

## Appendix G

Ref no.	SCI comment	WCC action
11/82	<p>You have underestimated the ability of many of the consultees e.g. environmental interest groups to respond within the given timescales as they rely on unpaid volunteers, who are invariably under resourced and do not meet on a day to day basis. It is impractical for such groups to respond to ad hoc, though important, consultations without significant prior notification and information. A period of at least 12 weeks is felt to be suitable.</p>	<p><b>See amendment: Paragraph 7.6</b></p> <p>The Government is fully committed to the provision of a speedy, efficient and effective planning system in which planning authorities meet rigorous speed and efficiency targets. Warwickshire County Council is fully committed to meeting these targets and thus must strike a balance between the need to consult and involve stakeholders in the planning process and the need to determine planning applications quickly and efficiently. Circular 15/92 “Publicity for Planning Applications” approved by the Secretary of State gives 21 days as a reasonable time for consultees to respond to an application and it is important that consultees adhere to this timetable. The County Planning Authority will however accept and consider comments and representations received after the end of the consultation period, provided the application has not already been determined.</p>
	<p>You need to do some pre-application consultation with the community, not just the applicant. The number of consultees permitted in the later stages is too limited, as is the time for representations. The time period is too limited for consultees and should allow at least a twelve-week period.</p>	<p>Pre-application consultation with the community is normally carried out in conjunction with the applicants. <b>(See Paragraph 7.11)</b></p> <p><b>No amendment has been made</b></p>
	<p>Notification of an application should be sent to ALL those who might be affected by an environmental, health or other impact and not just to those in the immediate vicinity. If such notifications are given via the local press they should be clear, noticeable and prominent.</p>	<p>Notifications and consultation regarding applications are carried out in accordance with the requirements of Circular 15/92 “Publicity for Planning Applications”. Applications which are likely to have a wider than purely local impact are advertised by site notices in the</p>

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		<p>local press. Notices are clear, noticeable and prominent.</p> <p><b>(See Paragraphs 7.1 and 7.2)</b></p> <p><b>No amendment has been made</b></p>
13/164	I think 21 days for reply from a voluntary group is not enough time - ok for neighbours but what if they are away on holiday.	<p><b>See amendment: Paragraph 7.6</b></p> <p>Circular 15/92 “Publicity for Planning Applications” approved by the Secretary of State gives 21 days as a reasonable time for consultees to respond to an application and it is important that consultees adhere to this timetable. The County Planning Authority will however accept and consider comments and representations received after the end of the consultation period, provided the application has not already been determined.</p>
	Will somebody from planning attend voluntary group meetings to answer questions on any fears the public has - before the planning decision is made and will it make a difference to the proposed plans?	<p>Warwickshire County Council’s planning case officers are always willing to attend public meetings or to meet local community groups to discuss a planning application before it is determined. Such meetings provide a useful opportunity to exchange information and certainly influence the decision-making process.</p> <p><b>(See Paragraph 7.10)</b></p> <p><b>No amendment has been made</b></p>
18/189	Figure 1 gives the stages but no date indication as to when	<b>See amendment: Paragraph 2.1</b>

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	these are likely to take place. This would have been helpful.	As this depends on the DPD it is considered more appropriate to refer to the LDS.
19/83	The consultation timetable appears to be well laid out, but what we perceive to achieve at the end of the session depends on the engagement of the consultees and to what proportion the representations are from each of the sections being present.	Comment noted.  <b>No amendment has been made</b>
	While the process is clear and fixed period allowance is given to the leverage of application filing, the rejected cases have an appeal system to follow which is evident by process through secretary of state and high court jurisdiction in this matter. More explicit views will come when much of the insight of the application is being determined and rejected cases weighed accordingly.	Comment noted, but would refer respondent to Figure 4 and its footnotes.  <b>No amendment has been made</b>
20/1	Figure 2 and paragraph 6.1 onwards sets out how the County Council will consult. The Highways Agency is concerned that they are not mentioned as being involved at the pre-application stage. The Highways Agency is keen to become involved at the pre-application stage in order to resolve/deal with transport matters as expediently as possible.	<b>See amendments: Paragraphs 6.2 and 7.11</b>  Above paragraphs now state that we refer developers to the Highways Agency for pre-application consultation, when appropriate.
24/0	Where developments are proposed near to the county boundaries, nearby or contiguous parishes or districts of the neighbouring county should be included in consultation. Obviously, geography will suggest who should be consulted in any particular case.	<b>See amendment: Paragraph 7.2</b>  The County Council endeavours to do this in all relevant cases.
26/193	Confusion of terminology between SPDs and LDDs and how	<b>See amendments: Figure 1 and Table 1</b>

