



Supplementary Planning Document No. 1: Housing
Supplementary Planning Document No. 2: Householder
Extensions and Alterations

STRATEGIC ENVIRONMENTAL ASSESSMENT

Consultation Screening Report

For Historic England, Natural England and the Environment Agency

Pre - Regulation 9 (1) (Screening) Consultation

Environmental Assessment of Plans and Programmes Regulations 2004 (SI No. 1633)

June 2019

Contents

	Page No.
1.0 Purpose of this Document	2
2.0 What is Strategic Environmental Assessment?	2
3.0 Supplementary Planning Documents Programme	2
4.0 Which Supplementary Planning Documents are being prepared?	2
5.0 Layout of the Assessment	4
6.0 Stage 1 - Is SEA applicable to the SPDs?	4
7.0 Stage 2 - Determining the Likely Significance of Effects on the Environment	9
8.0 Other Social, Economic and Environmental Assessments	15
9.0 Stage 3 - Conclusions	16
10.0 Next Steps	16

List of Tables

Table 1: SEA Questions and Relevant Table/Paragraph	4
Table 2: Is SEA applicable to the Housing and Householder Extensions and Alterations SPDs?	6
Table 3a Housing SPD – Determining the likely significance of effects on the Environment	9
Table 3b Householder Extension and Alterations SPD – Determining the likely significance of effects on the Environment	12

List of Figures

Figure 1: Application of the SEA Directive to Plans and Programmes	5
---	---

1.0 Purpose of this Document

- 1.1 This draft Screening Report has been produced to help determine the need for a Strategic Environmental Assessment (SEA) for the Housing Supplementary Planning Document and Householder Extensions and Alterations Supplementary Planning Document. It has been carried out in accordance with the European Directive 2001/42/EC applied through the Environmental Assessment of Plans and Programmes Regulations (SI No.1633).
- 1.2 This version of the Screening Report is to be used specifically to engage with the 'Consultation Bodies', whose comments will be taken into account before publishing the final ~~Determination Screening Report~~ for wider public consultation and engagement, alongside the draft Supplementary Planning Documents (SPDs).

2.0 What is Strategic Environmental Assessment?

- 2.1 Strategic Environmental Assessment (SEA) is required under a European Union (EU) related Directive 2001/42/EC which calls for "an assessment of the effects of certain plans and programmes on the environment". In doing so, it seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The SEA process is distinct from the planning process and governed by a different set of Environmental Regulations.
- 2.2 Stockton Borough Council, as a 'Responsible Authority' under those Regulations, must determine whether SEA is applicable to the SPDs and that being the case whether they are likely to have Significant Environmental Effects.

3.0 Supplementary Planning Documents Programme

- 3.1 **The Local Development Scheme (2016 – 2019)**¹ identifies existing SPDs and sets out that over the period of the LDS, and subject to resources and the progression of the Local Plan, the Council intended to produce a Householder Extension Guide and rationalise, redesign and update the guidance currently set out in a portfolio of SPDs. The Council has reconsidered the approach and is now preparing a series of simple, clear and effective documents. It is envisaged that in addition to the two in preparation, further SPDs will be produced in the near future. The LDS will be updated to reflect those decisions and set a timetable for the production of further SPDs in the very near future.

4.0 Which Supplementary Planning Documents are being prepared?

- 4.1 **Two SPDs are being produced and they relate directly to policies in the adopted Stockton on Tees Local Plan (2019).** These give advice on the interpretation and implementation of Local Plan policies H4 Meeting House Needs, SD3 Housing Strategy, SD5 Natural, Built and Historic Environment and SD8 Sustainable Design Principles. Both documents will be material considerations in the determination of planning applications.

