

Cyngor Sir CEREDIGION



CEREDIGION County Council

Ceredigion Local Development Plan 2007 – 2022

Initial Consultation Report Deposit Version

December 2010

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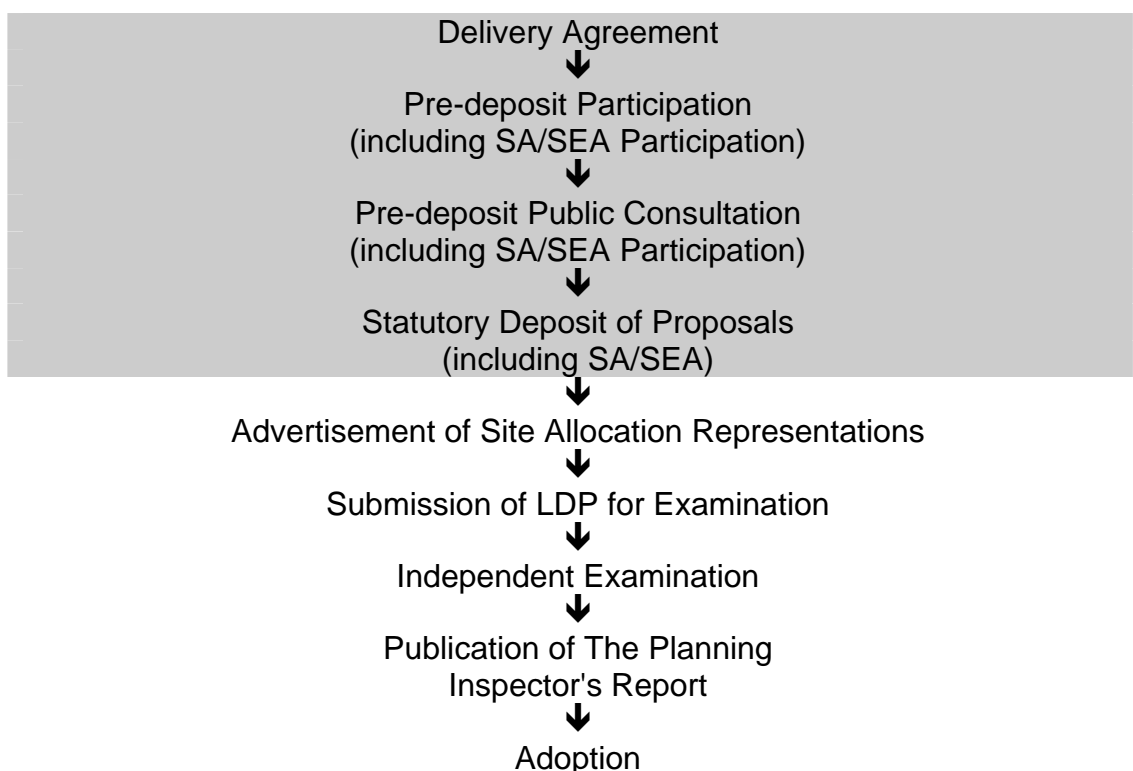
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List of Abbreviations

Abbreviation	Full
AA	Appropriate Assessment
CCC	Ceredigion County Council
CIS	Community Involvement Scheme
DA	Delivery Agreement
HRA	Habitat Regulations Assessment
ICR	Initial Consultation Report
ISAR	Initial Sustainability Appraisal Report
KSG	Key Stakeholder Group
LA	Local Authority
LDP	Local Development Plan
LPA	Local Planning Authority
NPA	National Park Authorities
SA/SEA	Sustainability Appraisal / Strategic Environmental Assessment
WAG (or The Assembly)	Welsh Assembly Government

1. Section 1: Introduction:

- 1.1 In 2004 the Government introduced 'The Planning and Compulsory Purchase Act, 2004' to change the way Councils plan for the future development needs of their communities. This new legislation places a statutory duty on all Local Authorities (LAs) in Wales to prepare a Local Development Plan (LDP) for their County. More detailed regulations regarding the process of producing the plans were set out in 'The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005'.
- 1.2 The LDP is a statutory plan which sets out policies and specific proposals for the development and use of land in Ceredigion for approximately 15 years; up to 2022. Work commenced on the Ceredigion LDP in 2007 and it was originally expected to take approximately 4 years to complete; however as with all new processes a number of LAs across Wales are finding that the process is taking longer than expected. The Ceredigion LDP is now estimated to reach adoption in late 2012. Once adopted the Ceredigion LDP will replace the current adopted Dyfed Structure Plan (alteration 1991) and the unadopted Ceredigion Unitary Development Plan Proposed Modifications Version (2006).
- 1.3 The two key LDP documents are the Pre-deposit and the Deposit Plans. The Pre-deposit (also referred to as the Preferred Strategy) was published in March 2009 and contained:
- the Preferred Strategy (including a Vision, strategic issues, aims and objectives, key policies, monitoring targets and indicators, broad locations for delivering sustainable development needs, and spatial interpretation of the strategy);
- 1.4 The Deposit Plan (December 2010) contains 2 volumes:
- Volume 1 – the Key Issues, Vision, Objectives, Strategy, Policies, Monitoring and matters in relations to implementation; and
 - Volume 2 – the individual Settlement Group Statements and the Proposals Map (including Inset Maps).
- 1.5 The Deposit consultation also includes the Sustainability Appraisal Report and Habitats Regulations Assessment Report, accompanied by this Initial Consultation Report.
- 1.6 The Local Development Plan process is briefly set out in the flow chart below, with the shaded areas representing the progress so far:



What is the Initial Consultation Report?

- 1.7 The new system of LDPs is designed to be more relevant, inclusive and engaging to local communities and to encourage a partnership approach to plan preparation involving the public, private and voluntary sectors, which should result in a strategy based on consensus. The Initial Consultation Report (ICR) provides an account of the activities of Ceredigion County Council in preparing its Deposit LDP to ensure these new objectives are met. These actions fall under Regulation 14 (Pre-deposit Participation), Regulation 15 (Pre-deposit Consultation) and Regulation 16 (Public Consultation Representations), of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.
- 1.8 The Initial Consultation Report is a supporting document to the Deposit LDP and is available for public inspection (as per Regulation 17).
- 1.9 The Initial Consultation Report refers to the CIS (Community Involvement Scheme) and identifies:
- those who were engaged in developing the LDP (Regulation 14);
 - a justification of any deviation from the CIS;
 - the main issues raised through consultation (Regulation 15); and
 - how responses have affected the policies and proposals in the Deposit LDP.

(WAG, 2006: p95)

- 1.10 The Initial Consultation Report provides evidence of the procedural soundness of the LDP; one of four soundness test categories. Tests of consistency, coherence and effectiveness refer to the policy content of LDPs, whilst procedural tests refer to the processes for LDP production. The specific test of soundness relating to this ICR document is;
- 1.11 Test P1: it has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme (CIS).

Key Question

Have all the relevant consultation/participation procedures set out in the CIS been carried out?

Evidence

- The local planning authority's CIS, as agreed by the WAG with any subsequent agreed variations;
- The Consultation Report produced for the LDP, which should show how the LPA has carried out its consultation procedures and how these relate to their CIS;
- The LDP Regulations.

Planning Inspectorate Wales, 2006:p 9

- 1.12 Following consultation at the Deposit stage the ICR will be updated and expanded upon to include representations received on the LDP at the Deposit stage and the Alternative Sites Stage consultation. The final Consultation Report will then be submitted to the Assembly, alongside the LDP, as a supporting document (Regulation 22).

How is the Initial Consultation Report Structured?

- 1.13 The document is divided into 7 sections. The second section looks at the production of the Delivery Agreement (DA) and focuses on the delivery timetable as set out in Part 3 of the DA, with respect to all aspects of the plan. This section will highlight the LA's progress in light of the agreed and subsequently amended timetable.
- 1.14 Sections 3 and 4 cover the procedures involved in the Pre-deposit participation and Pre-deposit consultation stages. These sections will show how the processes set out in the regulations and the 'Detailed Community Involvement Scheme' (appendix 2B of the DA (CCC, 2007)) were adhered to, in respect to the preparation of the main LDP plan, SA/SEA and HRA.
- 1.15 The candidate site and site allocation process will be dealt with separately in section 5. A decision has been made to handle it separately in this report, due to the scale of the process.

- 1.16 Section 6 will work through Part 2: 'The Community Involvement Scheme' of the DA (CCC, 2007) which covers the general approach to engagement as set out in the CIS. This section illustrates how the CIS has been adhered to date or if any deviations have occurred. With a brief conclusion in Section 7.

