# <u>Consultation Draft SCI (March 2006): Comments, Responses and Recommendations</u>

- 1. Introduction
- 2. Our values and principles
- 3. Methods we will use and support
- 4. How to get involved
- 5. Community involvement and the new planning system
  - the new planning system
  - Local Development Framework
  - Planning applications
- Resources
- Consultees
- Clarity of the document
- SCI Consultatiom
- General comments
- No comments

#### Section 1 : Introduction

Paragraph: 1.2

SCI/4/12 John Hayter

Paragraph 1.2 says "Part of the City Council's role is to provide the right kinds of opportunities to enable people to get involved in ways that best suit their needs". The other part of the role is not mentioned. The only way offered is by public participation in normal or special meetings held by the LPA, parish councils and other mainly voluntary bodies.

The SCI is intended to make it quite clear that the Council is committed to providing a broad and adaptable range of opportunities for people to become more easily and effectively involved. both in planning matters and in other areas of Council activity. Such opportunities range from advice and information given at the level of the individual householder. resident or business proprietor, through to the involvement of large numbers of people, in the case of major areas of Council policy or major planning proposals. This type of local engagement is likely to involve more people and may, therefore, require formalised arrangements for meetings, exhibitions etc. Although the SCI outlines some of these more complicated mechanisms for consultation and engagement, it is not intended to put undue emphasis on these particular methods.

### No Change

No Change

Paragraph: 1.3

SCI/4/13 John Hayter

In the context of the 'Ladder of Participation', paragraph 1.3 states "the important thing is to make sure people understand the impact their ideas can have". The SCI is focused on levels 2 to 4, without recognising that level 1 (inform) has not been met and that the SCI has not identified the steps to do so.

In terms of informing individuals, as well as the District's many and varied communities of interest, the SCI recognises that the timely distribution of accurate information plays an essential part in generating community interest and a more meaningful and mutually helpful dialogue with the Council: for example, in regard to such issues as Development Plan and Supplementary Planning Documents and the determination of planning applications.

Paragraph: 1.6

SCI/36/1 John Duncan

Need more explanation regarding "changes in the way in which we plan how land will be used"

To detail recent changes to the planning system, as introduced by the Planning and Compulsory Purchase Act 2004, would complicate what is meant to be a straightforward introduction to the Council's objectives in developing a Statement of Community Involvement.

SCI/4/45 John Hayter

It should refer to 'spatial' and not land use planning.

More information regarding these changes and how, in particular, they affect the planning policy system is contained in the Winchester District Local Development Scheme (March 2005). This is available from the City Council, as a printed document, or on the Council's website at <a href="https://www.winchester.co.uk">www.winchester.co.uk</a>

It is accepted that a reference to' spatial' planning would be appropriate at this point. This particular concept (defined in the Glossary) underlies those changes to the planning system which require a

move away from a basis in land use planning, and towards a more inclusive and better integrated approach which embraces community involvement and, in doing so, forms the basis for the Council's SCI.

#### Change Proposed:

Paragraph 1.6: Third sentence: 'in these land use matters of spatial planning.'

Diagram 1 (Page 4) SCI/4/19 John Hayter

A key element in the 'Ladder of Participation' is the consideration of alternatives. It is a serious weakness that this approach is omitted by the SCI.

Ranking three alternatives, in order of preference, is the single most effective way of consultation that is capable of both reaching out into the community and where the opinions of all, from the least able to the most expert, are given equal weight. Circular 2/99 'Environmental Impact Assessment' at 83, in the context of planning applications, states: 'consideration of alternatives is widely regarded as good practice'. This is equally true of LDF documents.

It is accepted that, in the context of forming policies and strategy, and in terms of public participation, 'the development of alternatives' is not only a matter of good practice but is something which the Council's SCI openly commits to. Section 5 of the Consultation Draft makes it clear that the 'pre-production' and 'production' stages in the preparation of Development Plan Documents are likely to include producing 'options' for policy making, which would then be followed by further stages of selection and refinement, before formal consultation and submission stages were undertaken.

However, there may be circumstances in which the Council, in its role as local planning authority, is faced with a simple choice between accepting, or rejecting, a formal proposal made by an applicant or other external agency.

In such circumstances, it would not necessarily be appropriate to consult with a local community on that basis, because generating alternative schemes or scenarios, for its own subsequent consideration, would fall outside the Council's remit and be misleading.

No Change.

Introduction: General Comments SCI/4/44 John Hayter

There is only a passing indication in the Introduction that sets out the scope of the consultation process it describes, and this is limited to agreeing, or otherwise, the content of the planning documents comprising the LDF and planning applications. The scope is not fully explained until later, in Section 5.

#### SCI/50/1

Partners discussed how it was important to manage people's expectations about

Given that Section 1 of the Consultation Draft is intended as a broad introduction to the range and purpose of the SCI, it seems more appropriate that the scope of the Council's intended consultation processes should be set out in more detail in the main body of the document, under Section 5.

The LSP Board raises a very important point. It is fully accepted that the SCI should make clear that, as a necessary part of its intention to build on and further develop community involvement the Council, nevertheless, has a responsibility for managing public expectations.

where the final decision on development would lie, and that there needed to be a balance between everyone's right to participate and the needs of communities of interest, when it came to making decisions about development. It was agreed that a statement to this effect would need to be included near the beginning of the document.

Therefore, it is agreed that the Statement should set out the need to balance rights of public participation with the Council's duties, in regard to its decision making role.

### Change Proposed:

Paragraph 1.5: Additional, fifth, sentence: 'However, it should be remembered that the Council has many statutory and other responsibilities, in regard to making formal decisions. It is important, therefore, to be clear about the scope of consultation and its place within the decision-making process.'

#### Section 2: Our Values and principles

Paragraph: 2.1

SCI/4/15 John Hayter

SCI is not 'creative and innovative in all that it does'. It is primarily setting down long standing practices and, far from being creative, certain critical ones are omitted e.g. Local Plan Committee and written representations to PDC.

Part of the purpose in producing a Statement of Community Involvement is to clearly describe the Council's consultation and decision-making procedures, in order to create a clearer understanding of what is involved. In this way, it is intended to encourage more individuals and groups to take an active part in policy and strategy making for the District and, importantly, in regard to all planning matters.

In addition to promoting a wider understanding of the processes involved, the Council intends, as is made clear in the Consultation Draft Statement, to 'strive to be an organisation which is creative and innovative in all that it does' (paragraph 2.1). This is considered to be a reasonable and justified objective and one which is part of an ongoing process of listening, and responding, to the District's communities.

No Change.

SCI/37/1 Alison Mathews From: Itchen Valley Parish Council

Find the use of the word 'customers' strange, as the Council is not selling its services and it is not clear who is meant to be included in this expression. A definition is required.

Paragraph: 2.2

SCI/37/2 Alison Mathews

From: Itchen Valley Parish Council

Add "The interests of those who currently

There are circumstances in which the Council does act as a service provider on the basis of a commercial arrangement e.g. prescribed charges for dealing with planning applications and where the use of this word would be entirely appropriate. Nevertheless, this particular 'value' is taken directly from the Council's Corporate Strategy and the wording used here is as set out in the Strategy document.

The comment is noted. However, as indicated above, these aims are taken from the Council's Corporate Strategy and it would not, therefore, be appropriate for the SCI to change this.

live and work in Winchester should be the prime concern of the Council".

No Change.

Paragraph: 2.4

SCI/4/18 John Hayter

The SCI refers to monitoring 'values and principles but sets no overall objective for what the SCI is intended to achieve. The section should set objectives by reference to the 'Ladder of Participation'. Only the 'Empower' level is consistent with the stated values and should, therefore, be stated as a long-term objective.

SCI/4/17 John Hayter

The principle of community involvement being accessible has not been met. It only gives examples of access by way of participating at meetings and I would expect this approach to fail criterion (v), of the Tests of Soundness. It is considered that, in paragraph 2.3, the SCI clearly describes the Council's objectives for involving local people and organisations. However, it is agreed that a further reference to the value of 'empowerment' could usefully be made in paragraph 2.2. It is, therefore, recommended that the word 'Empowerment' should replace the word 'Involvement' at the beginning of the third bullet-point.

The SCI makes it quite clear that 'accessibility' is of paramount importance, if a genuine increase in levels of community engagement is to be achieved.

Whilst the Statement does give relatively detailed information regarding organised participation and collective involvement, it is considered reasonable to provide for the many situations in which residents, businesses and other individuals may take a broadly shared, or widely diverging, view and where these could be expressed most effectively through some form of open forum. This can be helpful in terms of exchanging both information and opinion.

Nevertheless, the Statement does repeatedly make it clear that the Council is anxious to be both flexible and adaptable in its approach to all individuals and groups and to provide every opportunity for direct contact and engagement, not only with planning but all areas of Council activity

Change Proposed: Paragraph 2.2, third bullet point: 'Empowerment Involvement of local people...'

Section 2: General Comment

SCI/10/7 Vera Osborne

From: Parish Council of Denmead

A case can be made that WCC being "creative and innovative in all that it does" ignores the need to consolidate changed processes and, at times, maintain the status quo.

As an expression of its commitment to improving on current engagement processes, the Statement's reference to creativity and innovation are considered to be both necessary and appropriate.

However, as an equally important part of good practice, the Council will seek to retain and build on those techniques and strategies which have already been successful in achieving greater local participation. In this respect, it is important that the value of effective two-way

communication, together with high-quality feedback from the Council, are clearly emphasised.

No Change.

Section 3: Methods we will use and support

Paragraph: 3.5

SCI/10/2 Vera Osborne From: Parish Council of Denmead

The Parish Council wishes to register its interest in the flexible techniques now available (especially in relation to the West of Waterlooville MDA) The particular interest in the 'flexible techniques' which has been expressed by the Parish Council, is noted and has been communicated to the Council's MDA team.

No Change.

Paragraph: 3.7

SCI/10/3 Vera Osborne From: Parish Council of Denmead

Reservations regarding parish clusters. A cluster might have neighbouring parishes with different priorities and relationships with their residents.

Denmead already has a population of over 6000, which would probably be best served by continuing with the present organisation.

SCI/34/2 R Greenwood

From: Bramdean and Hinton Ampner PC

Developing parish "clusters" is a good idea: Bramdean and Hinton Ampner have a natural affinity with Cheriton, Kilmeston, Beauworth and Tichborne. More liaison would be welcome.

SCI/48/1 David Elsmore

From: Littleton and Harestock Parish Council

The current timing of responses to planning applications by Parish Councils is very tight, considering that Councils only meet once a month and the suggestion of parish clusters would seem to exacerbate this problem. This will only be a benefit in large developments affecting all Parish Councils in a 'cluster'. Small

This group of respondents illustrates a division of opinion which is perhaps reflected in other parts of the District. In very general terms it appears that parishes within the District which are above a certain size and which display some 'urban' characteristics are less interested in joining any particular association or 'clustering' of parishes. On the other hand, certain smaller parishes of a more pronounced rural character appear willing to explore the feasibility of forming some type of parish grouping, in order to share information and expertise and to make the best use of available resources.

Partly as a result of the Council's continuing concern regarding the un-parished nature of the City, and the resulting difficulties this causes for public consultation and engagement within the District's main settlement, some thought has already been given to the overall arrangement of District parishes and improved ways in which they might liaise and, more generally, work together.

Although any such changes could bring worthwhile benefits for consultation and community involvement, not least in regard to planning matters, they could only be introduced if fully supported by the parishes involved. Notwithstanding this, any widespread change to the present arrangements is likely to be a matter for the longer term.

