

Flintshire Deposit Local Development Plan 2015 - 2030

Background Paper 11 Soundness Self Assessment

September 2019

Contents

1. Introduction
2. Background
3. Self - Assessment

Appendices

Appendix 1 Test of Soundness Self – Assessment Table

1. Introduction

- 1.1 The Council is in the process of preparing the Local Development Plan (LDP) which will guide development in the County between 2015 and 2030. The LDP will identify certain locations where new development, such as housing and employment will be permitted, whilst also seeking to protect other areas from development. Once adopted, the LDP will form the basis for making decisions on individual planning applications in the County.
- 1.2 This background paper is one of a range of papers prepared to support the Deposit LDP and sets out a Soundness Self – Assessment whereby the Council has set out how and why it considers the Plan to be sound, against the Tests of Soundness Tests specified by Welsh Government. This document will help the public during the Deposit consultation and ultimately the Planning Inspector when the Plan is submitted to Welsh Government and a Planning Inspector appointed to test the Plans soundness.

2. Background

- 2.1 The Council has published what it considers to represent a sound Plan. The purpose of the consultation on the Deposit Plan is to consult on its policies and proposals and background evidence to provide all interested parties with the opportunity to make representations of support or objection and to explain why the Plan is or is not considered to be sound. These representations will be considered by the Council and in due course the Plan will be submitted to Welsh Government who will appoint an independent Planning Inspector to hold an examination into the Plan to determine whether the Plan is sound and can be adopted, either with or without modification. The representations received will be part of the evidence forwarded to the Inspector for Examination. The report of the Inspector will be binding on the Council.

3.1 Self - Assessment

- 3.2 The Development Plan Manual 3 recently published for consultation by Welsh Government states that a Local Planning Authority should not submit an LDP unless it considers the plan is ready for examination. The LPA will need to demonstrate that the plan meets the three tests of soundness set out in the Manual in Table 27. This table forms the basis of the self – assessment of the Plan. 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 intended by Welsh Government to be exhaustive and may not apply in every case.
- 3.2 Whilst not yet at submission stage, the self – assessment of the Plan is contained in Appendix 1 in a table with a commentary alongside each of the questions. This document may be amended prior to the submission of the Plan to Welsh Government.

Appendix 1

| Test of Soundness | Commentary |
|--|---|
| Preparation Requirements | |
| Has preparation of the plan complied with legal and regulatory procedural requirements? (LDP Regulations, CIS, SEA Regulations, SA, HRA etc.?) | Development Plan Regulations: |
| | Reg 5 Community Involvement Scheme Preparation: The Council engaged and consulted widely on the preparation of the preparation of the community involvement scheme (CIS) as part of the Delivery Agreement. Further details can be found in the Initial Consultation report. |
| | Reg 6 Content of Community Involvement Scheme: The CIS within the Delivery Agreement set 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 |
| | Reg 7 Timetable Preparation: The specific consultation bodies were consulted as part of the preparation of a timetable in the CIS / Delivery Agreement. |
| | Reg 8 Content of Timetable: The timetable within the CIS / Delivery Agreement includes key definitive and indicative dates for the preparation of the Plan and dates for the sustainability report and monitoring report. |
| | Reg 9 Delivery Agreement: The Delivery Agreement (comprising timetable and CIS) as well as subsequent reviews, have been submitted to and approved by Welsh Government in accordance with the Reg. |
| | Reg 10 Availability of a Delivery Agreement: The Delivery Agreement (and subsequent revisions) has been made available for inspection at County Hall (and subsequently at Ty Dewi Sant, Ewloe – following the relocation of the Planning Service) and on the website. |
| | Reg 11 Form and content of LDP: The Deposit LDP front cover contains the necessary information relating to name of the area, that it is an LDP and the stage |

