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Dear Mr Mellor,

## City and County of Swansea– Preferred Strategy Regulation 15 Consultation: Welsh Government Response

Thank you for consulting the Welsh Government regarding the Swansea Local Development Plan pre-deposit documents. Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Welsh Government is committed to helping local planning authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation. The Welsh Government looks for clear evidence that the ten tests of soundness (as set out in 'LDP Wales') are addressed. Having considered all the submitted documents provided by the City and County of Swansea we have **significant concerns regarding the soundness** of the plan which are set out in the supporting annex.

### Economic modelling:

The Welsh Government fully endorses local authorities seeking to maximise employment opportunities through their LDP. However, we have fundamental concerns regarding the robustness of the assumptions underpinning the economic growth modelling and the consequential housing requirement, based on your own economic modelling evidence and delivering the plan objectives. This poses serious questions regarding the 'soundness' of the plan. We consider the economic evidence should result in a housing provision of approximately 20,900 dwellings over the plan period, a **4,200 shortfall**. This also has significant implications for progressing Swansea as an economic City Region.

### **Housing Provision & Methodology:**

In addition, it is considered that the evidence base to support a deviation of **4,400 dwellings below** the latest (2008) Welsh Government population and household projections insufficient. There is a fundamental disparity between the base assumptions utilised across a range of evidence base documents, and the relationship of these assumptions to the strategic growth options and the economic model. The base assumptions underpinning the evidence are inconsistent. Substituting the appropriate data, on a consistent basis (including a 10% flexibility allowance) we consider the total housing provision should be 21,100 homes. This represents a **shortfall of 4,400 homes**.

In summary, it is considered that the level of housing proposed embodies a low level of growth that is not akin to deliver the economic objectives in the plan, or the role of Swansea as the hub of the city region. Based on the evidence we consider **there is a shortfall of approximately 4200-4400 homes** that needs to be addressed. Our detailed comments are included within the supporting annex to this letter.

Our representation also includes **other concerns** which are set out in detail within the **annex to this letter**. Collectively our comments highlight a myriad of issues that need to be addressed if the plan is to be considered 'sound'. We have indicated where evidence of soundness is not immediately clear and where the evidence base can be improved/strengthened going forward. Some key areas include:

- **gypsy and traveller site provision**
- **infrastructure and deliverability**
- **flooding / sewerage infrastructure**
- **affordable housing need and viability**
- **minerals**

In totality there are fundamental issues that we consider present a significant degree of risk for the authority if not addressed prior to the deposit stage. We strongly advise that these matters are addressed in order to maximise the potential of your LDP being considered 'sound' at the deposit stage.

As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment, as responsibility for these matters rests with your Council.

If you would like to **meet at an early date** to discuss any matters arising from our formal response to your deposit LDP, please contact me. You should document your response to our comments in your Consultation Report.

Yours sincerely

**Mr Mark Newey**  
**Head of Plans Branch**  
**Planning Division**

## **Annex** to Welsh Government Letter 25<sup>th</sup> October 2013 in response to the City & County of Swansea Preferred Strategy

### Economic Modelling

The joint economic growth study (Economic Assessment & Employment Land Provision for Swansea and Neath Port Talbot – Peter Brett) with Neath Port Talbot underpins growth levels proposed in the plan. WG supports the Councils aspirations to improve economic activity and increase the resident labour force, i.e. to maximise economic opportunities for the benefit of Swansea, the wider area and Wales, as expressed in the preferred employment led growth option (EE Adj.+ Table 7.9). We note that it is a policy aspiration to reduce net-in commuting by increasing the balance of jobs to residents, and to minimise the gap of unemployment rates with the Welsh Average. The calculations include assumptions on the base population and households at 2010, additional jobs required, the economically active population and household size. **Based on assumptions chosen by the authority the economic model results in a projected net increase of 14,700 jobs, which equates to 16,400 dwellings over the plan period.**