Whilst it is probable that this particular issue will continue to be a subject for discussion, it is also the case that any pressure for introducing change within this District would need to come from the Parishes and their own representative bodies.

No Change.

developments only affect those residents in the vicinity.

SCI/7/3 Steven Lugg

From: Hants. Association of Parish and Town Councils

Hope that incentives are given to help develop parish clusters.

Section 3: General Comment

SCI/14/3 Pat Edwards

From: City of Winchester Trust

Community led involvement processes are welcomed, but these need to be established early in the timetable for Development Planning, if they are to usefully inform the plan. The Council should provide the resources necessary for their production, rather than imposing this as an added financial burden on the community.

SCI/5/3 Stephen Waring

Whilst it is important to liaise with the LSP, this is not a representative body. Also, not convinced that local councillors can be said to represent all interests; they are affected by party political considerations. The most relevant methods of consultation are those that go direct to individual residents.

SCI/7/2 Steven Lugg

From: Hants. Association of Parish and Town Councils

Very pleased to see that Parish Plans, Village Design Statements and Market Town Health Checks will be taken seriously as evidence and as material planning considerations.

SCI/7/4 Steven Lugg

From:Hampshire Association of Parish and Town Councils

Pleased with the pre-production involvement of parish and town councils

Glossary: Parish Plans

This comment is noted. The overriding importance of a continuing dialogue, from the outset of any significant project, and the value of fully integrating the community into the LDF and all other areas of Council decision making is fully endorsed. It is certainly a primary objective of the SCI to make such objectives abundantly clear. It is also agreed that adequate resources should be made available, in order to achieve these objectives whilst, at the same time, not placing unreasonable additional burdens on the community and the voluntary sector.

It is accepted that the LSP is not directly representative, in the sense of having been democratically elected. Nevertheless, as a consultative body it does represent a wide range of community interests and is made up of a number of skilled practitioners with considerable experience of community involvement issues.

Local Members, on the other hand, are representative in that they are specifically elected to represent all interests within their ward, in a fair and unbiased way. It should also be made clear that the LSP will not be making decisions which are the responsibility of its member organisations, including the City Council.

It is fully accepted that amongst other methods of consultation and involvement a direct approach at the level of the individual or, in some cases the neighbour, can be an extremely effective method of engaging with the public.

The support is welcomed.

No Change.

A number of Parish Plans have been produced, or

SCI/31/4 Jeremy Dolphin
From: Compton and Shawford Parish
Council

The status of Parish Plans is not clear - are they supplementary planning documents? Parish Plans need to be defined in the glossary,

are in the process of being produced, by Parish Councils. Such Plans deal with a wider range of issues than town and country planning and could not be adopted as Supplementary Planning Documents. A definition of such Plans, and their present status, will be included in the Glossary to the SCI.

Change Proposed: Glossary: add definition of Parish Plans and their status.

### Section 4: How to get involved

Paragraph: 4.5

SCI/37/3 Alison Matthews From: Itchen Valley Parish Council

Where a ward member is on the planning committee he/she is unable to be "a voice for the community", in relation to planning, unless they give up their right to vote on an application.

may comment on issues raised by the community, provided they have not been part of a lobby group or otherwise predetermined the application. This follows normal practice and case law. The Council's Planning Protocol gives guidance on such issues.

The respondent's comment is noted. Councillors

No Change.

Paragraph: 4.6

SCI/31/5 Jeremy Dolphin From: Compton and Shawford Parish Council

The exclusion of specific reference to the arrangements for speaking at committee undermines an existing part of the public consultation process and we believe that this should form part of the adopted SCI. Any decisions to remove this right should only be dealt with through a formal revision to the SCI.

SCI/37/4 Alison Matthews
From: Itchen Valley Parish Council

Add "or Parish Council websites"

The representation is noted. However, as the Draft SCI explains, the current arrangements, which generally work well and allow the Committee to give proper consideration to a large number of complex applications within a reasonable time-frame might, at some point, need adjustment.

If that situation were to arise it would be more practical and more immediately responsive, if the need for alteration could be properly considered by both the community and the Council, without the further need to wait for a formal review of the entire SCI before bringing any alteration into effect.

The suggested additional reference to Parish Council websites is fully accepted.

Proposed Change:

Paragraph 4.6: new sentence, after second sentence, 'Such information is also available on some Town and Parish Council websites.'

Paragraph: 4.7

SCI/20/4 Vera Osborne From: Parish Council of Denmead

Denmead Parish Council is currently having a complete makeover of its website, so that this provides a clearer source of information to residents and an alternative means of contacting the Council.

The City Council is committed to promoting and encouraging the most effective dissemination and exchange of information. Town Councils, Parish Councils and Parish Meetings represent an essential element in the process of locally informing and consulting and, therefore, this Council welcomes any advances which would further improve those links.

The omission of a specific reference to Parish

SCI/34/3

R Greenwood

From: Bramdean and Hinton Ampner

Parish Council

Some areas are represented by Parish Meetings, and not Parish

Councils.

Meetings is regretted and will be corrected in the revised Draft SCI.

Change Proposed:

Paragraph 4.7, first sentence: '...Parish or Town Council or, for some smaller parishes, a Parish Meeting with whom...'

Second sentence: '... Parish or, Town Council or Parish Meeting...'

Paragraph: 4.8

SCI/14/4 Pat Edwards From: City of Winchester Trust

The Town Forum meets infrequently and discusses subjects selected by the City Council and determined by City Councillors. All other parts of the district are represented by Parish Councils and are directly represented on the Local Strategic Partnership Board.

As referred to elsewhere, in the response under paragraph 3.7, the Council has considered the issue of community representation within the ward areas of the City. The introduction of the Town Forum is intended to provide an additional channel of communication and regular opportunities for the open discussion of current issues affecting the City.

The present forum arrangement, and the facility which it provides, will be kept under review. However, this is not a matter where it would be appropriate for the SCI to seek a specific change.

No Change.

Paragraph: 4.9

SCI/14/5 Pat Edwards

From: City of Winchester Trust

Formal 'Scrutiny' is welcomed. However, feedback after giving evidence is needed.

The importance of providing accurate feedback without undue delay is fully accepted. Under normal circumstances the Chair of a Scrutiny Panel will advise members of the public attending a Panel meeting of the subsequent availability of minutes of the meeting, on the Council's web-site.

Where an Informal Scrutiny Panel is set up to review a particular issue and report back on this to the main Panel, officers of the Team involved in this will directly feed back information on outcomes/decisions to any individual or group that had been invited to present evidence to the Informal Panel.

No Change.

4.9 - 4.11 Paragraphs: SCI/4/49 John Hayter

Information dealing with 'scrutiny' is misleading and incomplete. The Scrutiny Committees (SC), portfolio holders (PH) and the topics within the scope of the LDF, that each is responsible for, should be detailed. There is only one applicable SC and one PH. Principle Scrutiny and Cabinet should both be included and described as "appeal" routes, with

It is not accepted that information relating to the area of 'Scrutiny' is misleading. Nor is it accepted that a more detailed description of Scrutiny Committee or Portfolio Holder responsibilities would be appropriate for this type of document.

One particular flaw in this suggestion is that, at a detailed level, such information can rapidly become outdated as the normal and routine result of ongoing change.

Therefore, to use the SCI to provide this level of information could well lead to the publication of a cabinet for immediate matters.

A glaring omission is the Local Plan Committee that in fact performs the role described for Scrutiny Committees in a far more focused and expert way than an SC could ever do. document which contained out-of-date material, relatively soon after its adoption. This would not only devalue the SCI itself, but would result in premature pressure for the document's review.

The precise decision-making process for Local Development Documents is under review, now that the Local Plan Committee has fulfilled its role. However, this is essentially an administrative issue which may be subject to change, rather than something which should be prescribed through the SCI.

#### No Change.

#### General Comment

SCI/4/5

John Hayter

Test of Soundness (v). "Methods of consultation suitable for the intended audience." The intended audience includes those that are hard to reach [SCI 4.6] but the methods proposed are largely the same as have been used for a long time. These have failed to reach such groups and are over-reliant on public participation at WCC, Parish Council and other meetings.

It is accepted that some parts of the community may not be adequately represented. For example this could include the gypsy or traveller communities within the District, young people or those who travel relatively long distances beyond the district boundary to their place of work.

The Council intends to ensure that the best and most adaptable use is made of contacts within the District community and that, as appropriate, new linkages are formed, in order to involve hard to reach groups in all aspects of Council activity.

In addition, the SCI commits the Council to working closely with other relevant organisations that have experience in particular fields, in order to develop further the best and most effective means of communication and engagement with all groups.

No Change.

### Section 5: Community Involvement and the new planning system

Paragraph: 5.2

SCI/40/1

Will Harding

This section talks about wishing to "create areas with a strong sense of identity". Often the residents have a strong sense of identity and it is external planning impacts that seek to destroy it. Suggest "create and preserve"

It is considered that the SCI's aim of helping to strengthen and, where necessary, build community identity is entirely valid. Nevertheless, it is accepted that it is also appropriate to recognise the value of maintaining a sense of community, where this already exists. It is proposed that the wording of paragraph 5.3 should be amplified, accordingly.

Change Proposed:

Paragraph 5.2, third sentence: '...create <u>and</u> maintain areas with a strong sense of identity.'

Village Design Statements

SCI/8/2

J Brooks

From: Corhampton and Meonstoke

This comment and the sentiment it contains are agreed. It is, already the SCI's intention to unambiguously stress the importance of such inputs.

#### Parish Council

Must ensure that greater material weight is given to settlement/community level inputs into the planning system (in the spirit of PPS 1).

No Change.

Issue: Local Development Framework

Paragraph: 5.07

SCI/4/20 John Hayter

Paragraph 5.7 refers to building a database of individuals who wish to be involved in the LDF, asking for people to indicate which documents they have an interest in. To do this will require prior knowledge and will exclude the majority. The topics included in sustainability appraisals would be more appropriate and should be widely circulated. Without this groups such as the homeless, hidden households and affordable home seekers are likely to be under-represented.or not represented at all.

SCI/4/21 John Hayter

Sports and youth organisations could be given recruiting leaflets specific to their interests and thus draw in much younger individuals. This part of the Draft SCI is intended to emphasise the need for effective and timely publicity, in order to promote the various stages in the production of Local Development Documents.

Valuable lessons have already been learned from the production of previous Local Plans and various other Council strategies and initiatives. As a result, It is intended that the evolution of a Local Development Framework for the District will be more effectively publicised and that this will particularly target those who in the past, and for a variety of reasons, have not been included in the local planning process or in other Council activities.

Therefore, in addition to the various other methods used for raising levels of awareness and involvement throughout the District, consideration is being given to the feasibility of placing publicity material and basic explanatory information at some, or all, of the following: local sports halls; village halls; secondary schools; colleges and places of higher education; public transport and park-and-ride locations and; selected businesses in both rural and urban locations.

No Change.

Paragraph: 5.08

SCI/41/1 Susan Solbra

From: Southern Water

Welcome the inclusion of Southern Water as a statutory consultee.

The comment is noted.

No Change.

Paragraph: 5.9

SCI/21/1 Michael Knappett

From: Bryan Jezeph Consultants

Reference should be made to developers, planning consultants etc., as they do not appear within the paragraph (although mentioned in diagram 5).

iagraiii 3).

