

**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: Whilst it is logical to follow a process now established for the production of a full LDP, the Council would question a number of assumptions made about the efficiency of operation and implementation of the present LDP regulations which will be similarly applicable for the proposed SDPs. In the main this relates to the assumption that four years is sufficient time to prepare an SDP in line with all of the proposed key stages in the process, including evidence gathering, community and stakeholder engagement, formal public consultations, and examination. This is particularly in the context that the wider public engagement across North Wales will need to understand what an SDP is, how it relates to them and their local communities, and the relationship between SDPs and LDPs.

**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 assumption that the ability to engage adequately on an SDP in the same way as an LDP is simply one of a difference of scale, seriously underplays the nature of the task, the resources required to do this and the logistical, governance and engagement challenges. The difference in scale is significant and is therefore key to delivering a successful SDP and should not be underestimated not least, for example, in securing public and political commitment from the seven Local Planning Authorities.

**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: This is a short, generic list when compared to that contained in most LDP Delivery Agreements. Omissions include:

- PINs
- Cross border i.e. English authorities
- Town Councils (reference is made to Community Councils only)
- Telecommunications Infrastructure Providers
- Emergency Services
- Those with licenses granted under the Gas Act 1986
- Business Interests Groups/Chamber of Commerce
- Access Fora
- Transport Operators (other than just trains)

- Local/regional Environmental Groups
- MPs/AMs/County Councillors
- Professional Bodies
- Higher Education / Further Education

**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: The Council does not disagree with this as it has followed this process for its LDP. That said, and to avoid the possibility of the strategy being found 'not sound' at the examination stage and therefore the whole plan, has any thought been given to examining the Preferred Strategy for soundness, before a plan is allowed to progress to deposit? An early test of the soundness of the Plan's strategy could be beneficial as a matter, such as regional housing apportionment, will be a major aspect of the SDP. An early examination before the plan progresses too far, assuming that its content at deposit is as broad as the scope of LDPs presently could be productive and save time later in the SDP process.

**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: The stages mirror the current LDP process but the concerns raised earlier relating to the significance of the difference in scale are relevant, particularly the ability of a CJC to ensure "effective public involvement" across such a geographically extensive North Wales sub region, as well as then accounting for the economic, social and environmental diversity within the sub region.

Equally, the call for strategic locations and sites will be difficult to manage as well as the subsequent level of assessment including background studies and evidence gathering, required to demonstrate the viability and deliverability of such strategic sites, sufficient for the SDP to be found sound.

There may well also be the sense that decisions about growth taken at the CJC strategic level will be imposed on individual LPAs rather than agreed, despite the intended remit and governance arrangements for CJsCs.

In terms of the relationship between an emerging SDP and the position that LPAs have reached with LDPs or reviews, the assumption that has to be made by LPAs is that they will have to await the preparation and adoption of an SDP to set the context for the preparation of LDPs or 'lites', particularly as an SDP will carry no weight until examined

and adopted. This could lead to local 'policy gaps' and lead to pressure for speculative un-planned development. Further guidance will be needed on this relationship.

It is also not clear how the other functions of the CJC – Transport and Economy – will relate to the preparation of an SDP in terms of, for example, aligning the preparation of a Regional Transport Infrastructure Plan to identify the infrastructure needed to support the strategic growth being proposed in the SDP.

**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, with the only difference being 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: Whilst the process mirrors present practice and would be acceptable in principle, there are a number of increased uncertainties, even if an SDP is examined and found sound, to do with the implementation and deliverability of strategy development and sites, not least their lead-in times. This will depend on the location, the particular LPA the sites are in, and the policy context below SDPs.

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

Council's Response: The main concern relates to the uncertainty of the relationship between an emerging SDP and the position with emerging LDPs or 'lites' within the CJC and the consequences for those plans if an emerging SDP were withdrawn prior to submission? Much clearer guidance is needed on this and the relationship of SDPs to LDPs.

**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: Clearly it is acknowledged that it takes time to set in place the necessary regulations to govern the production of an SDP and the relationship of this

responsibility to the proposed CJsCs. Notwithstanding the fact that the Council is supportive of the principle of establishing SDPs in Wales, the regulations alone generate many unanswered questions at this stage, some of which the Council has tried to reflect above from its perspective. The following table also reflects some of the 'pros and cons' that occur to the Council prompted by this consultation and highlight the need for greater supporting guidance and explanation to assist in better understanding SDPs, and their relationship to LDPs going forward.

## **Pros and Cons of proposed SDP Process**

### **Pros**

- Provides an agreed regional baseline for housing provision and apportionment to inform LDP 'Lites';
- Agreement of a set of regional strategic planning policies to save repetition in LDPs
- Scope to define and prioritise regionally the main issues that an SDP strategy should lead or focus on;
- Consideration of strategic locations and sites for growth and their prioritisation across North Wales;
- Facilitate the delivery of the North Wales Growth Deal priorities where there is a land use implication;
- Opportunity to consider infrastructure requirements at a regional scale to support growth and their integration at the SDP strategy stage e.g. integrated planning and transport strategy for North Wales;
- Creation of a regional dedicated SDP Planning Team to lead on production of the SDP and co-ordinate with individual LDP production;
- Speeds up the future provision of an up to date LDP in each LPA area.

### **Cons**

- Is 4 years to produce and adopt an SDP realistic given the range of community and political considerations to take into account across all the North Wales authorities?
- Who would be the lead authority to host the SDP 'team', reporting then to the CJC?
- What size of team would be required to produce the SDP?
- Would each LPA contribute to resource this team?
- How much would it cost to produce an SDP?
- What would be the scope of topics covered by the SDP as to support LDP 'Lites' then the SDP should cover the full range of policy issues covered currently in LDPs?
- How would the CJC ensure effective and co-ordinated community engagement across North Wales?
- How would current LDP timetables in each LPA be aligned to the production of an SDP?
- Does an SDP carry any weight before it is examined and adopted?
- How does the requirement to prepare an SDP affect LPAs currently reviewing their LDPs?