¹ <https://www.stockton.gov.uk/media/1585769/local-development-scheme-2016-2019.pdf>

- **The Housing SPD** provides guidance on the interpretation and application of Local Plan policies relating to meeting the Borough's housing needs; it does not relate to overall supply calculations nor does it allocate sites. This SPD addresses the principles and processes that will ensure the delivery of a range of market and affordable housing to meet local need and demand. It touches upon housing densities, house types, and the provision of affordable, accessible and adaptable homes. The draft document covers the following matters:
 - Housing Mix and Design
 - Housing Mix
 - Specialist Housing
 - Design
 - Affordable Housing
 - What is affordable housing?
 - How much affordable housing is required?
 - What affordable housing types are required?
 - How will affordable housing provision be provided?
 - Management of affordable housing
 - Viability
 - Vacant building credit
 - Accessible and Adaptable Housing including Wheelchair User Homes
 - What are Accessible and Adaptable Homes?
 - How much Accessible and Adaptable Housing is required?
 - Exemptions
 - Self-build and custom housing

- **The Householder Extensions and Alterations SPD** is intended to replace the existing Household Extension Guide Supplementary Planning Guidance Note 2 (2004) and aims to provide clear guidance on the design, scale and siting of householder developments. As well as a material consideration in the determination of planning applications, it represents good practice, and is therefore helpful and relevant when planning permission is not required. The draft document covers the following matters:
 - Do I need Planning Permission?
 - Submitting a Planning Enquiry
 - Talking to your Neighbours
 - ~~Prior Approval Applications~~
 - Conservation Areas and Listed Buildings
 - Tree Preservation Orders and Trees within Conservation Areas
 - Other Consents
 - Submitting an Application
 - General Design Principles
 - Scale and Massing
 - Materials and Architectural Features
 - Separation Distances
 - Privacy and Overshadowing
 - Corner Plots
 - Car Parking

- Front, Side and Rear Extensions
- ~~Conservatories~~
- Dormer Windows and Loft Conversions
- Garages and Detached Buildings
- Balconies, Raised Decking and Terraces
- Hard Surfacing and Boundary Treatments
- Renewable Energy Generation (Microgeneration)
- ~~Satellite Dishes and TV and Radio Antenna~~

5.0 Layout of the Assessment

5.1 The Assessment is set out in **three stages** and evidence is presented in ~~in~~ **three tables** reflecting the requirements of the associated Legislation and Regulations. In **Stage 1**, the Assessment seeks to determine whether SEA is relevant to each SPD, and then if so, in **Stage 2** identify the likely impacts of the SPDs and the significance of those impacts on the environment. This will enable the Council to make a preliminary conclusion in **Stage 3** whether an SEA Environmental Report is required. This preliminary view is required to enable consultation with Consultation Bodies. **Table 1** below sets out where each Stage of the assessment can be found in this document.

Table 1 – SEA Questions and Relevant Table/Paragraph

Stage	Question	Assessment	Page No (s)
1	Is SEA is applicable to the SPD?	Table 2	6
2	What is the likely significance of effects on the environment?	Table 3a (Housing SPD) and Table 3b (Householder Extensions and Alterations SPD)	9 & 12
3	Is an SEA Environmental Report required?	See Paragraph 9.0 Conclusions	16

6.0 Stage 1- Is SEA applicable to the SPDs?

6.1 **Stage 1** of the Assessment is to determine if SEA is applicable to the plan or programme – in this case the Supplementary Planning Documents. This is carried out using a series of eight questions. These are taken from ‘A Practical Guide to the Strategic Environmental Assessment Directive’ published by the Office for the Deputy Prime Minister in 2005. A figure taken from that guidance illustrates a pathway to a determination, and is set out below at **Figure 1**. **Table 2** below sets out those questions again and the Council’s response for each of the proposed SPDs. It provides the Council’s conclusion to **Stage 1**.