SCI/39/6 Alison Matthews

The comment is noted and it is accepted that reference should be made to development interests and planning consultants in paragraph 5.9, in order to be consistent with the same information contained in Diagram 5.

Examples of the type of group which has both national status and coverage are given in Diagram 5, at the foot of page 20 in the Consultation Draft.

Change Proposed:

From: Itchen Valley Parish Council What is meant by a national group?

Paragraph 5.9, additional bullet point: '<u>Landowning</u> and development interests and/or their agents.'

Paragraph: 5.11

SCI/48/3 David Elsmore From: Littleton and Harestock Parish Council

Planning policies are often detailed and require expert advice and, therefore, a six week comment period would appear too short. It is agreed that planning policies are often complex in their nature and context. Nevertheless, comment periods are usually set through legislation and regulations imposed by central government. The SCI, itself, is one example of an LDF document for which there is no flexibility in terms of formal consultation periods.

Nevertheless, because of the importance that the Council attaches to community engagement and front-loading the entire consultation process, every effort will be made to achieve successful involvement in the early stages of formulating key planning policies for the future of the District.

No Change.

Paragraph: 5.12

SCI/41/2 Susan Solbra From: Southern Water

Welcome the approach proposed in 5.12, which goes beyond the minimum requirements for consultation, at the pre-submission stage of DPDs. However, if a proposal for alternative sites and/or boundary changes is received after submission of the Development Allocation DPD, further consultation will be required to give stakeholders the opportunity to comment on these proposals (Regulations 32 and 33). This has been omitted from paragraph 5.12 and Diagram 4.

The support for the SCI's approach to consulting on Development Plan Documents is welcomed. The helpful additional comment, regarding opportunities for further consultation on a Development Allocation DPD should this be required, is fully accepted and a reference to this under Regulations 32 and 33 will, therefore, be included in revisions to the Consultation Draft's text.

In order not to overload the Draft SCI with detail, Development Plan Documents have been dealt with and explained in Section 5 of the Draft SCI, both as a distinct group of documents and in terms of the main elements of their preparation and consultation.

It is accepted that the Core Strategy and Development Allocation DPDs will generate very high levels of interest within all parts of the District's community. The Council will, therefore, seek to maximise public awareness of, and involvement in, these critical areas of planning policy. Large-scale consultation will be undertaken, both in terms of breadth and depth, and will include landowning and development interests.

#### SCI/42/3 Heron Land Development

There is no specific mention of consultation in relation to the Core Strategy, or the site-specific Development Provision and Allocations DPD. The use of greenfield sites for further housing development is likely to generate the most public interest and potentially has the largest impact on landowners. As such, consideration must be given to who should be consulted and when this consultation should take place.

### Change Proposed:

Paragraph 5.12, under 'Submission to the Secretary of State', after the third bullet-point an additional bullet point: 'For DPDs that deal with site specific allocations any alternative sites, previously put forward by respondents during the Formal Consultation period, will be published for this further six-week period of public and stakeholder consultation'

Paragraph: 5.14

SCI/41/3 Susan Solbra

From: Southern Water

Regulation 17(2)b requires the LPA to send draft SPDs to specific consultation bodies, if the authority thinks that the SPD affects the body. This has been omitted from paragraph 5.14.

This helpful comment is noted and accepted. Accordingly, it is recommended that paragraph 5.14 should be amplified to make clear the need to consult the 'specific consultation bodies' where circumstances make this appropriate.

#### Change Proposed:

Paragraph 5.14, under Participation and Production Stage, first bullet point, additional sentence... 'Specific Consultation Bodies will also be consulted where the Council considers that the SPD affects that particular body.'

Appendix 3

SCI/14/6 Pat Edwards

From: City of Winchester Trust

A voice for both the built environment and natural environment needs of the City must be included at every stage in producing Local Development Documents. The City of Winchester Trust is excluded from the list of consultation groups.

Although individual organisations are not named, in order to maintain the currency of contact information contained in the SCI, Appendix 3 does contain a clear indication as to the General Consultation Bodies which will be consulted 'if the subject matter of the Local Development Document is likely to affect them'.

Without going so far as to name the City of Winchester Trust, the Appendix makes it clear that the Trust and other amenity and community groups (referred to on page 57 of the Consultation Draft) will be consulted, whenever it is appropriate to do so.

No Change.

Paragraph no: Feedback SCI/42/2 Heron Land Development

In accordance with the Tests of Soundness criterion (vii), further clarification is required in relation to how the results of community involvement will be fed into the preparation of Development Plan Documents and Supplementary Planning Documents. The statutory process is outlined once the document is submitted to the Secretary of State. However clarification, on how representations prior to this stage will be dealt with, is required.

The comment is noted. However, it is considered that a sufficiently clear indication is given in Section 5 of the importance the Council attaches to early consultation and engagement and the need to then translate the results of this into the production stage, well in advance of any, more formal, stages of submission and examination.

No Change.

Paragraph no: SA/SEA SCI/11/2 Amanda Dunn From: Environment Agency

There is no reference to SEA in Section 5. Would like the SCI to state

Although some information is included in Diagram 4 (page 18 of the Consultation Draft), it is accepted that a clear text reference to the European legislature's requirements for Strategic Environmental Assessment in relation to Local Development Documents and their sustainability

that the LPA intends to incorporate the requirements of the SEA into the sustainability appraisal for Local Development Documents. It is important that the text of Section 5 describes how the different stages of the SA/SEA process will develop alongside DPD/SPDs.

SCI/4/10 John Hayter

A Sustainability Appraisal has to be made of all LDF documents, including SPD's, and is therefore subject to the same LDF consultation requirements. This is not mentioned in the SCI.

SCI/4/11 John Hayter

SEA -This EC directive requires an Environmental Report on the likely significant effects of the plan and consultation on both the plan and the Environmental Report. This, therefore, sets the over riding legislative framework for the SCI yet it is not mentioned at paragraph 5.2 and is only mentioned in the glossary.

SCI/4/3 John Hayter

Test of Soundness (i). "Complied with the Regulations". It does not provide for sustainability appraisals or a Strategic Environmental Assessment. appraisal, should be incorporated into Section 5.

It is recommended, therefore, that a new explanatory section should be introduced, following paragraph 5.5 of the Consultation Draft.

### Change Proposed:

After paragraph 5.5, new section headed 'Sustainability Appraisals and Strategic Environmental Assessment', followed by new paragraphs:

- '5.6 The Council is required to carry out a
  Sustainability Appraisal of each Development Plan
  and Supplementary Planning Document that it
  produces. European legislation also requires
  Councils to undertake Strategic Environmental
  Assessments of certain planning documents in order
  to assess the potential impact of proposals on the
  environment.
- 5.7 It will often be appropriate to incorporate
  Strategic Environmental Assessments within
  Sustainability Appraisals and to produce a single
  Sustainability Report, to accompany Local
  Development Documents. For each Sustainability
  Appraisal the Council will assess the likely impacts of
  draft policies and potential development sites against
  a series of social, economic and environmental
  criteria, highlighting the issues raised by the
  Strategic Environmental Assessment.
- 5.8 The Sustainability Appraisal for each document will be initiated at an early stage and amended as the document progresses. This should ensure that the likely impacts of policies and proposals are taken into account from the beginning. The process will also allow changes to be made in the light of any predicted impacts before the document is finalised.
- 5.9 The Council will seek to involve the local community in the preparation of Sustainability Appraisals, with particular emphasis on involving those individuals and groups with relevant social, economic and environmental interests.
- 5.10 Where relevant, the Council will clearly set out its methodology for making an assessment of the impacts (including those relevant social, economic and environmental factors which will provide the basis for making the assessment) and summarise the baseline information that it already has in a 'Scoping Report'. The Council will publish that Scoping Report and consult the community at each

stage in the preparation of the subject Development Plan or Supplementary Planning Document.' (Re-number subsequent paragraphs). Supplementary Planning Documents It is agreed that Village and Neighbourhood Design Statements, and the community based groups which Helen Chambers produce them, express and give focus to locally NDS should be used by the Council driven initiatives that make an important contribution as an overview of local residents' to the Council's appreciation and understanding of wishes. the District's diverse qualities and needs. A continuing role for such documents, and the local groups responsible for them, is a matter which is dealt with in the responses under paragraph 5.40. No Change.

Issue: Planning Applications

Paragraph no: 1.6

SCI/4/14 John Hayter

SCI says the government requires "changes to the way...that decisions are taken on individual planning applications." The SCI does not identify what changes are required, or have been made. The only detectable changes have been those to reduce public participation in deciding planning applications.

In the interests of producing an SCI of a manageable length and technical detail which can be approached and understood by a wide audience, relatively recent changes in legislation and government requirements are not set out in precise detail. Such detailed information is available on the relevant Government Departmental websites.

Nevertheless, the recent changes are clearly intended to streamline the local planning process and to promote a positive approach to managing development. They are also intended to enhance community involvement in planning, strengthen policy content and achieve a clearer focus on implementation.

The changes already made by the Council, together with other measures that are in the process of being implemented or improved, are all aimed at increasing the scope and reach of community involvement in planning and other issues.

The programme of improving and further developing the content and accessibility of the Council's website, together with a much stronger and clearer emphasis on pre-application consultation, are only two examples of the various methods for improving community participation which are set out in the SCI.

As part of the Council's further development of its own website, it is intended to provide links to the Government's comprehensive planning guidance, which is set out in a series of Planning Policy Guidance Notes and Planning Policy Statements.

With further reference to this particular comment, it is not accepted that the Council has reduced meaningful public participation in deciding planning applications. On the contrary, it is seeking, partly through its SCI, to take every reasonable step to enhance this and other forms of public participation.

No Change.

Paragraph: 5.4

SCI/10/1 Vera Osborne From: Parish Council of Denmead

The issue of strengthening community involvement occurs throughout the document. In recent years there has been no discernable impact of local Denmead views on decisions relating to development control, or the WDLPR. This gives the impression that if these don't fit the 'Winchester' view, then there is not much point in commenting.

SCI/36/3 John Duncan

"Improved flow of information" - once preliminary discussions have taken place, residents in the immediate vicinity and NDS officers should be informed immediately.

SCI/37/5 Alison Matthews

From: Itchen Valley Parish Council

Does the expression "at the earliest possible stage" mean that Parish Councils, residents etc. will in future be informed as soon as a potential developer contacts the planning department? In the past, this was not done due to commercial sensitivity.

The Council regrets any sense, on the part of the Parish Council, that its views have not been heard or acted upon. There is, nevertheless, a clear commitment on the part of the City Council, to increase both the quality and quantity of local participation and community engagement in decision-making in all parts of the District. The production of a transparent Statement of Community Involvement is one element, intended to help carry that process forward.

Notwithstanding this, the Council does accept that continuing development pressures on all parts of the District create a very considerable challenge for the Council, its district partners and the wider community. One example of the Council's ongoing efforts to respond to that challenge and engage with local communities, including Denmead, has arisen in the case of the currently proposed Major Development Area West of Waterlooville.

To inform all significantly affected residents, Parish Councils and other relevant interests of any formal development proposals 'at the earliest possible stage' is, and will remain, a key objective of the SCI.

However, although the Council is absolutely committed to the principle of transparency in its dealings with all individuals and communities of interest, informal 'preliminary enquiries' made by private householders, landowners or developers are normally responded to by the Council with a degree of sensitivity and/or respect for reasonable commercial confidentiality.

There is, however, a mechanism provided by the Freedom of Information Act, whereby a specific request can be made to the Council, for it to consider revealing such information, although the Act does recognise that in some situations, commercial confidentiality should be protected.