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	they relate to DPDs. Who will decide what is what?	The diagram of the Local Development Framework has been moved from Appendix 3 to Figure 1 and Table 1 has been expanded to clarify this.
	Also not clear how widely you will consult so as to involve us only in relevant but in all relevant, applications.	This is set out in paragraphs 7.1 to 7.5  <b>No amendment has been made</b>
30/0	I would like to know of all good "planning" reasons for opposing or supporting planning applications.	<b>See amendment: Paragraph 7.13</b>  Section 38(6) of The Planning and Compulsory Purchase Act (2004) sets out the basis for planning decisions stating that Local Planning Authorities must determine planning applications in accordance with the provisions of the statutory Development Plan unless material considerations indicate otherwise. Thus the development plans should be the starting point for the determination of a planning application and other material considerations. These come into play only when the Development Plan is either not up to date or does not give clear guidance on the matter under consideration.  Examples of material considerations are included in paragraph 7.13
32/203	The overall layout and presentation of this document is encouraging. In making revisions consideration should be given to paragraph 7.4.2 (page 70) of <i>Creating Local Development Frameworks</i> , which indicates that the SCI	Comment noted.  <b>No amendment has been made</b>

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	should be approximately 25 pages in length.	
	The purpose of the SCI is to identify how and <u>when</u> local communities can become involved, this should be reflected in paragraph 1.1	<b>See amendment: Paragraph 1.1</b>  An amendment to clarify the purpose of the SCI.
	Has the scope of having common community engagement practices with other LDDs or strategies such as the Community Strategy been identified as a way of reducing cost and also reducing the potential of consultation fatigue?	Opportunities have been explored with both the Waste Management Strategy and the Community Strategy to avoid consultation fatigue, but unfortunately there was no potential for joint-working. The Waste Management Strategy was working to a different timetable and the Community Strategy lacked the technical content required for our more specialist Minerals and Waste plans. Community Strategies at county-level do not share the same potential for overlap as Community Strategies at district-level or at unitary authorities.  <b>No amendment has been made</b>
	The term “consultation” should be replaced with “engagement” to reflect the “step change” in Government planning objectives.	<b>See amendment: throughout document</b>  This has been noted and incorporated into the document.
	Figure 1 clearly identifies the opportunities for local communities to become involved in the preparation of DPDs; this will aid community awareness.	Comment noted.  <b>No amendment has been made</b>
	Paragraph 3.2 should be revised to reflect the fact that SCIs DPDs and SPDs are all classed as LDDs but it is only the DPDs that have development plan status.	<b>See amendments: Table 1 and Figure 1</b>  Table 1 has been revised and moving the diagram from Appendix 3 to Figure 1 should help to clarify this.

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	Consideration should be given to incorporating a diagram, which clearly identifies the stages involved with SPD preparation.	<p><b>See amendment: Figure 3</b></p> <p>Diagram has been incorporated.</p>
	The SCI should clearly identify the “hard to reach” groups which will be engaged during the community engagement practices of your authority. Such groups should include rural youth groups.	<p><b>See amendment: Paragraph 4.4</b></p> <p>Paragraph 4.4 has been amended to give greater clarity as to which groups we intend to make deliberate efforts to include. For a full listing of groups we targeted from our mailing list please see Appendix F.</p>
	Further details about the role and purpose of the LSP should be provided, including what community groups are represented and whether it will have an impact in the community engagement method preferences of the authority.	<p>At a County-level we have contacted all members of the Strategic LSP with limited success. Advice received from our officers responsible for the Strategic Plan (Community Strategy) was to concentrate on organisations with particular expertise in the area of minerals and waste. We explored this avenue with much greater success. We also made use of our Citizens Panel for a broader perspective. The LSPs for each of our District Councils are understandably concerned with their local issues, as identified in their Community Strategies. We have not received a great deal of interest in our specialist plans, but we continue to include members of local LSPs on our mailing list.</p> <p><b>No amendment has been made</b></p>
	Will there be any need to employ external consultants for any part of the LDF.	<p><b>See amendment: Paragraph 5.2</b></p> <p>Consultants will be used during the early stages of the Sustainability Appraisal process.</p>

