

Number: **WG23293**

## **Consultation: Local Development Plans Process Review - Annex 3: CONSULTATION RESPONSE FORM**

We want to know your views on our proposed revisions to improve our Local Development Plan (LDP) guidance documents and secondary legislation.

In considering the following questions we would like you to consider whether you agree with both the principle of the proposed changes and the detail of the revisions.

Please submit your comments by **2<sup>nd</sup> January 2015**

If you have any queries on this consultation,

please email: [planconsultations-d@wales.gsi.gov.uk](mailto:planconsultations-d@wales.gsi.gov.uk)

or telephone: 029 2082 6956 / 3710; or 0300 0625426.

### **Data Protection**

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

### **Confidentiality**

Responses to consultations may be made public on the internet or in a report.

**If you do not want your name and address to be shown on any documents we produce please indicate here**

**If you do not want your response to be shown in any document we produce please indicate here**

## CONSULTATION RESPONSE FORM

### Local Development Plans Process Review (Consultation)

Date 1<sup>st</sup> October 2014 – 2<sup>nd</sup> January 2015

|  |  |  |
|--|--|--|
| <b>Name</b>  | James Caird  |  |
| <b>Organisation</b>  | Institute of Historic Building Conservation  |  |
| <b>Address</b>   | IHBC Business Office<br>Jubilee House<br>High Street<br>Tisbury<br>Wiltshire<br>SP3 6HA  |  |
| <b>E-mail address</b>  |  |  |
| <b>Telephone</b>   | 01584 876141   |  |
| <b>Type</b><br><i>(please select one from the following)</i> | Business   |  |
|  | Local Planning Authority   |  |
|  | Government Agency / Other Public Sector  |  |
|  | Professional Body / Interest Group   |  |
|  | Voluntary sector (community groups, volunteers, self-help groups, co-operatives, enterprises, religious, not for profit organisations) |  |
|  | Other (other groups not listed above)  |  |

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|-----------|--|----------|
| <b>Q1</b> | <b><u>Front-loading / alternative sites</u></b>  | <b>X</b> |
|           | With the proposed greater front-loading of the process in terms of sites and a more defined and informative Preferred Strategy, do you agree that no-one would be disadvantaged by the elimination of the 'alternative sites' stage (Regulations 20&21)? |          |
|           | <b>Agree</b>   | x        |
|           | <b>Neither Agree nor Disagree</b>  |          |
|           | <b>Disagree</b>  |          |
| <b>Q1</b> | <b>Further Comments</b>  |          |
|           | We agree with the proposal but would wish to see a fail-safe arrangement to ensure proper publicity for proposals arising in this way on the odd occasion when, through the plan review, they find their way back into consideration.                    |          |

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| <b>Q2</b> | <b><u>Review report</u></b>   | <b>X</b> |
|           | Do you agree that the LPA should prepare and publish a Review Report to justify whether a full or partial plan revision is appropriate, and that this should form part of the package of required documents at pre-deposit, deposit and submission? |          |
|           | <b>Agree</b>  | x        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |

|                                       |                         |
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| <b>Q2</b>                             | <b>Further Comments</b> |
| <p>This seems eminently sensible.</p> |                         |

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| <b>Q3</b>  | <b><u>Short-form Revision Procedure</u></b> | <b>X</b> |
| <p>Where an authority is proposing to make partial revisions to an adopted LDP and the plan strategy remains sound, do you agree with the provision of the short-form revision procedure (quicker, shorter and more proportionate)?_</p> |   |          |
| <b>Agree</b>   |   | x        |
| <b>Neither Agree nor Disagree</b>  |   |          |
| <b>Disagree</b>  |   |          |

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| <b>Q3</b>                  | <b>Further Comments</b> |
| <p>We agree with this.</p> |                         |

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| <b>Q4</b>   | <b><u>Soundness tests</u></b> | <b>X</b> |
| <p>Do you agree with the proposed package of soundness tests?</p> |                               |          |
| <b>Agree</b>  |                               | x        |
| <b>Neither Agree nor Disagree</b>                                 |                               |          |
| <b>Disagree</b>   |                               |          |

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| <b>Q4</b>  | <b>Further Comments</b> |
| <p>We agree with these subject to the promoters of excluded sites having to demonstrate how their site contributes to soundness (Manual, Sections 8.3.3 and 8.3.4)</p> |                         |

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| <b>Q5</b>  | <b><u>Integrated approach</u></b> | <b>X</b> |
| <p><b>a.</b> Do you agree that an integrated approach to incorporating sustainability appraisal (including strategic environmental appraisal) fully into LDP preparation will produce savings and reduce complexity?</p> |                                   |          |
| <p><b>b.</b> Do you agree that this integration would not conflict with any statutory process?</p>   |                                   |          |
| <b>Agree</b>   |                                   | x        |
| <b>Neither Agree nor Disagree</b>  |                                   |          |
| <b>Disagree</b>  |                                   |          |
| <b>Q5 Further Comments</b>   |                                   |          |
| <p>We support this and agree that using SA as a planning tool is sound practice. We are not aware of any statutory process that may be contravened by this approach.</p>   |                                   |          |