Maximising economic opportunities and jobs to advance the Welsh economy and distribute the benefits to all members of society is a key Welsh Government priority. The Council has also acknowledged its role as the hub of the emerging City-Region economic work undertaken by the Minister for Economy Science and Transport. In addition, recommendations from the Independent Advisory Group (IAG) Report into planning, particularly focusing on tackling cross boundary issues, will be explored in the forthcoming Consultation Paper in a Draft Planning Bill. There may be outcomes contained in the Draft Bill which could have ramifications in consolidating this position. Consequently, maximising the economic opportunities at Swansea, and hence the provision of homes to support the economic growth, is vital. **The Welsh Government has fundamental concerns regarding the robustness of the assumptions underpinning the economic growth modelling, the inconsistency between those assumptions when compared with Neath Port Talbot and the consequential housing requirement.**

The assumptions underpinning the baseline information within table 7.9 of the Peter Brett Report differ considerably between Swansea and Neath Port Talbot. The following are key areas of difference.

### Population and Household Base

It is unclear why Swansea has chosen a different population and household base data set to Neath Port Talbot, bearing in mind it is the same model being utilised? Table 7.9 (Peter Brett Report) is misleading as it references the 'source' as the WG 2008 population and household projections; this is clearly not the case in respect of Swansea with 183 fewer households but more significantly a lower population of 4,128 people. This appears that base assumptions for population and households are based on the Households Estimates for Wales (2010) and are set out in Table 3 of the Population and Household Projections Paper (June 2012). We note that Neath Port Talbot have utilised the Welsh Government (WG) 2008 population and household figures. As set out in the table below the base population assumed by Swansea is more akin to the WG 2008 zero net migration variant, although Swansea's base population assumption is 2,197 people lower than the zero net migration projection.

**Assuming a lower population base than the 2008 based zero net-migration projection does not maximise economic growth and is contrary to the LDPs key objective.**

WG 08 Principle Projection: Population at 2010	Swansea Assumptions Population (Table 7.9)  (+/- the WG 08 Projection)	WG 08 Principle Projection: Households at 2010	Swansea Assumptions Households (Table 7.9)  (+/- the WG 08 Projection)
232,828	228, 700 (-4128)	102,783	102,600 (-183)
WG 08 <u>Zero Net Migration</u> Projection: Population at 2010	WG 08 Lower Variant Projection: Households at 2010	WG 08 Household Size at 2025	Swansea Assumptions on Household Size at 2025 (Table 7.10)
230,897 ( 2,197 above Swansea’s assumptions)	102,347 (-253 below Swansea’s assumptions)	2.10	2.13 (0.03 above the WG08 projection)

Household Size

In addition the average household size (row. j) at 2025 is referenced to be based on the WG 2008 projections; however, this is again not the case. The above table shows that the household size is larger than the WG 2008 projection of 2.10 There is no explanation as to why the council have chosen a higher value (2.13) the implication being that more dwellings would be required if the WG projection of 2.10 was used.

Vacancy/churn Rate

Row k, the number of additional dwellings by 2025 does not factor in the appropriate vacancy/churn rate. The ‘assumptions’ column states that a 1:1 ratio of households to dwellings has been used; resulting in a provision of 16,421 dwellings. However, using the Council’s own conversion ratio (1:1.05, i.e. a 5% vacancy/churn rate) would increase the number of dwellings required to make provision for.

Utilising the WG 2008 household size (at 2025) of 2.10 and a vacancy rate of 1:1.05 would increase the dwelling requirement to 19,000 units.

Flexibility Allowance

The Local Development Plan (LDP) should include a flexibility allowance to demonstrate that the plan can respond to economic challenges, unforeseen circumstances associated with delivery. The Welsh Government has indicated that a notional flexibility allowance of 10% may be appropriate to allow for uncertainty regarding the delivery of sites and unforeseen issues. The plan should include a level of flexibility that is appropriate for the area, reflects local circumstances and is based on a realistic assessment of the available evidence. This level of flexibility is for the authority to determine. **Applying a 10% flexibility allowance dwelling requirement generated from the economic growth strategy results in a housing provision of around 20, 900 dwellings, 4,200 units more than the plan provision.**

The implications arising from the above economic growth scenario have not been tested. Indeed it is important that the LDP considers the spatial and land implications arising from

this level of growth, a result of delivering the Council's own key objective. The consequences of other assumptions integral to the economic model, if they are not achieved, also need to be addressed, specifically what it could mean for the level of housing provision:

- What are the implications if the reduction in unemployment is not achieved? Could this lead to an increase of in-migration to fill the jobs resulting in more pressure to access housing? Not increasing the housing stock sufficiently could raise prices and increase pressure on affordable housing?
- The identification of Swansea as an economic city region suggests that the city should be a focus for economic growth and consequential housing, a driver for a wider area. What are the implications for economic growth if there is insufficient housing provision? How would this align with the proposed wider role to support its hinterland?
- Can the council constrain in-migration level and control in-commuting? If these issues continue at levels set out in WG projections, or current levels, will an insufficient housing provision restrict economic growth? Will it force the local population out of the housing market?
- Broadly speaking, when considering the ratio of homes to jobs it is not clear why Swansea is providing, on average, half of the number of jobs per new dwellings when compared to Neath Port Talbot (Swansea 1.1 *as per current figures*, Neath Port Talbot 2.2)? Whilst there is no direct mathematical relationship the difference between two adjoining local authorities appears stark and lacking explanation.

In summary, we consider that the justification for the fundamental differences between the assumptions applied to Swansea compared to Neath Port Talbot have not been fully explained or justified. **This poses serious questions regarding the soundness of the plan. The Welsh Government considers that the Council's economic growth evidence to justify the key plan objective of maximising economic opportunities does not translate into the appropriate level of housing provision necessary, approximately 20,900 dwellings over the plan period. The 4,200 shortfall in housing provision will have series implications on maximising the economic growth of Swansea.**

### **Housing Provision & Methodology**

Planning Policy Wales (PPW) (paragraph 9.2.2) states that the latest WG population and household projections should form the starting point when assessing the housing requirement for the plan. In this case, the WG 2008 based household projections are the latest projections. Using the Council's own conversion ratio (to translate households to dwellings) of 1:1.05, converting the 2008 principal household projection into dwellings equates to approximately 19,200 dwellings over the plan period 2010-2025. Applying a notional 10% flexibility allowance on the requirement, to ensure delivery, indicates that the **plan should make provision for approximately 21,100 dwellings. However, the plan only makes provision for 16,700 dwellings, approximately 4,400 dwellings below the WG latest projections. This causes fundamental concerns, particularly as the plan claims to maximise economic opportunities. The deposit LDP needs to increase the level of housing provision to maximise economic opportunities, as stated in the plan. It currently does not achieve this goal, its own goal.**

### 2011 Based projections

Whilst the WG 2011 based population projections have been published, the equivalent household projections have not yet been released. We anticipate those to be available later this year. The Council need to consider the implications of the revised implications, although early indications do not suggest a reduction to bridge the current shortfall of 4,400 dwellings. The Council also need to consider the appropriateness of using projections based on lower levels of economic performance, particularly as the city has been identified as an economic city-region. Further explanation of why any reduction in housing provision is essential.

### Spatial Strategy

Further evidence is required to demonstrate how the Council's 'hybrid' spatial option incorporates the principles of sustainable development, as set out in PPW. All aspects of sustainable development should be taken into account when determining the scale and location of development i.e. economic and social factors as well as environmental issues, supported by a Sustainability Appraisal/SEA, based on robust evidence. The Deposit Plan will need to demonstrate that an open and transparent process has been followed, clearly stating any assumptions and their relationship to the strategy/objectives in the plan.

**Additional sites will be required to meet the current shortfall of housing, approximately 4,200 – 4,400 dwellings.**

The authority need to demonstrate that all housing allocations and commitments are financially viable and deliverable within the plan period. See also our comments on deliverability.

### Settlement Strategy

The Deposit Plan will need to incorporate a detailed review of settlements to ensure the strategy is robustly evidenced to support the level of growth accommodated in each settlement/settlement tier.

### Strategic Growth Options

#### Base Population Assumptions

The Council has considered five different growth options 'Population and Household Projections Paper' (2012) and Update Paper (May 2013). All five options (Table 3, Update Paper) have a base population ranging from 231,500 to 232,800, **not the same base population.**

The 2010 mid year estimates include a base population of 228,700 people. It is unclear why these figures have been used as the basis of the economic growth assumptions when they have not been tested as part of the various spatial options. The base population of the preferred option (Option 3, AGS1) is 232,600. **There is no explanation why there is a disparity, or the implications arising from such a disparity between the preferred growth option and the economic growth base population assumptions which also appear to support the preferred option.** It would appear that two different methodologies are being used, with differing sets of data, yet arriving at the same numerical conclusion. This appears illogical.

