

Appendix 1: SDP Delivery Agreement: Comments received and Responses

Ref	Comment by	Comment Details	CJC Response to Comment	Changes to DA
1	Cllr Geraint Wynn Parry Cyngor Gwynedd	Thank you for sending me this information. As a new Councillor, I have a great interest in your organisation (CJC) and the delivery of Strategic Plans (where Transport is an important part of the main Strategic Plan itself). I'll read the Delivery Agreement in more detail and let you know. One issue that immediately stands out is your program with a very short timeline to agree a draft of the Delivery Agreement. Collaboration must be shown to accept everyone's comments if you want to avoid complaints. If you have lost time providing the Agreement, you really need to avoid squeezing the approval timing. I say this in the best spirit.	Thank you for your recent email in response to the notification of the publication of the SDP draft Delivery Agreement. In addition, its good of you to set out the interest you have in the plan going forward. Clearly you are an important stakeholder and will be kept informed as the plan progresses. Transport as you refer is a key element of the plan, both in terms of the SDP recognising specific transport schemes and projects where the land they need to happen may need protecting for example, but also in terms of recognising the importance of transport infrastructure to support the spatial strategy and main locations for future growth and development. A key source to inform this will be the Regional Transport Plan. In terms of the timing of the Delivery Agreement, there is no intention to rush its preparation and in fact the consultation that has been commenced for six weeks is not a statutory requirement but one the CJC has recognised as important in the spirit of openness and of sharing each stage of the process. In addition, the delivery agreement is a procedural document only, a plan of how the plan will be produced if you like and does not contain anything that relates to plan policy formulation or the identification of the location of development, for example. Welsh Government are aware of the stage reached with the plan and are supportive of	None

			the positive progress made by the CJC to prepare for the commencement of the SDP.	
2	Cllr Jina Gwyrfai Cyngor Gwynedd	A new Strategic Development Plan - I would like to see what attention will be given to the Welsh Communities Report and also to the Welsh Language.	Thank you for your email in relation to the Strategic Development Plan. As the SDP is an almost identical process to that used for LDPs such as your own in Gwynedd, the requirements to take account of the impact to the Welsh Language are the same as for the local Plan. This included considering the impact on the Welsh Language as part of a wider Integrated Impact Assessment to ensure that the plan is as sustainable as possible, and in line with the Wellbeing of Future Generations objectives. The CJC is already planning work to identify the scope of this assessment and the key aspects of Welsh Language impact to include within that. To inform the above, all material evidence will be referred to and that will clearly include the recent publication you refer to. Whilst the publication refers in the main to changes needed to national policy and guidance, it clearly is of relevance to the SDP process and particularly so where its recommendations result in changes to national policy and guidance which the SDP will then need to fall into line with.	None
3	Jenny Emmett Heneb: The Trust for Welsh Archaeology	Heneb: The Trust for Welsh Archaeology is not currently mentioned in the lists of consultees, but the pre-merger organisations of Clwyd-Powys Archaeological Trust and Gwynedd Archaeological Trust do appear in the lists provided by Gwynedd, Flintshire and	The CJC will ensure the contact list is updated to reference Heneb and not the old trusts – the list was compiled from those each local authority uses for its LDPs so the CJC will make the same point to the LPAs that they need to update your details.	Update the CJC SDP contact list with the amended details