| | |
|--|--|
| | reached. The LDP policies, both strategic and detailed, are supported by a reasoned justification (explanation) and are presented so that the two elements are readily distinguishable. |
| | Reg 12 Proposals Map: Proposals maps have been produced which are available in hard copy form, as pdf's within the consultation portal and as an interactive mapping system on the council website. The proposals maps have been prepared in a format which meets the requirements in this Reg. |
| | Reg 13 LDP additional matters to which regard to be had: The preparation has had regard to the matters raised in the Reg. |
| | Reg 14 Pre-deposit participation: The Council undertook an extensive period of engagement and consultation events leading up to the Pre-deposit Preferred Strategy. As part of this engagement and consultation process, consultation was undertaken with specific and general consultation bodies as well as the Key Stakeholder Forum. Further details can be found in the Initial Consultation report. Town and Community Councils were invited to engagement events and Officers attended numerous individual T&CC meetings to update on and discuss the LDP |
| | Reg 15 Pre-deposit public consultation: The Council consulted on the Preferred Strategy between 09/11/17 and 21/12/17. The consultation complied with the Regs in terms of publishing and making available documents for inspection, consulting relevant bodies and giving notice by local advertisement. Further details can be found in the Initial Consultation report. |
| | Reg 16 Public Consultation Representations: The Preferred Strategy consultation provided the opportunity through a variety of methods, to make representations, including an on-line consultation portal. Representations were considered by Planning Strategy Group. Further details can be found in the Initial Consultations Report. |
| | Reg 17 Deposit of Proposals: The Deposit LDP consultation has complied with the Regs in terms of publishing and making documents available for inspection, consulting relevant bodies and giving notice by local advertisement (although local advertisement is no longer required by the updated 2015 Regs, this has been undertaken in accordance with the Delivery Agreement). |
| | Reg 18 Representations on deposit proposals of LDPs: The public notice for the Deposit LDP consultation sets out a variety of methods of making representations on the Plan including an on-line consultation portal. |
| | Reg 19 Handling of representations: deposit: [This regulation does not apply to a site allocation representation]. |

| | |
|--|--|
| | <p>As soon as reasonably practicable, copies of representations will be made available at the places at which the pre-deposit / deposit Plan documents were made available for inspection. The Council will publish on its website details of all representations received together with a statement of how they can be inspected.</p> |
| | <p>Reg 20 Handling of representations : site allocation representations: No longer required by the updated 2015 Regs</p> |
| | <p>Reg 21 Representations on a site allocation representation: No longer required by the updated 2015 Regs</p> |
| | <p>Strategic Environmental Assessment Regs – European Directive 2001/42/EC Sustainability Appraisal - The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004:</p> <p>The Council has employed specialist consultants Arcadis who have prepared the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) throughout the preparation of the LDP. This has been combined into a single 'Integrated Impact Assessment' (IIA).</p> <p>Consultation with the statutory environmental bodies took place on the Scoping Report over a 5 week period between 13/04/15 and 18/05/15. This sought to invite comments on the scope and level of detail in the Scoping Report.</p> <p>Consultation took place at the following stages in the Plan's preparation:</p> <ul style="list-style-type: none"> • On the Sustainability Appraisal accompanying the Strategic Options consultation between 26/10/16 and 09/12/16. • On the Sustainability Appraisal accompanying the pre-deposit consultation (Preferred Strategy) between 09/11/17 and 21/12/17. • On the IIP accompanying the Deposit Plan consultation between 30/09/19 and 11/11/19 |
| | <p>Habitats Regulations Assessment – Planning and the Conservation (Natural Habitats etc) Regulations 1994:</p> <p>A Habitats Regulations Screening Report was published for consultation alongside the pre-deposit (Preferred Strategy) consultation between 09/11/17 and 21/12/17. A Habitats Regulations Assessment Report is made available for consultation as part of the consultation on the Deposit Plan between 30/09/19 and 11/11/19.</p> |