2. Section 2: The Delivery Agreement

- 2.1 The first requirement in the LDP process is the preparation of a Delivery Agreement (DA). The DA is an agreement between the LA and the Assembly to establish:
1. the timetable for adopting the plan, which is definitive for the stages up to the deposit of the plan, and indicative for the remaining stages;
 2. the resources that the Council will commit to the plan;
 3. the Community Involvement Scheme (CIS), which proposes how the Council will meet the participation and consultation requirements of the LDP Regulations in preparing, reviewing and amending the LDP; and
 4. the method by which the Council intends to deal with feedback from the consultation process.
- 2.2 A draft of the DA was issued for public consultation between 26 February and 5 April 2007, with General and Specific Consultation bodies (see Appendix 2A of the DA (CCC, 2007)) contacted directly, in line with LDP Regulation 5. The LPA also directly contacted over 550 persons who have requested to be included on the LDP database. The LPA placed advertisements in the press notifying the public of this consultation process (Cambrian News February 22nd and March 1st, 2007 and the Tivy Side February 20th and 27th, 2007). An example of the press article can be seen in Appendix 1. Advertisements were also posted on the Council's website. Fifty three responses were received to the consultation.
- 2.3 The DA was amended in the light of the responses to that consultation exercise and in accordance with regulations. Appendix 9 of the DA (CCC, 2007) sets out the main changes to the DA following the public consultation, and is replicated in Appendix 2 of this report. More detailed information on all the consultation responses and changes made to the DA has been available on the web as part of the published Cabinet and Council reports, May 15th and 30th, 2007, respectively. The final originally Agreed DA and a Summary Version have been available to view on the Council's website since the Assembly's approval on June 14th, 2007.
- 2.4 In April 2010, Ceredigion County Council reached agreement with the Assembly on revisions to the timetable for delivery of the LDP. An Addendum to the DA has been produced to set out the changes to the timetable element of the DA (CCC, 2010). The original DA slippage tolerance level of 6 months has been reduced to 3 months in the amended DA (CCC, 2010). Both the Addendum, (CCC, 2010) and the original DA (CCC, 2007) should be considered together.
- 2.5 All persons on the LDP database, which include statutory consultees were notified of the changes to the DA. Notices of changes and the new addendum were sent to all public libraries and placed on the Council's website.

The Timetable

2.6 The LDP timetable is broken down into two sections, the definitive and indicative timetables. The definitive timetable is the one over which the Council has the most control and covers the period from the adoption of the DA up until the Deposit stage of the LDP. Since the ICR covers just this period, only the definitive timetable and its addendum are shown in Table 1, in relation to the LDP documents and Table 1 in relation to the accompanying SA/SEA process. As the amended DA (CCC, 2010) retrospectively sets out the timetable, it acts as an indicator of where slippage in the original DA began to appear. Appropriate procedures in line with the regulations were undertaken when slippage became evident; the WAG were contacted which led to liaison between the LA and WAG which resulted in a new timetable agreed. Essential additional work resulting from the publication of new population and household projections during the Summer of 2010 has led to a delay in the publication of the Deposit Plan. The Plan is published in December 2010 as opposed to November 2010. This remains however within the scope of the agreed amended timetable due to the 3 months slippage built into that agreement.

Table 1: Critical stages in the LDP process up to Deposit

	Stage in Plan Preparation	Definitive Time Table (CCC, 2007)	Definitive Time Table (CCC, 2010)
1	Submission of a Delivery Agreement approved by the Council to the Assembly (Regulation 9)	June 2007	June 2007
2	Delivery Agreement agreed by the Assembly	June 2007	June 2007
3	Pre Deposit Participation: Participation with Specific and General Consultation Bodies for the purpose of generating alternative strategies and options (Regulation 14)	June 2007-August 2008	June 2007-January 2009
4	Pre-deposit public consultation - A 6 week period of public consultation (Regulation 15)	September – October 2008	March – April 2009
5	Assessment of representations received & Preparation of Deposit documents	November 2008 – August 2009	April 2009 – September 2010
6	Deposit of the LDP and related documents (Regulation 17)	September - October 2009	November 2010

Table 2. Critical Stages in the Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) process up to Deposit

Stage in SA/SEA Process	Definitive Time Table (CCC, 2007)	Definitive Time Table (CCC, 2010)
Policy review and collection of baseline information, identify sustainability issues and develop SA/SEA objectives and indicators	June – December 2007	June – December 2007
Carry out consultation with Specific Consultation Bodies on the Scoping Report (5 week consultation)	January – February 2008	January – February 2008
Publish SA/SEA of strategic options (6 weeks consultation)	September – October 2008	March – April 2009
Deposit SA including Environmental Report (with LDP) (6 weeks consultation)	September - October 2009	November 2010

- 2.7 In addition to the SA/SEA requirements, the DA stated that the LPA will also need to consider whether the LPA needs to undertake an Appropriate Assessment (AA) of the Plan under the requirements of the European Union Directive 92/43/EC (the Habitats Directive), as now set out in the Conservation of Habitats and Species Regulations (2010). This process is called the Habitats Regulations Assessment (HRA). To determine whether an AA is required, a Habitats Regulations Screening Report is done.
- 2.8 When producing the CIS the strategic direction the LDP was unknown, therefore the LPA were not aware of the effects it might have on International sites, either alone or in combination with other plans or projects. As such it was not appropriate to set out details regarding engagement to be undertaken in relation to the HRA Screening Report and if required, the AA.
- 2.9 However, subsequent to the production of the CIS, when the plan was being developed, it became clear that there was potential for the plan to have an effect on International Sites, either alone or in combination with other plans or projects. Therefore the LPA produced a HRA Screening Report both at Pre-deposit and Deposit stage.
- 2.10 There are no regulations in respect to the LDP process relating to HRA participation or consultation at any stage of LDP preparation. However, as a matter of good practice both TAN 5 (WAG, 2009) and guidance published by the Countryside Council for Wales (CCW) in 2009 and revised in 2010 (Tyldesley, 2010), encourage LPAs to inform CCW about the screening process and to provide CCW with a copy of the HRA Screening Report. The LA decided that, although

not required by the Regulations, to submit the HRA Screening Report to both CCW and make it available to the general public as part of public consultation of the Pre-deposit and Deposit Version of the LDP.

- 2.11 If an AA is required, then the Regulations state that this report should be consulted upon by the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specify. The regulations also state that the LA must also, if they consider it appropriate, take the opinion of the general public, and if they do so, they must take such steps for that purpose as they consider appropriate.

3. Section 3: Pre-deposit Participation (Regulation 14)

- 3.1 Several stages were undertaken in preparing the Pre-deposit documents before putting them out for public consultation. The Pre-deposit documents include the Preferred Strategy, Habitats Regulations Assessment Screening Report and the Initial Sustainability Appraisal Report. It must be remembered that these documents were being produced simultaneously and iteratively.

The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005

Pre-deposit participation

14. Before an LPA complies with regulation 15, it must, for the purpose of generating alternative strategies and options, engage

- (a) each of the specific consultation bodies to the extent that the LPA thinks that the proposed subject matter of the LDP affects those bodies; and
- (b) such of the general consultation bodies as the LPA considers appropriate

- 3.2 The stages in preparing the Pre-deposit documents before putting them out for public consultation are as follows;

- Evidence Gathering;
- 5 weeks consultation of the SA/SEA Scoping Report;
- Identification of Issues which the LDP needed to address and focussing in on which of these were the key ones to focus in on;
- Engaging with Stakeholders to gauge where Ceredigion should be in 15 years time – to establish a Vision for the County;
- Engaging with Stakeholders to gauge how best to address issues and the Vision through objectives;
- The consideration of options in relation to Strategies and policies that would help deliver the Objectives and hence achieve the Vision and address the issues identified; and
- Preparation of Pre-deposit proposals documents (including the LDP Preferred Strategy, the HRA Screening Report and the Initial Sustainability Report.

3.3 **Stage in the document preparation process: Evidence Gathering and Objectives**

Purpose:

Initial Policy and Strategy Review and identification of factors and drivers for change including identifying issues, and potential LDP vision and objectives.

- 3.4 In writing a development plan it is important to know what key issues need to be considered. The Key Issues relevant to Ceredigion were identified by taking into account up to date policy guidance, the local context and the opinions of individuals and organisations. The Key Issues are part of larger lists of issues, which are covered by background Topic Papers for the LDP. A Vision of Ceredigion in 2022 was written that addressed these local issues. The Vision is further supported by 18 objectives which help show how the key issues are to be addressed and the Vision achieved. This process was iterative in nature, therefore whilst following a general flow, areas were revisited where necessary.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Cabinet Member and Officer Working Group. Key Stakeholder Group	Preliminary meetings to explain LDP process, role of groups etc. Subsequently meetings and input will involve reviewing material to date, maximising information sharing possibilities, and identifying further research needs	Reports posted on website for information as and when appropriate

Who did we involve and how did we do it?

- 3.5 A Key Stakeholder Group was formed consisting of a range of individuals and organisations that were deemed to be integral representatives in the LDP process. The KSG has 25 members. The membership of this and other Working Groups was formed with an emphasis on relevance of the individual or organisations' knowledge to the key areas of plan preparation (e.g., housing, environment, shopping, tourism, economic development etc). Individuals and organisations were selected both from the Specific and General Consultation Bodies (as required by Regulation 14 of the 2005 Regulations), Council Members and officers as appropriate. The membership of the Key Stakeholder Group can be seen in Appendix 3.