Figure 1 Application of the SEA Directive to Plans and Programmes

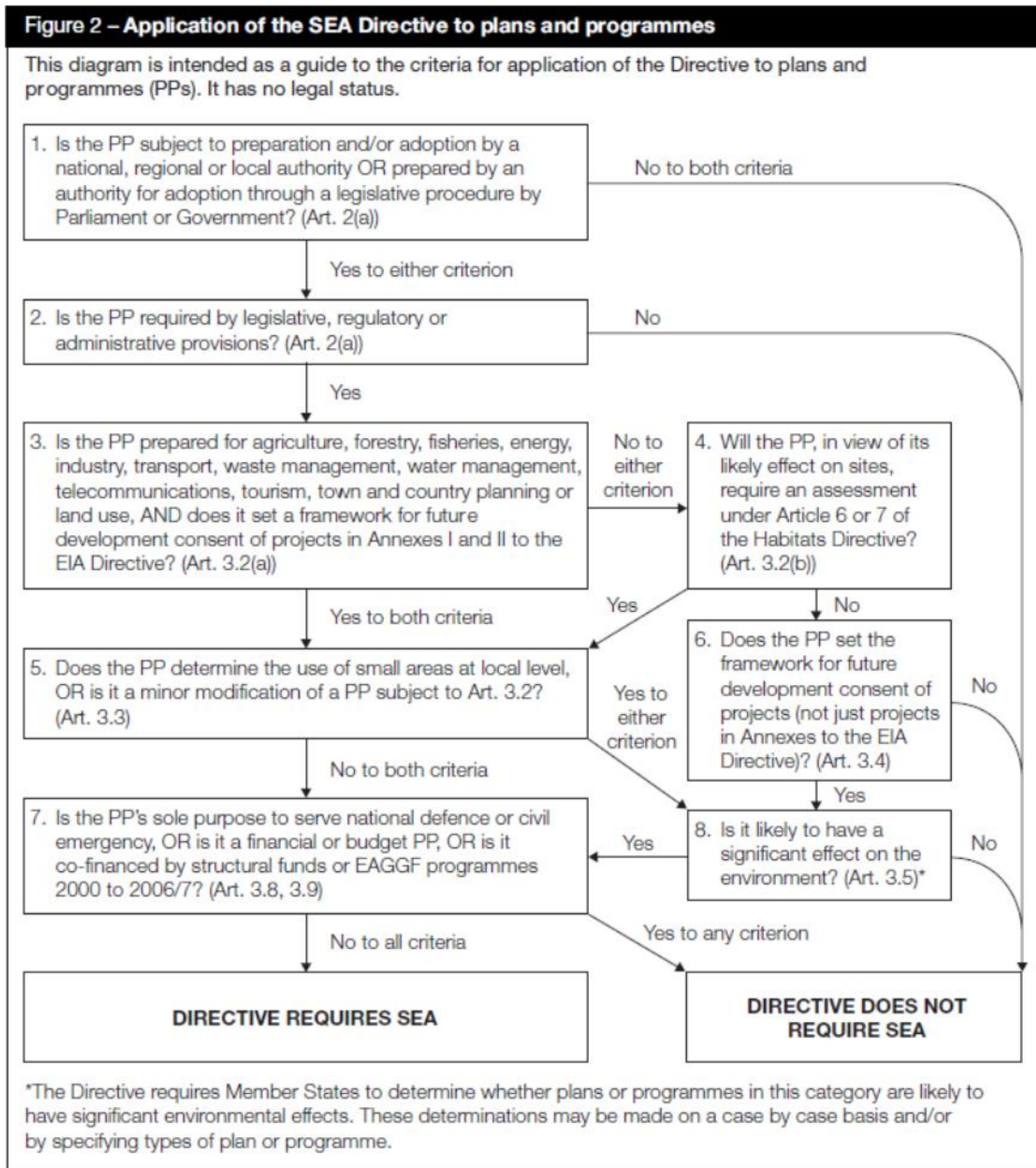


Table 2 – Is SEA applicable to the Housing and Householder Extensions and Alterations SPDs?

