

Summary of Representations

January 2006

The consultation on the draft Submission Statement of Community Involvement (7th November – 19th December 2005) generated a range of objections, comments and observations. These have been classified against the following codes:

- O = Objection (this is where respondents ticked 'No' against a specific question and made a comment)
- S = Support (this is where respondents ticked 'Yes' against one or more question(s) and made a comment)
- CA = Comment requiring an amendment to the Statement of Community Involvement
- C = Comment (this could be either positive or negative)
- NC = No comment made

Submission Draft SCI consultation comments

Ref no.	Classification Code	SCI Comment	Warwickshire County Council Response (where appropriate)
40/252	O	<p>Objection to paragraph 1.10</p> <p>The Cotswolds Conservation Board (“the Board”) notes that the proposed links with other Plans and Strategies set out in paragraph 1.10 and elsewhere in the SCI make no mention of Parish Plans ... The adoption of Parish Plans as Supplementary Planning Guidance under the former local planning process was encouraged...This guidance goes on to describe how Parish Plans should form part of Local Development Frameworks.</p> <p>The Board accepts that the Warwickshire SCI is dealing with planning on a strategic, county-wide scale. However, Parish Plans are a clear expression of community aspirations, and as such should be one of the methods of involving the community in the preparation of strategic plans.</p> <p>The Board Considered that the omission of any mention of the use of Parish Plans means that the SCI has failed Tests 2 and 7 of the Tests of Soundness set out in Planning Policy Statement 12: Local Development Frameworks.</p> <p>A description of Parish Plans and their role should be included in the Glossary in Table 1.</p>	
40/252	O	<p>The Cotswolds Conservation Board is not included in the List of Stakeholders and Consultees in Appendix 3 ... Not including the Board in the list of consultees means that the SCI fails Test 1 of the Tests of Soundness set out in PPS12.</p>	
39/256	CA	In relation to planning applications we do not	

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		consider it appropriate to solely use the GDPO to identify consultees. In practicality consultation on planning applications has changed significantly since the Order was released in 1995. This is particularly relevant to flood risk for which we are not a statutory consultee, however we are recognised in the national planning guidance as the relevant consultation body. Also the new draft PPS25 identifies that the Environment Agency are to be made a statutory consultee in relation to flood risk. We recommend that in addition to the identification of statutory consultation under the GDPO, it is clearly stated that in practice statutory consultees and non-statutory consultees are consulted on a wider range of issues than specified. It may also be useful to identify some of the potential issues that this may be relevant to such as flooding.	
38/228	C	Whilst you failed to make specific reference to the Regional Economic Strategy ... the Agency welcomes the amendments made to the 'description of development' section of Table 7 (page 28).	
1/253	CA	Churches are not identified as consultees.	
1/253	C	Will there be time and opportunity for feedback – will it be rushed?	
1/253	CA	Perhaps radio and TV has a role to play? It's okay if you are in the know but the man in the street might miss it all.	The original Statement of Community Involvement was made available to radio, but was not successful in pursuing this approach.
1/253	C	In response to question 4: This is a key point. I confess that I do not know how it could be improved so that there should be sufficient time for	

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		the process to take place.	
1/253	S	In response to question 6: This is the best section of the Submission Document	
1/253	CA	In response to question 7: It is a “thorough” mechanism which is needed.	
1/253	C	I like the document very much. Somehow the plan has to be sold to the population and the part played by the government clearly enunciated. A lot of people suggest that this government has made its mind up and “consultation” without a vote is a means of enforcing its will.	
31/234	C	The sites currently on the Minerals plan. How do we try and get them taken off the plan? Particularly the site at Abbots Salford.	The Minerals Development Framework will review all sites when we produce the Minerals Allocation DPD – this work is due to commence in December 2007. If you would like to know more about work on the Minerals Core Strategy please contact us on 01926 412538.
32/254	C	Not everyone receives a daily paper – the Coleshill Tamworth Herald contains mainly Tamworth news – therefore it would be helpful to Coleshill people to be advised of proposals via the free paper circulated “The Gazette”	In North Warwickshire we currently advertise our consultations in the Atherstone Herald. We could certainly investigate the possibility of advertising in “The Gazette”.
33/40	O	In response to question 2: Warwickshire Compact specifies the duration for consultation. We believe 12 weeks.	
33/40	O	In response to question 3: We were unaware of the forum meetings, these could have been noted in the letter.	The respondent will be notified of our forthcoming forum meetings in due course.
33/40	C	In response to question 6: Sometimes clear, sometimes not.	
42/84	C	In response to question 1: The overall comments should be the one which has been agreed through	Noted.

