

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

P1 - Prepared in accordance with the Delivery Agreement including the CIS	
<u>Comments</u>	<u>Suggested Actions</u>
<p>We acknowledge that the Preferred Strategy has been prepared in accordance with the Delivery Agreement originally agreed by the Welsh Government (WG) in September 2008, with revisions to the timetable being agreed by the WG in April 2011.</p> <p>The plan has been prepared in accordance with the CIS involving stakeholder and specialist groups.</p> <p>PS stresses throughout the role of earlier consultations and work by the Key Stakeholder Forum (KSF) in defining the plan issues, vision, objectives, and strategy options.</p>	N/A
P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)	
<u>Comments</u>	<u>Suggested Actions</u>
<p>SA/SEA: We note that: The Preferred Strategy has been subject to an interim SA/SEA: supporting documentation includes, Stage 1 SA Scoping Report Revised (Feb 2011), Stage 2 SA LDP Pre Deposit Plan Interim Report (Sept 2011), SA Forum Summary (May 2011) Non-technical summary included within Appendix D. Strategic objectives, options and policies have been assessed.</p> <p>Habitats Appropriate Assessment - Habitats Regulations Appraisal (HRA): We note that: The Preferred Strategy has been subject to HRA screening: supporting documentation HRA Note Pre Deposit LDP (Sept 2011)</p>	N/A

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

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C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.

<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that Chapter 2 of the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key relevant plans, policies and strategies.</p> <p>These are explained fully in the supporting background paper; National, Regional & Local Context Paper (Sept 2011)</p> <p>Neighbouring Authorities</p> <p>The PS and the supporting background paper, National, Regional & Local Context Paper (Sept 2011) explains the relationship with its six neighbouring authorities. In particular the paper notes the key relationships with Bridgend and benefits that the Maesteg Regeneration Area will have on the upper Afan Valley and Bryn, it is noted that boundaries share landscape designations and mineral buffer zones.</p> <p>The neighbouring authorities' preferred strategies could have an impact on the role and function of the authority and influence the strategy. It is important the authority provides evidence of collaborative working for example on housing, infrastructure; utilities e.g. recorded meeting notes, to ensure a robust evidence base.</p>	<p>Ensure evidence is provided on the areas of joint working identified both within the authority and external organisations.</p> <p>Provide explanation of how the preferred strategy takes account of water/drainage infrastructure proposals and constraints.</p>

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

C2 It has regard to national policy.	
Comments	Suggested Actions
<p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p>See comments under soundness tests CE1 & CE2</p>

C3 It has regard to the Wales Spatial Plan	
Comments	Suggested Actions
<p>The LDP strategy is considered to have had regard to, and to be broadly in line with, the Wales Spatial Plan.</p>	<p>To note.</p>

C4 - Has regard to the relevant community strategy/ies.	
Comments	Suggested Actions
<p>Appears to do so, 2.0.13 – 2.0.16 identifies the community strategy as a key document and identifies key objectives.</p>	<p>To note.</p>

Neath Port Talbot LDP

Annexe to letter 17th October 2011

Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities

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CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base

Comments	Suggested Actions
<p>Document structure and presentation</p> <p>The structure of the document would benefit from the cross referring to background documents where required.</p>	<p>Key objectives should be numbered and cross references to strategic and development management policies in the Deposit Plan.</p>
<p>Evidence Base</p> <p>A number of studies in the evidence base are not yet completed or need to be reviewed; most notably the FCA and LHMA review. Should any fundamental aspects of the strategy change when the evidence is finalised, the Authority in preparing the next stages of the plan should make it clear where such changes occur</p> <p>We note the list of 'possible' SPG and masterplans (Section I)</p>	<p>Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic site take up and other changes.</p> <p>Information on the SPG programme should be provided in the deposit plan including timescales for its preparation. SPG adopted under the UDP should be reviewed or updated to ensure that it is in line with the preferred strategy of the LDP.</p>