#### Option 1: 23,500 dwellings

**The Council has not tested the WG 2008 (High Growth) projection.** Whilst Option 1 is a high growth scenario it is 1600 dwellings above the higher WG 2008 variant projection. Option 2 tests the WG 2008 principal household projection. Options 1 & 2 appear to have been discounted as 'they appear to project unjustifiable housing requirement' and the

Council raise questions whether the house building industry could build the number of dwellings. Whilst past built rates should be a factor in informing the housing requirement, such as ministerial priorities, economic growth aspirations, key plan objectives, the need for affordable housing and being the economic hub of a wider area. The implications of a higher growth, or the WG 2008 principal projection have not been fully identified, considered or rationalised.

#### Option 3/AGS1: 16,700 dwellings

The Council has amended the WG 2008 principal projection to remove the 2003-04 in-migration peak and included migration figures for 2008-09, the onset of the economic downturn. The Council is therefore proposing to deviate from the WG 2008 principal household projection by 2,500 units (excluding flexibility allowance). While it is for the local authority to evidence such a deviation in light of the Council's economic strategy the evidence to explain such a deviation, and how it relates to the economic growth strategy to this degree is not clear. This is currently absent.

The WG 2008 based projections assume that net UK migration will be +400 people per annum and net overseas migration will be +550 people annum, an overall net migration increase of +950 people per annum. The WG 2011 based population projections were released in July 2013. The figures are based on the 2011 Census and indicate that the base population at 2011 is 238,700, significantly higher than the assumptions factored into modelling assumptions by the local authority. In addition, while net UK migration has decreased to +160 people per annum, and international migration has increased to +750 people per annum, the overall net migration is +900 units, a small reduction from the 2008 assumptions. This suggests that the authority's assumptions are incorrect and significantly lower than what has happened in recent years.

**In summary, it is considered that the level of housing proposed embodies a low level of growth that is not akin to the economic objectives in the plan, or the role of Swansea as the hub of the city region. There is a shortfall of 4200-4400 homes that needs to be addressed. Additional sites will be required to meet this shortfall if the LDP is to deliver on its strategy and objectives.**

#### **Affordable Housing - Local Housing Market Assessment (ORS)**

It is important that the LPA demonstrates that it has maximised affordable housing provision given the high level of identified need. It has also been identified as a key issue for the plan. Affordable housing continues to be a Welsh Government Ministerial priority. We note that the Council has prepared a LHMA which identifies a need of 7,100 affordable homes over the plan period. The Council aim to deliver 4,130 affordable units through the LDP. It is unclear:

- Why the level of need appears to be constrained by the proposed housing provision? Surely, the level of need should be a fixed number based on the evidence? More explanation is required to determine whether the identified need takes account of backlog, the current need, as well as the anticipated need over the plan period.

In addition we note that the report uses different assumptions on base population, the proportion of economically active and a different household size which appear to be derived from the 2011 Census data. We note that both the population at 2011 and the proportion of economically active people are significantly higher than the base assumptions utilised within the economic growth paper. In addition, the model uses a vacancy rate of 3.8% where the

Council has stated that the conversion factor should be 5% in the housing papers. **The base assumptions underpinning all evidence should be consistent. Currently it is inconsistent.**

### **Affordable Housing – Financial Viability Assessment**

The Council has undertaken a financial viability assessment to inform the affordable housing policy. The evidence base appears to support the use of a split threshold as set out in the proposed draft affordable housing policy (AH1 – Affordable Housing Topic Paper). It is accepted that a split target would be more reflective of local market circumstances. However, we would question the proposed target for **Swansea East and Swansea North. The evidence does not support a 10% target in these areas; the viability evidence suggests that this should be 0%.**

It is important that the viability evidence supporting the Deposit plan is up-to-date and takes into account known costs, including the impact of affordable housing contributions. All associated known build costs should be factored into any assessments. Whilst challenging, targets need to be grounded in evidence and applicable to the majority of applications, whilst allowing site specific negotiations to occur, if/where necessary (on a limited number of sites). All components of viability evidence need to be justified by the local authority. Consideration should also be given to the inclusion of policies on windfall sites, rural exceptions policy and the allocation of sites for 100% affordable housing.