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		the consultation process.	
42/84	C	In response to question 2: While it does involve different sections of the community and a stipulated timetable given is workable, however, participation from the community focus and involvement is an essential component.	Noted.
42/84	C	In response to question 3: For the embedded programme looks very comprehensive in details, but in practice what is written and is to be achieved dependent on resources available	Noted.
42/84	C	In response to question 4: Progress has to be monitored and evaluated properly.	Noted.
42/84	C	In response to question 5: It is necessary to know how other projects correlate to the development plan and consultation process.	Noted.
42/84	C	In response to question 6: Planning applications will have to be approved with the planning regulations in force.	Noted.
42/84	C	In response to question 7: It is dependent on how the objectives are put in practice and how far involvement of the community is evident to reach the targets to be obtained.	Noted.
42/84	C	In response to question 8: According to the information from the report, perhaps the resources are sufficient but this should be reviewed in line with the attainment of success of the policy.	Noted.
42/84	S	In response to question 9: By the look of the document it appears that it had been proposed by the set standards of the Town and Country Planning Regulations of 2004.	
36/103	C	In response to question 1: Bidford-on-Avon is well experienced in this area active/interested	Noted.

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		parties will be available for consultation.	
36/103	C	In response to question 3: The [list of consultees] should always be kept open to enable new or adhoc bodies with an interest to make their views felt.	We welcome interest from all sectors that wish to make a contribution to the Minerals & Waste Development Framework. For groups or individuals who wish to be added to our mailing list please simply register your contact details with us.
36/103	S	In response to question 4: Demonstrated in Appendix G to the pre submission consultation statement.	
36/103	C	In response to question 5: It corresponds with other similar documents that the Parish Council has seen. The County should remain alert to areas where linkage is not smooth.	Noted.
36/103	CA	In response to question 7: The updating of LDFs should take care of this but it may be prudent to consult periodically (Perhaps 3 yearly)	
36/103	S	In response to question 8: The PC supposes that the county has made provision. But experience suggests an expectation of constant change in funding and priorities in strategic work.	
36/103	S	In response to question 9: The PC would be greatly surprised if it were otherwise.	
37/88	C	In response to question 6: Consultation does not always happen e.g. Development within 500m of ancient woodland sites.	Noted.
43/257	O	In response to question 1: Although we received this circulation the Warwickshire Geological Conservation Group is not listed in Appendix 3 (perhaps our neglect) Could this be rectified? We would wish to be involved in all categories listed in Appendix 2. Contact by mail preferably but e-mail can be used.	Warwickshire Geological Conservation Group will be added to our mailing list for consultation on the Minerals Development Framework.

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43/257	CA	In response to question 2: WGCG would wish to be notified of any development proposal affecting a Regionally Important Geological Site (RIGS) or SSSI (geological) (see page 28)	This is currently normal practice.
43/257	CA	In response to question 6: BUT it only seems to involve statutory consultees (see page 27/8) WGCG would wish to be notified of any development affecting RIGS and SSSIs (geological)	This is currently normal practice.
43/257	O	In response to question 7: I can't find reference to such a mechanism. As I've indicated we would wish to be included as consultees.	Warwickshire Geological Conservation Group will be added to our mailing list for consultation on the Minerals Development Framework.
53/0	S	In response to question 2: As stated in Tables 2 and 3? Yes	
53/0	O	In response to question 4: Not really clearly	
53/0	O	In response to question 5: Such as?	
53/0	C	In response to question 6: Table 6 is better/clearer than all the text	
53/0	O	In response to question 7: Haven't found it!	
53/0	C	In response to question 8: What resources? Man power?	
53/0	C	In response to question 9: Haven't had access to full Regs.	
53/0	C	Is so much text really necessary – tables are so much clearer. Several of my colleagues have looked at your glossy expensive brochure but are completely baffled by the number of abbreviations used, e.g. DPD's etc. This is hardly a document to send to the uninitiated.	
44/109	C	Genuine community involvement should be encouraged and cherished. Only time will tell whether this is a shallow ploy to appear to involve	

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		local communities but in reality to railroad central and regional policies!	
45/258	C	This was an extremely long and complicated document which we found difficult to comprehend in its entirety. We would wish to be involved in all stages as we represent a large body of older people.	Senior Peoples Forum of Warwick District will be added to our mailing list for consultation on the Minerals & Waste Development Framework.
25/247	S	In response to question 1: Very clear.	
11/238	S	In response to question 6: Appendix 6	
11/238	S	In response to question 7: Appendix 1	
47/190	CA	<p>Page 2 – reference M6 toll for completeness</p> <p>Page 8 – Paras 2.3 and 2.4 should state “County Council” not “Local Authority” as this is the County Council’s SCI. Also the “1990 Act” should be quoted in full as it is the first occasion it is referred to.</p> <p>Page 11 – Tables 2 and 3 should be ticked alongside “Operators/landowners” under “Forum” and “Residents liason meetings” to be in conformity with P17 (para 4.8) and Appendix 4 which identifies these forum areas as important.</p> <p>Page 12 and 14 – The “alternative” formats should include Braille as stated in 4.4 p16</p> <p>Page 20 – As per page 8 “County Council” should replace reference to “Local Authority”</p> <p>Page 21 – Para 6.3 seems to suggest screening and scoping are mandatory however they are <i>not</i>. Words should be inserted stating these requirements are not mandatory and are at a developer’s request.</p>	Warwickshire County Council is happy to incorporate these minor changes into the final document.
48/260	CA	In response to question 2: Still feel that timescale to respond to major planning applications is too	