| | |
|--|--|
| | <p>Health Impact Assessment / Equalities Impact Assessment:</p> <p>The IIP undertaken by Arcadis is an all-embracing assessment of the Plan which incorporates Sustainability Appraisal and Strategic Environmental Assessment, along with Health Impact Assessment and Equalities Impact Assessment. It also has regard to the Well-being of Future Generations (Wales) Act 2015. A re-scoping exercise was undertaken in August 2017 which revisited the IIA framework to take account of the new legislation. The IIA includes considering the Welsh language.</p> <p>Nevertheless, the Preferred Strategy consultation was accompanied by an internal Flintshire Integrated Impact Assessment (Welsh Language, Health and Equalities). It is a new tool that has been developed by Flintshire County Council to assess the impact of proposed strategies and policies on equality and diversity issues, the Welsh language and health and wellbeing (including child poverty). The assessment was conducted by a small working group comprising internal representatives of various FCC Services alongside Public Health Wales.</p> <p>A Rapid Health Impact Assessment of the Deposit Plan took place on 19th September 2019 involving a working group of Public Health Wales and various representatives from the Ley Stakeholder Forum.</p> |
| <p>Is the plan in general conformity with the NDF and/or SDP? (when published or adopted respectively)</p> | <p>The National Development Framework has been published for consultation by Welsh Government and consultation will take place between 07/08/19 and 01/11/19.</p> <p>The NDF covers the period 2020 to 2040 and is intended to represent a higher level spatial planning document beneath which sit Strategic Development Plans and Local Development Plans. Notwithstanding that the NDF is still draft, the LDP is consistent with the NDF's focus of growth in the Deeside (and Wrexham) area.</p> <p>No Strategic Development Plan has been prepared for the North Wales region.</p> |
| <p>Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?)</p> | |
| <p>Does it have regard to national policy (PPW) & the WSP (NDF when published)?</p> | <p>Yes, the Plan was primarily prepared in the context of PPW9 but was the subject of a thorough review of policies and proposals against PPW10 which was published in December 2018. The Strategic policies each have an accompanying Policy Context table which details relevant sections of PPW10.</p> |

| | |
|--|---|
| | <p>Yes, although the Wales Spatial Plan (WSP) is now rather dated and will shortly be replaced by the National Development Framework (NDF), the Plan has been prepared in the light of the spatial context set by the WSP. In particular the earlier consideration of growth and spatial options had regard to the focus of growth in the Wrexham Deeside / Wrexham / Chester growth hub given its importance to the economy of Wales and the ULK economy.</p> <p>The National Development Framework (NDF) was published on 7th August 2019 for consultation. Given that it was published only shortly after the Plan was approved by Council, it has clearly not been possible to have regard to the NDF in the Deposit Plan. The Council will give due consideration to the draft NDF via a report to October Planning Strategy Group and will feed back representations to Welsh Government. This assessment will consider the degree to which the LDP is in conformity with the emerging NDF as well as commenting on the appropriateness of the content of the NDF.</p> |
| <p>Does it have regard to the Well-being Goals?</p> | <p>Yes. The preparation of the Deposit LDP has had regard to the well-being goals of Welsh Government. The policy context table at the end of each strategic policy sets out which of the well-being goals the policy will work towards. The IIA of the LDP also has regard to the well-being goals.</p> |
| <p>Does it have regard the Welsh National Marine Plan?</p> | <p>Yes. Welsh Government is developing a Welsh National Marine Plan (WNMP) that covers Welsh inshore and offshore waters. The inshore areas extend to the 12 mile limit. There are 25 general plan policies that apply to the whole of the Marine Plan Area and these are cross-cutting, applying to all sectors and activities. They support the sustainable development of our seas, identifying future opportunities for growth and sustainability considerations that will guide new developments and related decisions.</p> <p>The County has a coastline which comprises the coastal strip at Talacre and Gronant, the Dee Estuary and the canalised section of the R. Dee. These are of ecological importance and are protected by policies in the plan. Policies also seek to protect the open character of the undeveloped coast. In broad terms the Plan is considered to be consistent with the WNMP.</p> |
| <p>Does it have regard to the relevant Area Statement?</p> | <p>In the context set out by the Environment Act, NRW are presently preparing the North East Wales Area Statement, by working with others to develop an Area Statement for North East Wales. The area statement will set out:</p> <ul style="list-style-type: none"> •the natural resources in each area and the benefits they provide •address the key challenges and opportunities at a local level •common evidence base with information, data and evidence |