From the SCI standpoint there is, furthermore, a distinction in regard to pre-application contact between applicants/agents and the local community.

If the applicant fails to undertake pre-application consultation, appropriate to the scale and nature of the application, or is unwilling to release the results of pre-application discussions, disclosure or further information may be required in order to properly assess the material considerations relevant in a particular case.

No Change.

Paragraph: 5.6

SCI/4/28 John Hayter

The SCI procedure regarding site notices and comment periods cannot be met unless they are coincident. As flexibility on site notices is acceptable to the LPA there is no reason for not permitting more flexibility on comment periods. To maximise the opportunity to involve Parish Councils and other organisations, a five week comment period is required to accommodate a calendar monthly meeting schedule.

The procedure set out in the Consultation Draft is meant to be adhered to. Recent staffing constraints have, however, led to a delay in some notices being forwarded to applicants/agents for display on site. The resultant timing difference between notices and comment periods, which the Council does not regard as being some form of inbuilt, or acceptable, 'flexibility', are currently the subject of determined efforts aimed at their elimination.

Additionally, and In the interests of greater clarity, it is recommended that the wording of paragraph 5.36 should be amended to set out more precisely what is expected of applicants/agents.

In order to meet the targets se by Government, the Council's PDC Committee schedule is based on a three-week cycle. While there may be occasions when that interval is extended, as a general rule it would not be possible to maintain the necessary frequency of meetings and allow for a five-week comment period.

#### Change Proposed:

Paragraph 5.36, second sentence: 'in the majority of cases applicants, or their agents, are expected to erect such notices and, in practice, are given a total period of up to 28 days, during which time they must make the necessary advance arrangements to allow the notice to be displayed on site for not less than 21 days.'

Paragraph: 5.18

SCI/21/2 Michael Knappett From:Bryan Jezeph Consultants

Agree with the principle of public consultation prior to the submission of major planning applications.

SCI/36/4 John Duncan

Throughout a project recommend short minuted meetings between developers and residents.

The expression of support is welcomed.

In the case of large scale or potentially controversial developments, several respondents to the publication of the Consultation Draft SCI have highlighted a need to limit the risk of later misunderstandings and contradictions, by producing reliable and mutually agreed minutes of any early consultative meetings between potential applicants and the local community.

The Council does accept that there could be benefits, in terms of clarity and greater openness, if

such minutes formed part of the supporting statement of public participation which accompanied such applications.

However, currently, the practical and resource implications of doing so, prevents the Council from offering to undertake such record-keeping.

Also, the Council is unlikely to be involved in many of these meetings, not least because it will need to retain impartiality. Although the keeping of good records of meetings is to be encouraged, there is likely to remain a danger of disagreement about the content of such records.

No Change.

Paragraphs: 5.19/5.20

SCI/23/6 Alison Goss

Must state that it applies to medium scale as well as large scale developments.

In terms of seeking the best and most effective ways of involving the community, it is considered to be unnecessarily inflexible for the SCI to prescribe absolute divisions between small, medium and large scale proposals. However, in general terms, the SCI does follow the scale criteria set down by central Government. These are reproduced in Diagrams 7 and 8.

Whilst the Council accepts that certain effects or environmental impacts may result from the scale of a development it would, nevertheless, prefer to retain a degree of flexibility, by referring to consultation procedures appropriate to 'more significant planning proposals', as opposed to those simpler procedures suitable for 'small-scale or minor applications'.

In any event, the Draft SCI's additional proviso that planning proposals regarded as 'significant' may include those that are likely to give rise to degrees of controversy, are located on sensitive sites or are of a significant scale, is intended to provide an additional safeguard which will allow the Council to call for wider and deeper public participation if the nature of the proposal warrants this.

No Change.

Paragraph: 5.20

SCI/11/4 Amanda Dunn From: Environment Agency

It should be made clearer that, for issues that fell within their remit, statutory consultees would be keen to be involved in pre-planning discussions with the LPA and applicant.

SCI/13/3 Julian Cooper

The comment is noted. It is accepted that the SCI could helpfully refer to the fact that, for certain types of proposal, early contact with relevant statutory consultees could usefully inform pre-application discussions and early community involvement. It is, therefore, recommended that a useful reference to this could be made in paragraph 5.23.

One of the Council's main objectives, in producing an SCI, is to ensure that every reasonable step is taken to improve the quality of consultation, and to broaden

The SCI is not explicit enough. In particular it needs to address the pre application process. All developments of one house or more should be posted to local NDS site.

SCI/17/4 Patrick Martin

From: Teg Down NDS Core Group

Paragraph 5.20 and following paragraphs are too weak. Developers should be obliged to consult neighbours, not merely notify. Consultation should take place during a defined period (e.g. 6 weeks) before plans are submitted.

SCI/28/3 Margaret Fawkes

From:Local Resident NDS group

Should be more consultation between developers, residents and the Council. This must take place before final plans are submitted. Communication of outcomes is also necessary.

SCI/30/4 Bobbie Neate

Paragraph 5.20 is not strong enough. Need meetings with local residents before development plans have been drawn up.

SCI/40/2 Will Harding

This should be more definitive and, to that end, should change "expects" to "requires".

out the involvement of individuals and communities of interest in the development control process.

Notwithstanding this, it should be pointed out that although NDS groups are valued for the contribution which they make, they are self-appointed and do not have an equivalent status to Town or Parish Councils.

Whilst the Council does not disagree with the underlying sentiments expressed by this group of respondents, it does not accept that the spirit and content of paragraph 5.20 are weak. On the contrary, the SCI reaches to the limit of what is permitted by central Government.

As an illustration of this, the use of the word 'expects' is generally considered to be acceptably robust, whereas the mandatory control implied by the word 'requires' does not accord with the adaptable approach recommended by Government and would be unlikely, therefore, to meet the 'Tests of Soundness', at the later stages when the SCI is subject to formal 'examination'.

The Council fully acknowledges the importance of feeding back quality information on decisions made and the outcome of any schemes put forward for approval. Partly through the establishment of a Major Applications Team and other related adjustments within the Development Directorate, and partly through further development of its website, the Council intends to improve performance in this area, in so far as resources will permit.

Change Proposed:

Paragraph 5.23, an additional sentence after the third sentence:' It should also be pointed out that for certain types of proposal, early contact with relevant statutory consultees could usefully inform preapplication discussions and early community involvement.'

Paragraph: 5.22

SCI/35/2 S.D Sadler

'At an early stage' is not explicit enough. The local community should be involved as soon as a developer has decided to proceed, and before any plans are drawn up.

The phrase used in the Draft SCI is considered to be both clear and reasonable. Whilst it is desirable to involve residents at an early stage, this cannot necessarily be enforced by the Council, which may itself be unaware of the proposal.

Furthermore, to consult local residents, groups or others without the aid of sufficient explanatory material could be counter-productive and lead to misconceptions regarding the scheme's content and details. This could also hinder more sustainable and acceptable development which might otherwise

|  | result from a better understanding of local community needs.   |
|--|--|
|  | No Change.   |
| Paragraph: 5.23<br>SCI/35/3 S.D Sadler   | This comment is noted. A response on this issue has been given above, under paragraph 5.18.  |
| This should go further; stipulating either written confirmation of agreements made with residents, or minuted meetings recording this.  Verbal agreements are not reliable.  | This comment is noted and agreed. The Council is making every reasonable effort to achieve genuine consultation from the very beginning of the process.  |
| SCI/36/6 John Duncan   | No Change.   |
| Pre-application consultation must be enforced, and from the outset.  |  |
| Paragraph: 5.24  SCI/37/7 Alison Matthews  From: Itchen Valley Parish Council  How will the accuracy of the statement  | This comment is also noted. A response with regard to the recording and verification of matters arising from early contacts between developers and local communities is given under paragraph 5.18, above.   |
| of public participation be checked? Parish Councils could be asked to confirm that they agree with the statement.  | As explained above, under paragraph 5.20, 'fixed processes' are unlikely to comply with the Government's tests, which will be later applied to determine whether or not the Council's SCI can be confirmed as being 'sound'.   |
| SCI/40/6 Will Harding  | Committee as being sound.  |
| Defines Table 7 as giving examples of the kinds of community involvement exercises. This is insubstantial. For medium and large scale applications it is important to have a fixed process where the developer: contacts the right neighbours and groups; conducts consultations(s); records the results and; makes the altered application. | The Council's method is, therefore, to incorporate sufficient flexibility for the SCI to be deemed consistent with the Government's recommendations for an 'adaptable approach' to local participation whilst, at the same time, providing a sound and practical framework for the continuing delivery of better community engagement.   |
|  | Nevertheless, the clear and straightforward process put forward in the response SCI/40/6, is one which the Council would wish to support, by the inclusion of an additional sentence in paragraph 5.23.  |
|  | Proposed Change:   |
|  | Paragraph 5.23, after second sentence, add sentence: 'For medium and large scale applications, the Council considers it sufficiently important to give every encouragement to a transparent process and clear sequence, in which the applicant undertakes to: make initial contact with all appropriate individuals and groups; conduct appropriate consultations; accurately record the results of these consultations and; make an altered application, as necessary.' |
| Paragraph: 5.25<br>SCI/37/8 Alison Matthews  | There are minimum requirements for the amount of accompanying information necessary for applications to be registered. These are adhered to by the   |

From: Itchen Valley Parish Council

If the system of front loading is to work it is vital that applications are not accepted until all necessary information is available and that no amendments are accepted after the application is submitted.

Council. However, to insist that all information must be initially available is considered 'unreasonable' and would be impractical to impose.

There are quite normal circumstances in which the need for additional, or amplifying, information only comes to light following examination of, or technical consultations relating to, a particular application. It is, nevertheless, accepted that in every instance the Council should strive to obtain timely information, of dependable quality, to properly inform potentially affected parties and other consultees within the community and to guide its own decision making.

Given the requirements of the SCI and the need for the efficient determination of planning applications, the Council is unlikely to tolerate amendments to planning applications as an acceptable substitute for proper pre-application consultation.

As indicated in paragraph 5.24 of the Consultation Draft, the Council routinely provides written advice relating to householder and other applications, to set out what information is required. The adopted District Local Plan gives further guidance with regard to this and other types of application.

Currently, as part of the process of establishing the new Major Applications Team, consideration is being given to the production of a 'protocol' document, to provide detailed guidance for those intending to make large-scale or more significant applications. This document would also contain information relating to the own Council's standards and commitments for pre-application discussions, as well as other aspects of local consultation and participation.

As part of the ongoing development and improvement of the Council's internet access facility, copies of such guidance and information would also be placed on the web-site.

No Change.

Paragraph: 5.27

SCI/41/4 Susan Solbra

From: Southern Water

Would welcome a commitment in the SCI to consulting utility providers on relevant planning applications.

The suggestion is noted. However, it is considered that the first sentence in paragraph 5.27 gives a sufficient indication as to the need for thorough consultation, both in terms of local and community interests and in seeking to obtain specialist advice, as appropriate. In this context, it is not thought necessary to identify particular groups of consultees.

No Change.

Paragraph: 5.30 The support is welcomed. The Council's

SCI/21/6 Michael Knappett From: Bryan Jezeph Consultants

Welcome use of the Public Access System. Need to ensure that all submitted information is displayed. commitment to improving the scope, quality of content and user-friendliness of its web-site, including all planning pages, is referred to in response to a number of comments on the Consultation Draft.