		Denbighshire. To avoid confusion, Heneb should be listed as a consultee for all six of the local authorities and Eryri NPA, and references to the former regional Trusts should be removed.		
4	Jenny Emmett Heneb: The Trust for Welsh Archaeology	Heneb has a statutory role in maintaining the statutory Historic Environment Record on behalf of the Welsh Ministers, which public bodies are obliged to use in carrying out their functions, and are the archaeological planning advisors for each of the local planning authorities. To ensure we are consulted at the relevant points in the process, alongside other organisations delivering public services, it may be appropriate for us to be grouped for consultation purposes with the Specific Consultation Bodies rather than with the broader suite of special interest groups and voluntary / community organisations.	Whilst the SDP regulations are quite specific in terms of the type of consultee and who should form part of the Specific Consultee list, the CJC has nevertheless added Heneb to that list.	Add Heneb to the SDP Specific Consultee list
5	Jenny Emmett Heneb: The Trust for Welsh Archaeology	There is little mention of cultural heritage and the historic environment in the DDA, and the Historic Environment (Wales) Act 2023 is missing from the outline of relevant policy and legislation. Both the physical historic environment and intangible cultural heritage should be included in the ISA, in accordance with the integrated approach of the WBFGA 2015 and the SEA Regulations 2004.	In terms of the Delivery Agreement, it is a procedural document and not one that represents perse, actual plan content. The CJC will certainly address the lack of reference to the legislation you refer to but in terms of your point about reference to cultural heritage and historic environment, it should be borne in mind that the Delivery Agreement is a procedural document that sets out how the plan will be produced, who will be involved, and how long it will take. On this basis nothing is ruled in or out and there are key processes contained within the SDP regulations	Amend the draft Delivery Agreement to refer to the Historic Environment (Wales) Act 2023

			and a draft SDP Manual that relate to things like assembling an evidence base and scoping the content for an Integrated Impact Assessment where these issues will be considered. The SDP must also reference Future Wales The National Plan and how it deals with the issues you highlight, in order to determine how these issues may convert to policy at the strategic regional level. That is where the benefit of you now being a unified body can really help, and understanding how you feel the issues you raise could be referenced at a regional strategic planning policy level.	
6	Jenny Emmett Heneb: The Trust for Welsh Archaeology	The list of Evidence Base Documents in Appendix 1 includes a Landscape Character Assessment and Special Landscape Designation Assessment. You may be aware that Natural Resources Wales undertakes regular reviews of this nature which will be relevant, and are presently working with Heneb to look particularly at change in areas designated on the non-statutory Register of Landscapes of Historic Interest. As and when these strategic assessments are being prepared, we would like to be consulted so that we can contribute any relevant information arising from this work.	Appendix 1 of the Delivery Agreement includes a broad basis for the likely evidence that may be required to inform production of the SDP and a large part of this will be to examine what exists already, both in terms of the evidence each Local Authority has collated for their respective LDPs, and sources such as those you mention. It would however be useful if NRW were more proactive in promoting this work and that they also presented it in a wider than local context. In a recent discussion with an experienced NRW officer they referred to their frustration that it was difficult to get an overriding strategic picture of key environmental work and policy areas that form part of NRW's remit, which would be helpful to SDP work. The CJC do not see that it is the role of the SDP to collate such work or carry out strategic studies to inform NRW if that work is only being done at a local or piecemeal level by NRW, and	

			the lessons from the way the whole issue of phosphates has been handled need to be learnt also. This will form part of early engagement in terms of evidence gathering as well as informing how we scope work on things like landscape assessment as the CJC certainly do not want to simply expend public money on 'reinventing the wheel' if these assessments are already available and/or the responsibility of others to prepare.	
7	Jenny Emmett Heneb: The Trust for Welsh Archaeology	It should also be noted that, increasingly, specific assessment (known as ASIDOHL) is being required by Heneb and Cadw for Candidate Sites affecting Registered Historic Landscapes, to inform site allocation in local development plans. It is reasonable to anticipate that this may be needed when considering strategic level proposals, which have a commensurate large scope for historic landscape impact, as a complement to the LCA and SLDA.	In terms of ASIDOHL, when you say that Heneb and Cadw are 'requiring' these for candidate sites, The CJC is unclear as to how that work links to the CJC (and respective LPA) responsibility to produce LDPs and the guidance they follow in terms of PPW and the LDP manual in terms of the candidate sites process and how they select sites? What role does Heneb and Cadw play in site selection? The CJC cannot find reference to ASIDOHL in either of the national guidance mentioned? It would be helpful for Heneb to clarify how these assessments will apply to SDP candidate site assessment process.	None Heneb to clarify reference to ASIDOHL