| | |
|--|--|
| | <p>Area Statements will help us better understand the state and trends of natural resources in an area, the pressures on them and the benefits they provide. They will give people the information they need to better manage natural resources. The Plan has been prepared in the light of consultation with Natural Resources and this would have provided NRW the opportunity to flag up compatibility of the Strategy and strategic policies with the emerging Area Statements.</p> |
| <p>Is the plan in general conformity with the NDF (when published)?</p> | <p>Further and fuller consideration will be given to the recently published draft National Development Framework. In broad terms the Plans focus of growth towards sustainable locations within the Deeside – Wrexham – Chester growth hub sits comfortable with the NDF identify growth hubs at Wrexham and Deeside.</p> |
| <p>Is the plan in general conformity with relevant SDP (when adopted)?</p> | <p>There is presently no Strategic Development Plan in North Wales.</p> |
| <p>Is it consistent with regional plans, strategies and utility provider programmes?</p> | <p>Yes. The Plan, its supporting topic papers, background papers and supporting evidence explains how it has been prepared in the light of regional plans and strategies. Key examples include Mersey Dee Alliance, North Wales Economic Ambition Board, AONB management Plan, Regional Technical Statement for Minerals and the Regional Transport Plan. Engagement has taken place with utility providers throughout the Plans preparation and further details are set out in the Infrastructure Plan. Key programmes include Welsh Water AMP6, Scottish Power infrastructure capacity, Wales Infrastructure Investment Plan and the National Transport Finance Plan.</p> |
| <p>Is it compatible with the plans of neighbouring LPAs?</p> | <p>Yes. The Council has engaged with the neighbouring authorities of Wrexham, Denbighshire, Wirral and Cheshire West and Chester. Each of the adjoining authorities was an important member of the Key Stakeholder Forum which met several times during the earlier stages in the Plans preparation.</p> <p>The closest working relationship has been with Wrexham whereby joint working and commissioning of key studies has taken place in terms of the Local Housing Market Assessment and Employment Land Review and an earlier Viability Assessment. Close liaison also takes place through the Flintshire Minerals and Waste Service which has worked closely with both Wrexham and Denbighshire. The more recent Viability Study undertaken by the District Valuation Service also included a coordinated approach with both Wrexham and Denbighshire to ensure consistency across the three County areas. Throughout the preparation of the Plan regular meetings have been held with Officers from Wrexham and Chester. Representatives from the Policy section of each North Wales lpa also meets 4 times per year in Llandudno Junction to discuss general policy matters</p> |

| | |
|---|---|
| | <p>as well as LDP progress and topic based discussions. Regard needs to be had to the differing timescales for Denbighshire which has an adopted LDP, and is presently working on a revised Preferred Strategy at the same time as the Flintshire LDP has reached Deposit.</p> <p>In consultations with the neighbouring authorities there have been no fundamental objections to the Plan.</p> |
| Does it have regard to the Well-being Plan or the National Park Management Plan? | Yes. The Plan has had regard to the Well-being Plan as demonstrated in the policy context boxes accompanying each of the strategic policies. The IIA has also had regard to well-being goals. |
| Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base? | Yes. As set out above the Council has worked closely with Wrexham in terms of commissioning key consultants studies as part of developing the evidence base and through the work undertaken by Flintshire's Mineral and Waste Planning Service. This has also included a recent and important piece of work on Viability with Denbighshire and Wrexham. However, the differing timescales for the preparation of each Plan has prevented further joint working or shared evidence gathering. |
| Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?) | |
| Is it locally specific? | Yes, the Plan has had regard to a wide range of local issues from devising the vision and objectives through various stages of preparation to the deposit Plan. These are identified in the early Topic Papers, the vision, objectives and issues. In addition to County wide matters, the Plan also recognises the unique character of different parts of the County such as the Deeside urban area, the coastal strip, the AONB and large rural areas and a series of market towns. The preparation of the Plan has also been facilitated by a Key Stakeholder Forum and engagement and consultation with Town and Community Councils, other local bodies and organisations to ensure local inputs can be taken account of. |
| Does it address the key issues? | <p>Yes. The issues and key messages identified in the Plan have arisen from early engagement on the Plan as well as the growing evidence base. For instance, the Plans vision and objectives were developed in conjunction with the Key Stakeholder Forum.</p> <p>The preparation of the Plan included a Key Messages document as part of the participation phase. This document was important in setting out the vision for the Plan, the issues to be faced by the Plan and the objectives for the Plan. The intention of the consultation was to ensure that a range of stakeholders,</p> |