- 3.6 Generally the Cabinet Member and Officer Working Group evolved to be one that involved ALL members. This decision was taken in order to improve ownership of the LDP amongst all Members and to aid with the implementation of the LDP further down the line. Workshops were held with Members to explain the new LDP process. Formal decisions remained however with Cabinet and Full Council at formal meetings. In terms of other departments, on-going liaison was seen as more productive than formal meetings. Some departments had a greater role to play in terms of assisting with the evidence base and discussing options – depending on the remit of their work and priorities.
- 3.7 The various departments of the LA are also well represented on the Officer Group which feeds into the Local Service Board (LSB). The LDP team also have a representative at the Officer Group meetings (which occur quarterly) and feedback is provided at each meeting with regard to the LDP process and progress. This information then feeds up to the LSB meetings which always follow the Officer meetings in terms of timing. Additionally the membership of the KSG is similar in terms of the organisations represented. These forums provided opportunity to educate a range of organisations and other LA Departments early with regard the LDP process.
- 3.8 The Candidate Sites process is explained further in Section 5, however as part of that process the LA held 3 meetings across the County and invited representatives to attend from each of the County's town and community councils. The LA used the opportunity not only to introduce the Candidate Sites consultation, but also to explain the new development plan process in general. The LA sought feedback from the councils as to whether they would welcome similar meeting at consultation stages of the LDP – to assist with understanding the stage of the process and how to best get involved. The LA explained that time and resources meant that visiting all 52 town and community councils would be difficult and whether the councils could support this area approach to the meeting. The feedback from the meeting was supportive of the 3 area meetings approach and that such meetings would be beneficial at key stages of the plan process.
- 3.9 On March 26th 2008 the first Key Stakeholder Group (KSG) meeting was held which introduced the LDP process and the role of this Group within it. Of the 25 Key Stakeholders invited 12 were represented on the day. Subsections of the KSG were invited to topic workshops, and in some cases formed topic specific working groups. Specific workshops included; Population and Household Projections; Local Housing Market Needs Assessments; Built Environment; Energy, Housing and Welsh Language. Workshops, these were held between March and July of 2008.

- 3.10 Throughout the process a series of small targeted meetings were held to aid evidence gathering on specific topics. Invitees to meetings varied, drawing applicable officers both internally and externally from specific and general consultation bodies
- 3.11 A Visioning Day was held, on June 6th 2008. A range of specific and general consultation bodies were invited, in addition to other representatives considered to have an interest in the LDP. Approximately 130 individuals and organisations were invited to the event, representatives from just over half confirmed they could attend, with the attendance on the day of around 60 different individuals and organisations. The day considered what the Vision of Ceredigion in 2022 should include in addition to what objectives would stem from such a Vision. This was held as a joint visioning day with the C2020 partnership, in order to form collaborative vision for Ceredigion. However, the C2020 partnership process has since been delayed, therefore it is no longer running alongside the LDP timetable.
- 3.12 To ensure the LDP addresses the key issues of young people events were held in 3 of the County's Secondary schools. Also the views of older people were sought through engagement with the 50+ forum and an awareness raising broadcast during the older peoples radio show.
- 3.13 A second meeting of the KSG was held on September 15th 2008 to feedback the key Issues that had been identified. Of the 25 Key Stakeholders invited 6 were represented on the day. In addition attendees were asked to help confirm the Issues, Vision and Objectives to be taken forward as the basis for the Preferred Strategy.
- 3.14 Feedback was given to Cabinet Members and the LDP Officers working group on June 19th 2008 on the Visioning day event, with a more general LDP briefing with Council Members on July 25th 2008.
- 3.15 The Key Issues and Vision were discussed with Council Members on September 17th 2008. The formal decision on these matters was taken by Cabinet and Council and is covered in the following section.

How was it reported?

- 3.16 Documents relating to all of the above events, with the exception of the small meetings, have been available to view on the Council's website since the time of the events. Documents include presentations, lists of invitees, agendas, minutes and notes of events. Issues papers have been available to view on the website since May 2008. In addition more detailed topic papers, from which key issues were drawn are also available to view on the website. Minutes and Reports from formal Cabinet and Council meetings are also available to view on the Council website.

How did this influence the plan?

- 3.17 There are 18 Topic Papers, covering the main elements of the Ceredigion LDP. These papers were presented as background papers (CCC, 2009) at the Pre-deposit Consultation Stage (CCC, 2009) and have been updated for presentation alongside the Deposit LDP consultation (CCC, 2010), with the addition of the Topic Paper : Candidate Site Assessment Process. These documents provide essential background information to the LDP. Of particular relevance to the ICR are Section 6, 7 and 8 of the Topic Papers (CCC, 2010). Section 6 of the Topic Papers discusses how the policies have taken into account the Issues raised through engagement and evidence gathering, with Section 7 covering the Objectives. In Section 8 there is a narrative of how the Policies have evolved through the LDP process to date.

Did we do what we said we would?

- 3.18 Yes

- 3.19 **Stage in the document preparation process:** Preparation of strategy options and assessment of alternatives

Purpose

To consider LDP Vision and Objectives and implications of evidence base.

- 3.20 There were lots of different options for meeting the 18 objectives and delivering the Vision. All the different options were checked to see how appropriate they were by discussing them with a wide range of people and checking how sustainable they would be. The best options were selected and formed the basis of the Preferred Strategy.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Key Stakeholder Group. Cabinet Member and Officer Working Group.	Initial Focus/Working Groups on draft options report to meet LDP Objectives Meeting to consider options and determine draft preferred strategy Feedback forums to comment on strategic options, assess evidence base (topic reports prepared) and options against draft preferred strategy, consider strategic sites identified.	Report events on website as and when appropriate

Who did we involve and how did we do it?

- 3.21 On July 10th 2008 a second Visioning Day was held. Again a range of specific and general consultation bodies were invited, in addition to other representatives considered to have an interest in the LDP. Approximately 130 individuals and organisations were invited to the events, representatives from just over half confirmed they could attend, with the attendance on the day of around 50 different individuals and organisations. The day addressed the Options stemming from the Vision and Objectives.
- 3.22 The KSG met on October 1st 2008 to discuss objectives and options, which had been drawn from the Key Issues covered in the previous meeting. Of the 25 Key Stakeholders invited 9 were represented on the day. Subsections of the KSG were invited to topic workshops, and in some cases formed topic specific stakeholder groups.

Opinions expressed in these meetings, as well as the KSG meeting itself, were drawn upon to inform the creation of and preference for options.

3.23 Objectives and Options were discussed with the Council Members on October 6th and 14th 2008.

3.24 The draft Vision, Objectives, Options and Preferred Options were sent out to the KSG on October 21st, 2008 and taken to Cabinet on October 28th and to Council Members on November 11th 2008.

How was it reported?

3.25 Documents relating to all of the above events, with the exception of the small meetings, have been available to view on the Council's website since the time of the events, except one workshop's notes which have subsequently been added. Documents include presentations, lists of invitees, agendas, minutes and notes of events.

3.26 An assessment of all the options and a summary of the preferred options which includes stakeholder feedback is available to view as part of the Minutes and Reports from formal Cabinet and Council meetings and are available to view on the Council website.

How did this influence the plan?

3.27 Options were assessed for their compliance with and contribution to existing guidance, meeting the vision and objectives, the SA/SEA and HRA, in addition to the comments received through engagement events. The 'Issues, Vision, Objectives & Options' document presented to Cabinet and Council (October 28th, and November, 28th 2008) shows where applicable comments from engagement supported the selection of the preferred option, however it must be noted that stakeholders did not always provide an opinion.

Did we do what we said we would?

3.28 Yes

3.29 **Stage in the document preparation process:** Preparation of Pre-deposit proposals documents

Purpose

To prepare draft strategic policies and strategic allocations to fit preferred strategy

What Did the Delivery Agreement Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Key Stakeholder Group. Cabinet Member and Officer Working Group.	Focus/Working Groups by topic	Draft Preferred Strategy Proposals Document to Cabinet for approval /recommendation to Full Council for consultation.
Cabinet Council	Cabinet to consider draft Pre-deposit documents with a view to recommending to Full Council to publish for consultation. Council meeting to consider Cabinet recommendation and to approve Pre-deposit draft LDP for consultation.	Decisions posted on website.

Who did we involve and how did we do it?

3.30 Whilst the Strategic Policies were heavily influenced by previous engagement on options (see para 3.21 – 3.24), a specific meeting with the KSG and Members was not held. Instead the Strategic Policies as part of the Preferred Strategy Documents were sent electronically to the KSG and views invited prior to the Council taking a formal decision on the Preferred Strategy Documents. The Preferred Strategy documents were taken to Cabinet and Council on the 3rd and 19th of February, 2009, respectively.

3.31 Only the Capel Bangor employment site was identified as a strategic allocation at the Pre-deposit stage of the consultation. At the time the site was subject to an underdetermined planning application. This was the only 'new' site required to meet the economic growth of the County (DTZ, 2008), with the remainder to be accommodated on existing or expansions to existing employment sites. Further research on the expansion of existing sites had yet to be completed at the time of consultation; therefore extensions to employment sites were not included as strategic allocations. Whilst the Preferred Strategy also sought housing growth, no strategic sites were

identified, as a decision on the precise spatial distribution of growth was undergoing further research and was the subject of the Pre-deposit consultation. Furthermore, unlike employment sites such as Capel Bangor, it was clear that housing needs would be dependant on a large number of sites across the County (in line with the emerging Strategy) rather than a small number of very large sites in a few locations. The housing sites were not therefore considered to be strategic in their nature. See section 4 of this report for more details on Site allocations.

How was it reported?

- 3.32 The Cabinet and Council reports containing the draft Preferred Strategy which includes the strategic Policies is available to view on the Council's website.

How did this influence the plan?

- 3.33 The comments and recommendations received allowed the plan to progress to the public consultation stage. Due to the high level of involvement proceeding this stage, there were few alterations prior to public consultation.

Did we do what we said we would?