Question No.	Question	Housing SPD	Next Step	Householder Extensions and Alterations SPD	Next Step
1	Is the PP* subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art.2(a))	Yes - Following public consultation and publicity, the SPD will be formally adopted by the Council.	Q2	Yes - Following public consultation and publicity, the SPD will be formally adopted by the Council.	Q2
2	Is the PP required by legislative, regulatory or administrative provisions*? (Art 2(a))	Yes – The SPD is required as an update to the information set out in the Affordable Housing SPD (2014), High Density Development: Flats and Apartments Supplementary Planning Guidance (2005), and provide assistance with the interpretation and implementation of Stockton on Tees Local Plan Policy H4 – Meeting Housing Needs, including a new policy requirement for accessible and adaptable homes. Policy H4.6 refers to a successor document to the current Affordable Housing SPD 8.	Q3	Yes – The SPD is required as an update to the information set out in the Householder Extension Guide (2004), to reflect the best practice and local distinctiveness. It sets out how applicants can approach development to address the relevant elements of adopted Local Plan policy, primarily SD3 Housing Strategy, SD5 Natural, Built and Historic Environment and SD8 Sustainable Design Principles.	Q3
3	Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and	Yes – The SPD will be for Town and Country Planning purposes. Yes - It sets a framework all types of development which may include those falling within Annexes I and II of the EIA Directive.	Q5	Yes – The SPD will be for Town and Country Planning purposes. No - It will not set a framework for all types of development falling within Annexes I and II of the EIA Directive.	Q4

	country planning or land use, AND does it set a future framework for future development consent of projects in Annexes I and II to the EIA Directive (Art. 3.2(a))?				
4	Will the PP, in view of the likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art 3.2 (b))?	-	-	No - A Habitat Regulations Assessment Screening and as relevant Appropriate Assessment were undertaken to inform the preparation of the parent Policies in the now Adopted Stockton on Tees Local Plan.	Q6
5	Does the PP determine the use of small areas at local level, OR is it minor modification of a PP subject to Art 3.2? (Art 3.3)	Yes - The SPD supplements the Local Plan policies on affordable housing which define the type and mix of dwellings on development sites, which may in turn determine the other types of land uses provided.	Q8	-	-
6	Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive (Art 3 (5)))?	-	-	Yes - The SPD will set the framework for determining a variety of planning applications. It will also inform master planning work.	Q8
7	Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by	-	-	-	-

	structural funds or EAGGF programmes 2000 to 2006/7 (Art 3 (8), 3(9))				
8	Is it likely to have a significant effect on the environment? (Art 3(5))	No – The SPD will have a largely neutral impact on the environment. See Table 3a for assessment against SEA criteria.	-	No – The SPD will have a largely positive impact on the environment by promoting good and sustainable design principles. See Table 3b for assessment against SEA criteria.	-
Conclusion to Stage 1		The Council considers that the SEA Directive is applicable to the Housing and Householder Extensions and Alterations Supplementary Planning Documents. See Tables 3a and 3b for assessment against SEA criteria for likely significance of effects on the environment and the need for further reporting under the Directive.			

*PP - Plan or Programme

7.0 Stage 2 - Determining the Likely Significance of Effects on the Environment

7.1 As the Council has determined that SEA is applicable, **Stage 2** of the Assessment is of the likely significance of effects on the environment. The determining criteria is taken from Schedule 1 of the Regulations², and is set out alongside the Council's response to them below; in **Table 3a** for the **Housing SPD** and **Table 3b** for the **Householder Extensions and Alterations SPD**.