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	<p><i>The SCI should be treated as a DPD during preparation and will require <u>Full Council</u> approval for both the Submission stage and Adoption stage of the preparation process.</i></p> <p>The above representation has since been superseded by ODPM advice, stating that the SCI does <u>not</u> require full council approval.</p>	<p><b>No amendment has been made</b></p>
	<p>It is encouraging to see that your authority promotes pre-application discussions between developers, local communities and your authority. However, this should be extended to the encouragement of pre-application discussions on minor planning applications as well as major applications.</p>	<p><b>See amendment: Paragraph 6.2</b></p> <p>We encourage pre-application discussions on all planning applications.</p>
	<p>The following organisations should be included within the appendix as consultees:</p> <ul style="list-style-type: none"> <li>- Museums, Libraries &amp; Archives West Midlands</li> <li>- Culture West Midlands</li> <li>- Tourism West Midlands</li> <li>- Arts Council West Midlands</li> <li>- MADE (Midlands Architecture and the Designed Environment)</li> <li>- West Midlands Planning Aid Service (WMPAS)</li> </ul>	<p><b>See amendment: Appendix 3</b></p> <p>These organisations have been added to our consultation mailing list and added to Appendix 2, under the sub section “Regional Interest Groups”</p>
	<p>Consideration should be given to incorporating a section that explains the purpose and potential benefits the WMPAS can bring to local communities.</p>	<p><b>See amendment: Paragraph 7.14</b></p> <p>The purpose of West Midlands Planning Aid Service is explained in the revised SCI.</p>
	<p>It is pleasing to see many references to engagement with DEFRA. However it needs clarifying that engagement will be via GOWM.</p>	<p><b>See amendment: Appendix 3</b></p>

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	It is encouraging to see the diagram that identifies the plans and strategies hierarchy. However, consideration should be given to adding a “national level” to indicate the national policies and strategies that help shape planning policies and strategies at the regional and local level.	<b>See amendment: Appendix 7</b>
	The SCI should establish what mechanisms are in place to enable the SCI to be monitored and what mechanisms are in place to trigger a review. This should include the role of the AMR and timescales for review. Are there mechanisms in place to learn from experiences and adapt or establish any new community engagement techniques if required?	<b>See amendment: Paragraph 5.4</b>  As part of our consultation we will invite respondents to comment on how satisfied they are with the methods of consultation. All feedback and the County Council’s response will be publicized in our Annual Monitoring Report (AMR). This will be included in all AMRs from December 2006 onwards.
	It should be highlighted that although community engagement is actively encouraged by your authority, it is likely that because of the nature of community engagement it will mean that a consensus on plan preparation will not always be achieved.	<b>See amendment: Paragraph 1.2</b>  It has been highlighted that consensus cannot always be achieved.
	The SCI would be strengthened with the inclusion of a general profile of the local area. This would give the community a broad understanding of the make-up of the Warwickshire County areas in terms of land area and demography.	<b>See amendment: Paragraph 1.3</b>  A profile of Warwickshire has been included.
	The SCI is required to include an audit of the proposed methods of community engagement that your authority will employ.	<b>See amendments: Paragraph 3.2 and Appendices 4, 5 and 6</b>  Community engagement methods have been appraised
	A section detailing what the future stages will be in the	<b>See amendment: Appendix 1</b>