- 3.34 Although no meetings were held with the KSG in relation to agreeing the final wording, as it was considered more efficient to e-mail the draft wordings to the Group and gauge their view in that way. This is only a slight variation from that set out in the DA. This was particularly effective due to the level of involvement that the KSG had already had in discussing and recommending the best options in relation to specific policy matters. Previous Member involvement fed significantly into the process, although no specific meetings were held to discuss the final wording of the Preferred Strategy prior to the decision making meeting. The final decision on the Preferred Strategy was agreed by both Cabinet and Council, therefore in line with the process set out in the DA. Therefore on balance, 'yes' the LA did carry out what it set out to in the Delivery Agreement.

The Initial Sustainability Appraisal Report Participation

- 3.35 **Stage in the document preparation process:** 5 week consultation on SA/SEA Scoping Report

Purpose

To enable all interested persons to comment on the scope of the SA/SEA and objectives.

- 3.36 Between September 2007 and January 2008 the LA prepared the Draft SA Scoping Report, assisted in the process by consultants from the company 'C4S'. This process entailed reviewing European, National, Regional and Local level plans and programmes for relevant LDP issues. Evidence gathering aided the identification of sustainability issues and objectives for Ceredigion. These were refined to produce key sustainability issues relevant to Ceredigion which were used to generate the key sustainability objectives for the County. The resulting SA Framework is a set of Sustainability Objectives which enable the sustainability effects of policies and proposals in the LDP to be assessed.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Specific Consultation bodies	Letter	Summary of comments received placed on web site.
Sustainability Working Group (SWG)	Workshop	
General Public	Copies of Scoping Report available in council offices, and all public libraries	Hard copy of comments placed in Council Offices

Who did we involve and how did we do it?

- 3.37 As part of a participative scoping process, and in order to inform and advise in the production of the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) a Sustainability Working Group was established. Membership of the Group was identified to balance contributions that reflect three of the five UK shared principles of sustainable development, namely: "living within environmental limits," "ensuring a strong healthy and just society", and "achieving a sustainable economy". The organisations which make up the Group are listed in Appendix 5 of the ISAR (CCC, 2009).
- 3.38 The Scoping Report was sent to the mandatory consultation bodies (the Countryside Council for Wales, the Environment Agency and

Cadw) and also to the WAG) in line with the consultation requirements, for this stage of the SEA (WAG, 2002).

- 3.39 In order to make the process as inclusive as possible, the general public and organisations generally were also given an opportunity to comment on the Scoping document. In accordance with the SEA Regulations for Wales (WAG, 2002), the consultation period for the scoping stage was set at five weeks. However due to an error in the first consultation period, the Scoping Report was re-consulted on, therefore the consultation period lasted eleven weeks in total. The consultation periods ran from January 7th to February 4th, 2008 and March 20th to April 28th, 2008.
- 3.40 Notice of the consultation period was advertised in local press (Cambrian News January 3rd, 10th and March 20th, 27th, 2008; Tivy Side January 1st, 8th and March 18th, 25th, 2008). An example of the press advertisement can be seen in Appendix 4. Letters were sent out to Councillors and all those on the LDP database. Copies of the scoping report were available at the main council offices at Penmorfa Aberearon, all public libraries and via the Council's website. Sixty one responses were received to the consultation overall.

How was it reported?

- 3.41 Detailed information on all the consultation responses and changes made to the scoping report was made available on the Council website as part of the published Cabinet and Council reports, June 24th and July 29th 2008, respectively. The public could view hard copies of responses upon request from the Penmorfa, Council Offices.

How did this influence the LDP?

- 3.42 Following consultation on the Scoping Report, representations were considered and the LA began the process of reviewing all the SA/SEA work undertaken to date. Principally additional plans and programmes were reviewed, new baseline information was considered, key issues were updated and the SA Framework of Sustainability Objectives and indicators were amended as part of work on the ISAR.

Did we do what we said we would?

- 3.43 Yes

The Habitats Regulations Assessment Screening Report Participation

- 3.44 **Stage in the document preparation process:** Pre-deposit participation of the HRA

Purpose

To work with CCW and other appropriate bodies, LA and National Park Authorities (NPA) to discuss cross border issues, obtain relevant information and agree on draft assessments of the Strategic Policies.

What Did the CIS Say We Would Do?

- 3.45 The CIS said that the LPA will consider whether the LA needs to undertake an Appropriate Assessment (AA) of the Plan under the requirements of the European Union Directive 92/43/EC (the Habitats Directive). This has been translated into UK law via the Conservation of Habitat and Species Regulations 2010.

- 3.46 As the details were unknown at the time, the CIS did not state how this would be undertaken or when. However, part of this process included pre-consultation participation of the Pre-deposit as described below.

Who did we involve and how did we do it?

- 3.47 CCW were constantly kept informed of the draft assessments of the Strategic Policies of the Pre-deposit and advice was provided where necessary. This was achieved through email and meetings. Contact was also made with the Environment Agency (EA) at various points in the production of the report.

- 3.48 Furthermore, a SA/SEA and HRA group was set up in South and West Wales to discuss cross border issues and to share best practice with other LAs and NPAs.

How was it reported?

- 3.49 Meetings and key points of in-formal consultation were noted as to who the correspondence was with and the dates. In most cases, no formal notes were taken but comments from these meeting were incorporated into the HRA screening report Pre-deposit Version (CCC, 2009) which was subject to public consultation. Where formal notes were taken these are available on request from the LA.

How did this influence the plan?

- 3.50 Any comments made of information provided was incorporated into the final version of the HRA Screening Pre-deposit Version (CCC, 2010) where appropriate.

Did we do what we said we would?

- 3.51 Yes

4. Section 4: Pre-deposit Public Consultation (Regulation 15 and 16)

- 4.1 The following is an extract from the LDP process guidelines. It sets out the regulatory procedures for the Pre-deposit Public Consultation. It is against these regulations, in addition to the LA's DA (CCC, 2007 and 2010) that the procedural soundness should be determined.

The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005

Pre-deposit public consultation

15. Before an LPA finally determines the content of a deposit LDP in accordance with regulation 17, it must

(a) make copies of the Pre-deposit proposals documents and a statement of the Pre-deposit matters available for inspection during normal office hours at

(i) its principal office, and

(ii) such other places within its area as the LPA considers appropriate;

(b) publish on its website

(i) the Pre-deposit proposals documents,

(ii) the Pre-deposit matters,

(iii) a statement of the fact that the Pre-deposit proposals documents are available for inspection and the places and times at which they can be inspected;

(c) send to those bodies identified under regulation 14(a) and (b)

(i) the LPA's Pre-deposit proposals documents,

(ii) such supporting documents as are relevant to the body to which the documents are being sent,

(iii) notice of the Pre-deposit matters,

(iv) the statement in paragraph (b)(iii); and

(d) give notice by local advertisement of the

(i) Pre-deposit matters,

(ii) fact that the Pre-deposit proposals documents are available for inspection and the places and times at which they can be inspected.

Public Consultation Representations

16. (1) Any person may make representations about an LPA's Pre-deposit proposals documents.

(2) Any such representations must be

(a) made within a period of 6 weeks starting on the day the LPA complies with regulation 15(a), (c) and (d); and

(b) sent to the address and the person (if any) specified, pursuant to regulation 15(d).

(3) An LPA must consider any representations made in accordance with paragraph (2) before finally determining the content of the LDP proposals to be made available under regulation 17.

- 4.2 **Stage in the document preparation process:** 6 weeks Pre-deposit public consultation followed by assessment of representations received. Also a 6 week consultation on Initial Sustainability Report and Habitats Regulations Screening Report.

Purpose:

To enable anyone to make representations to the Council's Pre-deposit document.

To demonstrate how preferred options have been derived having regard for the SA/SEA and HRA. To give the opportunity to comment on the SA/SEA and HRA.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Preferred Strategy		
Specific Consultation Bodies and General Consultation Bodies. Elected Members. Database registrants.	Direct correspondence	Standard Representation Form Site allocation request form – see Section 5
General public	Advertisements in the press, use of local media.	

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
	Copies of the Pre-deposit documents available in the council offices and all public libraries including mobile libraries. Information available on the website. Site notices in respect of site - specific land allocations.	
SA/SEA		
Specific Consultation Bodies	Direct Correspondence	Summary of comments received made available on website. Hard copy of comments placed in Council offices.
Sustainability Working Group (SWG)	Information Available on Website	
General Public	Press releases, local media.	

4.3 As mention previously (see para 2.7 – 2.11) the CIS did not set out what the LA aimed to achieve in terms of the HRA and consultation. However as a matter of good practice, a HRA Screening report was produced for the Pre-deposit version of the Plan. It was submitted as part of the Pre-deposit consultation and adhered to the same principals as those for the Preferred Strategy and SA/SEA document.

Who did we involve and how did we do it?

4.4 Community Council's were invited to attend one of three meetings (March 3rd -5th, 2009) to introduce the LDP process in general, Pre-deposit documents and consultation process. This occurred prior to the consultation release to prepare Community Council for the receipt of their consultation documents and assist them with any questions they had. This was intended to place Town and Community Councils in a better position to be able to assist their constituents during the forthcoming consultation. Additional summary leaflets were sent to Town and Community Councils so that they could distribute them to constituents as appropriate.

4.5 Hard copies of all the Pre-deposit documents were made available at the main Council Office in Aberaeron and another office in Adpar (where there's no library) and through all local and mobile libraries, with all but the SA/SEA and HRA appendices (due to their size) being available to take out on loan. Guidance letters were provided with the documents to help ensure library and office staff members were able to answer general queries (see Appendix 5). In addition a

Pre-deposit Consultation Strategy Summary Leaflet and a Initial Sustainability Appraisal Report Non-Technical Summary were available for people to take away. Separate response forms were also available at these locations, one each for the Preferred Strategy, SA/SEA and HRA. Copies of the Pre-deposit documents could also be purchased in hard format or in CD form.