No Change.

Paragraph: 5.33

SCI/37/9 Alison Matthews From: Itchen Valley Parish Council

Would be helpful if the responses of the consultees were made available on the website and that the planning officer's report to the Planning Committee meeting was made available to the Parish Clerk before the Meeting. The Committee report is needed to decide whether to take up the public speaking option.

Planning Officer's reports, which contain summaries of all relevant consultation responses, are despatched to City Councillors, Applicants, Clerks of Parish Councils and Chairs of Parish Meetings in time for their arrival at least five working days before the date of the relevant Development Control Committee Meeting.

This also gives time for requests to be made to the Public Speaking Coordinator, for the opportunity to speak at the meeting, in accordance with the Committee's adopted procedures.

Whilst original copies of consultation replies are taken to the Committee meeting, where officers may be questioned as to the detailed content of any particular response, it would be logistically difficult to put all such replies on the web-site in advance of the meeting. Whilst many consultation responses are now received electronically, a number are still received in paper form, adding to the practical difficulty.

No Change.

Paragraph: 5.35

SCI/10/1 Vera Osborne From: Parish Council of Denmead

Neighbourhood notification Denmead has increasing instances of
sites, adjacent to an application site,
that have not been notified of the
proposal. A tangible definition of
"neighbour" would be a useful addition
to the SCI.

SCI/23/7 Alison Goss

Too late. Notification essential at earlier stage.

SCI/24/2 Lee Atkinson

Residents should be consulted, not just notified. Consultation should start as early as possible and should continue throughout the planning process.

The Council's current procedures for issuing all forms of publicity and neighbour notification, following the receipt of planning applications, are set out in Section 5 of the Consultation Draft SCI. The various methods of publicising new planning applications are intended to be complementary and, especially in the case of larger applications, mutually reinforcing.

Furthermore, Town and Parish Councils, together with Parish Meetings, Residents Associations and Amenity Groups, provide a great deal of help in locally publicising applications.

As referred to elsewhere in these responses, the Council is aware of some slippage which has recently occurred with regard to the issuing of certain site notices. This particular problem is mainly the result of staffing changes which have, in turn, led to a need for increased training. All teams within the Development Directorate are currently working to overcome this particular problem and to reduce the incidence of any slippage to an acceptable minimum.

### SCI/4/27 John Hayter

Neighbour notification is described as "according to the allocating officer's assessment of which properties may be affected by the proposed development." This is the former system. The new system introduced a 'narrow focus' for neighbour notifications so that notification, although not defined in the report is now only to immediate neighbours. Clearly, many issues impact far wider than the immediate neighbours. This fails to meet the LPA's own standards of consultation.

Notification should be set by proper consideration of the need to consult those most affected and including the hard to reach, not by an inevitably arbitrary and exclusive limit.

### SCI/4/32 John Hayter

When the planning officer considers an application, the steps required are to list the applicable plan policies, determine if the application has the required information to assess against these policies and initiate internal consultations where specialist information is required. This analysis should be included in the notifications sent to neighbours, parish councils etc. and the SCI should be amended to include it. It would go to supporters and objectors without bias. It would facilitate the consultation by focusing it around the policy issues it identifies and then enable consultation on whether all policy issues have been identified. This will draw the attention of the uninitiated to matters that are material to their well being.

#### SCI/4/9 John Hayter

Test of soundness (ix.) "describe policy for consultation on planning applications". Neighbourhood notification is not as described in SCI 5.35 and has been reduced. Site notices may not even be displayed before the comment period expires.

However, with regard to the associated issue of neighbour notification, the same development control teams are using all available resources, to ensure that notification is carried out as soon as possible after the initial registration of an application, and in accordance with the Council's adopted procedures.

Those procedures, which are subject to periodic review, are intended to balance the often conflicting objectives of efficiency and speed of determination, on the one hand, with effective neighbour notification and other local consultations on the other.

It should, however, be stated that the adopted procedures do result in neighbour notification standards that exceed the minimum requirements laid down in legislation. Furthermore, in practice, every effort is made to apply the Council's standards evenly throughout the District but on a 'common sense' basis, anticipating and taking account of wider impacts where this is appropriate.

Nevertheless, it is accepted that it is important, and necessary, to set out the adopted notification procedures and post these on the upgraded website, where they could then be easily accessed and kept up to date in the event of any changes.

As is clearly stated in the Consultation Draft, the Council is anxious to avoid acting in any way which could be regarded as selective, or arbitrary. This is particularly the case in regard to consultation and the exchange of information and equally applies to those individuals or groups which might be regarded as 'hard-to-reach'.

The routine inclusion, with neighbour and Parish notification, of the kind of 'summary analysis' suggested in the comment SCI/4/32 would result in significant additional delay in sending out such notifications. This would, in turn, make it virtually impossible for the Council to receive representations in time to make planning decisions which met the Government's performance targets (Set out in paragraph 5.46).

Given levels of resource availability that can currently be predicted for the future, It is considered that the practical and logistical disadvantages of such an innovation would considerably outweigh the gains to be made by more widely disseminating relevant information in this particular way. Nevertheless, over time and with more effective and widespread use of electronic communication and internet access, it Public participation at meetings is the SCI's major method for public involvement. Public involvement at PDC is not part of the SCI and the existing but poorly publicised procedure for placing written communications before them is omitted from the SCI, thus leaving no direct public access to the Planning Development Control Committee.

should be possible to steadily improve ways of sharing this type of information.

The issue of public access to the Council's Planning Development Control Committee is addressed under paragraph 5.41below.

### Proposed Change:

Paragraph 5.35, after second sentence, add:' <u>The criteria</u>, which form the basis for that initial assessment, will be included on the Council's website and updated as necessary, as part of the further development of the Council's internet facility.

Paragraph: 5.36

SCI/21/7 Michael Knappett From: Bryan Jezeph Consultants

The Council should be obliged to display site notices. Other local planning authorities do not expect an applicant/agent to do this.

The Council's position, set out in the SCI, is to introduce measures to more directly involve landowners, applicants and developers, as partners, not only in the day-to-day processes of planning and development control, but also by becoming more actively, and pro-actively, a part of wider community engagement. Set against this objective, it seems reasonable to expect applicants and their agents to take responsibility for this essential form of communication with the public.

No Change.

Paragraph: 5.38

SCI/37/1 Alison Matthews From: Itchen Valley Parish Council

If the neighbouring property is farmland, no attempt is made to notify the occupier/owner.

The Council's Development Directorate does not hold any information as to the ownership of individual parcels of arable or other farmland. Often, in the case of large tracts of farmland it is not possible, without unusually detailed local knowledge, to assess on site, or from mapped information, the precise divisions and sub-divisions of land ownership. Much farmland is now owned and managed remotely and is farmed by contractors. In such circumstances there may no longer be a farmhouse as the locus of the farm.

However, In the case of smaller farms and holdings which are still centred on a dwelling or dwellings, the ownership or tenancy is likely to be more readily apparent and, in such cases, neighbour notification should be carried out in the normal way.

No Change.

Paragraph: 5.39

SCI/10/5 Vera Osborne From: Parish Council of Denmead

The statement that "a Parish Council's

It is accepted that this paragraph's reference to acceptable reasons for planning applications being referred to Planning Development Control Committee does not accurately reflect current practice, in three respects: Town or Parish Council's reasoned reasoned representation, contrary to office recommendations" can cause a planning application to go before the Development Control Committee is not consistent with the new planning process.

SCI/4/29 John Hayter

The SCI should set a target of 6 weeks for Officer's reports on 8 week applications and allow time for public verification of the report.

SCI/4/33 John Hayter

90% of applications are dealt with by the Director of Development under delegated powers. This provides no opportunities for comment (which would enable errors to be corrected and also ensure that all comments have been recognised and properly considered) and no data has been published on how often, if ever, the Director does not accept the officer's recommendation. Without allowing comment, it is impossible to ensure all reports are accurate, complete and transparent.

representations; an application's status as a 'major development' and; the origin of six or more representations.

The recommended changes below are intended to correct these inconsistencies and bring the Draft SCI up to date.

The comment is noted. However, it would become more difficult to even approach the Government's performance targets, if this particular suggestion was to be adopted. The Council's aim in setting up a Major Applications Team is to devote additional resources to specifically improving performance, in regard to what are generally the most complex and potentially controversial proposals.

Part of this improvement is also intended to make better provision for consultation and community involvement. However, given the pressures already placed on officers currently dealing with these and all other applications, it is unlikely that, at present, the availability of officer reports could be brought forward by the amount of time suggested.

The comment and the concerns which it contains are noted. The Director of Development and his staff make every reasonable effort to ensure that this part of the development control process is fully responsive and open to community involvement.

However, the responsible use of delegated powers cannot be avoided, if the Council's development control service is to comply with all its obligations in a timely and efficient manner, and if Government targets on overall performance are to be met.

Changes Proposed:

Paragraph 5.39, second bullet point:' Due to a Town or Parish Council's reasoned representation, contrary to officer recommendation based on material planning reasons, and agreed by the Head of Planning Control.'

Fourth bullet point: 'The application is for a major development'

Fifth bullet point: 'If six or more representations, from different households, which raise material...'

SCI/4/34 John Hayter

Problems arise in officer reports because the discipline of identifying all applicable policies, SPDs and other Every effort is made to include all relevant information in officer reports. This includes the matter of bringing the existence of an adopted Village or Neighbourhood Design Statement to the attention of Members and other interested parties.

material considerations is not followed. For example there have been many complaints about Village Design Statements not being taken into account and in such cases the applicable paragraphs should be identified. Without this, the decision process is not transparent to objectors, supporters or the applicant.

SCI/4/35 John Hayter

Problems arise in officer reports because comments have to be summarised and recommendations then take account of the summary. Occasionally comments are omitted and in others, particularly those where a number of separate arguments are made, the summary and therefore the recommendation do not take account of them. Summarising inevitably forms a view of the significance of a comment before it can be properly known. This cannot be a fully transparent process and, therefore, the right to challenge is especially important.

SCI/4/36 John Hayter

Problems arise in officer reports because no consideration is given as to whether the comments made also represent the interests of those who are difficult to contact for dialogue. This should be mandatory in every report.

SCI/4/37 John Hayter

Problems arise in officer reports because in some cases and, notably, in considering need for higher density without damaging character, where a compromise has to be made, it is not made in an objective and transparent manner e.g. by identifying the minimum density permitted on the site and then assessing whether the higher density has been achieved by an unnecessary sacrifice of character.

SCI/4/38 John Hayter

The SCI should commit to providing officer reports 10 days before either the PDC Meeting, or before a delegated decision is taken.

The purpose of adopting such Statements, as supplementary planning documents, is that It they should not only provide a valuable assessment of local character and its most important constituent elements, but that they should be in conformity with currently applicable planning policies.

It is open to Members to question any apparently significant divergence between an officer's recommendation and the content of a Design Statement although, should this be the case, it is very likely that such a disparity would have been identified in the officer's written report.

In order to progress with the proper consideration and determination of numerous planning applications, within a finite time-scale, it is unavoidable that some degree of summarisation is used in officer reports. Every effort is made to ensure that those reports are accurate and contain all that is factually relevant to the aim of making reasoned and justifiable decisions. Furthermore, the structuring of the Committee and its procedures make added provision for any clarification or correction of detail, where this is needed.

It is normally the case that anyone contacting the Development Directorate, in connection with a current planning application, and who wishes to make a representation, or obtain additional information, will provide some details of how they can be contacted by the appropriate registration or development control team.

