

Report of: Strategic Policy Manager

Subject: Response to the South West Wales Corporate Joint Committee on the draft Delivery Agreement for the Strategic Development Plan.

Decision Required: Yes

Recommendation:

The Authority is recommended to:

- A. Approve the attached consultation response on the Strategic Development Plan's Draft Delivery Agreement and agree its submission to the South West Wales Corporate Joint Committee (see Appendix A)

1. Key Messages

The South West Wales Corporate Joint Committee (CJC) has a statutory duty under the Local Government and Elections (Wales) Act 2021 and the associated Strategic Development Plan Regulations to prepare a Strategic Development Plan (SDP).

The Strategic Development Plan for South West Wales will set out the regional framework for the development and use of land. Upon adoption, the SDP will have development plan status and form part of the development plan hierarchy in Wales.

The first stage in the SDP process is for the CJC to prepare a Delivery Agreement setting out the timetable for preparing the Plan and the Community Involvement Scheme.

The Draft Delivery Agreement is being consulted on for a five week period, until 20 February. A draft response has been prepared in Appendix A which is supportive and raises some issues regarding resources and engagement which is intended to be constructive and assist in strengthening the Delivery Agreement.

Members of the Authority will be asked to approve the attached response (see Appendix A) as the Pembrokeshire Coast National Park Authority response.

2. Background

The South West Wales Corporate Joint Committee (CJC) is a regional government body established to improve economic well-being through enhanced collaboration and strategic planning across South West Wales. It brings together four Local Authorities (Carmarthenshire, Neath Port Talbot, Pembrokeshire and Swansea) and two National Park Authorities (Pembrokeshire Coast National Park and Bannau Brycheiniog) to address key regional priorities.

CJCs were established following the implementation of Regulations by Welsh Government in April 2021. One of their statutory duties, set out in the Local Government and Elections (Wales) Act 2021 and the associated Strategic Development Plan Regulations, is to prepare a Strategic Development Plan (SDP).

The SDP will identify strategic objectives and policies for housing, employment, transport, infrastructure and environmental protection to ensure growth is sustainable and coordinated between authority areas. Upon adoption, the SDP will have development plan status and form part of the development plan hierarchy in Wales. The SDP must be in general conformity with Future Wales: The National Plan 2040 and the LDP is required to be in general conformity with the SDP.

The first stage in the SDP process is for the CJC to prepare a Delivery Agreement. This has two main parts: a Statement of Community Involvement which sets out how the plan will be produced and who will be involved and how; and a detailed timetable that sets out how long it will take to prepare the plan, following all of the stages set out in Welsh Government regulations and guidance.

The Draft Delivery Agreement is subject to consultation with the constituent authorities and relevant stakeholders for a period of five weeks. The CJC is keen to submit the Delivery Agreement to Welsh Government by the end of the financial year as there is potential for £100k of Welsh Government funding upon submission of the Delivery Agreement and an additional £100k once the DA is approved. A draft consultation response is provided in Appendix A which is generally supportive to the Draft Delivery Agreement and identifies some areas where clarification or strengthening would be beneficial.

3. Main Issues

The consultation response is supportive and raises the following main issues:

Timetable

The proposed timetable for preparation of the SDP spans five years and nine months, with adoption scheduled for December 2031. Officers consider the proposed timetable to be ambitious, yet appropriate and proportionate.

Engagement

The Draft Delivery Agreement refers to the statutory minimum consultation periods of six weeks. The draft response encourages consideration of extending consultation periods beyond the minimum wherever possible in order to maximise engagement, particularly for harder-to-reach groups and to support more inclusive and informed participation.

The Draft Delivery Agreement proposes a default approach of prioritising electronic communication and virtual engagement. Whilst this is efficient and accessible for many stakeholders, paper copies of documents should be made available at specified locations. The response also highlights the importance of in person public information exhibitions distributed across communities.

Costs and resourcing

The cost of preparing the SDP is estimated to be approximately £3.2 million, which reflects the scale and complexity of the task. Under current legislation, National Park Authorities are only obliged to financially support the strategic planning functions of the CJC. Contributions are calculated based on population size, and in 2025/26 the NPA's financial contribution was £672. The CJC agreed its budget for the 2026/27 financial year on 27 January 2026, with the Authority's contribution set at £654. This budget option does not provide for the preparation of the SDP during the next financial year, and further discussions will be held with the Welsh Government regarding funding of the SDP. An alternative budget option (option 1) was presented to the CJC, which would support preparation of the SDP during the next financial year. Under this option, the Authority's financial contribution would increase to £18,787. This level of contribution is considered to be reasonably manageable.