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| <b>Q6</b> | <b><u>Resources</u></b>   | <b>X</b> |
|           | In the LDP Regulations, do you agree with adding 'resources' as a matter to which regard must be had at Regulation 13, given that LDP strategies should be deliverable within the plan period?  |          |
|           | <b>Agree</b>  | x        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |
| <b>Q6</b> | <b>Further Comments</b>   |          |
|           | We agree with this in principle but would urge that the Manual makes it clear that, while the purpose of the provision is realism, it should not subvert the ambition and vision of the Plan as a whole. This is because the availability of funds may have short-term cycles that should not overly influence long-term plans. |          |

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| <b>Q7</b> | <b><u>End date</u></b>  | <b>X</b> |
|           | In the LDP Regulations, do you agree with adding the end date of the LDP period (i.e. the end of the period for which the LDP is planning) to the LDP sub-title at Regulation 11(1)(b)? |          |
|           | <b>Agree</b>  | x        |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |
| <b>Q7</b> | <b>Further Comments</b>   |          |

This is already best practice.

|           |   |          |
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| <b>Q8</b> | <b><u>Notice by local advertisement</u></b>   | <b>X</b> |
|           | In the LDP Regulations, do you agree with removing the requirement to give notice by local advertisement (e.g. at Reg22(5)(b); Reg23(1)(c); 24(2)(b); 25(2)(c); 26(b))? |          |
|           | <b>Agree</b>  | <b>x</b> |
|           | <b>Neither Agree nor Disagree</b>   |          |
|           | <b>Disagree</b>   |          |
| <b>Q8</b> | <b><u>Further Comments</u></b>  |          |
|           | We do not believe that the interests of publicity are best served by formal one-off advertisements in newspapers which are, generally, a declining medium.              |          |

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| <b>Q9</b> | <b><u>Consultees</u></b>                                    | <b>X</b> |
|           | Do you agree with the revised list of statutory consultees? |          |
|           | <b>Agree</b>  | <b>x</b> |
|           | <b>Neither Agree nor Disagree</b>                           |          |

|                 |                         |  |
|-----------------|-------------------------|--|
| <b>Disagree</b> |                         |  |
|                 |                         |  |
| <b>Q9</b>       | <b>Further Comments</b> |  |
|                 |                         |  |

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|---|--------------------------------|----------|
| <b>Q10</b>  | <b><u>Guidance package</u></b> | <b>X</b> |
| Do you agree with the principle of having a succinct two-document guidance package that excludes the need for <i>LDP Wales</i> ? (Please note that we will in due course be revising the public guide, <i>Planning Your Community: A guide to Local Development Plans 2006</i> , to reflect changes taken forward.) |                                |          |
| <b>Agree</b>  |                                | x        |
| <b>Neither Agree nor Disagree</b>   |                                |          |
| <b>Disagree</b>   |                                |          |
|   |                                |          |
| <b>Q10</b>  | <b>Further Comments</b>        |          |
| We agree that the number of guidance documents should be kept to a minimum to avoid the need for the comparative interpretation of sources using different forms of words.  |                                |          |

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| <b>Q11</b>   | <b><u>Errors</u></b> | <b>X</b> |
| Are there any factual errors in the revised LDP documentation? |                      |          |

|                                   |  |   |
|-----------------------------------|--|---|
| <b>Agree (yes)</b>                |  |   |
| <b>Neither Agree nor Disagree</b> |  |   |
| <b>Disagree (no)</b>              |  | x |
| <b>Q11 Further Comments</b>       |  |   |
| Not as far as we can see.         |  |   |

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|--|----------------------------------|--|
| <b>Q12</b>   | <b><u>Any other comments</u></b> |  |
| We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them. |                                  |  |
| We have nothing further to add.  |                                  |  |

**How to respond**

Please submit your comments by **2<sup>nd</sup> January 2015** in any of the following ways:

| Email  | Post  |
|--|---|
| <p>Please complete the consultation form and send it to :</p> <p><a href="mailto:planconsultations-d@wales.gsi.gov.uk">planconsultations-d@wales.gsi.gov.uk</a></p> <p>[Please include ‘<b>LDP Process Review Consultation WG23293</b>’ in the subject line]</p> | <p>Please complete the consultation form and send it to:</p> <p>LDP Process Review Consultation<br/>Plans Branch<br/>Planning Division<br/>Welsh Government<br/>Cathays Park<br/>Cardiff CF10 3NQ</p> |

### Additional information

If you have any queries about this consultation, please

Email: [planconsultations-d@wales.gsi.gov.uk](mailto:planconsultations-d@wales.gsi.gov.uk)

Telephone: Carole Doyle on 029 2082 6956,  
Elaine Ancrum on 029 2082 3710, or  
Heledd Cressey on 0300 0625426.