- 4.6 The main Pre-deposit documents contained statements clarifying that the Pre-deposit documents were available for inspection and the places and times at which they could be inspected, and how to submit a response.
- 4.7 At the time of the consultation a link was available from the Council's homepage informing people of the consultation process, however since the close of the consultation the web page has been amended and these links removed to avoid confusion. Therefore, although all the Pre-deposit proposals documents and Pre-deposit matters are available to view and download, information stating the fact that the Pre-deposit proposals documents are available for inspection and the places and times at which they can be inspected and how people can respond, is no longer available to view on the Web itself. This ensures that people can still access for information but are clear that they cannot now respond to those documents.
- 4.8 The regulations state that aside from the WAG, the provision of hard copies of the pre-consultation documents is at the discretion of the LA. Therefore hard copies of the Pre-deposit documents were directly mailed to the WAG, CCW, Dwr Cymru, CADW, the Community Councils and County Councillors. This was accompanied by letters informing them of the fact that the Pre-deposit proposals documents are available for inspection and the places and times at which they could be inspected, and how they could respond.
- 4.9 Letters were sent out to all other stakeholders on the LDP data base, which included specific and general consultation bodies, informing them of the fact that the Pre-deposit documents were available for inspection and the places and times at which they could be inspected, and how they could respond.
- 4.10 Advertisements were placed in the press (Cambrian News March 12th, 19th; Tivy Side March 10th, 17th and the London Gazette March 11th, 18th, 2009), with a statement of the fact that the Pre-deposit documents were available for inspection and the places and times at which they could be inspected, and how people could respond to the consultation. Examples of the press advertisement can be seen in Appendix 6. A notice was incorporated into the Council's internal e-mail newsletter (March 16th, 2009).

- 4.11 In line with the Delivery Agreement a site notice was erected at the strategic employment site in Capel Bangor. A copy of the notice can be found in Appendix 7.

How was it reported?

- 4.12 Three separate forms were available for people to make representations. This meant that Stakeholders could comment on the 3 Pre-deposit documents separately. These forms are included in Appendices 8-10. Forms were available in the same locations as the Pre-deposit documents. Responses could be made via the post or e-mail, and submissions not on the forms were also accepted. A total of 98 responses were received to the Pre-deposit consultation, 81 for the LDP Preferred Strategy, 12 for the Sustainability Appraisal Report and 4 for the Habitats Regulations Assessments Screening Report. Of these, 75% of representations on the Preferred were made on the forms provided. Five submissions made after the closing date were not considered, this was in line with the LA's statement included with the consultation material that late representations would not be accepted. Forms were also available to comment on the Candidate Sites submitted to date or for the submission of new sites; this is covered in Section 5.

How did this influence the plan?

- 4.13 See Para 4.23 – 4.26.

Did we do what we said we would?

- 4.14 Yes

- 4.15 **Stage in the document preparation process:** 6 weeks Pre-deposit public consultation followed by assessment of representations received

Purpose:

To enable consideration of all matters received

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Preferred Strategy		
Key Stakeholder Group (see page 8). Cabinet Member and Officer Working Group. Sustainability Working Group (SWG)	Focus/Working Groups to consider a Report of Consultation and to prepare recommendations for consideration by Cabinet	Cabinet Report of Consultation and recommendations to Council placed on the website.
SA/SEA		
Specific Consultation Bodies	Direct Correspondence	Summary of comments received made available on website. Hard copy of comments placed in Council offices.
Sustainability Working Group (SWG)	Information Available on Website	
General Public	Press releases, local media.	

- 4.16 Again, the CIS did not state the particular stages of how it would deal with the requirements of the Habitats Directive. However, it was good practice to deal with the comments in the same manner as the Pre-deposit and the SA/SEA.

Who did we involve and how did we do it?

- 4.17 See Para 4.4 to 4.11

How was it reported?

- 4.18 An overview of the comments received was available as part of the Cabinet and Council Reports (June 23rd, 30th, 2009, respectively). These documents are available to view on the Council's website, with direct links from the LDP page.

- 4.19 The covering report to those Cabinet and Council meetings were accompanied by 4 Annexes. Annex 1 of the report provided a numerical overview of those that filled in the tick box options in relation to the specific questions on the Preferred Strategy consultation form.
- 4.20 Annex 2 of the report contained 2 tables:
- A summary of representations for each specific consultation question asked was provided in Table A, with
 - A summary of general comments to the LDP document in Table B.
- 4.21 As some representation were very detailed in nature and constituted 10 or more pages it was advised that forms should be viewed as originally submitted and the summary was just that, a summary. The original submissions are available to view upon request from the Policy and Forward Planning Team, ldp@ceredigion.gov.uk.
- 4.22 Annex 3 and 4 of the report set out a summary of comments received from individuals with regards to the SA/SEA and the HRA. A number of these comments actually related to the LDP, rather than the SA/SEA or HRA specifically.

How did this influence the plan?

- 4.23 Each of the Annexes contained a 'recommended response' column. The recommendation columns of Annexes 2, 3 and 4 set out the Council's proposed draft response to the comments received. A large number of the 'recommendations' were to further consider the comment in drafting the Deposit version during the course of the year. This is because work was on going at that stage, in terms of developing many detailed aspects of the plan.
- 4.24 For example, more work was being done in relation to the settlement classification and settlement groupings, which did lead to changes to those in the Preferred Strategy document. Another example on an area where work was on-going related to that of population and household growth. New figures are periodically released with regard to this matter and there was (is) a need to review in order to establish whether the figure included in the preferred Strategy remains the right one.
- 4.25 Comments made to the Pre-deposit consultation needed to be taken in the context of any further information collated and work undertaken in progressing the Deposit LDP. Therefore, it would have been premature to provide a final response in many instances. However, where it was clear that no further action was needed in relation to a representation, this was noted and explained in the response column.

4.26 These Pre-deposit Consultation response summary tables remained working drafts until they were firmed up later in the process, ready for Deposit consultation. The final responses are included in Appendix 11. They are made available to the public as part of this ICR report.

Did we do what we said we would?

4.27 Yes

- 4.28 **Stage in the document preparation process:** Preparation of Deposit Document

Purpose:

To advance formal deposit of LDP

- 4.29 In the interim between the Pre-deposit consultation and the Deposit plan much work was undertaken in developing the Deposit policies and in identifying land to be allocated to meet identified needs. This entailed reviewing the background evidence, making amendments in light of new national policies and taking on board the comments of stakeholders and general public and the comments raised through the previous consultation.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Cabinet Council	Cabinet to consider draft Deposit Local Development Plan with a view to recommending to Full Council to publish for consultation. Council to Consider Cabinet recommendation and to agree document for public consultation.	Council decision posted on website.

Who did we involve and how did we do it?

- 4.30 Draft policies were discussed with Development Control officers in a series of workshops between June and August 2010. Policies were sent to relevant internal officers, such as Education, Tourism and Highways. Topic based Work Groups and C2020 groups were sent the draft policies, such as the Built Environment working group and the C2020 group Bilingual futures. External organisations were also involved on an individual basis, for instance the Landscape policies were sent to Dyfed Archaeology and the Nature Conservation ones to CCW.
- 4.31 A series of Member workshops were also held in July and August 2010 to discuss policy direction.
- 4.32 On the 7th of September 2010, the level and distribution of housing growth was discussed by the Council. Due to the level of discussion a final decision was deferred until the 30th September, 2010. This allowed more information to be presented. At the second meeting, on 30th September, 2010 the Council approved both the level and distribution of housing growth.

4.33 On the 9th of November, 2010 the Cabinet recommended the approval of the Deposit LDP, SA and HRA documents and recommended approval for public consultation on these documents.

4.34 On the 23rd of November, 2010 the full Council approved the Deposit LDP, SA and HRA documents and approved the deposit public consultation on these documents.

How was it reported?

4.35 Updated Topic Papers are available as part of the supporting documents to the Deposit consultation. These set out how the Policies have evolved in light of changing contexts and stakeholder and community engagement.

4.36 The Topic Papers are supported by a number of further Background papers, many of which are technical and detailed.

4.37 Reports and Minutes from the Cabinet and Council meetings are available to view on the Councils Website.

How did this influence the plan?

4.38 The Pre-deposit Consultation response summary tables have been firmed up ready for Deposit consultation. The table shows how, if applicable, comments have been taken into consideration. The final responses are included in Appendix 11. They are made available to the public as part of this ICR report.

4.39 As previously mentioned, see para 3.17, Section 8 of the updated Topic Papers (CCC, 2010) set out how the Policies have evolved in light of changing contexts and stakeholder and community engagement.

4.40 Addendums accompanying the Council report set out any changes that have occurred in light of the comments made in the Cabinet but also as a result of on-going consistency checking by Officers and to reflect information updates where relevant; none of these affected the plan fundamentally.

Did we do what we said we would?

4.41 Yes

5. Section 5: Candidate Site Process and Site Allocations

Pre-deposit participation

5.1 Stage in the document preparation process: Evidence Gathering and Objectives

Purpose:
Establish needs and potential candidate site lists with public service providers, developers, landowners and the general public.

Produce sites register.

