



RTPI Cymru

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18 December 2020

e-mail response sent to: planconsultations-b@gov.wales

Dear Sir/Madam,

Response to: Establishing the Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 25,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,300 members. The Institute seeks to advance the science and art of planning, working for the long-term common good and well-being of current and future generations. The RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Thank you for the opportunity to respond to the above consultation. Our response to the consultation questions is set out below.

If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

Dr Roisin Willmott OBE FRTPi
Director
RTPI Cymru

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?	X
	To assist with your response please see paragraphs 4.1 - 4.4 of the consultation document	

	Agree	X
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	Disagree	
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If not, please explain why

While we broadly agree it would seem sensible for the Strategic Development Plan (SDP) Regulations to mirror the key stages of plan preparation, we have a number of comments to make in relation to this through our response.

Firstly, we believe that the difference between an SDP and Local Development Plan (LDP) is much more than an issue of scale. There will be a number of challenges that will arise including resourcing, logistics, governance, engagement etc that working across a region presents. There will be a particular challenge around securing public engagement, political commitment and collaborative working at this level. Adequate support and resources are vital in delivering this agenda.

Q2	Do you agree with the proposed approach to the Community Involvement Scheme (CIS) and Delivery Agreement (DA)?	X
	To assist with your response please see paragraphs 4.6 - 4.7 of the consultation document on SDP Stage 1	

	Agree	
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	Disagree	
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If not, please explain why

In terms of the process as a whole, we have the following comments to make:

Regarding the proposed time frame, we question if four years to prepare an SDP is realistic given the reality of preparing LDPs in Wales, this is particularly relevant to the first SDP. The evidence gathering and consensus building and engagement alone, across multiple Local Authorities could prove considerably more difficult in comparison to one Local Authority preparing an LDP. Similarly, the volume of representations, proposed sites etc could require additional time and resources to adequately address.

We understand that Local Authorities often have quite different ways of collecting and producing data which would be useful in the creation of SDPs but may require time to ensure it is consistent and comprehensive etc.

We do appreciate that in terms of the time period, this may become more efficient over time and with future SDP revisions, but we feel it is likely that the first revision of SDPs could take longer than the four years. However, we appreciate to build confidence in the new arrangements and SDPs, there should be an aim to adopt them as close to the four year timescale as possible. This could be achieved by providing an upfront investment in resources and drawing in expertise where appropriate.

SDPs must be prepared on a foundation of consensus and cooperation, with Local Authorities working together to build trust and enable difficult strategic decisions to be made. Councils will need to form a strong relationship with Corporate Joint Committees (CJC) and consider and agree regional plans prior to agreement by CJs. This is important for ensuring appropriate buy-in from Councils and to avoid collaboration breaking down in the long-term. (See our response to Regulations to Establish Corporate Joint Committees <https://www.rtpi.org.uk/find-your-rtpi/rtpi-nations/rtpi-cymru/policy-and-research/>)

Given the scale of an SDP, consideration should be given to ways of avoiding the Plan being found 'unsound' at the end of the process. A proposal that has been put forward by the industry to overcome this, sets out a suggestion of a two-stage approach to examination for SDPs, so that the SDP Strategy could be tested for soundness at an earlier stage, through an examination, with the detailed plans, policies and proposals follow.

Earlier security regarding soundness could also have the additional benefit of providing some degree of certainty to developers, investors, communities and those authorities preparing LDPs and LDP Lites in accordance with the SDP.

Clear guidance on SDP preparation is vital to ensure that the plans concentrate only on strategic level matters in both content and consultation. This in turn requires further clarification on the relationship between SDPs and LDPs/LDP Lites to ensure that the right plans are addressing the issues appropriate to that level/tier and there are effective links between them.

Q3	Do you agree with the list of general and specific consultation bodies listed in Annex 1?	X
	To assist with your response please see paragraphs 4.6 - 4.7 and Annex 1 of the consultation document	
	Agree	
	Disagree	
If not, who else do you think should be considered for inclusion and why?		
<p>The following omissions are noted:</p> <ul style="list-style-type: none"> • Cross border authorities, including English border authorities and equivalent consultation bodies in England, including the Environment Agency, etc) which should be usefully consulted, particularly given the strategic nature of the SDP; • Town Councils (only Community Councils noted); • Access groups; • Environmental groups; • MPs/MSs/Councillors. • Business interests such as house builders, the Confederation of British Industry (CBI), strategic scale enterprises such as British Aerospace etc. • Representatives of the tourism sector. 		
Q4	Do you agree with the two stage preparation and consultation approach proposed at Preferred Strategy and Deposit?	X
	To assist with your response please see paragraphs 4.11 - 4.13 of the consultation document on SDP Stages 2 - 4	
	Agree	
	Disagree	
If not, please explain why and what alternative approach you would suggest?		
See above comments on 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?	X
	To assist with your response please see paragraphs 4.8 - 4.13 of the consultation document on SDP Stages 2 - 4	
	Agree	
	Disagree	
If not, please explain why		
See above comments on process		

Q6	Do you agree with the proposed approach for submission, examination and adoption of an SDP?	X
	To assist with your response please see paragraphs 4.14 - 4.20 of the consultation document on SDP Stage 5	
	Agree	
	Disagree	
If not, please explain why		
See above comments on process		

Q7	Do you agree with the proposed approach to monitoring, review and revision of an SDP?	X
	To assist with your response please see paragraphs 4.21 - 4.23 of the consultation document on SDP Stage 6	
	Agree	
	Disagree	
If not, please explain why		
Monitoring, review and revision will be as important for SDPs as they are for LDPs.		
In any review process, there should be recognition that SDPs contain strategic projects that may take many years to come to fruition. While a review should be prompted by the Annual Monitoring Report (AMR) if the Plan is demonstrably not		

working, a mandatory review should be long enough to take account of the strategic nature of the plan.

Changes to the NDF as a result of a review, could impact on SDPs. Therefore further information on the relationship between the review cycle proposed for the National Development Framework (NDF) and the SDPs would be useful.

The monitoring process should recognise the importance of measuring outcomes and going beyond the standard indicators of AMRs. Building this into the process from the outset will help monitor impact on the ground in the longer term. The RTPI's Measuring What Matters Planning Outcomes Research provides a toolkit that sets out a three stage process to measuring impact. The levels set out a progression from understanding policy effectiveness in the decision making process (Level 1), to direct physical development outcomes on the ground (Level 2), to wider cumulative direct and indirect impacts of planning (Level 3).

<https://www.rtpi.org.uk/find-your-rtpi/rtpi-nations/rtpi-cymru/policy-and-research/>

Q8	Do you agree with the proposed approach for SDP withdrawal?	X
	To assist with your response please see paragraphs 4.24 - 4.27 of the consultation document on SDP withdrawal	
	Agree	
	Disagree	
If not, please explain why		
Further information and clarification is required regarding the 'planning reasons' for withdrawal and what this might include or exclude.		
Further guidance on the impact and consequences of withdrawal on LDPs/LDP Lites would be useful.		

Q9	We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please report them	
The relationship between an emerging SDP and LDPs requires further clarification and understanding including policy gaps and the weight of emerging SDPs etc.		