Table 3a – Housing SPD - Determining the likely significance of effects on the Environment

Criteria		Assessment
1. Characteristics of the Plan or Programme		
a.	The degree to which the plan or programme sets the framework for projects, other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	<p>The Housing SPD will provide information on the interpretation and implementation of the Council's Local Plan policy H4 which seeks to meet the Borough's resident' housing needs.</p> <p>The document refers to the design, tenure and layout of housing, reflecting the standards set out in the Local Plan.</p>
b.	The degree to which the plans or programme influences other plans and programmes including those in the hierarchy;	<p>The National Planning Policy Framework provides the following glossary definition of Supplementary Planning Documents:</p> <p><i>“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.”</i></p> <p>The objective of the SPD is to focus on the design and tenure of development, and not primarily to influence other plans and programmes including those in the hierarchy. The standards and advice could be taken into account when the Council prepares other strategy and delivery documents, but this is not the primary objective.</p> <p>The SPD will have less material weight than the adopted Local Plan, it expands on existing</p>

² Criteria taken from Schedule 1 of [The Environmental Assessment of Plans and Programmes Regulations 2004](#)

		<p>policies and cannot introduce new policies. In terms of the hierarchy of planning documents, there will be little opportunity for the SPD to have an impact on the content of those documents above it.</p> <p>The intention of this document is to set out a consistent and transparent approach to Meeting Housing Needs and to help applicants in making applications for planning permission.</p>
c.	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The SPD will help the Council meet the Council's objectives contained in the adopted Local Plan which seeks to deliver sustainable development. It is intended to promote sustainable residential development. This SPD delivers specific advice related to Meeting Housing Needs, whereas other policies, and SPDs both now and in future iterations, address environmental considerations.</p> <p>Together these planning documents provide for the integration of environmental considerations into the planning decision.</p>
d.	Environmental problems relevant to the plan or programme; and	<p>The Housing SPD does not address identified environmental problems or issues relating to the Borough, nor is it likely that any new issues will be as a result of implementing this SPD.</p>
e.	The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	<p>The Housing SPD is not relevant to the implementation of European Union legislation on the environment.</p>
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to		
a.	The probability, duration, frequency and reversibility of the effects;	<p>Any effects arising from the advice and guidance in this SPD are not irreversible. The effects of this SPD are largely evident, and should in the main be identified prior to planning permission be granted where this SPD is relevant to consideration.</p>
b.	The cumulative nature of the effects;	<p>There are unlikely to be any adverse effects singularly or cumulatively on the environment arising from the implementation of this SPD.</p>

c.	The transboundary nature of the effects;	It is not envisaged that there will be any transboundary effects.
d.	The risks to human health or the environment (for example, due to accidents);	None.
e.	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The administrative area of Stockton Borough Council, has an area of 20,393 ha of with a population of 196,500. The effects will be limited to Borough of Stockton on Tees.
f.	The value and vulnerability of the area likely to be affected due to:	
	(i) Special natural characteristics or cultural heritage	<p>The Borough has special natural characteristics including areas protected and noted as ecological networks, and for biodiversity and geodiversity and cultural heritage including Listed Buildings and Conservation Areas. The value and vulnerability of those special characteristics are unlikely to be adversely affected by the advice and guidance in the SPD. The natural and cultural areas and assets are protected from unacceptable adverse impact by higher level local and national policies and guidance.</p> <p>The SPD is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water, and soil quality.</p> <p>The SPD is unlikely to bring forward development of an extent that would result in intensive land use.</p> <p>The SPD does not propose additional development beyond that of the adopted Local Plan for which environmental impacts have been evidenced and examined.</p>
	(ii) Exceeded environmental quality standards or limit values; or	
	(iii) Intensive land use; and	
g.	The effects on areas or landscapes which have a recognised national, Community or international protection status.	There are unlikely to be effects on the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site, five Sites of Special Scientific Interest, twelve Local Nature Reserves and fifty six Local Wildlife and Geological Sites, or those in neighbouring Authority areas. The parent policy (H4) has been assessed by Habitats Regulation Assessment (including Appropriate Assessment), and Sustainability Appraisal (incl. SEA). The process identified that the parent policy could give rise to

		adverse effects, however through the Appropriate Assessment concluded that given the mitigation and other consenting legal framework it would not give rise to any adverse effects upon the integrity of European sites.
What is the likely significance of effects on the environment?		In light of the above, the evidence, assessment and examination in public of the Stockton on Tees Local Plan in 2018, the Council considers that the SPD is unlikely to lead to <i>any significant effects</i> on the environment.

Table 3b – Householder Extensions and Alterations SPD (HE&A SPD) - Determining the likely significance of effects on the environment

Criteria		Assessment
3. Characteristics of the Plan or Programme		
a.	The degree to which the plan or programme sets the framework for projects, other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The HE&A SPD will provide information on the interpretation and implementation of the Council's Local Plan policies SD3, SD5 and SD8 through which the Council seeks to ensure that new development is designed to the highest possible standard, and takes into account of the need to conserve and enhance all aspects of the environment.
b.	The degree to which the plans or programme influences other plans and programmes including those in the hierarchy;	<p>The National Planning Policy Framework provides the following glossary definition of Supplementary Planning Documents:</p> <p><i>“Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.”</i></p> <p>The objective of the SPD is to focus on the design of new development, and not primarily to influence other plans and programmes including those in the hierarchy. The standards and advice could be taken into account when the Council prepares other strategy and delivery documents, but this is not the primary objective.</p> <p>The SPD will have less material weight than the adopted Local Plan, it expands on existing</p>

		<p>policies and cannot introduce new policies. In terms of the hierarchy of planning documents, there will be little opportunity for the SPD to have an impact on the content of those documents above it.</p> <p>The intention of this document is to help applicants in making applications for planning permission.</p>
c.	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	<p>The SPD will help the Council to meet the Council's objectives contained in the adopted Local Plan which seeks to deliver sustainable development. It is intended to promote sustainability over all forms of development. This SPD delivers specific advice related Housing Strategy, conservation and protection of the Natural, Built and Historic Environment and Sustainable Design Principles. Other Local Plan policies and SPDs, both now and in future iterations, address environmental considerations.</p> <p>Together these planning documents provide for the integration of environmental considerations into the planning decision taking.</p>
d.	Environmental problems relevant to the plan or programme; and	<p>The HE&A SPD does not address identified environmental problems or issues relating to the Borough, it is preventative in nature. It is not likely that any new environmental problems will arise as a result of implementing this SPD.</p>
e.	The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	<p>The HE&A SPD is not relevant to the implementation of European Union legislation on the environment.</p>
4. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to		
a.	The probability, duration, frequency and reversibility of the effects;	<p>Any effects arising from the advice and guidance in this SPD are not irreversible. The effects of this SPD are largely evident, and would be identified prior to planning permission being granted in cases where this SPD is relevant to consideration.</p>
b.	The cumulative nature of the effects;	<p>There are unlikely to be any adverse effects singularly or cumulatively on the environment.</p>

c.	The transboundary nature of the effects;	It is not envisaged that there will be any transboundary effects.
d.	The risks to human health or the environment (for example, due to accidents);	None.
e.	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The administrative area of Stockton Borough Council, has an area of 20,393 ha of with a population of 196,500. The effects will be limited to Borough of Stockton on Tees.
f.	The value and vulnerability of the area likely to be affected due to:	
	(iv) Special natural characteristics or cultural heritage	<p>The Borough has special natural characteristics including areas protected and noted as ecological networks, and for biodiversity and geodiversity and cultural heritage including Listed Buildings and Conservation Areas. The value and vulnerability of those special characteristics are unlikely to be adversely affected by the advice and guidance in the SPD. The natural and cultural areas and assets are protected from unacceptable adverse impact by higher level local and national policies and guidance.</p> <p>The SPD is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water, and soil quality.</p> <p>The SPD is unlikely to bring forward development of an extent that would result in intensive land use.</p> <p>The SPD does not propose additional development beyond that of the adopted Local Plan for which environmental impacts have been evidenced and examined.</p>
	(v) Exceeded environmental quality standards or limit values; or	
	(vi) Intensive land use; and	
g.	The effects on areas or landscapes which have a recognised national, Community or international protection status.	There are unlikely to be effects on the Teesmouth and Cleveland Coast Special Protection Area (SPA) and Ramsar Site, five Sites of Special Scientific Interest, twelve Local Nature Reserves and fifty six Local Wildlife and Geological Sites, or to those in neighbouring Authority areas. The parent policies (SD3, SD5 and SD8) have been assessed by Habitats Regulation Assessment (including Appropriate Assessment), and Sustainability Appraisal (incl. SEA). The process identified that the parent policies could give rise to adverse effects,

