



## **ACS Response to the Local Development Plans Process Review**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Local Development Plans Process Review. ACS represents 33,500 local shops across the UK, including the Co-Operative Group, Spar UK, Nisa, Costcutter and thousands of independent retailers. 3219 convenience stores are located in Wales, employing 24,530 people. These stores are located in all types of locations: rural (38%), suburban (24%) and urban (38%)<sup>1</sup>.

An inclusive and efficient planning system is essential for the growth of convenience stores and for sustainable high streets and local centres. We strongly advocate a plan led approach to planning policy and urge the Welsh Government to ensure that the mistakes that have been made in England are not made in Wales. We want to see strong evidence based Local Development Plans that are consulted on with the entire community and that have the capability to stand up to applications made by large developers.

We broadly support the measures set out in the Local Development Plan Review consultations and have responded to the relevant questions below:

***Q3. Where an authority is proposing to make partial revisions to an adopted LDP and the plan strategy remains sound, do you agree with the provision of the short-form revision procedure (quicker, shorter and more proportionate)?***

Local Development Plans (LDPs) are an important part of planning policy in Wales, allowing communities, businesses and local authorities to decide how their local areas should change in the future. We therefore welcome a reduction in the required stages for plan revision where the issues involved are not significant to warrant the full procedure. The benefits of reducing these stages can be seen in the slow implementation of Local Plans in England, where only 13% of Local Plans are up-to-date and comply with the National Planning Policy Framework<sup>2</sup>. Evidence from England also suggests that the provision of housing in local development plans is often a source of delay<sup>3</sup>.

Partial revisions to an adopted LDP will also mean fewer delays in updating an LDP where smaller changes are required. The short-form revision process is appropriate for changes such as allocating new sites and completing this within 12 months, as opposed to 4 years helps to maintain up-to-date plans. Following revision procedure based on evidence and considering the effect of any changes on an LDP as a whole is also necessary to ensure the coherence of an LDP as a whole and to apply properly planning policy at a local level. Plan preparation and adoption will also be well facilitated by LDPs that are succinct and focused on the specific needs for a local area.

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<sup>1</sup> ACS Local Shop Report 2014

<sup>2</sup> Nathaniel Lichfield & Partners: [Positive Preparations: A review of housing targets and Local Plans](#)

<sup>3</sup> [Positive Preparations: A Review of Housing Targets and Local Plans](#)

***Q4. Do you agree with the proposed package of soundness tests?***

LDPs must take account of social, as well as economic, considerations when ensuring that developments are sustainable. A strong town centre first policy is necessary to maintain essential local services. Clear, simple soundness tests are essential to assess whether preparation requirements have been properly followed and to ensure consistency across different LDPs in Wales. Determining whether a plan is appropriate must consider the provision of adequate high streets, secondary parades, and other in-town retail space, which is necessary to support local communities.

ACS welcomes the Welsh Government's continued commitment to a strong planning policy and its role in encouraging and ensuring the adoption of sound and up-to-date LDPs that are based on robust evidence.

**For more information on this submission please contact Sophie Mew at [sophie.mew@acs.org.uk](mailto:sophie.mew@acs.org.uk) or call 01252 515001.**