5.2 A major component of the LDP process was the early consideration of land that may be suitable for the various development or safeguarding needs of the County. This required engagement with landowners, developers and the general public to obtain information on potential sites early on in the process. This particular exercise is referred to as Candidate Site Consultation.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Cabinet Member and Officer Working Group. Key Stakeholder Group and other Stakeholder Groups (see page 8).	Joint and individual meetings.	Report events on website as and when appropriate Hard copy of register at CCC Aberaeron
Database registrants	Letters only, advising period for submission of candidate sites	
General public	Press advertisements Local media	Electronic copy on website

Who did we involve and how did we do it?

5.3 No formal response period was suggested by guidance, so a standard 6 week consultation period was undertaken between March 7th and May 2nd 2008. The process and means of consultation were presented to full Council at the end of February 2009.

5.4 Letters were sent out to specific, general and other consultation bodies on the LDP data base informing of the candidate site consultation process.

- 5.5 Community Councils were invited to attend one of 3 evening events, in Aberystwyth, Cardigan or Aberaeron to learn more about the candidate sites process (17-19th March 2008).
- 5.6 A link to the Candidate Sites consultation documents was available from the Home page of the Councils Website.
- 5.7 Articles were published in two local papers in the week of the consultation launch and the following week; the Cambrian News (March 6th & 13th 2008) and Tivy Side (March 4th and 11th 2008). See Appendix 12 for an example of the advertisement placed.
- 5.8 Posters, guidance forms and candidate site submission forms (see Appendix 13) were sent to every Library including mobile services.
- 5.9 Bilingual broadcasts were also played on local radio (Radio Ceredigion) 3 times a day from March 2nd to May 2nd, 2008 asking Landowners, Agents, Community Groups and the public to get involved with the Candidate Sites submission process.
- 5.10 In addition the LA also allowed further sites to be submitted as part of the Pre-deposit consultation, this consultation ran from the 12th March 2009 to the 28th April 2009. An update version of the previous submission form, shown in appendix 13, was used for these purposes.
- 5.11 In order to ensure that all potentially suitable land that could potentially be developed had been considered in the candidate site process, the LPA itself added further identified parcels of land to the Candidate Sites Register in the Urban Service Centres (USCs) and Rural Service Centres (RSCs) for further assessment. These additions included land that had been highlighted in Council approved regeneration studies and in work undertaken by external consultancy work which supported the LDP (including the Urban Capacity Study, ENTEC, 2007, Economic Needs Assessment, DTZ Update 2010, Review of Potential Employment Sites in the Aberystwyth Area, NLP 2010, Review of Potential Employment Sites in South Ceredigion, NLP 2010), along with any sites which obviously related well to the built form of the Service Centre but had for whatever reason not been put forward by others.
- How was it reported?**
- 5.12 Sites have been plotted onto a GIS mapping system and details recorded in a database. A list of Candidate sites along with mapped representation of the sites, known as the Candidate Sites Register can be viewed in the Council Office at Penmorfa, Aberaeron and also on the Council's interactive mapping service (www.cerdigion.gov.uk). Digital scans of the submitted forms and Excel Spreadsheets are available upon request.

How did this influence the plan?

- 5.13 The Candidate sites submitted formed the main basis for land allocations in the LDP. For example, of the 60 sites allocated for housing in the Deposit LDP, 60% were submitted purely through public consultation, with a further 18% of housing allocations formed by combining sites submitted through public consultation and those earmarked by either Council approved regeneration studies, work undertaken by external consultancy work or the LPA itself. Of the 14 employment allocations, 11 comprise of land identified through public consultation and earmarked by either Council approved regeneration studies or work undertaken by external consultancy. The remaining 3 were identified through either Council approved regeneration studies or work undertaken by external consultancy. Only one allocation comprised of land identified by the LPA. Of the 9 mixed use allocations, 7 were submitted in whole or in part through public consultation. The other 2 were earmarked by either Council approved regeneration studies or work undertaken by external consultancy. All 3 transport allocation comprise of land submitted through public consultation, with 2 combined with land the LPA highlighted. Both the Minerals allocations were submitted through public consultation.

Did we do what we said we would?

- 5.14 Yes

Pre-deposit participation and Pre-deposit Public Consultation

- 5.15 Due to the scale and complexity of the Candidate Site process several of the CIS stages are discussed together, covering the period between the initial Candidate Sites submissions (as discussed above) and the Deposit LDP.
- 5.16 **Stage in the document preparation process:** Preparation of strategy options and assessment of alternatives, 6 weeks Pre-deposit consultation followed by assessment of representations received and preparation of the Deposit document.

Purpose:

To identify sites that are derived from/adhere to preferred strategy.

To enable anyone to make representation to the Council's Pre-deposit document.

To enable consideration of all matters received.

To advance formal deposit of LDP.

What Did the CIS Say We Would Do?

Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
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Who? Possible community involvement	How? Involvement mechanism	Reporting Mechanism?
Key Stakeholder Group. Cabinet Member and Officer Working Group.	Focus/Working Groups to prepare draft report on sites which do and do not fit the draft preferred strategy.	Draft report posted on website as and when appropriate

Who did we involve and how did we do it?

- 5.17 In order to have a transparent and consistent assessment of the candidate sites a candidate site methodology was devised, drawing upon internal office meetings and policy guidance. The Candidate Site methodology was consulted on from the 12th March 2009 to the 28th April 2009. This allowed individuals and organisations to comment on and make suggestions with regard to the draft methodology. In addition, views regarding sites submitted and on the database to date were accepted during that consultation, and a separate form was provided for this purpose (see Appendix 14). The LA also provided the public with a further opportunity to submit further sites for consideration at the Preferred Strategy consultation stage. For full details of the methodology consulted upon at the Preferred Strategy stage see Appendix 6 of the Preferred Strategy 2007-2022. That methodology has been superseded (though the changes are minor) to take into account consultation responses to the Preferred Strategy version. The up to date version, as used in the assessment process, can be seen in the Topic Paper: Candidate Sites Assessment (CCC, 2010).
- 5.18 In relation to the level and distribution of growth, the Preferred Strategy (CCC, 2009) sought to focus development on Ceredigion's main towns and villages, called Urban and Rural Service Centres, respectively. The County was divided into 29 Settlement Groups, each with a Service Centre (Urban or Rural) and a defined geographical area containing a variety of smaller settlements, called Linked Settlements, along with hamlets, individual dwellings and farms. A key focus of the Pre-deposit consultation (12th March to 28th April 2009) was whether the principal of Settlement Groups and Service Centre was an appropriate way to address the Key Issues and achieve the Vision and Objectives. Therefore at this stage the definitive list of Service Centres and the geographical boundaries of the Settlement Groups had yet to be determined. Nevertheless it was clear even at that stage that Ceredigion's large geographical area and dispersed rural population would not warrant a just a few large development sites, but instead the needs of the County would be best met by a larger number of smaller allocations.
- 5.19 The Strategy approach in general was confirmed by the Council, however, further work meant that the number of Settlement Groups, and hence Service Centres, was more appropriate at a figure of 22

than the 29 previously agreed. Although Council and Cabinet (on the 8th and 27th October 2009, respectively) confirmed the 22 new Service Centres to be taken forward in the Deposit Version, the number of housing sites needed for each Service Centre was not confirmed until 30th September 2010. The postponed decision allowed the impact of new population and household projections (issued nationally in June 2010) on dwelling requirements to be fully considered.

- 5.20 Therefore until the LA had consulted on the Preferred Strategy, undertaken further detailed work in relation to the distribution of growth between specific parts of the County and received updated population and household projections, the formal allocation of sites would be premature. Therefore work continued to be undertaken on the Candidate Sites and potential allocations right up until the Deposit LDP. Therefore site allocations, bar one Strategic Employment Site were not included in the Pre-deposit consultation (see para 3.31).
- 5.21 A recommendation by Cabinet and decision by the Council (on the 9th and 23rd of November, 2010) confirmed the sites that would be Allocated in the Deposit LDP. Until this final decision was taken by Members sites could not be formally ruled out, and therefore there was still opportunity for some sites to fail and others to pass the final stages of the Candidate Sites Assessment. Therefore lists of Candidate Site failures were not produced until the Deposit stage.
- 5.22 As part of the ongoing candidate site process numerous organisations were consulted and engaged. Whilst the following table sets out a rough guide to engagement timeframes, the iterative and continuous nature of this process means it is not pragmatic to set out exacts details. Whilst many of those consulted are members of the KSG, the Group was not consulted on the Candidate Sites process as a collective. Instead the expertise of individual members was drawn upon as necessary.