Neath Port Talbot LDP Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

<p>Vision and Objectives - Issues and alternatives paper (Spring 2009)</p> <p>The vision identifies the importance of the waterfront and coastal corridor, and notes the natural resources and renewable energy potential. Notably the Welsh language is mentioned as significant and is linked to the key issues. However the vision does not clearly state how the importance of these issues translates onto the ground, in terms of the form and function of places will be at the end of the plan period from a land use perspective.</p> <p>While the vision contains some locally specific elements, it could be more descriptive of the communities as they would look at the end of the plan period in terms of the land use planning changes envisaged.</p> <p>The objectives are similarly non-specific in terms of location and could have been more focused to help deliver the vision.</p>	<p>Consider amending the vision to make it locally distinctive and enable the LDP objectives to be clearly related to the vision.</p>
<p>Strategic Spatial Options</p> <p>Four spatial options have been considered.</p> <ol style="list-style-type: none"> 1: Continue with UDP Strategy 2: Focus new development, investment and services along the M4 corridor 3: Promote Significant Growth in Valleys Communities; 4: Focus new development on the coastal / M4 corridor whilst reinvigorating the Valleys Communities. <p><u>(The Preferred Option)</u></p> <p>It is not clear how effective the UDP strategy has been to date and why the strategy is no longer appropriate for the LDP.</p> <p>Option 4 attempts to re-invigorate valleys communities through intervention and allocations. The percentage split between the valleys and coastal strip is unclear of how much and in what location, this</p>	<p>Ensure that the selection of a preferred spatial option is clearly and firmly founded on robust evidence, and that the role of stakeholders in developing it is appropriate; and that it is clear in how it will achieve the plans objectives.</p> <p>Consider providing more clarity on why the UDP strategy is no longer appropriate for the LDP.</p> <p>Ensure adequate clarity on how the</p>

Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

Annexe to letter 17th October 2011

<p>should be clarified further in the Deposit Plan. Once this information has been identified, It will be necessary to fully explain how development in the valleys will come forward given the past low demand and low built rates and the implications for the plan strategy if it does not occur as expected.</p> <p><u>Settlement Strategy (Policy 1 & 2) Settlement Strategy Topic Paper</u></p> <p>Local Level – within walking distance, open space, green space, local shop, community facilities.</p> <p>Community Level – wider range, will include district centres “which the deposit plan will identify”</p> <p>Town Level – wide range including transport hubs, focus for larger scale development due to wider catchment areas and good transport links.</p>	<p>options selected are realistic options for meeting the plan objectives.</p> <p>A detailed review of settlements must ensure the strategy is robustly evidenced and establish the level of growth that can be accommodated at each tier. The capacities for development within various settlements need to be evidenced and clarified in the Deposit Plan.</p>
<p>Growth Options (Chapter 5 / Population & Housing Background Paper)</p> <p>Seven growth options have been considered in order to inform the strategy. A ‘moderate growth option’ has been chosen which assumes an annual change in population of +158 which results in a housing requirement figure of 6,279 dwellings (2011-2026).</p> <p>This is a massive decrease from the +246 percentage change (4,290 dwellings) as set out in the WG’s 2008 projections. Past build rates have been used as a key reason for deviation from the WG projections in addition to a recent trend (since 2009) of population decline (-33) in the Borough.</p> <p>The evidence to explain such a deviation from WG projections to this degree is not clear; given that this trend is a recent one and longer trends, from 2001, suggest a population increase.</p> <p>It is not clear whether the strategy sufficiently addresses the issues of an aging population, the need and provision of affordable housing, and implications of a reduction in household size, as highlighted in the key issues. For example the interaction between employment and housing provision could be better</p>	<p>Ensure clear evidence is available to explain how growth level predictions have influenced the selection of the preferred strategy.</p> <p>The deposit LDP should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced in accordance with national policy; - include a robust affordable housing target; - provide threshold(s) to deliver affordable housing and clarify the

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

explained

The disparity between the low growth rate chosen and the trends indicated above need to be fully explained and based on a robust evidence base in order to justify the growth option. Whilst past build rates should be a factor in informing the housing requirement, others influences such as what the industry could deliver in the future, key regeneration sites/policies within the plan, changing economic circumstances and the relationship to delivering affordable housing should also be a key considerations. The justification of the spatial strategy needs to be explored further to explain the implications of little or no demand in the valleys areas which could affect housing delivery over the plan period and, depending on the proportion of housing to be provided there, the implications for housing provision as a whole.

Given the positive aspects of the plan such as key regeneration areas of Baglan Bay, Coed Darcy and University Site at Fabian Way. Is the anticipation of low net population growth and subsequent plan for a decline likely to become a self fulfilling prophesy and therefore would it not be more prudent to plan for a greater level of growth to encourage a virtuous cycle of development and growth across the county?

It is noted that Policy 5 makes provision for 7320 new dwellings in order to deliver the 6280 new dwellings required to meet the moderate growth strategy.