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		short. They can affect a locality for decades and we only get 21 days.	
49/96	S	It is useful to have a full list of consultees of your database and very useful to have an audit trail of comments and actions resulting from consultation.	
50/34	C	Have some seminars targeting BME/Young/OAP. Try to consult on target basis, most groups do not come forward.	Noted.
51/261	C	In response to question 2: Although the Government's definition of timely and ours differs.	
51/261	CA	Point 7.10 "encourages applicants to involve residents" this should be compulsory on controversial applications and responsibility to organise public meetings should be joint between WCC and applicant.	
51/261	C	The amendments made show that you are trying to listen to consultees – Well done.	
62	S	In response to question 5: Reference is made to the Corporate Consultation Strategy (para.1.10) and other existing consultation groups and forums used by the Council. The continued involvement of these groups should ensure adequate links to other consultation initiatives.	
62	C	In response to question 7: Explained in paragraph 5.4 (Chapter 5).	
62	CA	In response to question 8: It is assumed that there are sufficient resources available to manage the consultation processes and it is acknowledged that (where necessary) external consultants may be required. Perhaps a role of the AMR could be to monitor this situation and if necessary highlight how problems or issues will be addressed?	Noted.

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54/203	CA	Paragraph 1.1 should make reference to Appendix 1, which clearly identifies the processes involved with SCI preparation.	Warwickshire County Council is happy to incorporate these minor changes into the final document.
54/203	CA	Paragraph 1.10 of the SCI should identify that the Local Development Framework (LDF) will give the land use expression for the objectives set out in the Community Strategy of Warwickshire County Council.	
54/203	CA	Paragraph 4.1 identifies that consultees already on the database of the Warwickshire County Council will be engaged. However, the SCI should identify how communities currently not on the database can have their details placed on the database enabling them to be engaged on future Local Development Documents.	Warwickshire County Council is happy to incorporate these minor changes into the final document.
54/203	CA	Section 4 should identify who the County Council identifies to be “hard to reach” in terms of engagement, this should be based on sound evidence. The SCI should identify as much as possible who are deemed to be “hard to reach” groups, such as: <ul style="list-style-type: none"> - Isolated rural groups for example, businesses or elderly people; - Gypsies and Travellers; and - BME Communities. 	
54/203	CA	Paragraph 6.3 identifies that “certain bodies” will be consulted to determine what issues the Environmental Impact Assessment (EIA) will need to cover. This should be amended so that the SCI clearly identifies which bodies will be consulted to determine the issues that are required to be covered in the EIA. Identification should also be	

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		made of where the published EIA will be made available for local communities to view.	
54/203	CA	It should be noted that the following Government Departments can also be consulted via the Government Office for the West Midlands: <ul style="list-style-type: none"> - Department for Transport - Department for Trade and Industry - Department for Education and Skills - Department of Health - Home Office 	This has been noted. We will amend our mailing list so that in future one communication to Government Office for the West Midlands will suffice.
54/203	CA	Identification should be made of which consultees are statutory requirements to be consulted on Local Development Documents and planning applications in regards to those set out in the 2004 regulations and in Annex E of PPS12.	
54/203	CA	The role and potential benefits that the West Midlands Planning Advisory Service can have for local communities as well as the organisation's regional contact details should be identified within the SCI.	
54/203	O	In response to question 2: The identification of the opportunities for local communities to engage on the preparation of the Sustainability Appraisal in regard to Development Plan Document (DPD) and Supplementary Planning Document (SPD) preparation should be made more clearly in terms of the locations where they can view the documentation. The SCI should indicate within what time scale and by what means, Warwickshire County Council will inform local communities once a DPD or SPD has been adopted. This should also be linked to Table	