The response recognises the challenges associated with securing adequate resources and emphasises the importance of clarity around funding arrangements and the need for sustained commitment from all participating authorities.

Staffing and secondments

The Draft Delivery Agreement identifies secondments as a potentially useful and cost effective way to support SDP preparation. Whilst the benefits of this approach are recognised, the response notes that the Authority is preparing its own replacement Local Development Plan 3 over the next four years, which places pressure on our staffing resources. Nevertheless, Officers consider it important that the National Park's interests are represented and would welcome officer involvement in the preparation of the SDP.

4. Legal Background

CJCs were established following the implementation of Regulations by Welsh Government in April 2021. One of their statutory duties, set out in the Local Government and Elections (Wales) Act 2021 and the associated Strategic Development Plan Regulations, is to prepare a Strategic Development Plan (SDP). The preparation of the Delivery Agreement is the first step in preparation of the SDP.

The CJC has stated that failure to prepare and adopt a Delivery Agreement by the end of March 2026 may result in legal challenge from Welsh Government for failing to deliver the CJC's statutory duties. The Authority should respond to the consultation as it is a constituent authority within the CJC area.

5. Financial considerations

There are no direct financial implications arising from agreeing the consultation response. However, the preparation of the SDP has significant longer-term resource implications for all participating authorities, which are acknowledged within the response. The Authority's financial contribution will increase significantly to support preparation of the SDP, this cost is considered to be reasonably manageable.

6. Impact on our Public Sector Duties

6.1 Integrated Assessment Completed: No. This is not necessary as this is required to be prepared by the CJC.

6.2 Welsh language impacts

The response in Appendix A highlights the value of in-person public information exhibitions, distributed across communities, to ensure broad, inclusive engagement and to enable Welsh speakers to participate fully in the process.

6.3 Section 6 Biodiversity Duty and Carbon Emission Impacts

The CJC is required to comply with the Section 6 Biodiversity Duty. The preparation of the SDP will consider environmental, biodiversity and climate evidence in developing strategic options.

6.4 Equality, Socio- Economic Duty, Human Rights

The draft response encourages consultation periods longer than the statutory minimum and in-person drop in sessions which will help harder to reach groups and those who may be digitally excluded.

6.5 Well-being of Future Generations (Wales) Act

The SDP will play an important role in shaping sustainable development across the region. Engagement with the Delivery Agreement consultation supports the Act's goals, particularly in relation to cohesive communities, and long-term planning.

7. Conclusion

The Authority is recommended to:

- A. Approve the attached consultation response and agree its submission to the South West Wales Corporate Joint Committee (see Appendix A)

8. List of background documents:

- Draft response (Appendix A)
- Link to consultation [Corporate Joint Committee for South West Wales – Neath Port Talbot Council](#)

(For further information, please contact Emma Gladstone via emmag@pembrokeshirecoast.org.uk)



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Corporate Joint Committee for South West Wales

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XX February 2026

Dear Charlotte,

**Re: South West Wales Corporate Joint Committee - Consultation on
the Strategic Development Plan Draft Delivery Agreement**

Thank you for the opportunity to comment on the draft Delivery Agreement (DA) for the Strategic Development Plan (SDP). The National Park Authority is engaged with the SDP process through its membership of the CJC and recognises the importance of the SDP in providing a coherent strategic planning framework across the region.

Overall, the Authority is supportive of the draft Delivery Agreement and considers that it provides a clear and structured basis for progressing preparation of the SDP. Our comments in Annex A are intended to be constructive and to assist in strengthening delivery and engagement as the process moves forward.

The National Park Authority looks forward to continuing to engage positively and constructively in the preparation of the SDP.

Yours sincerely

Dr. Madeleine Havard
Chair
Pembrokeshire Coast National Park Authority



*Rydym yn croesawu cael
gohebiaeth yn Gymraeg, a
byddwn yn ateb gohebiaeth yn
Gymraeg. Na fydd gohebu yn
Gymraeg yn arwain at oedi.*

*We welcome receiving
correspondence in Welsh, and will
respond to any correspondence in
Welsh. Corresponding in Welsh
will not lead to delay.*

Annex A: Comments from the Pembrokeshire Coast National Park Authority in response to Consultation on the Strategic Development Plan for South West Wales, Draft Delivery Agreement.

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.

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 windows would help to maximise engagement, particularly for harder-to-reach groups, and support more informed and inclusive participation.

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 local communities, including those who may be less comfortable with digital-only engagement.

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.

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 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.