The Council should update the financial viability work to take into account the implications of the recent Ministerial Statement (July 2013) which makes it clear that the expectation is that Part L will have a close to cost neutral effect on building costs. Based upon the domestic fire safety requirements costs outlined in the Consultation Regulatory Impact Assessment, an average cost of £3,100 can be used for a domestic property (Previous examinations assumed £7,300).

### **Gypsy and Travellers**

Local authorities have a statutory duty under sections 225 and 226 of the Housing Act 2004 to consider the needs of Gypsies and Travellers. Where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, local planning authorities should allocate sufficient sites to ensure that the identified pitch requirements for residential and transit use can be met.” (WG Circular 30/2007, paragraph 17).

We note the Council undertook a public consultation exercise earlier this year. Following a detailed site assessment process we note that an Extraordinary Council meeting was held on the 21<sup>st</sup> October to discuss the shortlisted sites for potential use as Gypsy and Travellers sites. We note that the Council did not approve the recommended sites and voted that a new site search/assessment process will be undertaken. We note that Cabinet will make a final decision in due course.

The Deposit LDP should make provision to meet any identified need over the full plan period to 2026. **Failure to provide sufficient sites in the Deposit Plan will pose serious questions regarding soundness.** In addition, the plan should also include criteria based policies as is the case with other LDPs.

### **Components of Housing Supply**

Paragraph 4.14 of the background paper is confusing and suggests that commitments will be rolled over as allocations. It is important that commitments and allocations are clearly differentiated in the plan to avoid confusion. Commitments are not allocations and should

not be recorded as such. Given the scale of commitments within Swansea the authority should consider what is both practicable and reasonable to show on the proposals map. The authority should set out all components of supply in the plan in order to aid the clarity and understanding.

## **Delivery & Phasing**

### Viability Evidence (Delivery, Phasing & Infrastructure)

A simple housing trajectory would assist all parties to understand and consider the ability of the sites contained in the plan to be delivered, supported by viability evidence. This work should be supported by an analysis and understanding of lead in times for large and strategic sites, the inter-relationship between such sites, potential constraints and costs, infrastructure requirements, funding streams and robust assumptions for small and windfall sites. The authority will need to demonstrate a five year housing land supply from the adoption of the plan.

### Community Infrastructure Levy (CIL)/ Planning Obligations

Where funding for related infrastructure is to be sought through planning obligations, the deposit plan should specify the Council's priorities to inform the provision of infrastructure/mitigation and avoid a scheme being unviable. In addition, the authority should clarify its position on CIL. The 2010 CIL Regulations (Reg. 122) sets out in legislation three tests which a Section 106 agreement must comply with. The implications for development arising from an inability to 'pool' future S106 agreements (Reg 123) and any CIL charging schedule preparation timetable should also be considered. This is particularly prevalent as the Council has already alluded to many large and strategic sites that have significant infrastructure requirements and constraints associated with their delivery. All other S106 agreements should accord with WG Circular 13/07 and the policy in the deposit plan needs to reflect this approach.

### Sewerage Infrastructure / Drainage Capacity

Sewerage capacity/drainage constraints have been identified as a key constraint to development (Physical Infrastructure Paper) which has implications on major residential applications in affected areas. The Council has been operating a Memorandum of Understanding (MoU) with various stakeholders that centres on removing surface water from the waste treatment infrastructure, thus increasing the capacity for the treatment of foul water (via planning conditions on new developments, SUDS and achievement of a betterment factor). The authority should explain fully the magnitude of sites affected the impacts on timing and deliverability, and how this constraint will be mitigated over the plan period. We note that the MoU will need to be updated in order to agree a way forward. It is essential that it can be demonstrated within the deposit plan that any sites affected can be delivered in the plan period. It would be beneficial to understand the legal status of the MoU and the infrastructure requirements/level of housing delivery and the financial connection between the two, linked to viability testing, to ensure that proposals can be delivered.