There appears to be an inconsistency with the allocation figure. Should it be 6649 and not 6280? $6649 + 10\%$ flexibility allowance = 7319. The windfall figure needs to be included in the housing requirement of Policy 5.

6279 is based on past build rates over 10 years. Is it appropriate to project this forward?

LHMA notes a figure of 2400 affordable homes, of which 70% is for 1 bed dwellings. Notes that since 2009 market has changed and needs to commission another one, if this is the need, it is not clear whether a density of 30 dwellings per hectare would achieve this.

reasons for them with suitable viability studies;

- evidence collaborative working with neighbouring LPAs in identifying housing requirements;
- Clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.

Neath Port Talbot LDP

Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

It is noted that a regional housing apportionment exercise has not been undertaken.	
<p>Strategic Policies</p> <p>There are too many strategic policies, and many of them resemble a UDP approach to plan making. Many of the strategic policies are generic and do not address specifically how the strategy will be delivered. Strategic policies are currently not linked to the objectives.</p>	<p>Reconsider the need to redraft strategic policies for greater relevance and local focus; add necessary detail from the emerging evidence base.</p> <p>Ensure the policies provide clear requirements as to how the spatial strategy will be delivered.</p> <p>It would be helpful to cross reference the strategic policies to the plan objectives and allocations within the Deposit Plan.</p>
<p>Agricultural land</p> <p>We note that the LDP's current spatial options are unlikely to affect best and most versatile agricultural land and we would wish to retain this position.</p>	Ensure agricultural land quality is taken into account in site selection.
<p>Climate Change (and Test C3)</p> <p>It is not clear how the proposed policies address the climate change strategy. The strategy does not establish a baseline for successful implementation and treats the issue in a superficial way. It does not give an indication of what measures will be looked for and how and when they will be sought in relation to the preferred strategy.</p>	Give consideration to the impacts of climate change and the adaptation responses with regard to; floodplain / coastal risks / water management,

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

	<p>biodiversity, green/open spaces and the historic environment in the location and design of new developments.</p> <p>Provide clear evidence of how climate change (including flood risk and coastal change) has been taken into account and affected the development of the preferred strategy</p>
<p>Design</p> <p>The approach to design is not clear. Policy 3 on sustainable development could have included the provisions of policies 6 and 34 dealing with strategic design issues in a more holistic way. Better explanation could have been provided about how policy 3 will assist in delivering the preferred strategy.</p>	<p>Assume that deposit plan will clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).</p>
<p>Employment/Economy</p> <p>The strategy indicates that its focus is on utilising existing employment land, including UDP allocations. The PS notes there is an over supply of employment land in Neath Port Talbot.</p> <p>PS states that existing UDP commitments will be more than sufficient to meet the jobs needed to meet the moderate growth option. The focus for employment is proposed around the M4. There is a focus on large employers and heavy industry. Policy 14 notes the Strategic Employment Sites.</p>	<p>Consider providing more clarity on why the UDP employment sites are considered appropriate for the LDP Strategy.</p> <p>The deposit plan and its evidence base should:</p>

Neath Port Talbot LDP

Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

<p>Have the UDP allocations been appropriately reviewed to ensure they are still relevant to the new strategy given there is an over allocation of employment land in the PS? It is noted that many of these allocations may be unsuitable for reallocation due to flood risk and other constraints.</p> <p>Employment land bank: The authority allocated 486.42ha of employment land in the UDP of which 312.60ha remains available.</p> <p>The background paper notes that over the past 9 years, however, only 56.12ha of employment land has been developed which equates to 6.24ha per year. If past trends continue over the next 15 years then 93.6ha of land would be required (6.24 x 15 years). Does this justify the large allocation proposed in the PS? Is this amount of employment needed to deliver the strategy?</p>	<ul style="list-style-type: none"> - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - Clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.
<p>Gypsies and Travellers (Policy 8)</p> <p>Lack of an up to date Gypsy /Traveller Housing Needs Assessment creates a distinct gap in the evidence base.</p> <p>Draft Policy 8 needs further development; including site allocations (if applicable) and an criterion based policy will also be needed (see paragraph 25 and Annex B to WAG Circular 30/2007). The possible development at Caergarw Farm, Margam would be within one of the few places within the plan area where best and most versatile agricultural land can be anticipated. Depending where the policy 14 development is actually to take place, and the extent of the development as to the significance of the agricultural constraint, it is possible that PPW 4.9.1 may need to considered within the site allocation process.</p> <p>The specific possible consequences on the two existing Briton Ferry Gypsy caravan sites, flowing from the proposed redevelopment scheme, need to be addressed. The views of Gypsy /Traveller community and any candidate sites suggested by them need to be addressed (see paragraphs 15 and 18 of same circular).</p> <p>Joint working with other local planning authorities also needs to be addressed (see paragraphs 10 and</p>	<p>Ensure that the required Accommodation Needs Assessment (ANA) for Gypsy and travellers informs LDP preparation.</p> <p>Ensure appropriate site(s) are identified in the deposit plan (both permanent and transit) along with an appropriate criteria based policy. The new LHMA will be essential to inform a robust evidence base.</p>

Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

<p>23 of same circular).</p> <p>Unclear what actual site is being referred to in the comment quoted in paragraph 5.22.7 of the Topic Paper "Population & Housing" . But, in the case of Travelling Show people, the provision usually sought is land for use as "extended" winter quarters (see paragraphs 2-6 and 14-16 of Welsh Office Circular 78/91). "</p>	
<p>Affordable Housing (Policy 7) – Affordable Housing Viability Study (2011)</p> <p>The PS states that since 2009 trends have changed, as a result the LPA intends to commission a new LHMA to clarify the current position. It is disappointing that the current LHMA background paper is not currently on the web site. It would aid clarification of the housing need and how this has informed the housing figures in the PS. It is essential that this work is completed in order to inform robust housing policy.</p> <p>Six different thresholds have been identified over the plan area. 25% in Neath & Port Talbot, 20% in Pontardawe, 10% in Valleys areas.</p> <p>Page 6 of the background document notes the identified affordable housing percentages in the Swansea and Amman Valley and the Afan Valley are at <u>0%</u> affordable housing requirement based on the viability work. The PS, p103 states 10% in these areas. Which figure is correct? There are no thresholds in the PS this will be considered at Deposit Stage, although there is some indication of thresholds/commuted sums (p122 of background document)</p> <p>The viability work suggests that densities of 30dp/h will increase affordable housing in general.</p>	<p>The LHMA will need to be updated in order to provide a robust evidence base.</p> <p>Consideration should be given to the inclusion of policies on windfall sites, rural exceptions site policy and the allocation of sites for 100% affordable housing.</p> <p>Consider mix and balance of house types and size to cater for a range of housing needs and contribute to the development of sustainable communities.</p> <p>Consider whether to develop a phasing policy to ensure a spread of development throughout the plan period.</p>

**Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

Annexe to letter 17th October 2011

<p>Minerals - Policies 22, 23 &24 (Topic Paper Minerals, Sept 2011)</p> <p>Valleys areas contain coal, stone and aggregate resources of national significance. Extraction provides employment opportunities, buffer zones will be drawn. The deposit plan will identify buffer zones, settlement protection zones, and safeguarding. Existing major aggregate quarry located to east of Brycoch and Cwm Nant Lleici Quarry. A buffer zone will be drawn around Gilfach Quarry</p> <p>The Deposit LDP should ensure that a landbank for aggregates is maintained and safeguarded having regard to the RTS; mineral resource is safeguarded up to settlement boundaries; efficient use of materials is considered.</p> <p>Mineral safeguarding and mineral allocations for working will need to be shown on the proposals map; the plan needs to be as clear as possible as to areas where coal should not be worked in the plan period.</p>	<p>Ensure clear evidence is provided on how mineral supply and safeguarding has affected the development of the preferred strategy.</p> <p>The deposit plan should:</p> <ul style="list-style-type: none"> - adequately safeguard mineral resources in line with national policy and consistently across boundaries with neighbouring LPAs; - adequately provide for the contribution to aggregates production over the plan period identified in the RTS; - be as clear as possible as to areas where coal should not be worked; - include Buffer Zone and dormant site requirements; - clarification on serving prohibition orders would be of assistance; - be supported by robust background evidence.
<p>Renewable Energy - Policy 25 (Renewable & Low Carbon Energy Topic Paper, Sept 2011)</p> <p>While the authority may be seeking to restrict wind turbine development outside SSA the strategic policy unduly concentrates on this and does not seek to promote alternative renewable sources promoted in its topic paper.</p>	<p>Clarify how renewable energy resources will be promoted through the preferred strategy.</p>

Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

<p>Transport / Infrastructure</p> <p>Transport is not set out as a specific policy within the PS. It would be beneficial to provide greater detail within the Deposit Plan noting the key transport infrastructure that will be required to meet the Strategy, and the various funding/planning obligations mechanisms (if this is the case) in order to deliver the key projects. (para 7.0.13)</p> <p>Reference to the importance of the M4, A465, Rail and the Docks and the importance of these regional links.</p> <p>The focus of Housing and Transport are aligned along the M4 improving access to employment and reducing the need to travel. Settlement Strategy aims to promote more sustainable travel patterns and reduce car dependency.</p>	<p>It would be beneficial to provide greater explanation within the Deposit Plan noting the key transport / infrastructure that will be required to meet the Strategy, and the various funding/planning obligations mechanisms (if this is the case) in order to deliver these key projects.</p>
<p>Waste – Policy 21 (Waste Topic Paper, Sept 2011)</p> <p>Policies and proposals should be based on evidence, including;</p> <ul style="list-style-type: none"> - why the sites have been chosen for the location of suitable waste facilities; and - The ability of the sites to accommodate site waste management facilities required to meet regional and local needs (e.g. suitability and availability). <p>Sites allocated for waste management in the LDP should be identified on the proposal map.</p> <p>Policies proposing any major new development should incorporate adequate and effective waste management facilities.</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - be supported by background evidence; - Identify sites for local and regional waste facilities.
<p>Water management / Flooding</p> <p><u>Flooding policy</u></p> <p>The Candidate Site assessment methodology includes reference to flood risk. The location and topography, tidal and river flooding are noted as particular issue/objective for the plan to address. The PS (p19) states that significant areas of the coast fall into zone C2 together with the valleys areas. Flood risk areas are identified on the constraints map (10.2)</p>	<p>Provide clear evidence of how flooding policy has been considered in the development of the preferred strategy and strategic site selection.</p>

Neath Port Talbot LDP
Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

Annexe to letter 17th October 2011

<p>Climate Change and Environment Topic Paper (Sept 2011) (Includes FCA) notes there are key regeneration and employment areas on the coast that will be subject to Zone C flood risk. A detailed FCA will be undertaken on at risk sites in order to justify development proposals. This work will inform the Deposit Plan.</p> <p>It is very important that those studies take place and that appropriate action is taken in relation to each site identified if we are to support the final plan</p>	<p>Clarify how the candidate site assessment methodology will respond to sites vulnerable to flooding.</p>
<p>Welsh Language (Policy 32) - (Welsh Language Topic Paper (Sept 2011))</p> <p>The Welsh Language has been highlighted as a key issue in many of the Valley communities. Para 1.3 page 46 notes the Welsh Language Development Area within the Borough consisting of Brynamman, Gwaun Cae Gurwen, Cwmllynfell and Ystalyfera. The deposit plan will identify these areas of linguistic importance.</p>	<p>Ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>

CE 3 There are clear mechanisms for implementation and monitoring	
<u>Comments</u>	<u>Suggested Actions</u>
<p>Implementation and Delivery</p> <p>The deliverability of the preferred option has not really been addressed in the Preferred Strategy. When developing the deposit plan more consideration should be given to this matter, with clarification of what infrastructure is critical to the delivery of the strategy (versus what is desirable), and how it will be delivered, including timescales for implementation, and impacts on the delivery of affordable housing should also be fully explored. There is an indication flooding and other key issues will need to be considered, however these have yet been fully explored; these may prejudice the delivery of the spatial growth strategy in certain areas and affect the soundness of the plan. Section 106 priorities should be made clear.</p>	<p>The monitoring framework within the Deposit Plan should include key targets and links to strategic objectives. Indicators should be locally distinctive and linked to the key issues.</p> <p>Consider whether to develop a phasing policy to ensure a spread of</p>

Neath Port Talbot LDP**Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response**

<p>A monitoring framework (Chapter G) has not been included as part of the PS. The key indicators as noted in the LDP Manual have been listed. Targets have not yet been established; there are no links to Strategic Objectives; indicators are generic, with limited local distinctiveness or links to the identified key issues.</p> <p>A developed monitoring framework should consider plan objectives, strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets (along with directions of travel and milestones), phasing and indicators. Contingencies and triggers for review should also be considered. Ensure that WG core indicators are included.</p>	<p>development throughout the plan period.</p>
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CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
<p>The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p> <p>At present it is difficult to assess whether the PS is sufficiently flexible given that key elements of many policy areas have not yet been finalised.</p>	<p>Ensure the strategy and deposit plan is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>