Clearly a dialogue, as such, is not always necessary, when the outcome of an initial contact is simply the receipt of an objection or expression of support. Nevertheless, it is the Council's practice to always try to establish a means of making further contact, should this become necessary.

However, given the limited information which can be expected, or asked for by the Council, it is often impractical, especially in the case of an individual, to assess whether or not that person could be said to fall within one of the recognised 'hard-to-reach' groups.

Acceptable density ranges, for housing development within the District's built-up areas are clearly set out in Government planning guidance (Planning Policy Guidance Note 3) and repeated in the adopted District Local Plan.

#### SCI/4/39 John Hayter

The implementation of the comments made on 5.39 would result in a revised version of the facility that already exists to make written representations to be provided to each Planning Development Control Member (in any event this procedure should be included in the SCI). An advantage of this procedure is that it allows some written 'participation' in the decision. This would significantly reduce the unacceptable exclusion inherent in only allowing verbal participation and even then only to those who have the communication skill to muster five other objectors or parish council or ward member support. Comment 28 describes how this can be accommodated within the 8 week time scale.

### SCI/4/40 John Hayter

There is nothing in 5.39 that could be changed in a minor way and in any event a change would prevent proper annual monitoring of most of the planning application activity.

### SCI/4/41 John Hayter

Only 2 of the 6 criteria are known when the application is posted. There are issues such as the provision of high-density affordable housing, where those in need may be excluded because they are not contactable. uninitiated in planning matters, lacking in communication skills and whose needs may be the opposite of the represented majority. The criteria are, therefore, overwhelmingly biased in favour of ensuring as many decisions as possible are delegated and all further comment is muzzled, instead of promoting the widest possible community engagement. The major criteria should be that all applications that affect more than immediate

neighbours should go to Planning Development Committee.

Any proposed increase on the minimum figure would be made clear in an officer's report and if, as a result, there were considered to be issues of potential harm to local character, then such matters would almost certainly be central to the Committee's consideration of the proposal and, if necessary, its questioning of officers.

The suggestion that, in the interests of providing greater opportunities for public involvement, officer reports should be made available either ten days before Planning Committee meetings, or the date on which it is intended to make delegated decisions, is theoretically valid.

However, whilst the Council continues to seek steadily improved performance in the area of public consultation and with regard to the availability of additional material which can inform community participation, the resources are not available at the present time, to allow the Council to commit to the sudden changes in procedure which the respondent suggests.

Nevertheless, in terms of access to the decisionmaking processes by way of written submission, it has been and still is possible to write to, or e-mail, a Ward Member in connection with a planning application, in advance of any decision being made.

To present what may need to be complicated written submissions to Members in, or preparing to go to, Committee can have a distracting effect and this is not always helpful, or productive.

The comments under SCI/4/40 and SCI/4/41 are noted. However, amendments and improvements to the Council's procedures are ongoing, partly to reflect the normal processes of change and partly to incorporate more effective and efficient practices.

The 'criteria' referred to are intended to provide a clear, rational and accessible framework for drawing the distinction between those applications which need to be determined by Members and those other applications, with potentially fewer and/or more localised impacts, which could reasonably be determined under the Council's scheme of delegation. The scheme, as it currently exists, is open to review and, if that is thought to be beneficial, change.

However, the scheme is not intended to 'muzzle' community involvement. On the contrary it is, to an

extent, used in order to free up limited resources to allow more focused attention to be paid to those, admittedly fewer, applications which could have significant impacts over a wide area.

Without seeking to belittle the importance to individual residents, or local communities, of 'householder' or other proposals which may affect a smaller neighbourhood area, the more major applications that are submitted are regarded by the Council as fully meriting the very detailed attention which their scale, and often inbuilt sensitivity, demand.

No Change.

Paragraph: 5.40

SC/28/4 Margaret Fawkes From: Local Resident NDS group

NDS needs to be registered to provide two way process - website of NDS to be a contact link to ensure overview is taken into more consideration.

SCI/11/5 Amanda Dunn

From: Environment Agency

Would suggest that sustainable construction be listed as a relevant planning issue.

SCI/34/5 R Greenwood

From: Bramdean & Hinton Ampner PC

What is the difference between "enjoyment of neighbouring properties" (the effect on outlook) and the "loss of a view over other people's land"?

SCI/37/1 Alison Matthews

From: Itchen Valley Parish Council

The difference between "effect on outlook" and "loss of a view" will not be clear to the majority of readers. "Noise and light pollution" s hould be added to the 8th bullet point."restrictive covenants" should replace "legal covenants", at the top of page 26.

Although initially set up to fulfil a specific planning purpose, VDS and NDS groups can have a useful ongoing role, in the sense that these particular initiatives have brought together local residents and others who share an interest in a particular locality or environment and who may, therefore, wish to continue to function as a group, after completing the parish-, village- or neighbourhood-based project.

Such ongoing groups can easily register to maintain an involvement with the development of the Council's planning policies through its Local Development Framework.

However, it should be pointed out that the Council could not treat any such groups as alternative planning bodies for a local area, particularly bearing in mind that Town and Parish Councils have a statutory role in regard to planning and community matters.

This forward-thinking suggestion is noted and accepted. An appropriate change to paragraph 5.40 is, therefore, recommended.

It is recognised that the role of sustainable development, of which 'sustainable construction' is a key element, is evolving and gaining in importance. Consequently, the attention paid to these aspects of development, by all decision makers, is certain to increase in the future. Appropriate additional provisions will, therefore, need to be made.

It is a relevant and 'material' consideration for the Council, as local planning authority, to take account of an occupier's, or occupiers', legitimate enjoyment of their property. This, for example, could be considered in terms or privacy, or reasonable access of natural light to rooms within a dwelling adjoining a proposed development. It is accepted, however, that this is not made entirely clear in the Consultation Draft wording of the eighth 'bullet point' in paragraph 5.40. A change to that wording is, therefore, recommended in order to clarify the distinction. Conversely, the wording of the third of those criteria listed as not being material planning considerations is correct and, therefore, does not require a change.

The additional comments, with regard to forms of pollution and restrictive covenants, are also accepted. Appropriate changes are, therefore, recommended to incorporate these helpful amplifications.

#### Changes Proposed:

Paragraph 5.40, eighth bullet point: 'Impact on the <u>amenity</u> enjoyment of occupiers of neighbouring properties (the effect on <del>outlook,</del> privacy or daylight).'

Eleventh bullet point: 'Pollution, <u>including noise and</u> light pollution.'

Nineteenth bullet point: 'Matters covered under other legislation (i.e. the building regulations, restrictive legal covenants, alcohol licences).'

Paragraph: 5.41

SCI/23/8 Alison Goss

Involve NDS representatives in preplanning discussions

SCI/36/7 John Duncan

Development Control Committee is too late a stage for residents to raise issues. There is a need for detailed discussions throughout the lifetime of a project.

SCI/4/42 John Hayter

5.42 describes the PDC arrangements only in terms of public speaking that is inherently an exclusive process. It does not describe how the results of public consultation are fed into the decision taking, nor does it include the existing procedure for placing written comments before the Planning Development Committee.

This comment is noted. However, the Council's response in regard to NDS groups and their wider planning role has already been given under paragraph 5.40, above.

The Council fully concurs with the sentiments expressed by this comment. A primary objective for the Council is to achieve and maintain a sense of dialogue with the local community, and all interested parties, which is based on a genuine exchange of views and information throughout the duration of any planning policy project or significant planning proposal.

The SCI is specifically intended to further and support this principle and to give a clear and credible expression of the new opportunities which can be more fully put into practice. However, it also needs to make clear the existence of those practical and resource constraints and limitations which must be addressed, and accommodated wherever possible.

It is not accepted that current public speaking arrangements are 'inherently exclusive'. What is maintained, however, is that these arrangements

should be seen as one element in a comprehensive framework of opportunities for participation, that allows individuals and groups of all backgrounds, capabilities and experience, to contribute to the Council's decision-making processes and, in that way, play a meaningful part in public issues affecting their immediate neighbourhood, or wider community. No Change. Paragraph: 5.43 This comment is noted. SCI/4/43 John Hayter No Change. There is nothing in 5.41 or 5.42 that could be changed in a minor way. In any event, a change would prevent proper annual monitoring of most of the planning application activity. Paragraph: 5.44 This comment has been repeated in a number of responses to the Consultation Draft SCI. SCI/10/9 Vera Osborne Furthermore, it contains an attractive suggestion and From: Parish Council of Denmead one which the Council might wish to adopt on the The best method of communication is basis of merit. writing to all those who have got involved. This process has been However, it should be made clear that to reinstate this particular facility would have significant resource discontinued which fails to encourage implications whereby the Council, operating as it them to have involvement on future must within strict resource limits, would need to occasions. balance this additional outlay with corresponding SCI/11/6 Amanda Dunn savings which would have to be made in other areas. From: Environment Agency The request by the Environment Agency is noted. In It would be useful if the Environment the light of the above response, however, it may be Agency could be notified, by email, of that the Council would wish to review its current when a decision notice is available on procedures for notifying partners and other 'public access.' participants, as to both decisions made and other planning outcomes. SCI/34/6 R Greenwood No Change. From:Bramdean and Hinton Ampner PC Despite the cost implications, this is a retrograde step. The public should be aware that this information is always available from Parish Clerks, via the decisions' lists. This comment is noted. Both the weekly lists of SCI/37/1 Alison Matthews applications received and individual letters of From: Itchen Valley Parish Council notification identify the case officer for each It would save time if the name of the application. However, the only way in which a

particular case officer's working pattern could be

added to this, would be for the information to be

typed in manually. This would be additionally timeconsuming and, given the pressures imposed on the validation team, is unlikely to be possible for the

planning officer dealing with the

sheet.

application was typed on the front

## foreseeable future.

No Change.

Matthews

From: Itchen Valley Parish Council

Alison

Public speaking on planning applications is not encouraged by the Council. Speakers can wait several hours. They should be told when their item will be heard.

Certainly there are practical limitations on time, if the business set out in the Planning Committee's prearranged agenda is to be dealt with during a meeting of reasonable length.

Allowing for the normal, and inevitable, fluctuations of presentations and debate every effort is, nevertheless, made to give intending speakers guidance on approximate timings.

No Change.

Diagram 7

SCI/37/1

SCI/21/3 Michael Knappett From: Bryan Jezeph Consultants

Not necessary to attend public meetings, public exhibitions and meet with the Town/Parish Council before submitting a planning application.

Attendance at a Town/Parish Council meeting is sufficient.

SCI/23/3 Alison Goss

'Involve' - to work directly with the public *from the beginning* and throughout the process...

SCI/21/4 Michael Knappett

From:Bryan Jezeph Consultants

The amount of public consultation should reflect the size of a proposal. There should be wider consultation for a scheme proposing 150 dwellings than a smaller proposal for 10

SCI/21/5 Michael Knappett

From: Bryan Jezeph Consultants

Where an offer is made to meet with a parish council or local group, to discuss a proposal, the offer should normally be accepted. Have experience of invitations being declined as applications have not been formally submitted.

SCI/23/4 Alison Goss

'Before' a planning application is too vague. Should read 'At the outset of

The comment is noted. Whilst the Council is conscious of the need to avoid unnecessary duplication of effort there may be occasions, for example in connection with particularly complex or locally contentious planning proposals, where considerably more developer input than one preapplication meeting with the local community, or its representatives, will be necessary. Consequently, in some instances, there may be a need for several events, if proper consultation is to be achieved rather than simply 'notification'.

