

Strategic Development Plan (SDP)  
Regulations Consultation  
Plans Branch  
Planning Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Dear Sir/Madam

**Re: Response to Welsh Government consultation: The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021**

Thank you for consulting on the above document. The draft document was discussed at the Council's Strategic Planning Group meeting on 25<sup>th</sup> November 2020 and Members expressed concern that the development of a Strategic Development Plan could undermine local democracy, with concerns that decisions about growth taken at the Corporate Joint Committee strategic level would be imposed on individual local planning authorities rather than agreed. They also raised issues relating to costs and the availability of resources to support the development of Strategic Development Plans.

Detailed responses to the consultation questions are set out below:

**Q1 Do you agree the SDP Regulations should broadly mirror the key stages and plan preparation requirements set out in the LDP Regulations, subject to the exceptions referred to? If not, please explain why**

Council's Response: The proposed process and procedures in the consultation document broadly mirror the LDP process, which is welcomed as it demonstrates a consistent approach and allows for independent examination of SDPs. The Council would question the assumption that four years is sufficient to prepare an SDP given the scale of SDPs and the inevitable challenges of engaging effectively with local communities and securing the consensus of seven different local planning authorities.

**Q2 Do you agree with the proposed approach to the Community Involvement Scheme (CIS) and Delivery Agreement (DA)? If not, please explain why**



Council's Response: The challenges and resources required to engage effectively across the region are likely to be significant and should not be underestimated.

**Q3 Do you agree with the list of general and specific consultation bodies listed in Annex 1? If not, who else do you think should be considered for inclusion and why?**

Council's Response: The requirement to consult with relevant local planning authorities and community councils is welcomed, however the list of consultation bodies should be expanded to include:

- City, Town & Community Councils (only Community Councils referred to)
- Telecoms Infrastructure Providers,
- Emergency Services
- Transport Operators (not just rail)
- Local/regional Environmental Groups
- MPs/MSs/County Councillors
- Higher Education / Further Education
- AONB Joint Advisory Committees

**Q4 Do you agree with the two stage preparation and consultation approach proposed at Preferred Strategy and Deposit? If not, please explain why and what alternative approach you would suggest?**

Council's Response: These stages mirror the LDP process and the Council would generally support this approach, however experience from working on Denbighshire's LDP has shown that publication and consultation on a 'Candidate Sites Register' alongside publication of the Preferred Strategy leads to much confusion and misunderstanding over the status of 'candidate sites'. It is suggested that publication of the Candidate Sites should not take place at the same time as the publication of the Preferred Strategy. One option could be for the call for candidate sites to take place after the publication of the Preferred Strategy. Those wishing to submit candidate sites could then do so in the knowledge of the draft strategic approach proposed. In addition, there should not be scope for the submission of additional candidate sites after the formal 'call for sites' unless there is a requirement and a specific request for additional sites from the CJC.

**Q5 Do you agree with the particular elements of the procedures and requirements proposed for SDP preparation including proposals from pre-deposit to Deposit stage? If not, please explain why**

Council's Response: Again, these stages mirror the current LDP process, however as already raised there are likely to be challenges in ensuring effective public involvement across the North Wales region.

Further guidance on the relationship between an emerging SDP and development of new LDP 'lites' would be helpful, particularly in terms of timing. An SDP will carry no weight

until it has been examined and adopted therefore would local planning authorities have to wait until the SDP has been adopted before embarking on development of an LDP 'Lite'? This is unlikely to be an issue for Denbighshire's Replacement LDP as adoption is anticipated before work on an SDP is likely to start. However, it could be an issue for other authorities.

**Q6 Do you agree with the proposed approach for submission, examination and adoption of an SDP? If not, please explain why**

Council's Response: These again mirror the present LDP process and again the main concern is with the assumption that these stages and processes will operate as for an individual LDP now, as the only difference is one of scale. This could be a significant difference. Also given that the SDP will focus of establishing growth levels and its distribution across a sub-region, the point made earlier about examining the Preferred Strategy in its own right should be given consideration.

**Q7 Do you agree with the proposed approach to monitoring, review and revision of an SDP? If not, please explain why**

Council's Response: This process mirrors present practice and would be acceptable in principle, however, further clarity regarding the links to LDPs and LDP monitoring would be helpful.

**Q8 Do you agree with the proposed approach for SDP withdrawal? If not, please explain why**

Council's Response: Further clarity on the relationship between an emerging SDP and any emerging LDPs would be helpful, particularly with regard to the consequences for emerging LDPs if an SDP was withdrawn before submission.

**Q9 We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please report them**

Council's Response: There are concerns that the development of a Strategic Development Plan could undermine local democracy, and that decisions about growth taken at the Corporate Joint Committee strategic level would be imposed on individual local planning authorities rather than agreed. There are also concerns regarding the costs and availability of resources to support the development of Strategic Development Plans.

Yours sincerely

**Councillor Mark Young** Lead member for Planning, Public Protection and Safer Communities.