Stakeholder	Input Theme	When
Public Consultees	As part of the Pre-deposit consultation members of the general public were invited to make representations about Candidate Sites methodology, Candidate Sites submitted to date or suggest new Sites.	12 th March 2009 to the 28 th April 2009
EAW	Consulted from at an	Regular

	<p>early stage to ensure any necessary Strategic Flood Consequence Assessment (SFCA) could be undertaken. There was agreement that Assessments were only needed for Aberystwyth and Cardigan.</p>	<p>correspondence since September 2008.</p>
<p>Internal Officer Working Group: comprised of Officers from Highways, Engineering, Development Control, Forward Planning and the Officer overseeing SA/SEA and the Ecology/Biodiversity Officer.</p>	<p>Discussing the candidate sites which made it through all four previous levels of assessment. Having these specific Officers involved allowed the sites to be discussed with those who had more specialist knowledge and would identify any possible further technical issues, such as drainage, to be identified and possible mitigation methods that could be utilised.</p>	<p>Meetings throughout summer 2009, with follow up meetings and correspondence as required.</p>
<p>External Officer Working Group: Dwr Cymru Welsh Water; Countryside Council for Wales (CCW); Cadw; Environment Agency; Dyfed Archaeology; Trunk Road Agency (only when the settlement was affected by a Trunk road).</p>	<p>Members of this group comprised of organisations that were considered to hold vital information regarding the viability and deliverability of the sites.</p>	<p>Consulted after the initial Internal Officer Working Group meetings.</p> <p>Letters sent July 2009, with responses required by Autumn 2009. Responses received from the Environment Agency, CCW, Dyfed Archaeology, but not Dwr Cymru Welsh Water and Cadw.</p> <p>Meeting with Dwr Cymru Welsh Water October 2009 to</p>

		<p>discuss receiving responses. Incomplete information received December 2009, additional information received on March 2010.</p> <p>To date no information has been obtained from Cadw however Dyfed Archaeological Trust have been able to input on heritage matters generally. The knowledge and expertise of DC staff and policy Officers within the LA also drawn upon</p>
Town and Community Councils	It was acknowledged that local knowledge and general opinion could be valuable in finalising the assessment of sites.	May 2010 documents sent out and meetings held to discuss the draft ranking of sites and the process to date.
Council Members	It was acknowledged that local knowledge and general opinion could be valuable in finalising the assessment of sites.	Members were taken through initial results in November 2009. May 2010 documents sent out and meetings held to discuss the draft ranking of sites to date and the process to date. Further workshops were held in September 2010. In addition continuous dialogue was encouraged as sites were advanced through the process. Sites were agreed by Cabinet and Council on November 9 th and 23 rd , 2010,

		respectively.
Other Engagements Land owners; Sustainability & Environmental Evidence Division (WAG); Minerals Planning Officer; Economic Development (CCC);	These stakeholders were considered to hold additional information regarding the viability and deliverability of the sites (particularly the landowner).	May 2010 to present, as the sites are being finalised.

- 5.23 In order to provide further evidence on the biodiversity value of sites to inform the site selection, a biodiversity assessment project was undertaken by the Local Record Centre (West Wales Biodiversity Information Centre (WWBIC)) on behalf of Ceredigion County Council. This mainly updated Phase 1 Habitat Survey values of the sites and also looked at connectivity value of the Urban Service Centres. In addition, the LA Hedgerows and TPO Officer and the Biodiversity Officer/Ecologist surveyed several of the roadside hedgerows to sites to determine their value under the Hedgerow Regulations 1997. This, along with the information already provided by WWBIC and specialist knowledge of the LA Ecologist provided a basis for making decisions on the biodiversity value of sites and whether any issues could be mitigated/compensated. This could only be based on known information.
- 5.24 The candidate sites and allocations were assessed for their sustainability through the SA/SEA process. This was first of all achieved through meetings with C4S, the Forward Planning Principle Officer, SA/SEA Officer and Biodiversity Officer/Ecologist. Work was on-going from there and achieved through in-formal meetings and emails.
- 5.25 The allocations were also screened for their likely effects on International Sites, alone or in-combination, through the HRA process.
- How was it reported?**
- 5.26 In total 16 comments were received to the draft methodology at the Preferred Strategy consultation stage. These comments and the LPA responses to each of the comments are detailed in the report 'Pre-deposit Consultation on the Local Development Plan (feedback)' that went to Cabinet on the 23rd July 2009, specifically Annex 2, Table B, reproduced as part of Appendix 11 of this report. Comments received in relation to the strategic employment site at Capel Bangor can also be found at this location.

- 5.27 A draft list of sites that failed to reach stage 3 of the Candidate Sites Assessment and an Executive Summary of those that made it past stage 3 formed part of the background documents made available for the Cabinet and Council on the 9th and 23rd of November, 2010. As such these documents are available to view on the Councils website.
- 5.28 A finalised register of sites that have failed against the candidate site methodology and the Executive Summaries will be published alongside the Deposit version of the LDP.
- 5.29 The SA/SEA assessment of the candidate sites is available on the County Council's website, while the SA/SEA Assessment of the Allocated Sites can be found in Appendix 6 of the Sustainability Appraisal Report. The assessment of the allocations can be found in the main body of the report. The HRA Screening assessment of the allocations can be found in the Technical Background Paper of the HRA Screening Report. A summary is included in Appendix 4 of the Report. Both documents are available as part of the Deposit consultation.

How did this influence the plan?

- 5.30 Feedback from the Pre-deposit consultation was varied and the methodology was amended in response to one particular suggestion, so sites under the threshold size of 0.09ha, would be assessed if in combination with adjoining sites would result in a site greater than 0.09ha. This suggestion was considered to benefit the consistency and transparency of the candidate site process. Additionally a clarification was made within the methodology in relation to assessment against Policy 17: Biodiversity and Nature Conservation of the Preferred Strategy (still relevant as it is now covered by Policy DM14 of the Deposit Version of the LDP). The LPA clarified that any sites put forward on international, national or local designated nature conservation sites would fail at Stage 2 of the assessment.
- 5.31 The candidate sites process has formed a major component of the LDP and the engagement with stakeholders has played a major roll in the assessment and allocation of land in the LDP.
- 5.32 The SA/SEA affected the decision of what ranking sites achieved and helped identify mitigation measures that might be applied where potential negative effects were identified.
- 5.33 The HRA screening of the allocations resulted in two of the sites needing a slight boundary change. There were also additions to the draft Allocated Sites Schedules (Volume 2A of the Deposit LDP) including specific reference of International Sites that could be affected with a cross reference to Policy DM14 where the effects of the allocation where uncertain but had the potential to have a significant negative effect on an International Site, alone or in-combination. Draft policy DM14 was amended accordingly. Key

changes to the LDP from the HRA can be found in Appendix 6 of the HRA Screening Report.

Did we do what we said we would?

- 5.34 Whilst the methodology was consulted on and officially approved and thus made publically available, a list of site failures and successes will not be published until the deposit consultation stage. As previously discussed (see para 3.31) it was not appropriate to publish this sooner. Whilst this is a slight deviation from the CIS, the candidate site methodology made it very clear those sites that would be immediate failures, for instance those outside of the Service Centres, or those located in the C flood zones or international / national nature conservation areas. In addition Town and Community Councils and Members did receive an interim update regarding the progress of the sites in RSC's and USC's in May 2010.

6. Section 6: Overview Compliance with the Community Involvement Scheme (Part 2 of the DA, 2007; 2010).

- 6.1 As the following should have been integral in the previous sections this section will not elaborate vastly on what has been done, where it has been previously discussed. However where there are elements that have not previously been mentioned or where deviation occurred these will be explored in table 3 below.
- 6.2 A full list of engagement with various stakeholders can be found in Appendix 15. It covers all the engagement that has taken place between the start of the LDP preparation to the Deposit consultation.

Table 3 Compliance with the CIS

Involvement of Stakeholders	Did we stick to this?
<p>Council decision-making process. The Council will make the final decisions on the content of the plan at each key stage of the LDP preparation process</p>	Yes, the Council had the final decision regarding all stages of the plan to date, including the key issues, objectives, vision, preferred options, preferred strategy and the deposit plan.
<p>Full Council, Cabinet and Local Elected Member involvement</p>	Yes, they have been involved with every stage of the LDP process. Members have also liaised on an on-going basis with Officers to check progress and provide information when requested to do so regarding their areas.
<p>The general public will be encouraged to be involved in the process through press and other media appeals, the posting of site notices, etc., as appropriate.</p>	Yes, the general public were involved in the, scoping report of the SA/SEA, the candidate sites consultation, the Pre-deposit consultation and will also be involved in the Deposit consultation
<p>Ceredigion County Council has a Community Strategy for the next 10-15 years, known as Ceredigion 2020 (C2020). The Local Planning Authority will seek to build on the existing C2020 'structures' for the Stakeholder Groups.</p>	<p>Partially, over time these partnership groups have suffered from attrition and therefore their influence in informing the LDP has dwindled, from their originally strong incorporation at the Pre-deposit participation stage. It was envisaged that a joint vision could be taken forward, however the aforementioned issues mean they have fallen behind the progress of the LDP and therefore can have limited shared goals.</p> <p>However regular updates are provided to the C2020 Group (at meetings and via e-mail), and Officer representation on that Group means that LDP and C2020 matters</p>

Involvement of Stakeholders	Did we stick to this?
	<p>continue to be integrated.</p> <p>Furthermore the KSG (see below) is a mirror image of the C2020 Officer working group.</p>
<p>Throughout the process the LPA will make use of a Key Stakeholder Group to focus progress.</p>	<p>Yes, KSG were set up early on in the process and have been drawn upon as and when appropriate throughout the process.</p>
<p>The Council will also seek to involve the general public and harder to reach groups not yet involved through C2020 or Stakeholder Groups in the LDP consultation process as and when appropriate.</p>	<p>Yes, the general public have been engaged through the public consultation exercises in addition to indirect involvement through their town and community councils and local elected members. With respect to harder to reach groups, school visits tapped into the younger persons perspectives, in addition to meeting with the Play Strategy Officer. Gypsy and Traveller groups were sent personalised invites to engagement events, in addition to private meetings. Older people were engaged through the 50+ forum.</p>
<p>The Local Planning Authority will seek to work as consistently as possible with the corporate Community Engagement Strategy (which is currently emerging in draft form as a C2020 action).</p>	<p>No, this strategy has been stalled and therefore has been unable to inform the LDP process to date.</p>
<p>The Welsh Assembly Government is developing the concept of Local Service Boards to replace Local Partnership Boards currently associated with C2020.</p>	<p>Yes, the Local Service Board meetings are attended when applicable and feedback on the LDP is presented at the meetings. The impact on the LDP of applicable schemes and developments are taken into consideration. This group is linked with the C2020 Officer working group mentioned previously in this table.</p>
<p>At appropriate stages of the LDP process, there is a prospect (subject to confirmation of it being set up) that the Council will be able to make use of a Citizens Panel.</p>	<p>The Citizen Panel has not been utilised because it was not fully established when the key early stages of LDP were being undertaken. This Group would have been most useful at early stages – progressing the Preferred Strategy but wasn't properly up and running then.</p>