### Flooding

We note that the authority has undertaken a Stage 1 and Stage 2 Strategic Flood Consequence Assessment in light of potential flooding constraints to various areas across the borough. We note that this assessment has filtered out those sites that will require a Stage 3 detailed assessment. The authority should provide clear evidence of how flooding policy has been considered in the development of the preferred strategy and site selection process. **TAN15 clearly states that highly vulnerable development (*which includes residential*) and emergency services should not be allocated within zone C2.** This is regardless of a FCA. The deposit plan should ensure this is indeed the case.

### Transport Infrastructure

The Transport & Accessibility Paper highlights that transport infrastructure is key to delivering the strategy. The achievement of many of the LDP's key objectives will be dependent upon development being integrated with the provision of high quality sustainable transport infrastructure. The authority should provide greater explanation within the deposit plan noting the key transport infrastructure that is required to meet the strategy, including the various funding mechanisms & S106 planning obligations that would be required to deliver these key projects. (See CIL comments above.)

### Welsh Language

The approach to Welsh language is set out in topic paper on Culture and Heritage, section 11 (August 2013). Table 2 and paragraphs 11.32 – 11.36 would benefit from the inclusion of data on development (i.e. housing completions) and from showing all areas rather than only those where the population grew by more than 600. This would enable more conclusions to be drawn on any causal link between planning and the Welsh language. With incomplete data it cannot be argued, for example, that high growth affects the language if the same decline happens in areas of little or no growth.

It is not apparent how much development took place in the three areas listed at paragraph 11.36 where the Welsh language grew between 2001 and 2011, but it can be assumed that some took place. The information on demand for Welsh medium education is relevant and a good indicator of the Welsh language's role in the social fabric; it would be helpful to see this broken down into the sub-areas - paragraph 11.43 suggests that there is data available at that scale. Where demand for Welsh medium education is higher than the percentage of the population that speaks Welsh it could be argued that, with the right type of housing (i.e. family homes) more development could mean more people educated in Welsh and potentially going on to become fluent Welsh speakers. The evidence to demonstrate that growth will lead to a decline in the Welsh Language is unclear. It is not clear how/whether Welsh language has influenced the Preferred Strategy through a sustainability type of appraisal, where appropriate influencing the scale and location of development. The authority should consider the guidance within the recently published TAN 20, particularly how this issue should be addressed

### Agricultural Land

Our initial conclusion on the evidence available is that, at this early stage in the plan preparation process, it is considered that there is unlikely to be any significant loss of best and most versatile agricultural land (BMV). However, we will be able to provide a more detailed assessment of potential BMV loss at deposit stage.

### Minerals

We note that the authority has been engaged with Carmarthenshire County Council's Mineral Planning Team who have assisted Swansea in evidence gathering and the development of minerals policies for the LDP. This regional approach is supported and is important when forward planning for minerals. We are reassured that Swansea and Neath Council have formally endorsed a regional approach to minerals as set out in the Minerals Topic Paper (Appendix 5 & 6). Carmarthenshire Council should also formally agree this regional approach in order to ensure that the plan is compliant with national policy in respect of maintaining the required land banks.

### Renewable & Low Carbon Energy

The overarching objective to encourage appropriate development of low carbon and renewable energy resources and energy infrastructure is consistent with national policy. The 'Physical Infrastructure' Topic Paper sets out that the Council are currently undertaking an assessment of the resources and opportunities within the area for renewable and low carbon energy development. It indicates that a separate report will be produced at a later date. Undertaking such assessment is in accordance with national policy and will be important in ensuring LDP policies take into account the contribution the area can make towards development and facilitating renewable and low carbon energy. In undertaking the assessment reference should be had to paragraph 12.9.3 of Planning Policy Wales and Practice Guidance 'Planning for Renewable and Low Carbon Energy – A toolkit for Planners'.

### **Supplementary Planning Guidance (SPG)**

The preparation and timing of SPG, particularly of those significant elements should be provided at the deposit plan stage. SPG adopted under the UDP should be reviewed or updated to ensure that it is in line with the LDP.

### **Monitoring**

It is vital that the monitoring framework includes key triggers and action points so that appropriate action can be in place in advance to avoid a situation of non delivery. When the Deposit Plan is produced, a significant number of LDPs will have either gone through examination or been adopted. This provides useful good practice examples which the authority could benefit from.