In cases of the kind referred to above, the Council thinks it appropriate, and fair, to now expect far more input and consultative activity on the part of development interests, than may have been acceptable in the past.

As made clear in the response under paragraph 5.25, the establishment of the new Major Applications Team will result in formal procedures and protocols, for dealing with all aspects of larger and more significant applications, being made available

It is fully intended that these will set robust standards for future developer involvement and will also give a clear commitment as to the standards of service which the Council and its Major Applications Team will provide. It is also intended that such protocols will be in place, before the Council's SCI completes its 'examination' stage.

The comment SCI/23/3 is accepted. This aim, to work directly with the public from the outset, and throughout the entire process, is stated at a number of points in the SCI.

The first element in the response SCI/21/4 is agreed. However, scale or the proposed number of dwellings

discussions.'

SCI/23/5 Alison Goss

Line 7, 'Notify neighbours' must read 'consult with neighbours.'

SCI/28/5 Margaret Fawkes

From: Local Resident NDS group

'Before' is not specific enough. 'Notify' needs to be 'consult'.

SCI/34/4 R Greenwood

From: Bramdean and Hinton Ampner PC

Would prefer a public meeting/exhibition option for most medium scale applications. Do not want meetings exclusively with the Parish Council at any stage. In practice, developers tend to use Parish Councils as facilitators for meetings etc.

SCI/36/5 John Duncan

"Before submitting planning applications" must be more specific e.g. 'consultation must take place during the entire life of a project and before submitting a planning application.'

SCI/40/3 Will Harding

The process as defined by the table is not specific; a specific and measurable process should be defined.

Consultation "before" submitting a planning application is not sufficiently definitive. The role of community groups should be greater

SCI/40/4 Will Harding

Change "notify neighbours" to "consult neighbours and registered community groups" except for small scale applications where notify neighbours is retained.

SCI/40/5 Will Harding

Change "before" in the heading to a suitable definition of time e.g. 4 weeks. Time spent in proper consultation can be recouped in less objection and greater chances of first time approval.

alone may not be the most appropriate yardstick, in terms of public consultation needs. It is the Council's intention to attach equal, or greater, importance to the significance of a given planning proposal, in terms of its potential impacts and/or its effects on interests of acknowledged importance. Diagram 7 indicates a range of options and it is to be expected that large scale, or particularly significant, applications will include a number of these.

The comment SCI/21/5 is noted. It is agreed that Town/Parish Councils and local communities should play their part in this process, and it should be rare for them not to do so.

The general sentiment contained in this group of comments is agreed. However, there may be many instances of small-scale 'householder' applications with very limited, if any, impact beyond the property concerned. For those instances it could be sufficient for the Diagram to refer to 'Notify/Consult With Neighbours'. It is, therefore, recommended that a minor wording change, necessary to amplify the scope of the diagram's sixth sub-heading, be made.

The comment from Bramdean and Hinton Ampner Parish Council, with regard to pre-application meetings, is noted. However, the Parish's preference notwithstanding, it would not be realistic, or necessarily appropriate, for the SCI to prescribe in any great detail the format of, or attendances at, such meetings. These should, instead, be decided on the basis of the proposal in question, the issues it gives rise to and the extent and depth of initial local reaction.

The helpfulness of comments relating to the wording of the heading above Diagram 7 is noted and accepted. Therefore, it is recommended that the wording of the second sentence be changed to make it clear that, in the case of all but small scale applications, it is the applicant/developers responsibility to ensure that appropriate local consultation is carried out, throughout the duration of the project.

It is accepted that, in regard to larger scale developments, reference to appropriate developer involvement with relevant community groups could usefully be added to Diagram 7.

It is not considered realistic, or necessarily appropriate, for the SCI to attempt to set particular timescales for pre-application consultations. In fact, this could be counter-productive by implying that

Define the minimum consultation and recording period, according to the scale of the proposed development.

SCI/48/2 David Elsmore

From: Littleton and Harestock Parish Council

The pre-planning suggestion for large applications would be of benefit, but any discussions with developers for medium scale applications always tend to be 'one-sided' as the contentious issues are invariably never altered. Therefore, although an application may say that the developer has consulted, it should also state what has been agreed and what has not.

there is a pre-set time limit on the consultations that should be carried out.

Those additional comments with regard to developer responsibilities are noted. A primary purpose of developers being expected to provide accompanying 'statements of public participation' is to open up these areas of contact to the wider community and to introduce greater transparency for the benefit of the entire planning process.

Additionally, it should be pointed out that the question of recording and verifying the outcome of pre-application meetings, between developers and the local community, is addressed in the response under paragraph 5.24.

### Changes Proposed:

Diagram 7, the introductory heading above the diagram, after first sentence:' In the case of all but small-scale applications, the applicant/developers responsibility is to ensure that appropriate local consultation is carried out throughout the duration of the project.'

Diagram 7, sixth sub-heading: 'Notify/Consult With Neighbours,'

Diagram 8

SCI/31/6 Jeremy Dolphin

From: Compton and Shawford Parish

Council

The diagram does not include notification and consultation with Parish Councils.

This comment is accepted. Therefore, it is recommended that an additional sub-heading be introduced, to refer to 'notifying Town and Parish Councils and Parish Meetings'. Additionally, it is considered that the suggested reference to the additional area of 'consultation', with Town or Parish Councils, can be adequately dealt with by a minor change to the existing (second) sub-heading.

Changes Proposed:

Diagram 8, second sub-heading: 'Meeting/Consultation with Town/PC.'

Diagram 8, new sub-heading after fourth sub-heading: 'Notify Town/PC/PM.'

General comment

SCI/11/3 Amanda Dunn

From: EnvIronment Agency

This section does not clearly describe the different stages in the planning application process. It would benefit The logic behind this particular suggestion is noted. However, in the context of the SCI such a diagram, which would need to set out a valid and comprehensive network of interlinking processes and stages, could become unhelpfully over-complicated.

The comment is noted. In essence, this would be

from an additional flow diagram (similar to diagram 4 and 6).

SCI/16/4 Prue Martin

Developers should formally show that they have consulted locally, taken note of objections and answered these in submitting their plans. Planning officers should indicate clearly why they have overruled local opinion.

SCI/21/8 Michael Knappett

From:Bryan Jezeph Consultants

If the Council is intending to charge for pre- application advice, this should be stated in the SCI.

SCI/24/1 Lee Atkinson

It would strengthen the Council's expression of commitment, if the SCI was to state that officers will make every effort to comply with the SCI and that the extent to which the SCI has been followed should be material to a planning application.

SCI/26/4 Christine Ashford

Consultation, not notification should be the overriding watchword.

SCI/4/30 John Hayter

Paragraph 1.3 refers to the Ladder of Participation as being the benchmark for public consultation. Level 1 of the ladder is met when the public is provided "with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions". The LPA is not behaving in a balanced or objective way if it takes the view that applicants' information is balanced and objective. The information provided by the LPA about an application is the legal minimum, by only pointing out the existence of the application and does not meet the LPA's own benchmark.

SCI/4/31 John Hayter

The planning application process is not balanced. The LPA provides free

the Council's purpose in expecting developers proposing larger, or other more significant applications, to produce a 'statement of public participation' which can then form part of any subsequent consideration of that application. If local opinion relates to material planning matters, the officer's report will then give reasons if this is overruled.

The Council does not currently charge for any preapplication planning advice. However, the newly established Major Applications Team, in determining the need for clear protocols regarding various aspects of dealing with large applications, may wish to consider the need for some formula for charging applicants, or their agents, in unusual cases where the need for advice or other forms of pre-application involvement, related to the size or complexity of a proposal ,is clearly disproportionate to the availability of Council resources.

The suggestion made in this comment is fully accepted and it is, therefore, recommended that appropriate references to compliance with the purpose and provisions of the SCI should be incorporated in revisions to the Consultation Draft.

This comment, highlighting the proper distinction between consultation and notification is noted and accepted. Various changes to the Consultation Draft version of the SCI are being recommended, in order to make the overriding importance of 'consultation' absolutely clear.

This comment (SCI/ 4/30) is noted. The Ladder of Participation is seen as a way of graphically illustrating the aims and objectives of the SCI. One of those aims is to improve the way in which the Council obtains and shares information relating to planning applications.

It is inevitable that the information provided on an application reflects that provided by the applicant. It would be wrong for the Council to prejudice an application, by giving views on a particular scheme before it had been assessed. There are a number of means by which the full details of an application can be viewed.

The comments SCI/4/31 and SCI 8/1 are noted. In regard to pre-application advice the Council has taken the view that, currently, it will not charge for such advice and that it would encourage pre-application discussions as emphasised in Government advice.

pre-submission advice to developers. When attempting to do the same as a potential objector to an application the response from the City Council's solicitor was "it is not the role of Council Officers to give advice to potential objectors on how to formulate their case." The SCI should state that advice on planning policy and other material considerations is available equally to developers, supporters and objectors.

SCI/8/1 J Brooks

From: Corhampton & Meonstoke Parish Council

Friction occurs between Parishes and the LPA due to a difference in the interpretation of local, regionaland national policies. Often a single officer's interpretation is conveyed to a developer at the pre-application stage, resulting in a planning application based on this advice. The Parish Council then feels their comments are irrelevant to the outcome of an application. More transparency is required.

SCI/9/2 Janet Stanbury

An overview of developments within any NDS is essential, otherwise the real impact cannot be judged. This should include:

1. A registration process for all NDS. The Council Posting all relevant information at the pre-application stage onto the NDS website. 2. Mandatory timetable for medium and large scale developments, so that planners and developers would consult (not notify) a core NDS team. This would allow developers to evolve their proposals in line with resident's representations. Reasons should be given for any comments not taken into account.

In a similar way, the Council will offer any member of the public access to all relevant background material, on request, as well as technical advice on planning policies. It is not, however, the Council's role formulate a case, either for an objector or an applicant.

The Council perceives a clear distinction between this and a situation in which it might be seen to be drawing any individual, or group, towards developing a particular point of view, or a particular line of argument either in favour of, or opposing, a particular planning proposal.

This comment is noted. A response regarding the wider role of NDS groups, in the context of development control, is given under paragraph 5.40.

#### Change Proposed:

Paragraph 5.20, after second sentence: For its part the Council will ensure that it complies with the purposes and provisions of the SCI.

Issue: Resources

Paragraph: 5.27

SC/23/08 Alison Goss

The sentiment contained in this comment is fully accepted. The Council will continue to work towards its aim of maintaining and improving the District's

environmental quality. Nevertheless, the practical Sufficient resources must be made consequences of the many and various demands on available to protect the natural finite public resources have to be accepted and at environment. times, therefore, certain compromises made. No Change. Paragraph: 5.44 The suggestion is accepted. A change to paragraph 5.44 is, therefore, recommended in order to add this SCI/37/1 Alison Matthews additional reference. From: Itchen Valley Parish Council Change Proposed: Add the words 'or email' after 'letter' in the first line. Paragraph 5.44, first sentence:' "...objector/supporter's letter or e-mail gives Paragraph: 5.47 details...' SCI/4/16 John Hayter The statement contained in paragraph 5.47 is The SCI includes no procedures to considered to be a reasonable and justified implement better "coordination of statement of the Council's commitment to an ongoing consultation throughout the district" process, which is aimed at improving the quality and effectiveness of consultation at all levels, and throughout all parts of the District. No Change. This comment is noted. Whilst the Statement of Paragraph: 6.06 Community Involvement is primarily about improving SCI/35/4 S.D Sadler and increasing efforts with regard to community Good. Give more prominence to the engagement, this should not come about at the advantage of speed, lower costs and expense of the Council's overall efficiency, or its avoidance of problems subsequently. effectiveness in seeking to control costs. The benefits of improvements to consultation and the exchange of information, feeding through into fewer delays in the determination of planning applications, are already highlighted in the SCI. No change. General Comment These comments are noted. It is accepted that many, very important elements in the network which SCI/4/7 John Hayter supports the planning process within this District and, No assessment has been made as to indeed, makes the production of a valid SCI possible, whether the Parish Councils, and many are centred on voluntary efforts. other partners that are mostly volunteers, have the willingness and The Council does not automatically assume that capacity to do what the SCI expects of such groups or organisations are static, or fixed in them. If they do not, then the LPA will their ability to participate at what may, in the future, have to provide further resources to prove to be an even more challenging pace. consult and dialogue [SCI 5.4] directly

for the Council.

with the public. Many of the partners

documents and other strategies.

