

## Summary of Representations (Regulation 28)

Ref	Name (Agent)	Summary of Representation	Council Comments
SCI01	Highways Agency	Welcome its inclusion in the list of interested groups and people. Wish to main actively involved in all future stages.	Support noted.
SCI02	Sport England - West Midlands	<p>1) Copy of decision notice is required by Sport England and similar bodies.</p> <p>2) On major applications, it is worthwhile involving Sport England and other mainstream consultees at pre-submission discussions.</p> <p>3) Hardcopies of drawings will still be required.</p> <p>4) Sport England and similar bodies should be used in the drafting of conditions and 106 Agreements.</p>	<p>1) It is impractical to send copies to all statutory bodies or other local or national stakeholders who may have commented or have an interest in an application. The Council is aiming when the technology is in place to publish decision notices on the internet.</p> <p>2) Where appropriate Sport England will be involved at the pre-application stage.</p> <p>3) When requested they will be supplied. An appropriate charge may also be made.</p> <p>4) Comments noted.</p>
SCI03	British Wind Energy Association	<p>1) The SCI should follow recommendations contained in PPS 22: Renewable Energy.</p> <p>2) Local planning authorities may wish to consider informing local communities about renewable energy, its potential benefits and any potential effects of development, before any schemes are submitted for planning permission in their area.</p> <p>3) Appropriate methods of community involvement may include; public examinations, displays, road-shows, presentations at meetings, internet, local press, leaflet drops, focus groups and consultation with parish councils.</p>	<p>1) For renewable energy schemes the Council will follow guidance contained in PPS 22.</p> <p>2) Where appropriate the Council will consider raising the profile of renewable energy.</p> <p>3) The Council is proposing to undertake many of these methods.</p>

		<p>4) Issues that may need to be addressed include; lack of awareness, noise, visual effects, odour, juxtaposition between global warming and local impact of a project and difficulty between making link between regional policy and local delivery.</p>	<p>4) These issues will be considered at pre-application or during determination of a renewable energy proposal.</p>
SCI04	LEVVEL Ltd	<p>1) <i>Fig 2 - Stage 1 Evidence gathering</i></p> <p>i. SCI does not stipulate what major evidence gathering studies were carried out. Evidence base must be full and robust.</p> <p>ii Members of the development industry are considered to hold valuable information relating to local housing and commercial property market which local authorities would benefit from drawing on.</p> <p>iii Development industry must be involved in evidence gathering.</p> <p>2) <i>Fig 5 – Methods of Involvement</i></p> <p>i Levvel supports the use of focus groups, however it does not clarify who will be involved in these groups.</p> <p>ii Need to identify developers, landowners and house builders as a focus group and clearly state their purpose.</p> <p>iii Ensure appropriate methods of consultation are used when consulting developers.</p> <p>iv Focus groups and workshop sessions should discuss specific issues and seek to be quantitative where possible.</p> <p>v) Council should be more proactive in involving the development industry.</p>	<p>1i) The diagram is showing the key stages in Development Plan production. It is not intended to provide detailed information on each stage as the evidence base is constantly changing.</p> <p>ii) Comment noted.</p> <p>iii) Comment noted.</p> <p>2i) Involvement will depend on the type of document to be produced and required outcomes.</p> <p>ii) Stakeholders will be invited to relevant focus groups.</p> <p>iii) A variety of methods will be used.</p> <p>iv) Focus groups can be quantitative or qualitative depending on their purpose.</p> <p>v) This SCI will provide the framework for the proactive involvement of all stakeholders.</p>

		<p>3) <i>Fig 6 – Choosing the appropriate approach</i></p> <p>i Concerned Council is not using workshops and focus groups in stage 1 of DPDs and SPDs.</p> <p>ii Development industry may not be fully appreciative of the change in emphasis to a front loaded process. It is considered critical that the development industry is specifically cited.</p> <p>4) <i>Fig 7 – What do we mean by ‘Community’?</i> Commend the Council for incorporating housing groups and the development industry in “Communities of Interest’ and landowners in “Communities of Place”.</p>	<p>3i) The Council is intending to use Focus Groups in stage 1 of DPD production and if necessary in stage 1 of SPD production. Workshops may also be used during stage 1 of DPD and SPD production.</p> <p>ii) It will take time for all stakeholders to become fully aware of the change in emphasis. The Council will endeavour to promote the increased emphasis on front-loading.</p> <p>4) Support noted.</p>
SCI05	National Grid Transco (Malcolm Judd & Partners)	Offering assistance in the formulation of policies and requesting early involvement in the LDF process.	Comments noted. We will endeavour to involve Transco in the early formulation of policies.
SCI06	Billingham & Kite Ltd (Philip Woodhams)	<p>1) <i>Page 24 – Second Paragraph</i> The following text should be added; “Where a pre-application discussion is requested by an applicant such a discussion will be convened by a responsible officer for a date no later than ten working days after the date the discussion is requested.”</p> <p>2) <i>Page 24 – Section dealing with significant applications</i> This section should be deleted. It introduces uncertainty as there is no clear indication what sort of development will be embraced by the requirements. Secondly requirements go beyond what is judged reasonable for major developments. Such ‘extra’ obligations are therefore considered unreasonable. If reference to significant development is not deleted then what is significant should be defined in the document in clear and unambiguous terms.</p>	<p>1) Subject to resources the Council will endeavour to respond to requests for a pre-application discussion within a reasonable timeframe.</p> <p>2) The SCI encourages developers to undertake pre-application discussions and early community consultation for applications that may give rise to local controversy. This approach follows guidance contained in PPS12 and its companion guide.</p>

		<p>3) <i>Penultimate box of figure 8</i>  The box omits to refer to the fact that applicants may appeal against a refusal of planning permission. Whilst this is well known to the objector it is considered appropriate, for the public at large, that the omission be remedied. This can be achieved by the insertion of the words “The application is refused planning permission or” between ‘if’ and ‘specific’ in the first line of the penultimate box of figure 8.</p>	<p>3) Omission noted. The addition of the suggested text could help the ‘layperson’ better understand the process.</p>
SCI07	Gallagher Estates Limited (Wood Frampton)	<p>Support the inclusion of landowners as a community group to be included in consultations. Request that Gallagher Estates Ltd be added to the list of consultees.</p>	<p>Support noted.</p>
SCI08	Grinell, Johnson, Wild & McIntyre (Pegasus Planning)	<p>1) <i>Developer consultation on significant applications</i>  Fails test of soundness relating to the requirement to clearly describe the planning authority’s policy for consultation on planning applications. Does not provide enough certainty for applicants. Refers to ODPM guidance titled, “Statements of Community Involvement and Planning Applications” which details a number of factors influencing the extent of pre-application discussion by developers.</p> <p>2) <i>Major and significant application definitions</i>  Fails test of soundness relating to the requirement to clearly describe the planning authority’s policy for consultation on planning applications. A ‘tired approach’ should be adopted in line with guidance in “Statements of Community Involvement and Planning Applications” para 6.2. This sets indicative thresholds for determining which applications are subject to different types of community involvement required at each stage in the planning process.</p>	<p>1) “Statement of Community Involvements should encourage developers to undertake pre-application discussions and early community consultation although they cannot prescribe that this is done” (Companion Guide to PPS12, para 7.7). The Council’s SCI seeks to do this, as such it is not unsound.</p> <p>2) The Council have proposed a tired approach relating to the size and likely community interest in an application. As issues change both nationally and locally then the types of applications that will arise community interest also change. The Council have adopted a flexible approach by encouraging developers to adopt early community involvement for ‘significant applications’.</p>

SCI09	WM. Morrison Supermarkets PLC (Peacock & Smith)	Support the proposals set out in the SCI for future consultation, and in particular the proposal to write to all persons who have expressed an interest. Would like to be consulted at all stages in the LDF process.	Support noted.
SCI10	The Church of England - Diocese of Worcester	<p>1) The document looks at a number of means of contacting people in hard to reach groups. The Local Authority staff need to go to youth clubs, residential homes, prisons and so on, to speak to people directly, not through representatives or focus groups, about the proposals, with interpreters as necessary. While it is expensive other methods tend not to work. An alternative is for the Council to recruit and train representatives from those hard to reach groups to visit their peers.</p> <p>2) Concerned that the document is full of jargon and Local Authority speak.</p> <p>3) A Faith Group should not be confined to the “Communities of Interest” list because that means we may not be consulted about wider community matters, just those that the officers think the church will be interested in. We must be in the “Communities of Place” and “Service Providers” lists because of our engagement and activities.</p>	<p>1) Figures 5 and 6 of the Council’s SCI highlight the varying methods that the Council will be using.</p> <p>2) The SCI has been written so it can be read and understood by not just planning professionals but also members of the public.</p> <p>3) Generally faith groups are defined by their common interest. However we do recognise they also have wider community interests. Future consultation will not be restricted to any particular group or ‘community’ group.</p>