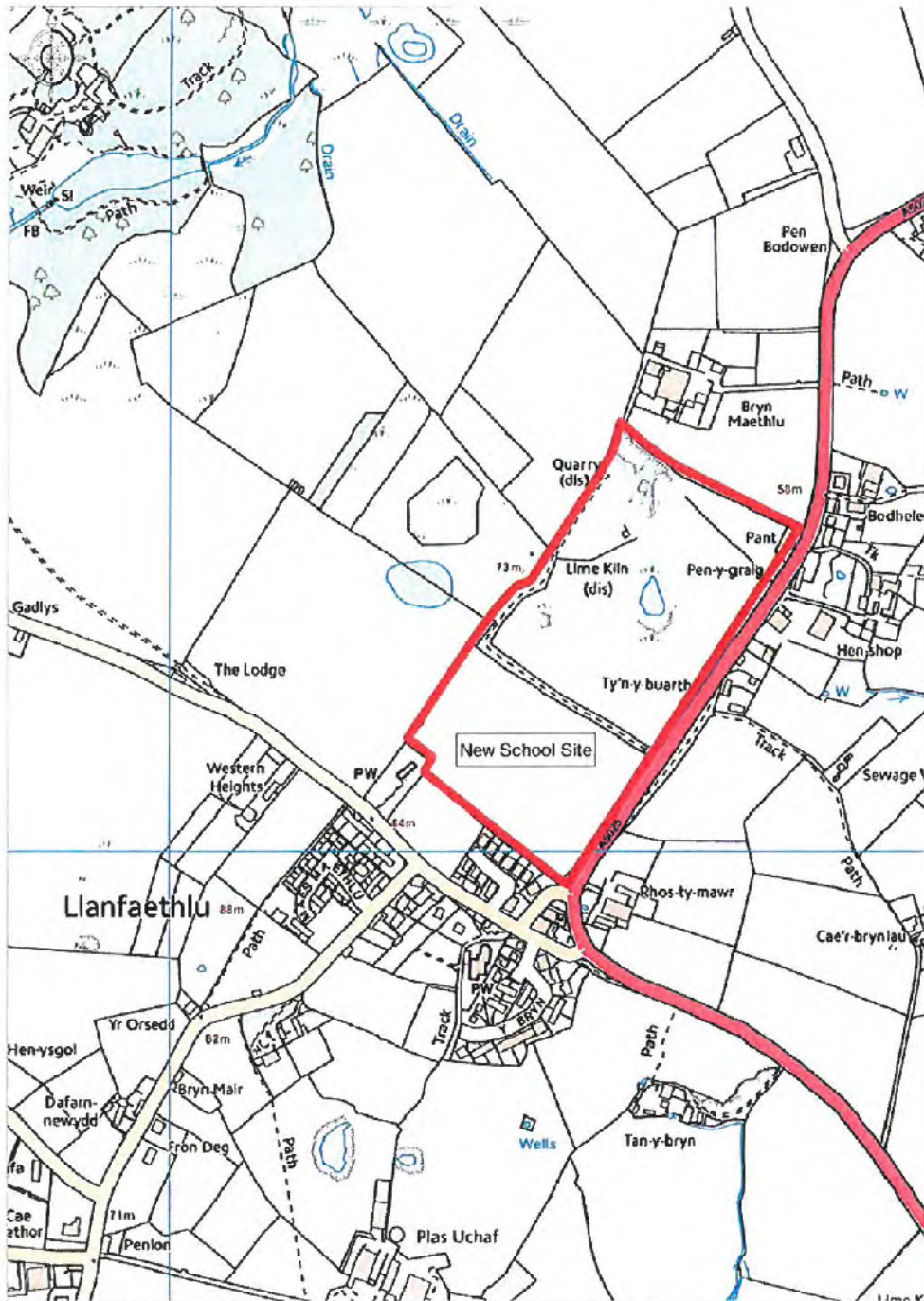
**REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN 5.00pm on the 31st March 2015
REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED**

Test of Soundness

Test	Procedural Tests
P1	It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	Consistency Tests
C1	It is a land use plan which does not have regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It does not have regard to national policy.
C3	It does not have regard to the Wales Spatial Plan.
C4	It does not have regard to the relevant community strategy.
	Coherence and Effectiveness Tests
CE1	The plan does not set out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.
CE3	There are no clear mechanisms for implementation and monitoring.
CE4	It is not reasonably flexible to enable it to deal with changing circumstances.

The Planning and Compulsory Purchase Act 2004 states that the purpose of the examination of a Local Development Plan (the Plan) is to consider whether it is "sound". This means that anyone who wants to comment on or object to the Deposit Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of "*showing good judgement*" and "*able to be trusted*". To assess the Deposit Plan we use 10 tests as set out above. The Deposit Plan will be examined by an independent Inspector appointed by the Welsh Government and it will be the Inspector's job to consider whether the Plan is sound.

Where you propose a change to the Deposit Plan you should therefore make clear which test(s) of soundness you believe the Deposit Plan fails. The tests are in 3 groups - 'Procedural' (2 tests); 'Conformity' (4 tests); and 'Coherence and Effectiveness' (4 tests). If you wish to comment on the way in which the Councils have prepared the Deposit Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Deposit Plan, it may help to look at the 'consistency' and the 'coherence and effectiveness' tests.



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