Involvement of Stakeholders	Did we stick to this?
<p>Overview and Scrutiny Committees which are also likely to have an interest in various aspects of the plan and its preparation:</p>	<p>This Overview and Scrutiny Committees have requested to view sub-sections of the LDP as it has progressed. However, since all the Members are regularly involved in the production of the LDP, duplicated engagement with a small subsection of Members was deemed unnecessary.</p>
<p>Welsh Language Scheme The LDP process will be conducted in accordance with the Council's Welsh Language Scheme.</p>	<p>Yes, correspondence was welcomed in English or Welsh and where a personal reply is appropriate, was replied to using the same language as the original letter. All standard letters, comments forms, newsletters, public notices and advertisements have been bilingual. Simultaneous translation was provided at public meetings</p>
<p>Accessibility</p>	<p>Large print versions of relevant documents can be made available on request. For public meetings, there are hearing loop facilities in the main Council chamber at Penmorfa, Aberaeron. For persons with other communication problems or with learning difficulties, the Council will seek to work with advocacy services established through the C2020 thematic groups. Meetings will be held in locations accessible to people with disabilities. The Council will undertake positive measures to reach those who suffer relative isolation in rural areas including distributing information and consultation material via the mobile library service and the internet.</p>

- 6.3 Whilst not explicitly stated in the DA (2007:2010) it is essential that the LA works with other LA's and NPA's. These authorities form part of the 'General and Specific Consultation Bodies', and as such their engagement has been documented throughout this ICR. Specific LAs include the County Council's of Gwynedd, Snowdonia National Park, Powys, Carmarthenshire, Pembrokeshire and the National Park Authorities of Pembrokeshire Coast and Snowdonia.
- 6.4 Ceredigion have worked with the above Authorities during the production of the Ceredigion LDP to identify generic cross border issues and to agree on matters which do not have cross border implications. Where matters have cross border relevance discussions with the relevant adjoining Authorities have ensured that the policies included in the Ceredigion LDP complement those of the

adjoining Authorities. Ceredigion LA will continue to revisit these issues in order to identify any change in the matters concerned and to address accordingly through a review where necessary.

- 6.5 More detail on cross-boarder engagement and issues can be found in the Topic Papers (CCC, 2010) and Section 10 of the Deposit LDP (CCC, 2010). In addition information on cross-boarder meeting will be available on the Council's website (www.ceredigion.gov.uk.)

7. Section 7: Conclusion

- 7.1 To recap the Initial Consultation Report provides evidence of the procedural soundness of the LDP; one of four soundness test categories. Tests of consistency, coherence and effectiveness refer to the policy content of LDPs, whilst procedural tests refer to the processes for LDP production. The specific test of soundness relating to this ICR document is;
- 7.2 Test P1: it has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme (CIS).

Key Question

Have all the relevant consultation/participation procedures set out in the CIS been carried out?

Evidence

- The local planning authority's CIS, as agreed by the WAG with any subsequent agreed variations;
- The Consultation Report produced for the LDP, which should show how the LPA has carried out its consultation procedures and how these relate to their CIS;
- The LDP Regulations.

Planning Inspectorate Wales, 2006:p 9

- 7.3 Therefore despite a few pragmatic variations the Pre-deposit Participation, Consultation and the preparation of the deposit documents has been carried out in line with the Regulations, DA and CIS. Therefore it is considered that this aspect of the Deposit LDP is Sound, against the Procedural Soundness Test P1.

Glossary:

AA	Appropriate Assessment	A more detailed assessment that needs to be carried out if the Habitat Regulations Assessment Screening Report finds that there is likelihood that the LDP will have a significant effect on an International site, alone or in-combination with other plans or projects.
CIS	Community Involvement Scheme	Part of the Delivery Agreement of the LDP. This explains how developers, public and interested groups can contribute to LDP plan preparation. It also explains how responses will be treated and what feedback will occur. See: Ceredigion Local Development Plan Delivery Agreement June 2007 and Ceredigion Local Development Plan Delivery Agreement June 2007 Addendum (April 2010).
DA	Delivery Agreement	A document comprising Ceredigion County Council's timetable for producing the LDP. It has two parts, a 'timetable' for when the LDP is to be produced and a 'Community Involvement Scheme'. See Ceredigion Local Development Plan Delivery Agreement June 2007 and Ceredigion Local Development Plan Delivery Agreement June 2007 Addendum (April 2010).
HRA	Habitat Regulations Assessment	An Assessment of the potential effects of the LDP on one or more International sites, both within the LA boundary and any sites that could be affected outside the boundary. The assessment looks at whether the LDP Deposit is likely to have a significant effect on an International site, alone or in-combination. If so, an Appropriate Assessment (AA) is carried out to see whether the Plan would have an adverse effect on site integrity. If it is found that the LDP is likely to have a significant negative impact on any of the sites, the plan will need to be amended accordingly.
ICR	Initial Consultation Report	A report which provides an account of the activities of the Council in preparing its Deposit version of the LDP.
ISAR	Initial Sustainability	A term used to refer to the Sustainability

	Appraisal Report	Appraisal Report, produced at the Preferred Strategy LDP stage. This assesses the LDP options against the Sustainability Appraisal framework. The report is then expanded at the Deposit LDP stage and finalised alongside the Adoption Statement.
LDP	Local Development Plan	The required statutory plan for each Local Planning Authority area in Wales under Part 6 of the Planning and Compulsory Purchase Act 2004.
SA/SEA	Sustainability Appraisal / Strategic Environmental Assessment	The SEA Regulations require a formal "environmental assessment of certain plans and programmes, including those in the field of planning and land use. Undertaking a SA is mandatory under the Planning and Compulsory Purchase Act 2004. The SA is used to promote sustainable development through the integration of social, environmental and economic considerations whilst developing LDPs.

References:

Ceredigion Country Council (2009) Preferred Strategy 2007-2022: Local Development Plan Consultation. March 2009

Ceredigion County Council (1990) Dyfed Structure Plan (alteration 1991)

Ceredigion County Council (2006) Unadopted Ceredigion Unitary Development Plan Proposed Modifications Version- March 2006

Ceredigion County Council (2007) Ceredigion Local Development Plan Delivery Agreement. June 2007.

Ceredigion County Council (2009) HRA Screening Report Pre-deposit Version

Ceredigion County Council (2009) Initial Sustainability Appraisal Report

Ceredigion County Council (2009) Initial Sustainability Appraisal Report Non-Technical Summary

Ceredigion County Council (2009) Pre-deposit Consultation Strategy Summary Leaflet

Ceredigion County Council (2009) Topic Papers:

- Built Environment
- Coastal
- Community, Leisure, Recreation and Wellbeing
- Education
- Employment and the Rural Economy
- Energy
- Environmental Protection
- Housing
- Landscape
- Minerals
- Nature Conservation
- Population and Housing
- Retail
- Sustainable Development, Climate Change and Flooding
- Tourism
- Transport
- Utilities
- Waste

Ceredigion County Council (2010) Ceredigion Local Development Plan Delivery Agreement. June 2007. Addendum (April 2010)

Ceredigion County Council (2010) Topic Papers:

- Built Environment
- Coastal
- Community, Leisure, Recreation and Wellbeing

- Candidate Site Assessment Process
- Education
- Employment and the Rural Economy
- Energy
- Environmental Protection
- Housing
- Landscape
- Minerals
- Nature Conservation
- Population and Housing
- Retail
- Sustainable Development, Climate Change and Flooding
- Tourism
- Transport
- Utilities
- Waste

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DTZ (2008) Economic Needs Assessment

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DTZ (2010) Economic Needs Assessment: Revised Core Report

ENTEC (2008) Urban Capacity Study

European Union Directive (1992) Council Directive 92/43/EEC On The Conservation Of Natural Habitats And Of Wild Fauna And Flora (the Habitats Directive)

NLP (2010) Review of Potential Employment Sites in the Aberystwyth Area

NLP (2010) Review of Potential Employment Sites in South Ceredigion

Planning Inspectorate Wales (2006) A Guide to the Examination of Local Development Plans

The Planning and Compulsory Purchase Act (2004)

Town and Country Planning (Local Development Plan) (Wales) Regulations (2005)

Tyldesley, D. (2010) Draft Guidance for Plan Making Authorities in Wales: The Appraisal of Plans Under the Habitats Directive. Produced for the Countryside Council For Wales

Welsh Assembly Government (2002) Sustainability Appraisal of Unitary Development Plans: A Good Practice Guide

Welsh Assembly Government (2006) LDP Wales. Planning Your Community:

A guide to Local Development Plans (LDPs)

Welsh Assembly Government (2009) Planning Policy Wales: Technical Advice Note. 5: Nature Conservation and Planning

Appendices: