

Appendix 1: Delivery Agreement – Consultation Report

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Table 1: Specific Consultation Bodies

Body	Comments	Response and Action	Change to DA needed?
Welsh Water	No comments received	NA	NA
Transport For Wales REF: TFW1	<p>POLICY CONTEXT:</p> <p>Although the South West Wales Regional Transport Plan (RTP) is referenced in the Executive Summary (1.1), it is notably absent from the dedicated policy context section. The RTP is a critical strategic document for the region, as the efficient movement of people and goods is fundamental to the success of the Strategic Development Plan (SDP) and to driving sustainable economic growth. Together with the Regional Transport Delivery Plan (RTDP), the RTP outlines how transport across Carmarthenshire, Neath Port Talbot, Pembrokeshire, and Swansea will be enhanced between 2025 and 2030. It sets a clear agenda for modernising and decarbonising the transport system by:</p> <ul style="list-style-type: none"> • Supporting economic growth • Reducing reliance on private car travel • Improving accessibility and connectivity • Minimising environmental impacts 	<p>Comments noted. Stronger reference to the Regional Transport Plan will be added to the policy context section.</p> <p>Future stages of SDP production will create opportunities for further alignment with the Regional Transport Plan.</p>	Yes

Body	Comments	Response and Action	Change to DA needed?
REF: TFW2	<p>LAND USE AND TRANSPORT:</p> <p>Integrating transport considerations into the SDP for South West Wales delivers major benefits by enabling a more aligned, efficient, and sustainable approach to regional development. The Draft Delivery Agreement emphasises that coordinating transport planning with spatial planning helps influence development patterns, reduce the need to travel, and improve connectivity between key land uses through integrated, multimodal transport solutions. This strengthens sustainable travel choices, supports economic development, and contributes to a long-term vision of a competitive, connected, and resilient region. A unified approach across the Corporate Joint Committee area also promotes cross boundary consistency, reflects real travel behaviours and economic functions, and ensures that transport infrastructure and land use decisions are mutually reinforcing rather than siloed. Such integration provides a solid foundation for securing public and governmental support for major schemes and contributes to a more robust, evidence driven regional strategy.</p>	<p>Comments noted. Stronger reference to the Regional Transport Plan will be added to the policy context section.</p> <p>Future stages of SDP production will create opportunities for further alignment with the Regional Transport Plan.</p>	Yes

Body	Comments	Response and Action	Change to DA needed?
REF: TFW3	<p>COLLABORATION:</p> <p>It is encouraging to note in section 5.20 that collaboration with Transport for Wales (TfW) and other infrastructure partners is anticipated in the development of the SDP. We welcome the opportunity to contribute to both the development and implementation stages of the plan. In addition to working with TfW, we recommend that engagement also be extended to the Wales Rail Board (WRB), the Department for Transport (DfT), and Network Rail (NR) to ensure comprehensive and coordinated transport planning across the region.</p>	<p>Comments noted. Network Rail (NR) and the Department for Transport (DfT) amongst other transport organisations are already identified as a Specific consultees for the SDP. The Wales Rail Board (WRB) will be added to the SDP consultation database and Appendix 4.</p>	Yes
Utility companies	No comments received	NA	NA
Adjoining Corporate Joint Committees	No comments received	NA	NA
Local Health Boards	<p>General feedback and engagement: Swansea Bay University Health Board (SBUHB) welcomes the</p>	<p>Comments noted.</p> <p>SBU.Partnerships@wales.nhs.uk and swanseabaylpht.admin@wales.nhs.uk</p>	Yes

Body	Comments	Response and Action	Change to DA needed?
<p>Swansea Bay University Health Board (SBUHB) REF: SBUHB1</p>	<p>opportunity to engage in the development of the SWW CJC Strategic Development Plan (SDP).</p> <p>'A Healthier Swansea Bay' is our organisational strategy which describes our commitment to building a healthier future for everyone in our communities, a future where people live well and age well, supported by high-quality care that is compassionate, equitable, and delivered close to home A Healthier Swansea Bay - Swansea Bay University Health Board.</p> <p>Substantial health inequalities exist in our communities, with planning and development playing a key role in addressing these inequalities.</p> <p>The organisational strategy and underpinning strategic plans commit us to acting with our partners to improve population health, the wider determinants of health, and reducing inequalities.</p>	<p>will be added to the SDP consultation database and Appendix 4.</p>	

Body	Comments	Response and Action	Change to DA needed?
	<p>The Health Board welcomes the reference to the Public Service Boards as a key stakeholder in this process and we would support the approach of the PSB as a vehicle for ongoing engagement. The PSBs in Swansea and Neath Port Talbot are working together on a number of initiatives including improving access to food, and climate change which should also be considered in line with any economic developments.</p> <p>Please add the following contacts to your database:</p> <p>SBU.Partnerships@wales.nhs.uk swanseabaylph.admin@wales.nhs.uk</p>		
Swansea Bay University Health Board (SBUHB) REF: SBUHB2	Connected communities: Opportunities for improving access to healthcare facilities and maximising opportunities in relation to health infrastructure: The Health Board would like to engage positively and proactively in the development of the SDP and would welcome the opportunity for early dialogue with the planning team	Comments noted. SBUHB will continue to be consulted on key stages of SDP production. A High level renewable energy assessment / modelling the impact of proposals on GHG reduction trajectories is included in the key documents and evidence base assessment at Appendix 2.	No

Body	Comments	Response and Action	Change to DA needed?
	<p>leading on the SDP on opportunities to enhance the health and wellbeing of our population.</p> <p>Any strategic developments must consider the potential for increased demand on health care services and health infrastructure overall, and assessment of demand should dovetail with any Health Impact Assessments.</p> <p>It is worth noting the requirements of the HIA Regulations which will be coming into force in April 2027 which can help ensure any integrated assessments and HIA element of the SEA have a strong emphasis on health impacts.</p> <p>Resilient communities with good access to health services is key to delivering the ambitions and missions included in the delivery agreement. The Health Board have been working collaboratively with Neath Port Talbot and Swansea Councils on the updating of their Local Development Plans. This work programme to date has progressed specific and targeted Health Impact</p>	<p>The draft SDP manual states that CJsCs must take account of a number of factors when assessing strategic spatial concepts/options. Examples include National strategies and priorities, such as decarbonisation and health issues. Various issues including health and decarbonisation will be addressed through future stages of SDP production, including the ISA which includes a Health Impact Assessment and the evidence base and again at the local level (RLDPs and LDP Lites).</p>	

Body	Comments	Response and Action	Change to DA needed?
	<p>Assessments as part of the consultation process, health input into LDP Policies and the potential for the development of a Framework to consider health triggers and indicators for inclusion in the updated LDPs in both areas. The key findings of this work to date include the following considerations for strategic developments:</p> <ul style="list-style-type: none"> • Provide and promote infrastructure that prioritises walking, inclusive cycling and access to public transport; • Support access to healthy, sustainable and affordable food choices • Ensure low levels of air pollution and reduce exposure to harmful emissions • Consider the capacity of primary care services and support sustainable access to GP practices <p>The following guidance was published by Public Health Wales in 2025 and has supported discussions locally. Planning-Healthy-Places-final-Eng.pdf</p>		

Body	Comments	Response and Action	Change to DA needed?
	<p>The Health Board would like to explore opportunities to align the SDP with Health Board plans and specifically in line with the NHS Capital Programme to ensure that growth assumptions are supported by deliverable healthcare capacity as outlined above. Modern ways of working are increasingly using remote monitoring and community diagnostic centres taking people away from acute sites and delivering more care within community settings.</p> <p>There is no reference to decarbonisation of Health Estates ~ p8 of the delivery agreement of the document mentions that the region aims for net zero by 2050. Given our hospitals are major consumers of energy, are critical infrastructure sites and long-term assets there is no explicit integration of NHS Wales decarbonisation strategy.</p>		
Swansea Bay University	<p>Policies that are relevant to the SDP: There are longstanding inequalities in the standard of living across the Swansea Bay population. There is widespread support</p>	Comments noted.	No

Body	Comments	Response and Action	Change to DA needed?
Health Board (SBUHB) REF: SBUHB3	<p>from local partners on tackling these persistent inequalities and there are several policies in Wales that can be utilised to progress this agenda. They are listed below and should be considered where relevant in the SDP:</p> <ul style="list-style-type: none"> • Wellbeing of Future Generations (Wales) Act 2015 • Social Services and Well-being (Wales) Act 2014 • Healthy Weight: Healthy Wales (2019) • Prosperity for All: A Climate Conscious Wales (2019) • Social Partnership and Public Procurement (Wales) Act • Natural Resources Wales- Corporate plan to 2030 - Nature and People Thriving Together • A Healthier Wales: long term plan for health and social care • Welsh Government Mental Health and Wellbeing Strategy • Public Health (Wales) Act (2017) HIA Regulations 		

Body	Comments	Response and Action	Change to DA needed?
	<ul style="list-style-type: none"> • Welsh Government (2021) Age friendly Wales; our strategy for an ageing society • United Nations Convention on the Rights of the Child • Public Health (Wales) Act 2017 • Smoke-free Premises and Vehicles (Wales) Regulations 2020 • Public Health (Minimum Price for Alcohol) (Wales) Act 2018 • A smoke-free Wales (2022) • The Environment (Air Quality and Soundscapes) (Wales) Act 2024 • The Health and Social Care (Quality and Engagement) (Wales) Act • Planning Healthy Places: A guide for local authorities in Wales for embedding health in planning policy; Public Health Wales, November 2025 Planning-Healthy-Places-final-Eng.pdf 		

Body	Comments	Response and Action	Change to DA needed?
Swansea Bay University Health Board (SBUHB) REF: SBUHB4	Local policies and plans that are relevant to the LDP: Other policies, organisational plans and programmes to consider including are as follows (further detail can be provided if required): <ul style="list-style-type: none"> • PSB Wellbeing Plans • West Glamorgan RPB Population Needs Assessment and Plan • Swansea Bay Pharmaceutical Needs Assessment • Primary Care Cluster Plans • West Glamorgan Emotional and Mental Wellbeing Strategy • West Glamorgan RPB plans for communities and older adults; learning disabilities and carers 	Comments noted.	No
Swansea Bay University Health Board (SBUHB) REF: SBUHB5	Health data to inform the SDP: An evidence review of current and future healthcare service infrastructure is recommended as this will help inform how the SDP addresses health and care service needs, alongside engagement with other health organisations as required, e.g., Public Health Wales.	Comments noted. The draft SDP manual states that CJsCs must take account of a number of factors when assessing strategic spatial concepts/options. Examples include National strategies and priorities, such as decarbonisation and health. The draft manual also states that planning for health	No

Body	Comments	Response and Action	Change to DA needed?
	<p>It is recommended that health specific evidence is included within the 'key documents and evidence base assessments' as it doesn't appear to be available currently. This should also include climate change impacts on health.</p> <p>Key data sources include:</p> <ul style="list-style-type: none"> • SBUHB State of the Population Report (available on request) • West Glamorgan RPB Population Needs Assessment • PSB Wellbeing Assessments • Swansea Bay Pharmaceutical Needs Assessment • A Regional Collaboration for Health (ARCH) Health Needs Assessment • National well-being indicators • Primary Care Cluster Profiles • Child Measurement Programme – measures levels of obesity and overweight in children across Wales • South West Wales Area Statement (Natural Resources Wales) 	<p>care should sit under the 'physical infrastructure' policy framework.</p> <p>Issues such as health and decarbonisation will be addressed through future stages of SDP production, including the ISA which includes a Health Impact Assessment and the evidence base and again at the local level (RLDPs and LDP Lites).</p>	

Body	Comments	Response and Action	Change to DA needed?
	<ul style="list-style-type: none"> State of Natural Resources Report for Wales (Natural Resources Wales) Population Health Outcomes Framework (PHOF) 		
UK Government	No comments received	NA	NA
CJC Members			
	No comments received	NA	NA
Welsh Government			
REF: WG 1	Thank you for consulting the Welsh Government on the South West Wales Corporate Joint Committee (CJC) – Strategic Development Plan (SDP) Draft Delivery Agreement (DA). Having an agreed DA in compliance with The Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021 is the cornerstone which enables formal commencement of the SDP preparation process. A DA sets out the Community Involvement Scheme (CIS), timetable to prepare the plan as well as the	Comments noted.	No

Body	Comments	Response and Action	Change to DA needed?
	<p>appropriate financial resources necessary to demonstrate progress will be made in accordance with the timetable.</p> <p>Officials have been working with officers at the CJC to progress a draft DA, currently out for consultation. The closing date for responses 20th February 2026. Regular engagement and discussion, as well as linking with other regions has resulted in positive and constructive progress to achieve a Draft DA. This close liaison is welcomed, and officials recognise the effort and achievement of officers in reaching this point.</p>		
REF: WG 2	<p>With regards to the Draft DA in terms of the CIS and timetable the Welsh Government is supportive of both aspects. The timetable is considered to be realistic, in line with other regions approach. In terms of consultation mechanisms and consultation bodies/groups the Welsh Government considers that the region is best placed to determine who to consult, based on past planning experience and knowledge.</p>	Comments noted.	No

Body	Comments	Response and Action	Change to DA needed?
REF: WG 3	Identifying the resources necessary to prepare the SDP is integral to the DA process. Information on the resources allocated to SDP preparation in SW Wales is currently unavailable. It will be necessary for SWW CJC to clearly set out the resources necessary to prepare the SDP and confirm that appropriate budget provision has been made prior to Welsh Government being able to agree the final DA.	Comments noted. The CJC regulations place a duty on the CJC and its constituent local authorities to produce a Strategic Development Plan. This duty extends to making a commitment to fund the costs of producing the plan. The issue of funding will be addressed in the next round of political reporting for the CJC. The resource section of the DA will be updated accordingly prior to final submission to WG.	Yes
Natural Resources Wales (NRW)			
	No comments received	NA	NA
Network Rail			
	No comments received	NA	NA
Llanelli Rural Council			

Body	Comments	Response and Action	Change to DA needed?
REF: LRC1	The council welcomes the opportunity of participating in the process for developing the SDP, which commences with the fulfilment of the key stages set out in the delivery agreement.	Comments noted.	No
REF: LRC 2	<p>For the time being please use my contact details for the future dissemination of any information or paperwork. However, to make you aware I will be retiring on 31 July 2026.</p> <p>Thanks for consulting the council and garnering its interest.</p>	Comments noted.	No
Penllergaer Community Council			
REF: PCC1	Penllergaer Community Council welcomes the opportunity it has been given to participate in the plan making process of the Strategic Development Plan for South West Wales.	Comments noted.	No
REF: PCC2	Whilst we fully appreciate that the CJC is, at present, limiting stakeholders participation to only comments or observations in relation to its proposed Delivery Agreement and Community Involvement Scheme, we feel it is important to also bring to your attention our concerns about other matters	Comments noted. The timetable proposed for the SDP is in line with the five-year target that is set out in the draft SDP Manual and is achievable subject to the necessary resources being made available. The Draft	No

Body	Comments	Response and Action	Change to DA needed?
	<p>that will urgently need to be considered if those concerns are to be properly addressed.</p> <p>In so far as any comments we may have on the Delivery Agreement are concerned, our principal concern relates to the proposed timetable, but more particularly its relationship with the timing proposed by the City and County of Swansea's for its LDP2.</p> <p>If the SDP is intended to:</p> <p><i>"...ensure alignment and cooperation across the local government administrative boundaries in the SWWR, reflecting the ways in which people live, how markets operate, and how the transport system and the region's businesses all interact and function. This represents a more joined-up approach than has previously been employed; aligned tightly to economic development ambitions and our vision for a more strategic approach to both land-use and transport planning."</i></p> <p>we seriously question and challenge whether this ambition can be realised.</p>	<p>SDP manual states that adopted or emerging LDPs can serve as a useful starting point for formulating the SDP. Adopted/emerging LDPs can potentially form the short to medium term component of the SDP plan period. For longer term, careful analysis of how places function, their role, sustainability, and interaction with other settlements will be key in developing a long term vision and strategy.</p> <p>CJCs should undertake a thorough audit of the evidence used for LDP preparation in the region, analysing, rationalising and generating standard methodologies for evidence formulation and collation. Annual monitoring reports can also provide robust evidence for the SDP.</p> <p>LDPs provide the building blocks for the first generation of SDPs. However, the longer term vision for the region should be</p>	

Body	Comments	Response and Action	Change to DA needed?
	<p>The agreed timetable for LDP2 envisages an adoption date of December 2027, whereas the proposed adoption of the SDP is not until December 2031. Consultation of LDP2's Deposit Plan is intended to commence in April 2026, and it begs the question whether the "cart is now pulling the horse".</p>	<p>considered afresh, addressing broader regional issues and drivers of change.</p> <p>When an SDP is adopted, LPAs within the SDP boundary should prepare Local Development Plan Lite (LDPLs) which will focus on local allocations and policies.</p> <p>LDPs must be in general conformity with both the SDP and Future Wales.</p>	
REF: PCC3	<p>Dealing now with the matter of your proposed CIS, we are encouraged by your promotion of "active participation", but the role that Penllergaer Community Council needs to play goes beyond that envisaged in the CIS, all of which will soon become evident. As a community we have already raised serious concerns about the Preferred Strategy document produced for LDP2. We have received no response from the LDP2 to our concerns, only confirming to us that the concept of community involvement is something that Swansea does not take too seriously.</p> <p>We look forward to a more proactive approach from yourselves, but to have a better understanding about our</p>	Comments noted.	No

Body	Comments	Response and Action	Change to DA needed?
	<p>concerns we have enclosed for your consideration copies of the submissions we made to the LDP2 team in April 2025, all of which remain unanswered.</p>		
REF: PCC4	<p>Background to our concerns</p> <p>Penllergaer, located at J47 of the M4 motorway, suffers more than any other community in South Wales of unacceptable levels of traffic congestion and everything associated with this. This problem has been exacerbated by the more recent housing over development in and around J47 and its importance as a strategic link to the NW of the City and County of Swansea. The problems associated with J47 are well known. The Topic Paper on Transport and Accessibility produced in 2013 for LDP1 recognised that M4 J47 suffers from considerable congestion. It further recognised that before sites could be developed a series of local improvements would need to be implemented. Development has progressed in the NW of the County, but the necessary highway improvements have not. This failure has only made the traffic congestion worse, and these required improvements will not be carried out.</p>	Comments noted.	No

Body	Comments	Response and Action	Change to DA needed?
	<p>LDP1 was underpinned by a Strategic Traffic Model prepared by Arup which concluded that:</p> <p>“With LDP developments, traffic movements increase by nearly 30% and traffic conditions will inevitably be worse than 2014. Without infrastructure measures and public transport enhancements the impact will be significantly adverse in respect of delays, congestion, air quality, noise and economic disbenefits.”</p> <p>That is the current situation which the team of LDP2 has, at worse, not recognised or, at best, is unable to provide a solution to the problem.</p> <p>LDP2 still continues to concentrate housing development in the NW of the County, identifying a housing need that, we believe to be totally overstated, situated on existing strategic development sites that will not come to fruition and will not satisfy the affordable housing requirement that has been identified by Welsh Government.</p> <p>Fuller and better particulars of these failings are set out in the unanswered submissions made to the LDP2 team in April 2025. The concerns we have made known to LDP2 are</p>		

Body	Comments	Response and Action	Change to DA needed?
	<p>matters that ultimately will also need to be properly considered in the SDP. With a budget cost of nearly £3.3m allocated from the public purse to cover the cost for the preparation of the SDP, it is vitally important that this allocation is properly spent.</p> <p>We look forward to receiving confirmation of your safe receipt of this submission. If, however, there are any issues where you feel greater clarification is required from us, please do not hesitate to contact the writer.</p>		

Table 1a: Local Planning Authorities and National Parks (officer comments)

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
Bannau Brycheiniog National Park Authority			
	No comments received	NA	NA
Pembrokeshire Coast National Park Authority (PCNPA)			
REF:PCNPA 1	Timetable and engagement: The proposed timetable for preparing the SDP appears ambitious, yet appropriate and proportionate. In particular, the allowance of over two and a half years for evidence gathering and preparatory work prior to publication of the Preferred Strategy in June-July 2028, followed by a further 18 months before the Deposit consultation in November-December 2029, appears reasonable. This should provide sufficient opportunity to develop a robust evidence base and meaningful strategic options.	Comments noted.	No
REF: PCNPA 2	While the Delivery Agreement appropriately refers to the statutory minimum consultation periods of six weeks, the Authority would encourage consideration of extending consultation periods beyond these minimum timeframes wherever possible. Longer consultation	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	windows would help to maximise engagement, particularly for harder-to-reach groups, and support more informed and inclusive participation.		
REF: PCNPA 3	<p>Approach to consultation and communication: The Authority notes the draft Delivery Agreement references the default approach will be to prioritise electronic communication and virtual engagement (paragraph 5.34). We acknowledge this approach can be efficient and accessible for many stakeholders. We also welcome confirmation that bilingual paper copies of documents will be made available at specified locations. In addition, paragraph 5.38 refers to the potential use of public information exhibitions, including drop-in sessions and virtual exhibitions. The Authority considers it will be particularly important that bilingual in-person drop-in sessions are held, and that these are well distributed across the region to ensure broad, inclusive engagement and to enable all our communities, including Welsh speakers to participate fully in the process. Such events can play a key role in promoting understanding of the SDP, raising awareness of its implications, and enabling meaningful dialogue with individuals in</p>	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	local communities, including those who may be less comfortable with digital-only engagement.		
REF: PCNPA 4	<p>Resourcing and costs: The estimated cost of approximately £3.2 million to prepare the SDP is significant and highlights the scale and importance of the task. Delivering the SDP will require clear commitment and sustained support from all participating authorities. The Authority recognises the challenges associated with securing adequate resources and would emphasise the importance of clarity around funding arrangements to ensure delivery remains on track.</p>	<p>Comments noted. The CJC regulations place a duty on the CJC and its constituent local authorities to produce a Strategic Development Plan. This duty extends to making a commitment to fund the costs of producing the plan. The issue of funding will be addressed in the next round of political reporting for the CJC. The resource section of the DA will be updated accordingly prior to final submission to WG.</p>	Yes
REF: PCNPA 5	<p>Staffing and secondments Paragraph 7.10 highlights secondments as a potentially useful and cost-effective way to support preparation of the SDP, and acknowledges the wider pressures on Local Planning Authorities (LPAs), including in relation to preparation of their own Local Development Plans. While the Authority recognises the potential</p>	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>value of secondments in principle, it is important to note that we currently have an agreed Delivery Agreement in place for preparing our replacement Local Development Plan (LDP 3) over the next four years, which places inevitable pressure on our staff resources. Nevertheless, we consider it important that the National Park's interests are represented in the region and we would welcome officer involvement in the preparation of the SDP.</p>		
Swansea Council			
REF: SC1	<p>Thank you for your e mail of 19 January 2026. We are grateful for the opportunity to comment on the Strategic Development Plan Draft Delivery Agreement (DA). Please note that these comments should be considered as informal feedback to assist the work required to produce a final version of the DA.</p> <p>Please note that Swansea Council's Cabinet Member for Delivery (Joint Deputy Leader) is Cllr David Hopkins, who is a Member of the Strategic Planning Sub-Committee. Additionally, the Council's Cabinet Member for Corporate Services (Job Share) – which has</p>	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>Planning Services as part of the portfolio – is Cllr Andrew Williams. For wider context, you will be aware that as well as being Leader of this Council, Cllr Rob Stewart is also the Chairperson of the South West Wales Corporate Joint Committee.</p>		
REF: SC2	<p>For clarity, you will note that the development plan position in Swansea is that the Swansea Local Development Plan (2010-2025 - adopted 2019) is now time expired. Work is underway on preparing a new development plan for Swansea – LDP2. Once adopted, LDP2 will provide the new planning blueprint for future development across Swansea up to 2038. An 8 week public consultation was held on the Pre-Deposit Preferred Strategy between 24 February and 18 April 2025. Also available for comment were key supporting documents, the Integrated Sustainability Appraisal, Stage 1 Habitats Regulations Assessment Screening Report and the Candidate Sites Register. The Council anticipates that consultation on the LDP2 Deposit Plan will commence at the latter end of 2026. You can view the Swansea LDP2 Revised Delivery Agreement, together with a range of further information, on our dedicated LDP2 webpage here: https://www.swansea.gov.uk/LDP2</p>	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
REF: SC3	<p>Turning to the Draft SDP DA itself, it is considered that the document presents as well prepared, clear and concise. The below sets out some specific comments for review and consideration as appropriate: <u>Chapters 2, 3, 4 and 5</u></p> <p>These chapters provide a helpful review of the relevant policy and legislative content. They also provide the pertinent procedural aspects in preparing the SDP, together with important links to other key workstreams advanced by the CJC which should align with the SDP. Their content is generally supported in this regard.</p> <p>It is considered that Chapters 2 and 4 (notably paragraphs 4.13-4.16) would benefit from specific reference to the CJC's Corporate Plan 2023-2028, both in terms of cross referencing to the CJC's well-being objectives and clarifying the role of the SDP in providing a land use expression of the corporate ambitions of the CJC. It may also be helpful if a brief overview of the Regional Transport Plan is added to Chapter 2, perhaps by way of clarifying its status and some of its high level messaging - in the same way that has been done with the South West Wales Regional Economic Delivery Plan (REDP) (2021-30).</p>	<p>Comments noted. References to the Corporate Plan and Regional Transport Plan will be added.</p>	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
REF: SC4	With specific reference to paragraph 4.12 (Habitats Regulations Assessment), we would advise that due regard is given to our below comments on nitrates which follow below.	Comments noted. Paragraph 4.12 on Habitats Regulations Assessment to be expanded to reference river and marine water quality challenges facing SW Wales.	Yes
REF: SC5	With regards paragraphs 4.20 and 4.21, it may be beneficial to note the respective timelines of Adopted an/or Replacement LDPs across the region within the DA. This will give the reader a clear picture as to the challenges faced in terms of the differing timelines in place. With specific reference to paragraph 4.28, we would emphasise that the region has a strong track record of regional working, including through the City Deal, with Swansea Council playing a key role in this regard. With a view to framing some of the regional context, a link to a Background / Technical Paper prepared on Regional Collaboration as part of the consultation on the Swansea LDP2 pre-deposit Preferred Strategy can be viewed here and may prove helpful to you: https://swansea.oc2.uk/docfiles/45/Swansea_LDP2_Regional_Collaboration_December_2024.pdf	These timelines are best addressed in an evidence base paper as they are subject to change, not within the Delivery Agreement itself, which is a procedural document.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
REF: SC5	In respect of paragraph 4.30, the SDP should have regard to economic and functional linkages with Ireland (as required by Future Wales) and should therefore require liaison and engagement with appropriate planning bodies there having regard to movement between South West Wales and Ireland's West coast. Appropriate references should be included in the consultation and engagement chapter/appendix and list of consultees in this regard.	Comments noted. A range of General consultees with linkages to Ireland are included within Appendix 4, however further Irish contacts can be included.	Yes
REF: SC7	<u>Chapter 6</u> The proposed SDP Timetable, along with reference to Appendix 6 of the DA is noted.	Comments noted.	No
REF: SC8	<u>Chapter 7</u> The Chapter provides a realistic and pragmatic overview of the resources required to prepare an SDP. In terms of the Resourcing Strategy, it is agreed that establishing an independent regional 'core' team is essential to ensure sufficient staff resources are in place for the preparation and delivery of the SDP. The proposed core roles are supported. It is agreed that there is a risk that recruiting staff from Local Planning Authorities within the region may then leave respective Local Plan teams struggling for resources themselves. The chapter is	Comments noted. The CJC regulations place a duty on the CJC and its constituent local authorities to produce a Strategic Development Plan. This duty extends to making a commitment to fund the costs of producing the plan. The issue of funding will be addressed in the next round of political reporting for the CJC.	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>clear in terms of the limitation in terms of current funding in place and the absence of a full funding solution. Paragraph 7.10 makes reference to secondments, and it is agreed in principle that these can be a cost-effective means of acquiring specialised knowledge and skills while adding resilience to the core team. However, the reference to "all secondments will be carefully planned to ensure minimal disruption to the ongoing LDP processes. (secondments will only be considered where existing workload demands permit this arrangement)" is supported. It may be prudent to strengthen this further by clarifying that it will be a matter for each LPA to consider its position in this regard in order to confirm the autonomy provided to each LPA. With reference to paragraphs 7.11 and 7.12, the Shared Resources and Graduate Training Programme proposals are supported.</p>	<p>The resource section of the DA will be updated accordingly prior to final submission to WG.</p>	
REF: SC9	<p><u>Appendix 2</u> The schedule is detailed and helpful in that it clearly frames some of the pertinent considerations. Again, in re-affirming the established regional working in South-West Wales, you will note that there is a track record of joint commissioned work in recent years- including a</p>	<p>Comments noted. The ISA will include both a Health Impact Assessment and a Welsh Language Impact Assessment.</p>	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>'South West Wales - Stage 1 Strategic Flood Consequence Assessment (SFCA)' (November 2022). Also, NPT and Swansea Councils have recently worked together in the commissioning of an Economic and Housing Growth Assessment to inform respective LDPs. Whilst the exact evidence required will emerge as the SDP proceeds, it is considered that the schedule set out in Appendix 2 is suitable in that it captures the topic areas that would be expected - albeit specific reference to the Welsh language and Health impact are not explicit (it is accepted these may potentially form part of any integrated impact assessment in any event).</p>		
REF: SC10	<p>Specific commentary is provided in respect of the Nitrates issue elsewhere in this response, and whilst it is accepted that it may be premature to identify what exactly an evidential component would consist of for this topic - it may be helpful if it is at least cited as a topic area in Appendix 2 given the massive implications that it has.</p>	<p>Comments noted. A Nitrates, Other Nutrients and Water Quality Impact Assessment will be added to the evidence base studies list in Appendix 2.</p>	Yes
REF: SC11	<p>The proposed approach of commissioning a regional Gypsy and Traveller Accommodation Assessment and Gypsy and Traveller Accommodation Transit Site Assessment are supported in that they</p>	<p>Comments noted. The Housing Market Assessment will be updated</p>	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>are matters that can be considered to be of regional significance. Due regard will be required to aligning (and possibly prioritising certain studies in terms of required timescales) with other pertinent legislative provisions over and above planning alone - notably the Housing (Wales) Act 2014 requirements. Similar considerations would be needed for the proposed regional Housing Market Assessment and also whether this is a task that should have the option of being undertaken by external consultants (it is currently annotated to be undertaken by CJC officers) due to the scale and complexity of the work and necessary cross linkages with the demographic/economic growth assessments. The proposed evidence base for minerals is also supported. It would appear logical that minerals apportionment is undertaken on a regional level.</p>	<p>to be prepared by external consultants.</p>	
REF: SC12	<p><u>Appendix 5</u> The Swansea Civic Centre will fully close this year. The following address should be used therefore as the principal office - Swansea Council, Guildhall , Swansea, SA1 4PE.</p>	<p>Comments noted. Appendix 5 to be updated with the Swansea Civic Centre address provided.</p>	Yes
REF: SC13	<p><u>Appendix 7</u></p>	<p>Comments noted. Reference to nitrate and water quality to be added</p>	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>It is considered that the Risk Assessment provides a realistic overview based on the information available at the present time. Clearly, and with further reference to those comments previously made, the provision of resource and availability of qualified staff will be notable considerations. With specific reference to the "Additional requirements arising from new legislation, national guidance or new evidence" heading, you will note the position in respect of nitrates. LPAs within the region have been dealing with challenges in relation to the recent publication of Marine SAC advice, alongside other technical issues, such as the publication of revised national planning policy on flood risk. With specific reference to nitrates, it is considered inescapable that it poses a risk to the production of an SDP that meets the tests of soundness and can be adopted. The issue also calls into question the soundness and integrity of Future Wales 2040 - noting the designation of the Swansea Bay and Llanelli NGA.</p> <p>We trust the foregoing is helpful and we look forward to continuing a constructive and collaborative approach in this regard.</p>	<p>to the risk assessment. This is already covered in the risk assessment under the "Additional requirements arising from new legislation, national guidance or new evidence".</p>	

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
REF: PCC 1	<p>I write in relation to the above and to advise that Pembrokeshire County Council will not be providing a formal response to consultation. Notwithstanding this, included below are officer's informal comments for consideration by the CJC:</p> <p>Appendix 1 – Draft Delivery Agreement</p> <p>The draft Delivery Agreement includes introductory information, explaining the purpose of the Strategic Development Plan and the role of the Corporate Joint Committee for South West Wales in its preparation. As would be expected, given the role of the CJC in taking forward regional planning for land use, the economy, transport and renewable energy, the material presented is clear and robust on regional economic matters, on the importance of placemaking, on renewable energy, on transport and on the importance of decarbonisation. There is also a strong emphasis on the important role that the Strategic Development Plan for SW Wales will play in making provision for future housing across the region. Additionally, there is a recognition of the importance of the Welsh language and a</p>	Comments noted.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	commitment to fully integrate Welsh language considerations into the preparation of the regional SDP.		
REF: PCC 2	Paragraph 1.3 of the draft Delivery Agreement makes reference to the wide geographical area covered by the SDP and the expectation that this will lead to a 'more joined up approach than has previously been employed, aligned tightly to economic development ambitions and our vision for a more strategic approach to both land-use and transport planning'. PCC's Delivery Agreement for its replacement LDP references the need for general conformity with the provisions of Welsh Government's 'Future Wales – The National Plan 2040' and, once adopted, the regional SDP. However, it notes that there are economic and cultural differences between (and sometimes also within) Counties, including those relating to the Welsh language, the role of tourism and the role played by different areas in terms of the economy. The SDP will need to embrace these differences and demonstrate how, at a regional level, they can be combined into a common vision to which all areas contribute in a variety of ways.	Comments noted.	No
REF: PCC 3	The introductory material on the environment, including the considerable environmental challenges linked to river water quality in	Comments noted. The DA is a procedural document. These issues	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	protected and other watercourses across the region gets a more limited coverage, likewise many aspects of the challenges that climate change poses across the region (and perhaps requires a greater emphasis given that climate and nature emergencies that have been declared in Wales). Given the participation of two National Park Authorities, it is also perhaps surprising that landscape considerations have a fairly low profile. Furthermore, whilst future housing provision is evident as a key matter for the SDP to address, the provision of affordable and specialist housing receives a lesser coverage.	will be adequately addressed through future stages of SDP production and are covered in the Key Documents and Evidence Base Assessments at Appendix 2.	
REF: PCC 4	On matters of detail, paragraph 4.7 could be modified to refer to the emerging Planning (Wales) Bill, which will facilitate future consolidation of planning legislation in Wales.	Comments noted. Paragraph 4.7 will be modified to refer to the emerging Planning (Wales) Bill.	Yes
REF: PCC 5	Paragraph 4.12 on Habitats Regulations Assessment could be expanded to say more about the river water quality challenges facing SW Wales	Comments noted. Paragraph 4.12 on Habitats Regulations Assessment to be expanded to reference river and marine water quality challenges facing SW Wales.	Yes
REF: PCC 6	and 4.25 should probably make reference to the Welsh National Marine Plan (which has some terrestrial implications).	Comments noted. The HRA section will make reference to the Welsh	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
		National Marine Plan/marine and water quality issues.	
REF: PCC 7	<p>The reference in 4.18 to ‘rationalising’ the evidence base across the region, as a broad objective, is supported, but PCC has made some observations on the detail in its response on the Appendix 2 document – see below.</p> <p>In the section on ‘Who will the CJC consult’, a paragraph dedicated to service and utility providers would be helpful. This could pick up the water company (Dwr Cymru Welsh Water), telecommunications providers, National Grid, the electricity and gas companies, etc’. Perhaps this could be combined with the transport providers? PCC notes that some of the above are picked up later as individual organisations, but a broader, generic, consideration would be helpful.</p>	Comments noted. The SDP regulations are quite specific in terms of the type of consultee and who should form part of the Specific Consultee list. This list includes Dwr Cymru Welsh Water, Utility companies and transport providers. These are already clearly listed on page 30 of the Delivery Agreement.	No
REF: PCC 6	<p>Appendix 2 – Evidence Base Assessments:</p> <p>The broad aspiration to prepare a consistent evidence base across the region is supported by Pembrokeshire County Council. However,</p>	Comments noted. The draft SDP manual clearly sets out two options for a Regional GTAA. One single GTAA containing the type and level of need	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>for some topic areas, what is proposed may require some further thought:</p> <p>Gypsy and Traveller Accommodation Assessments (GTAAAs) – these are prepared by local authorities in Wales, in accordance with the requirements of Part 3 of the Housing (Wales) Act 2014. In Pembrokeshire, because of the link between the findings of GTAA and the provisions of Local Development Plans with regard to provision of accommodation for gypsies, travellers and travelling show-people, that work is undertaken jointly between Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority, with PCC leading as it is a Housing Service function rather than Planning Service function to prepare these Assessments. PCC is uncertain whether there is suitable legal provision for preparation of a regional GTAA. If there isn't, then a background paper to combine the outcomes of Local Authority / National Park GTAAAs across the region might provide a suitable alternative, to inform preparation of the SDP. There is also reference in the draft Delivery Agreement to</p>	<p>including timescales both regionally and per individual LPA or multiple individual Local Authority's GTAAAs with the key conclusions from all then summarised into one topic paper approach.</p> <p>The manual states: Gypsy and Traveller Accommodation Assessment(s) will form part of the regional evidence base for an SDP. The most effective and efficient way of doing so will be to prepare one GTAA for the whole region covering the entire plan period.</p> <p>A regional GTAA will help to deliver a better understanding of travelling patterns and accommodation needs across local authorities, in particular for</p>	

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>provision of Transit Sites, which is an aspect of provision that is under active consideration by Welsh Government currently.</p>	<p>transit needs. The regional GTAA must make clear the type, level and timescales of need for the region as a whole and for each constituent LPA. A single GTAA will ensure consistency of approach and will deliver cost and resource savings both in evidence preparation and examination time/cost. This guidance does not preclude GTAA's from being undertaken on an individual LA basis to support the SDP. However, to assist clarity of the evidence base and understand the level of need within the region, the CJC should prepare a summary topic/evidence paper which explains the level and type of need both for the region as a whole and for each LPA,</p>	

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
		<p>including the timescales for when sites will be required.</p> <p>A SWW Gypsy and Traveller Accommodation Assessment has been included as part of the key documents and evidence base at Appendix 2.</p>	
REF: PCC 7	<p>Local Housing Market Assessments – it is mandatory for local authorities to prepare these every 5 years. Welsh Government guidance has been put in place to ensure that there is a consistent approach to their preparation across Wales. Their legislative basis in Wales is section 8 of the Housing Act, 1985 and there are also links to section 87 of the Local Government Act, 2003, the Housing (Wales) Act, 2014 and the Equality Act, 2010. In Pembrokeshire, because of the link between the findings of the LHMA and the provisions of Local Development Plans with regard to future housing provision, that work is undertaken jointly between Pembrokeshire County Council and the Pembrokeshire Coast National Park Authority and involves those in the PCC Housing and Planning Services and those working for the PCNPA Planning Service. PCC is uncertain whether there is suitable</p>	<p>Comments noted. Regional working has already been successfully completed by Swansea Council and Neath Port Talbot Council who have recently worked together in the commissioning of an Economic and Housing Growth Assessment to inform their respective RLDPs. A SWW Housing Market Assessment has been included as part of the key documents and evidence base at Appendix 2.</p>	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>legal provision for preparation of a regional LHMA. If there isn't, then a background paper to combine the outcomes of the Local Authority / National Park LHMAs across the region might provide a suitable alternative, to inform preparation of the SDP.</p>		
REF: PCC 8	<p>Regional Technical Statement for Aggregates – this is an all-Wales document, with separate appendices for North Wales and South Wales. Its preparation is led by Welsh Government and links to the work of the respective North Wales and South Wales Regional Aggregates Working Parties. Welsh Government has recently commissioned the preparation of the 3rd Review of the Regional Technical Statement for Aggregates. This will identify requirements to provide sites on a Local Planning Authority basis, so PCC is unclear whether / why further work would need to be commissioned on a regional basis. The conclusions of the 3rd Review of the RTS for the SW Wales Region could, if necessary, be set out in a short background paper.</p>	<p>Comments noted. It would appear logical that minerals apportionment is undertaken on a regional level. An evidence base for minerals has been included as part of the key documents and evidence base at Appendix 2 and this will use the best available evidence for the region.</p>	No
REF: PCC 9	<p>River Water Quality – the issues across the SW Wales Region relating to this matter are very significant. Some of the protected rivers (and some other rivers) in the region are affected by phosphate</p>	<p>Comments noted. Reference to a Nitrates, Other Nutrients and Water</p>	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>pollution. Some of the protected rivers (and some other rivers) in the region are also affected by pollution caused by Dissolved Inorganic Nitrogen (DIN). There are also other river water quality issues affecting riverine and marine protected sites and other watercourses. There will need to be a clear understanding of these issues in conjunction with preparation of the SW Wales SDP and as such it will at the very least require a background paper, as well as the mapping element that is mentioned.</p>	<p>Quality Impact Assessment to be added to the evidence base.</p>	
REF: PCC 10	<p>South West Wales Strategic Transport Assessment – PCC notes that this has been listed, but given that the CJC has already prepared a Regional Transport Plan for SW Wales it is unclear what further information this further assessment might add.</p>	<p>Comments noted.</p>	<p>No</p>
REF: PCC 11	<p>Renewable Energy – the proposed high-level renewable energy assessments should make reference to Local Area Energy Plans and to the provisions of Future Wales – the National Plan 2040 with regard to renewables.</p>	<p>Comments noted.</p>	<p>No</p>
REF: PCC 12	<p>Waste – it is anticipated that the regional strategy for SW Wales will be led by the provisions of Welsh Government’s Towards Zero Waste</p>	<p>Comments noted.</p>	<p>No</p>

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	document - and that the regional approach will combine a strategy in line with Welsh policy and suitable provision of waste management facilities to meet regional needs.		
REF: PCC 13	<p>Well-being</p> <p>As well as taking account of the Well-being of Future Generations (Wales) Act 2015, the SDP evidence base should also include a background paper covering the provisions of the various County-based Well-being Plans, including that for Pembrokeshire prepared by the Pembrokeshire Public Service Board. That will help to inform the Integrated Sustainability Appraisal for the SDP by providing a local as well as an all-Wales perspective on well-being aspirations.</p>	Comments noted. This work may be undertaken as part of the Integrated Sustainability Appraisal.	No
REF: PCC 14	<p>Appendix 3 – Community Involvement Scheme</p> <p>No comments.</p>	Comments noted.	No
REF: PCC 15	<p>Appendix 4 – List of General Consultation Bodies</p> <p>PCC notes that Travelling Ahead is listed for Carmarthenshire County Council. Although not listed in the PCC LDP 2 Delivery Agreement, this organisation is now involved with the PCC LDP review and has assisted the gypsy and traveller community as well as PCC in</p>	Appendix 4 will be consolidated into a single consultee list for the region prior to final submission to WG. Travelling Ahead has already been captured as a consultee in Appendix 4.	No

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>responding to issues relating to future provision of gypsy and traveller accommodation. PCC suggests that this organisation should be included for each local planning authority contributing to the SDP.</p>		
REF: PCC 16	<p>Appendix 5 – Local Government Principal Offices No comment.</p>	Comments noted.	No
REF: PCC 17	<p>Appendix 6 – SDP Detailed Timetable No comment.</p>	Comments noted.	No
REF: PCC 18	<p>Appendix 7 – Risk Assessment River water quality issues have emerged as a major issue in many parts of SW Wales. Addressing the planning response to phosphate and dissolved inorganic nitrogen pollution in protected rivers in the region has already caused significant delays to the progress of LDP reviews towards adoption. There are now nutrient neutrality requirements in place for nitrogen in the Milford Haven Inner waterbody and for parts of the Loughor and also the Burry Inlet. The emergence of new evidence or identification of new problems in this regard poses a significant risk to the delivery of the regional SW Wales SDP and this should be referred to in the risk assessment, as it has the potential to delay or to stall the plan preparation process. This</p>	<p>Comments noted. Reference to nitrate and water quality to be added to the risk assessment. This is already covered in the risk assessment under the "Additional requirements arising from new legislation, national guidance or new evidence".</p>	Yes

LPA	COMMENTS	RESPONSE & ACTION	Change to DA Needed?
	<p>issue has the potential to make the Habitats Regulations Assessment of the SDP (referenced in Appendix 2) both lengthy and complex. The recent experience of PCC and of Carmarthenshire County Council in taking forward their LDP reviews demonstrates the importance of not underestimating the significance of this issue.</p>		
Carmarthenshire County Council			
	No comments received.	NA	NA
Neath Port Talbot County Borough Council			
	No comments received.	NA	NA

Table 2: General Consultation Bodies

Body	Comments	Response and Action	Change to DA Needed?
Codi Group			
REF: CG1	<p>RE: South West Wales Strategic Development Plan (SDP) (2026-2051) Draft Delivery Agreement</p> <p>With reference to the above and further to the release of the consultation document, we welcome the opportunity to comment on the content of the publication.</p> <p>With the recent merger of Pobl Group and Linc Cymru to create Codi Group, we are the largest housing, care and support provider in Wales, with the combined group managing over 25,000 homes across Wales. We have significant growth plans to deliver more quality homes across a mix of tenures and locations, creating better places to live, with further expansion plans for our care and support provision to meet future needs.</p> <p>Furthermore, we work within all authorities contained in the South West Wales CJC/SDP area and have aspirations to continue delivering homes within the authorities in the future. We actively</p>	Comments noted.	No

	<p>contribute to all housing related planning policy frameworks across the SDP area, and would welcome the opportunity to play a significant role in the aspirations of the SDP.</p> <p>With regard to the proposed Delivery Agreement, we support the proposed key consultation stages, which appear in accordance with the parameters if he SDP manual.</p> <p>We hope the comments set out above are helpful and would welcome the opportunity to input/comment further as the Plan advances.</p>		
RNIB Cymru			
REF: RNIB1	<p>RNIB Cymru welcomes the opportunity to provide feedback on the Draft Strategic Development Plan. We have identified areas we feel need to be strengthened in Chapter 5: Community Involvement Schemes.</p>	Comments noted.	No
REF: RNIB2	<p>In reference to 5.3, we would like to highlight the unique barriers blind and partially sighted people experience when attending public engagement sessions and when responding to consultations.</p> <p>We are consistently told by blind and partially sighted people that they are unable to respond to consultations as documents are not available in their required alternative format, whether that's large</p>	<p>Comments noted. All of our documents have been produced in an accessible format, meeting the latest accessibility requirements to capture a wider audience. We have tried and will continue to ensure access for everyone. Our accessible documents</p>	No

	<p>print, braille or audio, and that digital documents are not compatible with screen reader technology.</p> <p>Other barriers occur when consultations are only held online. While technology can represent a means of empowerment, inclusion, and independence for blind and partially sighted people, 28 percent of people with sight loss never use the internet or don't have access to it. This is higher than the proportion of people with other disabilities (13 percent) and non-disabled people (4 percent).¹ Digital exclusion is strongly linked to age, 47 percent of people with sight loss aged 75 years and over never use the internet or do not have access to it.² This compares to 28 percent of non-disabled people in the same age group.</p> <p>Many people experience a loss of digital skills after acquiring sight loss due to a lack of knowledge of accessibility features and confidence.³ Those online are more likely to have lower digital skills and to use technology less often. Only 69 percent of people with</p>	<p>allow people with visual impairments with screen readers and magnifiers, hearing impairments and motor disabilities (keyboard navigation) to access the same information as everyone else. This ensures equal access to content, not just the webpages, but also our downloadable materials. All documents associated with the SDP timetable will be made accessible. We will continue to strive for improvements but have to balance this with the limited resource.</p>	
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¹ (Understanding Society: Technology (RNIB, 2023)

² (Understanding Society: Technology (RNIB, 2023)

³ Online Today: Final evaluation (RNIB, 2018).

	<p>sight loss have basic foundation level digital skills, compared to 90 percent of the UK population.⁴</p> <p>We welcome that a telephone call can be arranged during office hours. If blind and partially sighted people do not engage, they are excluded from participating in their community and as a result do not have equitable access to key services, such as education, employment and health appointments.</p> <p>RNIB Cymru believes that small changes are needed to the language included in the document. For example, section 5.32 refers to ‘people with disabilities. We would encourage the use of the term ‘disabled people’ instead, to reflect Social Model of Disability language.</p> <p>We encourage reference to the social model of disability throughout the document, as there are genuine efforts to embed this model by the Welsh Government. This model was developed by disabled people and describes how people are disabled by barriers in society rather than their impairment or difference. Language around disability is incredibly important, and terms such as ‘people with disabilities’ and ‘hard to reach’ do not reflect this shift.</p>		
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⁴ Lloyds Bank UK Consumer Digital Index 2023 (Lloyds Bank, 2023).

	<p>The Welsh Government's Active Travel team recently shared a guidance document for Active Travel Maps with Local Authority Active Travel Officers that explains inclusive ways to engage with all groups of people. We have included sections of this document below as it highlights good examples of meaningful and accessible engagement, as well as inclusive language.</p>		
REF: RNIB3	<p>Appendix 3: ATNM inclusive engagement and consultation</p> <p>1. Overview</p> <p>Inclusive consultation, especially when the primary method is an online map-based survey, requires thoughtful design and clear communication to ensure a wide range of people can participate meaningfully.</p> <p>Inclusive engagement helps to ensure that:</p> <ul style="list-style-type: none"> • Local authorities are applying the core principles of the Welsh Government's Travel for All approach, particularly the principle of 'Involvement' by actively engaging people who face barriers, ensuring they have a meaningful role in shaping transport services and infrastructure. • People of all ages, abilities, and backgrounds can access and understand the consultation. • Barriers to participation (digital, linguistic, physical, cultural) are identified and addressed. 	<p>Comments noted. Any good practice tips that can be shared between the SDP and RTP/transport teams will be explored.</p>	<p>No</p>

	<ul style="list-style-type: none"> • Feedback is actively sought from underrepresented or seldom-heard groups. • Multiple formats and channels are used to reach people where they are. 		
REF: RNIB4	<p>2. Tools</p> <p>The list below, from the draft Active Travel Act Guidance sets out the tools local authorities can offer as alternatives to the online survey map. It is important to communicate a clear way for people to request tools if they need, such as a contact email on the survey website.</p> <ul style="list-style-type: none"> • Hosting events at key destinations (e.g. schools, workplaces, shopping areas, transport hubs) • Community street audits • Walking, wheeling, and cycling focus groups • Semi-structured interviews • Cycle route inspections • Posters and site notices along routes with clear participation instructions • Attendance at public events (e.g. open days, family fun days, university freshers' fairs) • Engagement with existing groups and forums (e.g. local access groups) • Radio and local media events 	Comments noted. Any good practice tips that can be shared between the SDP and RTP/transport teams will be explored.	No

	<ul style="list-style-type: none"> • Digital and remote engagement tools • Online surveys promoted via social media or QR codes • Targeted digital marketing (e.g. social media ads) • Dedicated online consultation platforms with interactive mapping tools • Telephone surveys and letter/flyer drops • Social media-led events and online forum discussions targeting current or potential active travel users 		
REF: RNIB5	<p>3. Examples of good practice</p> <p>4.1. Torfaen ATNM consultation 2025</p> <p>Torfaen recently held a successful meeting with a representative from Sight Cymru to discuss accessibility challenges faced by visually impaired residents. The representative outlined several recurring issues, including:</p> <ul style="list-style-type: none"> • Waste and recycling bins obstructing pavements • A-frames blocking footpaths • Difficulties at pedestrian crossing points • Overhanging vegetation • Uneven footpath surfaces <p>During the meeting, specific locations were identified, and the Torfaen Active Travel Team used the DMW system to log each concern. Entries were read back to the representative for</p>	Comments noted. Any good practice tips that can be shared between other LPA teams will be explored.	No

	<p>confirmation before submission, and the feedback received was positive.</p> <p>Torfaen offered to arrange site visits to walk through the affected routes if requested. Additionally, the team expressed willingness to connect Sight Cymru with counterparts in neighbouring authorities should similar issues arise outside Torfaen’s jurisdiction.</p> <p>This meeting builds on previous engagement, including a route walk with another Sight Cymru representative and phone calls with other members of the organisation. A common concern raised was the placement of bins on pavements during collection days, particularly in valley communities where pavements are narrow and properties often lack rear access, making bin placement a significant barrier.</p> <p>To ensure inclusive engagement, Torfaen has conducted a range of activities including:</p> <ul style="list-style-type: none">• Microsoft Teams meetings• Telephone consultations• Site visits• Drop-in workshops <p>Why It Matters:</p> <p>These efforts aim to accommodate residents with protected characteristics and ensure their voices are reflected in local planning and policy implementation.</p>		
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REF: RNIB6	<p>4.2. Cardiff’s “Picture in Words” approach</p> <p>Cardiff Council has adopted a thoughtful and inclusive method for presenting infrastructure proposals by creating a “picture in words” document. This is a plain-language, sensory-based narrative that describes how a scheme will look and feel in real life. This approach is designed to make technical plans accessible to:</p> <ul style="list-style-type: none"> • Disabled people, including those with visual impairments • People with cognitive or learning difficulties • Anyone who finds maps, drawings, or technical language difficult to interpret <p>Key Features of the Approach:</p> <ul style="list-style-type: none"> • Plain, Descriptive Language: Avoids jargon and uses everyday terms to explain the scheme. • Sensory Detail: Describes textures, sounds, and physical sensations (e.g. tactile paving, rumble strips) to help users visualise and understand the environment. • Step-by-Step Experience: Walks the reader through how a pedestrian or cyclist would experience the space, from approaching the crossing to navigating it. • User-Centred Framing: Focuses on how different groups; children, wheelchair users, cyclists, people with prams interact with the infrastructure. 	Comments noted. Any good practice tips that can be shared between other LPA teams will be explored.	No
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	<ul style="list-style-type: none"> • Safety and Accessibility Context: Explains how design features improve safety, visibility, and ease of use for vulnerable road users. <p>Supporting Materials: Cardiff has also produced a glossary of terms and descriptions, which helps readers understand unfamiliar concepts and technical language.</p> <p>Why It Matters: This approach ensures that more people can understand and comment on proposals, particularly those who are often excluded from traditional consultation formats. It supports inclusive engagement and helps build infrastructure that reflects the needs of all users.</p>		
REF: RNIB7	<p>4.3. Pembrokeshire Tactile Maps</p> <p>Pembrokeshire County Council is working with the RNIB to trial tactile maps in Saundersfoot.</p> <p>Why It Matters: This initiative supports inclusive engagement by making spatial information accessible to people with visual impairments and others who may struggle with traditional maps. By providing tactile maps, Pembrokeshire is helping users better understand and navigate proposed active travel routes.</p>	Comments noted. Any good practice tips that can be shared between other LPA teams will be explored.	No

REF: RNIB8	<p>4.4 Practical considerations for in-person events</p> <p>TfW's Access and Inclusion panel have suggested some practical considerations for in-person events, noted below.</p> <p>4.4.1. Venue Accessibility & Practical Considerations</p> <ul style="list-style-type: none"> • Signage & Wayfinding: Clear signs outside venues (e.g. "Everyone Welcome") and practical directions like "by the little Tesco" help people feel invited and oriented. • Physical Accessibility: Ensure venues are on bus routes, linked up to timetables (not finishing after last bus), have accessible entrances, and consider which door is used. Be present outside to guide people in. • Layout Sensitivity: Avoid isolating participants (e.g. some wheelchairs can't get close enough to information tables); ensure inclusive seating arrangements. <p>4.4.2. Supportive Facilitation</p> <ul style="list-style-type: none"> • Confidence Building: Assign facilitators to tables to gently prompt and support quieter voices • One-to-One Support: Offer individual assistance, especially for those with dual sensory impairments • Ask, Don't Assume: Use inclusive language and ask people how they prefer to engage. <p>4.4.3. Community-Led & Culturally Aware Engagement</p>	Comments noted. Any good practice tips that can be shared between other LPA teams/organisations will be explored.	No
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	<ul style="list-style-type: none"> Local Forums: Torfaen Access Forum shows the value of personal connections and continuity in engagement. Community Hubs: Hosting events in familiar, trusted spaces helps overcome digital exclusion and builds trust. Cultural Sensitivity: Recognise that engagement styles vary across local authority teams; tailor approaches accordingly. 		
The Canal and River Trust in Wales – Glandwr Cymru			
REF: GC1	<p>Thank you for your consultation on the above document.</p> <p>We are the charity who look after and bring to life 76 miles of canals in Wales. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of Wales. The Trust is known as Glandŵr Cymru, the Canal & River Trust in Wales and we are a statutory consultee in the Development Management process. As such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.</p>	Comments noted.	No

	<p>Please find below Glandŵr Cymru response to the Southwest Wales Corporate Joint Committee Consultation on the Strategic Development Plan Draft Delivery Agreement. We hope that the comments provided are clear and helpful and that you will address these points.</p>		
REF: GC2	<p>General comments:</p> <p>Our waterways should, in due course be acknowledged within the policy document, as significant blue/green infrastructure, which can serve as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of the Council areas mentioned above.</p> <p>Our vision is: living waterways transform places and enrich lives. The health and performance of the inland waterway network owned and managed by us is directly linked to the quality of the neighbourhood and environment through which our canals and rivers pass.</p> <p>The public benefit delivered from canals, rivers and docks in turn is substantially dependent upon their health and performance. An</p>	<p>Comments noted. This will be addressed through future stages of SDP plan production.</p>	<p>No</p>

	<p>underperforming waterway is usually a symptom of the economic and social failure of the neighbourhood through which it passes.</p> <p>Our waterways can provide benefits to the wellbeing of local communities. We believe that the formation of planning policy that identifies and includes approaches for promoting access to our network is highly important for helping to realise the positive benefits of our network to local communities.</p> <p>At all spatial levels there is a need to strengthen existing planning policy in order to provide a robust planning policy framework that supports canals, rivers and docks as a cross-cutting policy theme; acknowledging the value of canals, rivers and docks, in terms of:</p> <ul style="list-style-type: none"> • being a form of strategic and local infrastructure performing multiple functions (including sustainable transport, open space and green infrastructure, flood risk, drainage and water supply), which is likely to be affected by all scales and types of development • their roles in improving the physical environment, opportunities for people and the wider economy • supporting their ability to deliver economic, social and environmental benefits to local communities and the nation as a whole • their contribution to supporting climate change, carbon reduction and environmental sustainability 		
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	<ul style="list-style-type: none"> • the public benefits including people's health and wellbeing that can be and are being generated by our canals, rivers and docks • supporting future development, regeneration and improvement of canals, rivers and docks • protecting the heritage, environmental and recreational value of canals, rivers and docks and safeguarding them against inappropriate development • securing the long-term sustainability of inland waterway network, their corridors and adjoining communities 		
REF: GC3	<p>Detailed comments</p> <p>Appendix 2 – Key Documents & Evidence Base Assessments</p> <p>Appendix 2 is a list of documents and evidence base which will be provided in due course as the plan progresses. The Trust welcome further involvement on matters relating to</p> <ul style="list-style-type: none"> • • Green Infrastructure • • Infrastructure Delivery Plan • • Strategic Flood Consequences Assessment (SFCA). We may be able to provide information to inform the SFCA for our waterways <p>The Trust provides a key role as a green-blue-based infrastructure and heritage organisation and our waterways should be recognised</p>	Comments noted.	No

	<p>in strategic planning, climate resilience, biodiversity, health and wellbeing, and regional connectivity evidence bases and policies. We would welcome early engagement on these matters as documents are prepared.</p>		
REF: GC4	<p>Appendix 4</p> <p>Each LPA has provided a list of their consultees.</p> <p>Parts of the Swansea Canal in Swansea and Neath Port Talbot. We do not own or care for the Neath or Tennant canals. It is noted that the Canal & River Trust is included as a General Consultee and that the relevant restoration Groups (Swansea Canal Society and Neath & Tennant Canal) are also included.</p> <p>We own and care for the Monmouthshire & Brecon Canal in the BBNPA area. It is noted that the Canal & River Trust is not included as a consultee at all. We assume that this is an oversight rather than deliberate as we are normally consulted on both policy matters and planning applications. Please can we be included in the list of consultees. We would welcome further discussions with the NPA if they do not wish us to be added to the list.</p> <p>We do not own or care for any canal or canal restoration routes within Pembrokeshire or Carmarthenshire. Pembrokeshire and Camarthenshire. It is noted that the Canal & River Trust is included as a General Consultee even though we do not own or maintain any canals in these areas. There are no canal restoration routes through</p>	<p>Comments noted. Each LPA/NPA was consulted in compiling Appendix 4 General Consultee list. Appendix 4 will be consolidated into a single updated list for the Final Delivery Agreement.</p>	<p>No</p>

	<p>these areas. Please can we be removed from the list of consultees. We would welcome further discussions with these Local Authorities if they wish us to remain on the list. The above comments do not prejudice any further matters that might be raised at a later stage as the plan/document emerges.</p>		
<p>PAVS – Pembrokeshire Association of Voluntary Services</p>			
<p>REF: PAVS1</p>	<p>Thank you for your email inviting consultation responses to the Draft Delivery Agreement of the South West Wales Strategic Development Plan.</p> <p>I am writing on behalf of the four County Voluntary Councils in Pembrokeshire, Carmarthenshire, Swansea and Neath Port Talbot.</p> <p>Please can you add the following to your consultation database as we wish to be included in the process going forward.</p> <p>jessica.bickerton@pavs.org.uk</p> <p>marie.mitchell@cavs.org.uk</p> <p>amanda_carr@scvs.org.uk</p> <p>tonyp@nptcvs.org.uk</p>	<p>Comments noted. The four suggested contacts will be added to the SDP consultation database and Appendix 4.</p>	<p>Yes</p>

REF: PAVS2	<p>We represent the voluntary and community sector in each County, providing advice, guidance and support to organisations and individuals. We bring immense breadth and depth of knowledge and insight of the communities with which we work. On that basis, we are keen to be actively involved in the Community Involvement Scheme to ensure that the Strategic Development Plan properly reflects and captures the ambitions and perspectives of individuals and communities.</p> <p>For example:</p> <ul style="list-style-type: none"> • we undertake consultations, co-production and community engagement • we host forums and networks of third sector organisations, including in transport sector, the wellbeing, health and social care sector, with organisations supporting children, young people and families • we work closely with and support social enterprises operating in a wide range of sectors <p>We are members of our respective Public Services Boards and work closely through the Regional Partnerships Boards of our Health Boards so we are well versed in bringing both strategic and</p>	Comments noted. Each LPA/NPA was consulted in compiling Appendix 4 General Consultee list. Appendix 4 will be consolidated into a single updated list for the Final Delivery Agreement.	No
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	<p>operational perspectives to public policy contexts. Furthermore, we work closely with a range of private sector partners including through the management of Community Funds.</p> <p>In terms of the consultation plan you have set out, we are keen to work with you to ensure that it reflects the Five Ways of Working set out in the Wellbeing of Future Generations Act and to reflect the plan's commitments to engagement and listening to seldom heard voices. The plan lacks considerable detail on 'how' you intend to undertake consultation with such a wide range of potential consultees, so we would welcome an opportunity to discuss further. NB your general consultation list includes many organisations/groups that no longer exist so working through umbrella organisations such as ourselves will be vital.</p>		
REF: PAVS3	<p>We would like to see the delivery agreement acknowledge the importance of vibrant communities as an essential foundation to and complement for economic growth. And we trust that the delivery agreement will include a focus on the wellbeing economy, the need for health and social care provision (private and public) particularly in the context of a rapidly aging demographic and high levels of poverty/deprivation across our four Counties.</p>	Comments noted.	No

	We look forward to engaging with you on this important work and stand ready to meet with your team for further discussions.		
PACTO – Pembrokeshire Association of Community Transport Organisations			
REF: PACTO1	<p>1. Introduction</p> <p>PACTO welcomes the opportunity to respond to the Draft Delivery Agreement (DA) for the preparation of the South West Wales Strategic Development Plan (SDP). We recognise the SDP as a critical regional instrument intended to align land use planning, economic prosperity, transport planning and sustainable development across the four counties and two National Parks of South West Wales.</p> <p>The DA outlines a clear timetable, governance structure and consultation framework for development of the SDP, and PACTO strongly supports the commitment to early, meaningful and inclusive engagement throughout the plan-making process.</p> <p>As the coordinating body for community transport in Pembrokeshire, representing multiple operators and hundreds of volunteers supporting thousands of residents, PACTO is uniquely positioned to contribute evidence and insight on rural mobility, accessibility challenges, and the lived realities of transport disadvantage.</p>	Comments noted.	No

<p>REF: PACTO2</p>	<p>2. General Comments on the Delivery Agreement</p> <p>PACTO welcomes the DA's recognition of:</p> <ul style="list-style-type: none"> • The need for sustained and structured engagement with general and specific consultation bodies, voluntary sector organisations and community groups throughout all stages of preparation. • The commitment to bilingual, accessible and inclusive engagement, including for protected groups and hard-to-reach communities. • The integration of the SDP with the Well-being of Future Generations Act, the Sustainable Transport Hierarchy, and wider regional strategies. <p>However, we believe there are opportunities to strengthen the Delivery Agreement so that the mobility needs of rural residents—particularly in areas of deep transport deprivation such as large parts of Pembrokeshire—are fully recognised and included in the evidence base, strategic vision and spatial outcomes.</p>	<p>Comments noted. These issues will be addressed at future stages of SDP plan production.</p>	<p>No</p>
<p>REF: PACTO3</p>	<p>3. Specific Points for Strengthening the Draft DA</p> <p>3.1 Explicit Recognition of Community Transport as a Strategic Stakeholder</p> <p>PACTO welcomes confirmation in Appendix 4 that PACTO is included within the General Consultation Bodies list for</p>	<p>The SDP regulations are quite specific in terms of the type of consultee and who should form part of the Specific Consultee list. However, PACTO has</p>	<p>Yes</p>

	<p>Pembrokeshire. We request that this recognition is strengthened within the DA itself to reflect the regional role of community transport provision across rural areas.</p> <p>While the CIS identifies “general consultation bodies”, including voluntary groups and organisations representing disabled people and those experiencing disadvantage, PACTO and our community transport organisations are not explicitly mentioned within the list of stakeholders or statutory consultees.</p> <p>PACTO request: That existing <i>community transport organisations</i> be explicitly referenced within:</p> <ul style="list-style-type: none"> • The list of General Consultation Bodies. • The stakeholder engagement framework for the evidence base, Preferred Strategy and Deposit Plan stages. • Any working groups relating to transport, accessibility, social inclusion or rural mobility. <p>This will ensure the sector’s contribution is not overlooked in a process that will shape regional transport and accessibility provision for the next 25 years.</p>	<p>been added to the Specific consultee list at Appendix 4.</p>	
<p>REF: PACTO4</p>	<p>3.2 Ensuring Rural Accessibility is Embedded in the Evidence Base</p> <p>The DA rightly notes the need for a robust and proportionate evidence base, and for consideration of all drivers of spatial change</p>	<p>Comments noted. The DA is a procedural document that sets out how the plan will be produced, who will be involved, and how long it will take. On</p>	<p>No</p>

	<p>across the region. However, there is currently no explicit reference to rural accessibility, community mobility needs, or the unique travel patterns of areas with high levels of isolation.</p>	<p>this basis nothing is ruled in or out and there are key processes contained within the SDP regulations and a draft SDP Manual that relate to things like assembling an evidence base.</p>	
<p>REF: PACTO5</p>	<p>PACTO request: That the evidence base explicitly includes:</p> <ul style="list-style-type: none"> • Rural accessibility mapping and transport deprivation analysis. • Assessment of unmet transport need across health, employment, and social participation. • Detailed consideration of future demand due to demographic change (e.g., Pembrokeshire’s rapidly ageing population). • Recognition of community transport as a key mitigator of inequality in areas where commercial or statutory services cannot be provided. <p>PACTO is willing to supply existing data and collaborate on new evidence where needed.</p>	<p>Comments noted. The DA 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 and a draft SDP Manual that relate to things like assembling an evidence base.</p>	<p>No</p>
<p>REF: PACTO6</p>	<p>3.3 Early Integration of Community Transport into Sustainability Appraisal (ISA/SEA/HIA)</p> <p>The DA explains that the ISA/SEA/HIA will integrate environmental, socio-economic, health and Welsh language considerations throughout the plan-making process.</p>	<p>Comments noted. The DA 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</p>	<p>No</p>

	<p>Given the substantial evidence linking transport access to:</p> <ul style="list-style-type: none"> • health outcomes, • employment and skills, • social isolation, • equalities impacts, <p>community transport must play a central role in informing these assessments.</p> <p>PACTO request:</p> <ul style="list-style-type: none"> • That the ISA scoping stage (May–June 2026) explicitly considers transport disadvantage and community transport provision. • That PACTO and its members be invited to contribute evidence on health mobility, social isolation, equality impacts and Welsh-language implications (especially in rural Welsh-speaking communities). 	<p>there are key processes contained within the SDP regulations and a draft SDP Manual that relate to things like assembling an evidence base and scoping content for an Integrated Impact Assessment where these issues will be considered.</p>	
<p>REF: PACTO7</p>	<p>3.4 Representation on the Strategic Planning Sub-Committee (SPSC) Working Group</p> <p>The SPSC will oversee preparation of the SDP and consider key elements of the DA, evidence base and consultation processes. While political membership is fixed, the DA states the SPSC will ensure <i>expert and sector-specific advice</i> is available.</p>	<p>Comments noted. The Strategic Planning Sub Committee (SPSC) Working Group is comprised of the Cabinet Members of each constituent authority with responsibility for planning. These arrangements reflect</p>	<p>No</p>

	<p>PACTO request: That the SPSC Working Group includes representation (or routine invited participation) from:</p> <ul style="list-style-type: none"> • Community transport specialists • Rural mobility experts • Voluntary sector transport advisors <p>PACTO can provide representation or nominate sector specialists from Pembrokeshire.</p>	<p>the agreed governance structure for overseeing preparation of the Strategic Development Plan and consideration of the Delivery Agreement, evidence base and consultation processes.</p> <p>While the Delivery Agreement recognises the importance of expert and sector specific advice, it is not anticipated that additional formal representation will be added to the SPSC Working Group at this stage. Instead, specialist input will be sought through existing mechanisms, including consultation with the Private Sector Advisory Board, evidence gathering exercises, statutory consultation stages and established forums for scrutiny and engagement.</p> <p>This approach ensures that relevant expertise, including on transport and mobility matters, can inform plan</p>	
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		preparation in a proportionate way, while maintaining clear governance arrangements and roles for decision making.	
REF: PACTO8	<p>3.5 Alignment Between SDP and Regional Transport Plan (RTP)</p> <p>The DA recognises the statutory requirement for CJsCs to prepare both an SDP and an RTP, and that the two must be tightly aligned. Community transport plays a critical bridging role between land-use planning and local transport provision. Failure to properly integrate CT into both plans risks:</p> <ul style="list-style-type: none"> • continued gaps in rural access • increased social isolation • hindering delivery of the Well-being Goals • undermining decarbonisation objectives <p>PACTO request: That the DA emphasises the need for parallel engagement with CT organisations across both the SDP and RTP, and that evidence collected for one process should directly inform the other.</p>	Comments noted. The SDP and RTP will ensure alignment with each other.	No
REF: PACTO9	<p>3.6 Need for Resourcing the Evidence and Engagement Processes</p>	Comments noted.	No

	<p>PACTO notes the DA acknowledges significant resourcing and staffing challenges for the SDP team, which may hinder the breadth and depth of early-stage engagement and evidence gathering.</p> <p>This may particularly disadvantage rural communities and smaller third-sector organisations reliant on early dialogue.</p> <p>PACTO offer: PACTO stands ready to assist by:</p> <ul style="list-style-type: none"> • providing early evidence, • facilitating community engagement sessions, • supporting rural consultations, and • contributing lived-experience case studies for Pembrokeshire residents. <p>This can mitigate some resourcing constraints while ensuring rural voices are properly reflected.</p>		
<p>REF: PACTO10</p>	<p>4. Comments on the Consultation Approach (CIS)</p> <p>PACTO welcomes:</p> <ul style="list-style-type: none"> • The DA's structured approach to 5-week and 6-week consultation windows. • Commitments to bilingual engagement and digital inclusion. • Clear processes for managing representations and maintaining transparency. 	<p>Comments noted.</p>	<p>No</p>

	<p>PACTO request: That community transport operators be included in:</p> <ul style="list-style-type: none"> • Targeted engagement for the ISA Scoping stage (2026). • Engagement events for the Preferred Strategy (2028). • Stakeholder sessions during Deposit Plan consultation (2029). <p>Community transport users—often older people, disabled people, and those without private transport—should also be explicitly considered as a priority hard-to-reach group within the CIS.</p>		
REF: PACTO11	<p>5. Conclusions and Summary of Key Requests</p> <p>PACTO strongly supports the DA and welcomes the opportunity to contribute throughout the SDP preparation process. To ensure that rural and transport-disadvantaged communities are not left behind, we request the following amendments and commitments:</p> <p>Key Requests</p> <ol style="list-style-type: none"> 1. Explicit recognition of community transport as a stakeholder within the Delivery Agreement and CIS. 2. Comprehensive rural access and mobility analysis within the evidence base. 3. Inclusion of CT impacts in the ISA/SEA/HIA, especially around equality, health, and social well-being. 	Comments noted.	No

	<p>4. Formal engagement route for CT providers within SPSC Working Group processes.</p> <p>5. Explicit alignment between RTP and SDP in relation to community-led transport solutions.</p> <p>6. Inclusion of CT users as a priority group within consultation methodologies.</p> <p>PACTO is committed to supporting the CJC through data provision, engagement support and policy expertise.</p> <p>We look forward to continued constructive engagement as the Strategic Development Plan progresses.</p>		
Tanya Morgan			
REF TM1	<p>We could do with more council homes in seven sisters especially flats for single people or couples who are taking up 3 bed houses. There are the old tips that could be used .nice new playground for children like the one in tonna or glynneath. Could do with a tesco petrol station like the one in glynneath down by the nant y cafan. Decent roads that are not full of potholes. How about a Greggs</p>	<p>Comments noted. These issues will be addressed at future stages of SDP plan production.</p>	No
Heneb – The Trust for Welsh Archaeology			

REF: H1	<p>Thank you for consulting us on this document, as advisors to the Unitary Authorities in Wales regarding archaeology and the historic environment for planning, pre-planning and heritage management matters.</p> <p>As we have noted in responses to LDP and RLDP consultations, archaeology and the historic environment form an important part of the heritage of this region. By including Policies and Objectives via the SDP/RLDP system, this ensures change to archaeology and the historic environment is sustainably managed, understood, and protected within the planning context.</p> <p>Archaeology and the historic environment include a wide range of both statutorily designated historic assets as well as non-designated historic assets: areas of land, structures, artefacts, and buried archaeological remains. As time periods, the range of sites includes artefacts, buried and upstanding remains from the prehistoric to modern. It can be large scale representation of minerals and metals extraction, transportation and land and water management, as well as prehistoric upland settlement patterns and information on isolated finds of all periods, all of which contribute to the region's distinctive heritage and current form.</p> <p>The remit of statutorily protected sites falls to Cadw, and the non-designated sites falls to Heneb: The Trust for Welsh Archaeology</p>	Comments noted.	No
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	(formed by the merger of the four former Welsh Archaeological Trusts in 2024). The Historic Environment (Wales) Act 2023, and the resulting cascade of Policy, Advice and Best Practice Guidance provides a framework for the inclusion in Development Plans at a strategic level for managing change.		
REF: H2	The Historic Environment (Wales) Act 2023 should be added to the list in Para 4.7.	Comments Noted. The Historic Environment (Wales) Act 2023 will be added to the list of legislation.	Yes
REF: H3	Archaeology and the Historic Environment should not be seen as any constraint to development on any scale but viewed with the Well-being of Future Generations (Wales) Act, contributes substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals. The draft Delivery Agreement is helpful and charts the process and key stages which will allow us to be aware of upcoming consultations, and we should remain as a consultee. There are areas where we can contribute to the shape of the plan regarding archaeology and the historic environment.	Comments Noted.	No
Nature Recovery Team- Swansea Council			

REF:SCNRT 1	Thank you for consulting the Nature Recovery Team at Swansea Council. I can confirm that we wish to remain consulted throughout the development of the plan.	Comments noted.	No
REF:SCNRT 2	<p>We have no comments to make on the DA, however regarding Appendix 4 – List of General Consultation Bodies, we feel the following additional groups should be included for Swansea:</p> <p>The Wildlife Trust of South and West Wales (WTSWW) Associated British Ports (ABP) Clyne Valley Community Project (CVCP) Maritime Quarter Residents Association (MQRA) South Wales Trunk Road Agency (SWTRA) Swansea MAD – Make A Difference Young Farmers YMCA Pobl is now Codi (housing)</p>	<p>Please note that Codi housing group, YMCA, Young Farmers, Clyne Valley Community Project (CVCP), Associated British Ports (ABP), The Wildlife Trust of South and West Wales (WTSWW) and SWTRA have already been consulted as part of Appendix 4.</p> <p>Swansea MAD- Make A Difference and Maritime Quarter Residents Association (MQRA) will be added to Appendix 4</p>	Yes
Swansea Community Boat Trust			
REF SCBT1	Swansea Community Boat Trust operates “Copper Jack” on the Tawe River Navigation from outside the National Waterfront Museum to the Copper Works sites at Landore, where a landing pontoon has recently been installed.	Comments noted.	No

	<p>100,000 passengers have come on trips since 2011 - a superb achievement by the Trust.</p> <p>Copper Jack was purpose built in 2014 to serve a wide range of people, including those with restricted mobility. It has an access platform lift, adapted washroom and central heating. Copper Jack is licensed by the Maritime & Coastguard Agency (MCA) to carry 47 passengers, though around 40 is the usual number.</p> <p>The project is run by unpaid volunteers. Boat skippers are trained inhouse and licensed by MCA. Heritage guides give a lively commentary highlighting the industrial heritage and wildlife interest of the river corridor as the boat glides by.</p> <p>Copper Jack has become a key part of the tourist destination being developed in the lower Swansea Valley, as it links together Swansea Museum, National Waterfront Museum, the Copper Works, Penderyn Whisky and heritage structures along the river as a package.</p> <p>The Trust supports the proposals to connect the Tawe river navigation to the historic Tennant and Swansea canals, thereby</p>		
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creating a 35 mile inland waterways system extending across Swansea Bay. The routes are protected by the Neath Port Talbot and Swansea LDPs and by the Fabian Corridor SPG.

Please see the consultants report commissioned by the Trust in June 2025 :

https://drive.google.com/file/d/1Xo08bPFxcSAyiB_RMpF6QoWOytCDAKZX/view?usp=sharing

Addressing the climate emergency by creating areas of urban forest, with sustainable transport (passenger boats and active travel routes), will also enhance the visitor offer.

A new Heritage Trail connecting the heritage sites alongside the waterways in the Neath and Swansea Valleys could be marketed as a visitor destination of national significance.

The contribution to the South West Wales Regional Economic Delivery Plan (2021-30)

The Copper Jack boat trips are already supporting “*Mission 3: Growing and sustaining the ‘experience’ offer*”. It is an authentic heritage offering, created by the local community and valued by visitors, “*that brings our post-industrial and natural landscapes to life and promotes healthy living for all*”.

	<p>The Trust is pleased to note that <i>“The CJC will ... establish mechanisms for a strong non-government voice (for example from ...the third sector) in influencing priorities and maintaining oversight.”</i></p>		
REF SCBT2	<p><u>Initial comments on the SDP (2026-2051) Draft Delivery Agreement</u></p> <p>From a first reading, we note the continued commitment to growing and sustaining the experience economy and that the contribution of industrial heritage is recognised.</p> <p>Also that Biodiversity, Placemaking and Climate Challenge are amongst the Key Outcomes.</p> <p>Does “socio-economic duty” (page 14) include health benefits for the community?</p> <p>SWWR’s “portfolio and plans” are mentioned – where can these be viewed?</p> <p>If projects with significant volunteer input are proposed, perhaps advisory panels with community representatives might be considered? This would help ensure that the Community Involvement Scheme is “effective and meaningful” by providing a structured way for the community to take some ownership of the process.</p>	Comments noted.	No

	<p>The consultation process as outlined does perhaps seem to be a little prescriptive in its approach, but the Trust does agree that setting “realistic expectations” would be essential.</p> <p>Swansea Community Boat Trust looks forward to participating in the public consultations on the Preferred Strategy and the Deposit Plan in due course.</p>		
REF SCBT3	<p><u>The Potential for Community Benefit from the Strategic Development Plan (2026-2051)</u></p> <p>Some community inspired projects such as the regeneration of the inland waterways of Swansea Bay require substantial funding. They also cross council boundaries. The SDP could play a key role in facilitating and coordinating community access to funding programmes.</p> <p>The Trust recognises the achievements of the canal owners, voluntary organisations, local authorities and other stakeholders, who have been engaged over many years in the ongoing regeneration of the Swansea, Neath and Tennant canals.</p> <p>From 1974 onwards the Neath Canal was restored by Neath Borough Council (later Neath Port Talbot CBC), with the stunning</p>	Comments noted.	No

	<p>new Ynysbwlllog Aqueduct installed in 2008. The project was initiated and sustained by a voluntary group – Neath & Tennant Canals Trust – though the local authority secured much of the funding. Some of the restored infrastructure is now deteriorating through lack of use by boats, though the canal and towpath are still widely used for active leisure and tourism.</p> <p>From 1981, restoration of the Swansea Canal was undertaken mainly by another voluntary group - Swansea Canal Society, though in recent years funding from Swansea Council has facilitated construction of a canal visitor centre and the reopening of two locks in Clydach. These are remarkable achievements by a voluntary organisation.</p> <p>Since 2011, the Swansea community boats – currently “Copper Jack” – have operated on the Tawe River Navigation. The project was supported by Swansea Council from the outset, most recently with the provision of the landing pontoon at the Hafod/Morfa Copper Works site and others are planned along the river navigation and at the Swansea Waterfront.</p> <p>The Trust suggests that if the canal regeneration schemes in Neath and Swansea, together with the community boat on the Tawe, had</p>		
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	<p>been undertaken at the same time, this would have added considerable impetus to the development of the Swansea Bay Inland Waterway.</p> <p>The South West Wales Strategic Development Plan (2026-2051) could potentially have a key strategic role, bringing together community organisations and other stakeholders to put a master plan in place to deliver the regional waterways project in manageable phases as the funding became available.</p>		
<p>South West Wales Police – Designing Out Crime- Mike Harvey</p>			
<p>REF: SWWP1</p>	<p>In respect of the above, and at the appropriate stage of the process, I would like to have the opportunity to request and to state the importance, that one of the objectives of the Strategic Development Plan should be a Safe and Secure Wales.</p> <p>Welsh Government has been a great supporter over the years of Designing out Crime and Secured by Design by their inclusion in various documents and policies.</p>	<p>Comments noted.</p>	<p>No</p>
<p>REF: SWWP2</p>	<p>Welsh Government Beautiful Homes and Spaces.</p> <p>All Welsh Government grant funded social housing in Wales must meet the Secured by Design Gold Standard to meet the</p>	<p>Comments noted.</p>	<p>No</p>

	<p>Development Quality Requirements (DQR) set out in Beautiful Homes and Spaces.</p> <p>Welsh Government’s Technical Advice Note (TAN)12.</p> <p>Paragraph 5.17.2 of TAN12 states “Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.”</p> <p>Paragraph 5.17.3 of TAN 12 states “The Safer Places and Secured by Design Initiative provide recognised standards, that have been shown to reduce crime (particularly residential burglary) and the impact of crime upon neighbourhoods. It is desirable for the security of all housing developments, public buildings, and all buildings funded by public bodies, to achieve similar measurable standards.”</p> <p>Welsh Government’s Design and Access Statements April 2017 guidance</p>		
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	<p>States under Paragraph (v):” How Secured by Design principles have been considered and details of any consultation undertaken with Designing Out Crime Officers (DOCO).”</p> <p>Planning Policy Wales (PPW) 2024:</p> <p>PPW Wales states under 3.11 “Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal.”</p> <p>As can be seen from above Welsh Government have addressed community safety and crime prevention, and also been supportive of Secured by Design.</p> <p>National Legislation.</p> <p>Section 17 of the Crime and Disorder Act.</p>		
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	<p>Section 17 of the Crime and Disorder Act requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they can reasonably to reduce these problems.</p> <p>Violence Against Women and Girls (VAWG).</p> <p>The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.</p> <p>In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime and child sexual abuse.</p> <p>Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all.</p>		
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	Therefore, I would ask that at the appropriate time in the process I be consulted to produce a section in the Strategic Development Plan under the heading A Safe and Secure Wales.		
North Pembrokeshire Trade & Tourism			
REF: NPTT1	Thank you for the invitation to be the contact person for North Pembrokeshire Trade and Tourism with the SWWCJC. I have read some of the documents and look forward to the next stage.	Comments Noted	No
REF: NPTT2	For initial comments I would say that tourism and agriculture, which form the largest and longest lasting employment sectors in the region are insufficiently recognised in the analysis of the region. Certainly for North Pembrokeshire they are the most significant and it is a concern that their future does not feature.	Comments noted.	No