		however through the Appropriate Assessment concluded that given the mitigation and other consenting legal framework they would not give rise to any adverse effects upon the integrity of European sites.
What is the likely significance of effects on the environment?		In light of the above, the evidence, assessment and examination in public of the Stockton on Tees Local Plan in 2018, the Council considers that the SPD is unlikely to lead to <i>any significant effects</i> on the environment.

8.0 Other Social, Economic and Environmental Assessments

Sustainability Appraisal (Incl. SEA)

- 8.1 Although Sustainability Appraisal (SA) is required for all Development Plan documents, following the Planning Act 2008, SA is not required to be carried out for Supplementary Planning Documents, as they provide guidance, interpretation and implementation of adopted local plan policies – they should not and do not set out new policies themselves.
- 8.2 Nevertheless, the Council has considered the matter, and in doing so has taken account of the findings of the SA (including Strategic Environmental Assessment) undertaken in the formulation of the parent Local Plan strategy and policies. Given this, and as the SPDs are entirely consistent with the adopted Stockton on Tees Local Plan, the Council is confident that they are unlikely to have environmental, social or economic effects (significant or otherwise) beyond those of the plan it supplements.

Habitats Regulations Assessment (inc. Appropriate Assessment)

- 8.3 In addition to SEA and SA, the Council is also required to consider Habitats Regulations Assessment (HRA). HRA is the process used to determine whether a plan or project would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, known as European sites or European offshore marine sites. The need for an HRA is set out within the Conservation of Habitats and Species Regulations 2010 (which transposed EC Habitats Directive 92/43/EEC).
- 8.4 The Regulations state that the Council must assess the potential effects of its land use plans, in this case the SPDs, against the conservation objectives of any sites designated for their nature conservation importance. An HRA (with Appropriate Assessment) has been carried out on the 'parent DPD', the Stockton on Tees Local Plan.
- 8.5 The purpose of these SPDs is to expand upon policies with the Local Plan, which has already been the subject of an HRA. Therefore, the Council has determined that an HRA of the SPDs is not required. Furthermore, it should be noted that there are already avoidance and mitigation measures included in the Local Plan which will ensure that there would be no adverse effects on the ecological integrity of any European sites as a result of the proposals in the plan.

9.0 Stage 3 - Conclusions

- 9.1 The Council has taken account of the fact the 'Parent Policies', Strategies and Priorities to which the SPDs relate have, in the course of their preparation, been subject to Sustainability Appraisal including SEA and Habitats Regulations Assessment (with Appropriate Assessment). It has been determined at **Stage 1** that SEA is relevant to the SPDs. It is the Council's opinion at **Stage 2** that the Housing SPD and Householder Extensions and Alterations SPD are unlikely to cause significant environmental effects in their application to decision taking, particularly as the parent policies in the adopted Stockton on Tees Local Plan have very recently been subject to rigorous assessment in this respect both in preparation and in their final form through formal Examination in Public. At **Stage 3**, it is the Council's preliminary opinion that an Environmental Report is not required.

10.0 Next Steps

- 10.1 This preliminary SEA Screening Report has been prepared to be forwarded to the 'Consultation Bodies' – the Environment Agency, Natural England and Historic England for comment on content and conclusion. The responses received will then be taken into account in the preparation of the final determination. Provided that the responses from the Consultation Bodies do not cause alteration to the main conclusion of this Assessment, then the intention is to publish this as a statement setting out the reasons for this determination under Regulation 9 (3) for wider consultation alongside the SPDs.