| | |
|--|--|
| | <p>including the general public, were comfortable with the direction that the Plan is heading in.</p> <p>The Key Messages document also built on work relating to a comprehensive survey of settlement services and facilities. This work on the sustainability of each settlement informed a fundamental review of the approach taken in the UDP regarding settlement categorisation and resulted in a number of settlement hierarchy options being considered. The consultation therefore sought views as to whether the approach taken in the UDP is still fit for purpose or whether one of the alternative approaches is more appropriate. Documentation relating to this is still available on the website. The consultation overwhelmingly supported a new more sustainable settlement hierarchy to form the basis for the Plan's spatial strategy.</p> <p>As a result of earlier engagement and participation, and gathering of evidence, the written statement identifies in para 3.30 a series of Key Issues and Drivers and in para 3.35 identifies what Flintshire needs to plan for.</p> |
| <p>Is it supported by robust, proportionate and credible evidence?</p> | <p>Yes. The preparation of the Plan has involved a comprehensive evidence base. This includes research and data already available in a published format, locally derived information gathering and specific studies involving specialist consultants. Where possible joint studies have been commissioned with Wrexham CBC including an earlier Viability Study, the Employment Land Review and Local Housing Market Assessment. Further work on Viability with the District Valuation Service has also involved a joint approach with Wrexham and Denbighshire to ensure a consistent approach. The Plan has sought proportional approach to gathering information and evidence in terms of relevance and necessity, rather than trying to gather extensive evidence on every possible issue or topic.</p> <p>The Council's website has a 'Document and Evidence' section which sets out key evidence. At each subsequent stage, more specific evidence has been produced and released to support a particular consultation. All of this evidence is available on the website. The Deposit Plan is accompanied by a comprehensive set of background papers and supporting evidence.</p> |
| <p>Can the rationale behind the plan's policies be demonstrated?</p> | <p>The Plan seeks to flow from the vision through key messages and issues, to the preferred strategy and then on to strategic policies. These strategic policies set the scene for the more detailed area and topic based policies. Both the strategic and detailed policies are grouped according to sustainability / well-being themes to ensure consistency through the Plan.</p> |

| | |
|--|---|
| | <p>Each themed section of the strategic policies has an introductory section setting out the approach to and role of strategic policies. Each of the strategic policies is accompanied by an explanation (reasoned justification) and is then followed by a Policy Context box which:</p> <ul style="list-style-type: none"> • Relates the policy to the relevant Plan objective • Identifies the relevant contextual sections of PPW10 • Establishes which well-being goals the policy will work towards achieving • References key evidence • Signposts the monitoring chapter • Gives clear links to the relevant detailed policies in subsequent sections of the Plan <p>Strategic policies are considered capable of being used for DM purposes and not just in setting the scene for the detailed policies in the Plan.</p> <p>Each of the detailed policies also contains an explanation (reasoned justification). Where relevant and necessary links to Background papers and evidence and Supplementary Planning Guidance are provided in order to further explain the particular approach to a policy and its implementation.</p> |
| <p>Does it seek to meet assessed needs and contribute to the achievement of sustainable development?</p> | <p>Yes. The Plan seeks to meet an evidenced but aspirational provision for economic growth. This is based on the Employment Land Review and further employment led research and the Local Housing Market Assessment, alongside devising a set of projection led housing requirements. The Plan embraces a growth led strategy, set within the broader context of ongoing sub-regional and regional growth initiatives aimed at achieving economic prosperity across North Wales and North West England. The provision of housing is in excess of the Welsh Government derived projections (which were based on a period of recession) and are still well in excess of likely 2017 based projections. However, the Plan does not pursue growth at any cost and seeks to do this in a balanced and sustainable manner. The approach is consistent with the draft National Development Framework.</p> <p>The provision of growth and the spatial strategy for implementing that growth is based on sustainability considerations. The options behind the Preferred Strategy, as well as the chosen strategy in the Preferred Strategy have both been the subject of Sustainability Assessment.</p> |
| <p>Are the vision and the strategy positive and sufficiently aspirational?</p> | <p>Yes. As set out above the Plan has adopted an aspirational approach to delivering economic growth, supported by an evidenced and justified level of housing. The Plan therefore sits comfortably with the sub-regional and regional context of</p> |

| | |
|---|--|
| | <p>seeking to achieve economic growth. The Plan has adopted a positive approach to its policies and proposals to deliver economic growth in a sustainable manner which has regard to well-being considerations.</p> |
| <p>Have the 'real' alternatives been properly considered?</p> | <p>The Strategic Options engagement and consultation put forward 6 growth options and 5 spatial options. Each of these options were put forward to provide a variety of scenarios and to provide interested parties with the means to opt for the most appropriate option. None of the options were put forward as being unrealistic or presented merely to make up the numbers'.</p> <p>As part of the Strategic Options stage the Council worked with Planning Aid Wales to prepare a summary leaflet and 'easy read' document in order to more simply explain what was potentially quite a technical and comprehensive document. Planning Aid Wales also helped the Council by facilitating one workshop with the Key Stakeholder Forum and three workshops with Town and Community Councils. Each of the growth and spatial options was assessed as part of the Sustainability Appraisal.</p> <p>The rationale and reasoning behind the choice of growth option and spatial option is briefly set out in the Deposit Plan written statement. It is more fully explained in the Preferred Strategy and in a background paper accompanying the Preferred Strategy.</p> |
| <p>Is it logical, reasonable and balanced?</p> | <p>Yes. The Plan flows and is presented in a logical manner from the evidence base through to issues, objectives and policies, supported where necessary and relevant, by background papers. The Plan adopts a reasonable balance in terms of local, regional and national considerations which identify the County as part of a growth area, the environment of the County and the well-being of residents. It works towards achieving sustainable development.</p> |
| <p>Is it coherent and consistent?</p> | <p>Yes. The Plan is clear and has been carefully considered, having regard to national planning guidance and the evidence base. In particular, the policy context box at the end of each strategic policy ensures that the policy approach is consistent with national guidance, well-being goals and the evidence base. The Plan is clearly structured and presented and is considered to sit together with background papers and supplementary planning guidance in a coherent manner</p> |
| <p>Is it clear and focused?</p> | <p>Yes. The Plan has sought to focus on key issues, within the local and regional context. The Plan has organised and presented in a well-structured manner which should be clear to the reader.</p> |
| <p>Test 3: Will the plan deliver (Is it likely to be effective?)</p> | |

| | |
|---|---|
| Will it be effective? | Yes. The Plan will be effective in delivering its vision and objections and addressing key issues through a series of strategic and detailed policies. The Plan has set out an aspirational but realistic growth led strategy and a level of housebuilding which is higher than Welsh Government projections to support economic growth. |
| Can it be implemented? | Yes. The Plan has provided a portfolio of employment sites from strategic sites, which are key to the regional growth ambitions, through to more local sites, in order to provide a range and choice of sites. The housing allocations are of a size which are attractive the market and capable of being implemented, as explained in the Housing Land Supply background paper. |
| Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales? | Yes. The Plan is supported by an Infrastructure Plan and this demonstrates that there are no showstoppers in terms of infrastructure deficiencies which would prevent or delay the Plans delivery. |
| Will development be viable? | Yes. The District Valuation Service Viability Study has established the level of affordable housing that different housing market areas (and allocations) can deliver in a viable manner. |
| Can the sites allocated be delivered? | Yes. The Housing Supply background paper demonstrates the delivery of housing allocations (and commitments) in the form of a trajectory. This has been prepared in the light of discussions with site promoters / developers and demonstrates realistic delivery and a 5 year housing land supply, and where a number of the sites are capable of early delivery. |
| Is the plan sufficiently flexible? Are there appropriate contingency provisions? | Yes. The Plan's portfolio of employment sites ensures a degree of flexibility in terms of meeting the requirements of different types of industry. The Plans housing provision has been realistic assessed in terms of completions to date, commitments and small and windfall site allowances. Given that the housing requirement is in excess of that informed by Welsh Government projections and includes a flexibility allowance of nearly 15%, there is sufficient flexibility allowance. Furthermore, the Plan has moved away from the UDP approach of a large number of small allocations to a more focussed set of allocations which are evidenced as being available, viable and deliverable. |
| Is it monitored effectively? | Yes. The Plan has incorporated a Monitoring Chapter which sets out the arrangements for monitoring the Plan's performance. |