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		4 which identifies the methods of community engagement to be used by Warwickshire County Council.	
54/203	O	In response to question 7: Paragraph 5.4, should identify what will trigger a review of the SCI of Warwickshire County Council. There should also be identification of the mechanisms in place to incorporate new community engagement techniques or the revision of existing techniques used by the Warwickshire County Council if it is necessary to do so.	
55/263	CA	<p>British Waterways supports the submission consultation document and welcomes the recognition of British Waterways as a statutory consultee for planning applications. British Waterways also has other duties under the British Waterways Act 1995, to safeguard and protect the heritage and environment of the inland canal and river navigations we own and manage. Such duties are also very relevant to the development control process. As such, British Waterways would welcome being consulted at the Pre-Application stage regarding significant planning applications related to waterways within British Waterways consultation zone.</p> <p>Also as an “Other Consultees” within PPS12 British Waterways would especially welcome being consulted on any documents related to or likely to affect the waterways within Warwickshire County Council’s remit. British Waterways will shortly be providing all relevant Authorities with a digital plan of British Waterways’ consultation zone.</p>	British Waterways is currently on our mailing list for consultation on the Minerals & Waste Development Framework. In the event of an applicant engaging the Local Planning Authority in a pre-application discussion that impacted on a canal or reservoir managed by British Waterways then the respondent would certainly be included in those discussions.

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		British Waterways has two Waterways within WCCs remit : “Central Shires”, “South East” The following documents may be of interest for the future stages of the Development Framework production: <ul style="list-style-type: none"> - Code of Practice for works affecting BW - Freight Document - Transport Energy 	
52/262	C	We are pleased to see our previous comments recognised and reflected in the Pre-Submission Consultation Statement.	
58/265	C	I ... find it much easier to comment on proposals if a hard copy of the relevant plans (such as from a planning application) is sent to me!	Noted.
63	C	In response to question 1: Overall, document seems very long. Perhaps a shorter, more user-friendly version would be useful, in addition to the very detailed statement itself.	Noted.
64/268	C	In response to question 5: On one reading only.	
64/268	C	These answers given on first reading of document only.	
59/264	C	<i>We have no detailed comments to make on the document, but wish to lend our overall support for the document.</i>	
61/266	C	<i>A comprehensive analysis and statement but proliferation of technical jargon and use of initials marring understanding. What is the difference between a “stakeholder” and a “committee”?</i>	
8/77	NC	Expressed uncertainty around question 8, but generally supported the SCI.	
4/233	NC	Expressed uncertainty around questions 3 and 9,	

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		but generally supported the SCI.	
2/232	NC	Expressed uncertainty around questions 3 and 8, but generally supported the SCI.	
65/269	NC	Expressed uncertainty around questions 8 and 9, but generally supported the SCI.	
57/111	NC	Expressed uncertainty around questions 8 and 9, but generally supported the SCI.	
29/250	NC	Expressed uncertainty around question 8, but generally supported the SCI.	
28/193	NC	Expressed uncertainty around question 8, but generally supported the SCI.	
22/53	NC	Expressed uncertainty around question 8, but generally supported the SCI.	
3/194	NC	Expressed uncertainty around question 5, but generally supported the SCI.	
7/49	NC	Expressed uncertainty around questions 3,6 and 7, but generally supported the SCI.	
6/235	NC	Expressed uncertainty around questions 7 and 9, but generally supported the SCI.	
5/10	NC	Expressed uncertainty around questions 2, 6, 7 and 9, but generally supported the SCI.	
10/237	NC	Expressed uncertainty around question 9, but generally supported the SCI.	
18/25	NC	Expressed uncertainty around question 8, but generally supported the SCI.	
17/244	NC	Expressed uncertainty around questions 5,7 and 9, but generally supported the SCI.	
16/243	NC	Expressed uncertainty around questions 7, 8 and 9, but generally supported the SCI.	
15/242	NC	Expressed uncertainty around questions 3, 8 and 9, but generally supported the SCI.	
14/241	NC	Expressed uncertainty around questions 8 and 9,	

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		but generally supported the SCI.	
12/239	NC	Expressed uncertainty around questions 3, 8 and 9, but generally supported the SCI.	
46/259	NC	Please keep us informed of developments – at present we're capacity building a response framework for ongoing input.	The respondent's details have been included on our mailing list and will be kept informed as requested.
30/251	NC	Completed the questionnaire in support of the SCI.	
41/224	NC	Completed the questionnaire in support of the SCI.	
27/249	NC	Completed the questionnaire in support of the SCI.	
24/110	NC	Completed the questionnaire in support of the SCI.	
23/130	NC	Completed the questionnaire in support of the SCI.	
21/246	NC	Completed the questionnaire in support of the SCI.	
20/0	NC	Completed the questionnaire in support of the SCI.	
19/245	NC	Completed the questionnaire in support of the SCI.	
13/240	NC	Completed the questionnaire in support of the SCI.	
9/236	NC	Completed the questionnaire in support of the SCI.	
34/255	NC	Did not complete the questionnaire.	
26/248	NC	Did not complete the questionnaire.	