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	<p>preparation of the SCI should be included. This section would be strengthened with the inclusion of a diagram, which clearly depicts the key stages of the preparation of the SCI as well as opportunities for local communities to become involved. The section should also identify how local communities will receive feedback on the comments that have been made.</p>	<p>A summary of the SCI process has been summarized in diagrammatic form.</p>
	<p>This SCI is required to contain a section that sets out the vision and standards of your authority for the SCI. This section should also indicate how the SCI would be used in relation to plan preparation and planning applications.</p>	<p><b>See amendment: Paragraph 1.7</b></p> <p>A key aim of these reforms to the planning system is to encourage the public to get involved in the planning system at as early a stage as possible. The SCI highlights the early stages of public involvement where we would welcome constructive involvement so as to avoid unnecessary delay later on. This “front loading” should help resolve conflicts, thereby avoiding lengthy public inquiries and revisions in the later stages. We are committed to involving our stakeholders and the local community in decisions that will affect their quality of life as encapsulated in Warwickshire County Council’s Social Inclusion Statement of Intent (November 2000) “We will involve and consult with all sectors of the community, to make sure that all people have an equal chance of having their voice and views heard and of influencing their future.”</p>
33/204	<p>English Nature would not find the methods of involvement suggested in the SCI the most effective means and would prefer to have the option to input via written consultation.</p>	<p>We would ask the respondent to please note that Table 4: Methods of Engagement includes “Direct letters to statutory bodies”</p>

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		<b>No amendment has been made</b>
	Paragraph 6.6 suggests that the consultation period for planning applications is 21 days. The SCI should be clear about consultation timescales and these should take into account statutory timescales, for example those within the Wildlife and Countryside Act 1981 (as amended) that apply for proposals that may affect a Site of Special Scientific Interest (SSSI)	<b>See amendment: Paragraph 7.6</b>
	Section 8 should include reference to consultation with the Warwickshire Museum Field services for proposals that may affect non-statutory nature conservation sites (Sites of Importance for Nature Conservation)	<b>See amendment: Table 7</b>
35/218	No comments. Having seen several SCIs they are all very similar	Comment noted.  <b>No amendment has been made</b>
37/220	There is no reference to Sustainability Appraisal until the third stage of the DPD engagement when it should be an interactive activity influencing the development of policy.	<b>See amendment: Title of Paragraph 3.4</b>  We would ask the respondent to please note that Sustainability Appraisals are already consulted on at the second stage of the DPD engagement. The amendment brings this forward to the first stage.
	1.7 refers to the District and Borough LDFs being in conformity with the RSS but 1.2, 1.3 and 1.4 and particularly 1.6 do not refer to the County LDFs conforming to the RSS	<b>See amendment: Table 1</b>  All LDFs have to be in conformity with the RSS
40/223	Much of the Report requires a lot of concentration; this is predominantly due to the number of acronyms. New Sections “title pages” use acronyms but don’t repeat what they stand for, this means lots of referring back to the beginning of the	<b>See amendments: throughout document</b>  This has been noted and changed throughout.

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	report.	
	The flow diagrams are much clearer and easier to understand than reams of text. The use of charts is also good, however from table 4 onwards the marking changes from tick to cross creating some confusion	<b>See amendments: Tables 4 and 6</b>
	Section 6 is very clear, other sections may be made clearer by having flow chart along with text rather than in appendix at the back as it retains the flow of the document for the reader.	<b>See amendment: Figure 1</b>  The diagram has been moved from Appendix 3 to Figure 1.
42/225	Support for consultation on Minerals sites and concern that plans should take account of environmental considerations.	Due to a misleading press article the response made here is not relevant to the SCI. The comments have been noted and the respondent has been added to our mailing list for future consultation on minerals and waste plans.  <b>No amendment has been made</b>
	Additional Contacts: Warwick museum, Warwickshire Wildlife Trust, Butterfly Conservation (Warwickshire Branch)	Warwickshire Wildlife Trust is already on our mailing list. Warwickshire Museum and Butterfly Conservation have been added.
43/226	Particular interest in finding out when operators need to promote “preferred areas”	Throughout the development of the LDF we encourage operators to give as much detail as possible at the earliest possible stages, so that issues such as “preferred areas” can be given informed consideration throughout the plan-making process.  <b>No amendment has been made</b>
46/92	In Appendix 2 Sport England is mentioned as a consultee under both National Interest Groups and Regional	<b>See amendment: Appendix 3</b>

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	Government & Agencies. I suggest we only need to be referred to in the latter.	
	Sport England would like to be consulted on applications affecting playing fields as well as on applications where restoration provides opportunities for leisure and recreation	<p><b>See amendment: Table 7</b></p> <p>The County Council welcomes Sport England's interest in being consulted on applications. The County Council will ensure that in future Sport England is consulted on all applications affecting playing fields as well as planning applications relating to restoration of mineral sites.</p>
	Sport England would like to be consulted on the draft conditions/S106 agreements and would like to be sent copies of decision notices/S106 agreements to monitor our effectiveness in the planning system (i.e. submit the result to DCMS)	<p>Sport England makes a contribution to conditions and legal agreements as part of the normal procedures for consultation on a planning application. Conditions will be added in accordance with Sport England's advice if this is considered appropriate and they will be a party to the legal agreements if the authority considers it necessary. All information relating to planning application consultations, decision notices, conditions and agreements are published on our website and updated regularly.</p> <p><b>No amendment has been made</b></p>
47/88	The Forestry Commission would expect to be included under the list of Government Departments/statutory consultees	<b>See amendments: Table 7 and Appendix 3</b>
	Be aware that the West Midlands Forestry Framework was launched in October 2004 and sets out the regional vision for forestry and is accompanied by an annual Delivery Plan.	<p>Comment noted and will be considered as part of the plan-making process.</p> <p><b>No amendment has been made</b></p>

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49/228	Whilst it acknowledges in section 4 that all parties listed in appendix 2 will be consulted in the development plan process, this section may benefit from a brief reference to Advantage West Midlands. This could highlight the Agency's statutory consultee status and the role the Agency can play in policy development and delivery. This statement could be accompanied with a brief reference to the Regional Economic Strategy.	<b>See amendment: Table 7</b>
	Please amend the "description of development" section of Table 7. The entry for AWM should reflect the Agency's statutory consultee status for development which (i) involves or is likely to affect the provision of an existing or proposed strategic infrastructure project which is likely to have a significant impact upon a policy in the Regional Development Agency's Strategy; or (ii) is within an area which is likely to affect the implementation of a strategic regional investment or employment policy in the Regional Development Agency's Strategy (Town and Country (General Development Procedure) (England) (Amendment) Order 2003)	<b>See amendment: Table 7</b>
	It is encouraging to read that SCI is committed to engaging a wide range of communities and stakeholders.	Comment noted.  <b>No amendment has been made</b>
50/49	The Period of Consultation does not take into account the time span of voluntary organisations. We would suggest a minimum of 12 weeks.	<b>See amendment: Paragraph 7.6</b>  The Governemnt is fully committed to the provision of a speedy, efficient and effective planning system in which planning authorities meet rigorous speed and efficiency

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		<p>targets. Warwickshire County Council is fully committed to meeting these targets and thus must strike a balance between the need to consult and involve stakeholders in the planning process and the need to determine planning applications quickly and efficiently. Circular 15/92 “Publicity for Planning Applications” approved by the Secretary of State gives 21 days as a reasonable time for consultees to respond to an application and it is important that consultees adhere to this timetable. The County Planning Authority will however accept and consider comments and representations received after the end of the consultation period, provided the application has not already been determined.</p>
	<p>The methods of consultation are no good for lay people to understand and should be more explicit.</p>	<p><b>See amendments: throughout document</b></p> <p>Amendments have been made to increase clarity and avoid confusion e.g. Figure 1; Table 1 etc.</p>
51/0	<p>There should be a clearer explanation of what the sustainability appraisal is. The first mention of the sustainability appraisal appears to be in para 3.8 with no mention of the earlier scoping stages. It would be worth explaining this stage (perhaps as part of the issues and options stage)</p>	<p><b>See amendment: Paragraph 3.4 and Glossary</b></p>