SCI/4/6

will be consulted several times on LDF

John Hayter

Furthermore, issues and concerns relating to the question of 'consultation fatigue' are no less worrying

Therefore, if the present 'status quo' is changed, such that Parish Councils or other groups go through

some process of internal or external change, then

Test of soundness (vi) " resources available". In many cases the SCI process is said to be subject to resources [ SCI 3.4] or unspecified in order to provide flexibility [SCI 4.6] but no minimum requirement is made.

that situation would have to be addressed at that time, together with the resource implications of having to make alternative arrangements.

However, there must be a degree of responsibility for the groups concerned to resource their involvement in the planning process, to a level that they decide is appropriate. It is unrealistic to think that the City Council could provide resources for Parish Councils, or local groups, especially when the scale and type of planning applications is outside its control.

Operating in the context of Community Involvement, it is difficult to set firm resource targets for periods which inevitably extend into the future. Therefore, currently providing for a clear minimum requirement presents a considerable challenge.

No Change.

Issue: Consultees

Appendix 3

SCI/19/1 Chris Slattery

From: CPRE Mid Hampshire District

Group

CPRE are keen to be involved in every stage of the planning process. Have not been included in consultations, so far.

SCI/33/1 Marie O'Sullivan

From: Government Office for the South East

As well as the Gypsy Council, the local Traveller Education Office might also be helpful. Should consider other ways of consulting this community

SCI/4/51 John Hayter

There are considerable difference between the list of non-statutory consultees in Appendix 3, 5.9/5.10 and Diagram 5. Taking Appendix 3 as the definitive list, notable omissions from it are: individuals who have registered an interest; local hospitals; GP practices; the University and other academic institutions and sports clubs (who will have many local issues e.g. transport, parking, open space provision beneath

The CPRE Mid Hampshire Group's interest in continuing involvement with the District's planning processes has been registered and this will be acted upon.

This helpful suggestion is noted. The Council is intensifying its efforts to develop, and in some instances, establish contact with, 'hard to reach groups' within the District. The Council is also conscious of the fact that more meaningful and effective linkages should be created and maintained, not only for the benefit of planning processes but to influence and inform many other areas of Council activity.

This comment and, in particular, its references to local and community relevance are fully accepted. It is recommended, therefore, that Appendix 3 and Diagram 5 should be revised and enlarged, to incorporate additional groups/interests of the kind referred to as examples in this comment.

This helpful comment is appreciated. It is, therefore, recommended that reference to the Strategic Rail Authority should be deleted from Appendix 3 and replaced by a reference to Network Rail.

This comment is noted and will continue to be acted upon.

Change Proposed:

the radar of national or county organisations); the tourist industry and; the Engineering Council. Unless the list is widened in diversity and brought down to a more local level, it will not contribute to the aim of creating dialogue, especially with the hard to reach.

SCI/51/1 Valerie Dobson

From: East Hants District Council

The Strategic Rail Authority no longer exists - this needs updating

SCI/52/1 Paul Robinson

From: Highways Agency

The Highways Agency expects to be consulted on all Development Plan Documents. It is a formal statutory requirement to consult the Highways Agency on planning applications.

Make detailed additions and updating revisions to Appendix 3 and Diagram 5, which will include reference to additional examples of 'Other Consultation Bodies' and will replace reference to The Strategic Rail Authority, with a reference to Network Rail.

General comment

SCI/39/2 Rachel Green

From: English Nature

English Nature welcomes the consultation of key local stakeholders i.e. the Hampshire and Isle of Wight Wildlife Trust, the RSPB, Forestry Commission and the National Trust.

The support is welcomed.

| Issue: Clarity   |   |
|--|---|
| Paragraph: 2.1 SCI/22/2 R J Cruse "Seeks to promote sustainable communities through all its actions". What does this mean? | There are numerous definitions of the various aspects of 'sustainability', as a desirable state or objective. In the context of the SCI it is intended to refer to communities which, in the planning and economic senses, are not only thriving, resilient and, to an extent, self-sufficient but, in the social and cultural senses, are also sufficiently robust and well organised to provide for high levels of local involvement in decision making and a good degree of local self-determination. These are all attributes which the Council wishes to promote and, for its part, help to develop.  No Change. |
| Paragraph: 2.3<br>SCI/22/3 R J Cruse   | This is intended to emphasise that the Council can only help to deliver stronger and more potent community participation and a greater  |

democratisation of planning and other local "Be adequately resourced for an processes, if the staff and other resources to achieve effective process "What does this this are made available. mean? Community involvement is something which is SCI/22/4 R J Cruse strongly advocated by central Government. It is "Be given the authority to achieve hoped, therefore, that adequate resources will be their objectives" Who is given this provided and, most importantly maintained, in order authority? to meet this shared objective. The City Council operating in association with its partners and other organisations many of whom, like the Council, are required to operate within a formal framework set by higher authority. No Change. 'Facilitators' are those individuals, from both Paragraph: 3.5 professional and non-professional backgrounds, SCI/22/5 R J Cruse who have received formal training in established Under flexible techniques, reference is techniques which have proved to be extremely made to 'facilitators'. Are these effective in conducting various workshop, 'focus managers? group' and other public discussion meetings covering various issues of concern or local interest. A particular facilitation skill, which is brought out and developed through training and subsequent experience, is to enable ad hoc groups to be formed which can then discuss and share their own views and perceptions and, from this, produce proposals which can be put forward on behalf of the group. No Change. Paragraph: 4.9 Portfolio Holders are those Councillors who have been given particular responsibility for an area of SCI/22/6 R J Cruse Council interest or activity e.g. Planning and Reference is made to Portfolio Transport (which includes policy planning and Holders. Who are they and what do development control) or Housing and Communities. they do? Those Councillors who hold a particular 'portfolio' together form the Council's Cabinet. This body makes the majority of councillor-led decisions, other than regulatory matters such as planning and licensing. No Change. Paragraph: 4.20 The 'One Compact for Hampshire' initiative is a programme jointly developed and promoted by SCI/14/2 Pat Edwards Hampshire County Council and the voluntary and From: City of Winchester Trust community sectors. It is fully signed up to by the City Council. The reference to 'One Compact for Hampshire' in 4.20 and 6.5 is oblique and unclear as to what it means. It is considered that the Consultation Draft SCI gives

an adequate explanation of the purpose of this

scheme, which is essentially aimed at providing greater consistency in all future dealings between individual Hampshire district authorities and the voluntary and community sectors.

No Change.

Paragraph: 5.12

SCI/4/50 John Hayter

5.12 refers to 'pre-production', 'production' and 'formal consultation' stages but Diagram 4 uses different descriptions and has four consultation stages, not three, together with representations to the Inquiry that the SCI does not otherwise cover.

This comment is noted. The text and accompanying Diagram 4 are intended to convey essentially the same information, although seen from marginally different perspectives. The diagram, therefore, is set out as a 'flow diagram' depicting the staging and general sequence of events. In slight contrast, the text explanation within paragraph 5.12 is intended to give the inexperienced or lay reader a straightforward account of what would be involved, from the point of view of someone who might contemplate contributing to one or several stages of the DPD production process.

No Change.

Paragraph: General Comment
SCI/10/8 Vera Osborne
From: Parish Council of Denmead

Planning is a difficult subject with specialist terms. Whether the majority of residents will read the SCI and consider it clearly shows how we will involve people is doubtful. The document does a good job, under the circumstances.

This comment is noted with particular interest. It is agreed that planning issues and community affairs, more generally, can be dauntingly complex. This is especially so for many individual citizens and residents.

The District's communities of interest will determine, by the extent and depth of their engagement with the Council, whether or not the SCI can be judged to have been a positive contributing element.

No Change.

SCI/12/3 Helen Chambers

To ensure transparency and genuine involvement, we need more precise terms e.g. "the Council expects".

Terms must be clarified in order to achieve the stated aims of the SCI.

The comment is noted. However, the precise wording used in particular parts of the document has been carefully chosen to stay within the limits of both the Council's remit and its authority. The use of the words 'expect' and 'encourage', in the context of paragraph 5.22, are intended to go as far as is possible in making it clear what applicants/ developers should feel under a strong moral and ethical obligation to do.

Therefore, to go beyond such terms and to introduce any threat, or implied threat, of compulsion or sanction would almost certainly be successfully challenged and could then lead to a deterioration in relations between development and landowner interest, local communities and the Council.

SCI/35/1

S.D Sadler

Expressions such as 'as appropriate', 'as necessary', 'relevant', 'might' etc are woolly and open to interpretation.

This comment is noted. However, the use of such terms is not intended to be loose or to leave unnecessary room for dispute or arguments over meaning and interpretation. On the contrary, such phrasing is used primarily in order to provide a sensible and reasonable degree of flexibility and adaptability, in anticipation of the SCI's intended future application.

No Change.

Issue:

Glossary

General Comment

SCI/4/46 John Hayter

The Glossary should be moved to the end. It is only Abbreviations, most of which are not used in the SCI and fundamental terms like "spatial planning" are not explained (see PPG12).

The comment is noted. Although this is not a key issue, the Council will give further thought to the best place for the Glossary. What is accepted is that the content of the Glossary should be reviewed and any significant omissions made good.

Change Proposed:

Making any detailed revisions and updates to the Glossary which will improve its usefulness.

General comments

SCI/11/1 Amanda Dunn

From: Environment Agency

The definition of Strategic Environmental Assessment is inaccurate.

This helpful comment is accepted and should be acted upon.

Change Proposed:

Glossary, Strategic Environmental Assessment:'...An assessment of the impacts of policies on economic, social and environmental matters contained within the Local Development Framework'.

Issue:

SCI consultation

Paragraph: 4.08

SCI/36/2 John Duncan

A Town Forum, or area workshop, could be used for an event for local residents to explain/discuss the SCI.

The suggestion is noted. The Council has sought to achieve wide public involvement in the preparation of the SCI, so far.

The Council will shortly be making detailed preparations for the Submission of a revised Draft SCI to the Secretary of State. At that stage an opportunity will be given for more formal comments to be made, in regard to the SCI and any changes made to the Consultation Draft version, following the March 2006 public consultation.

Any representations made at that point will need to address the issue of the documents 'soundness', for when it is tested against certain pre-set criteria.

Although the sequence of events is explained in paragraph 5.12 of the Consultation Draft, the overall process and the Government's 'tests of soundness', which are central to the later stages of that process, are quite complex.

Therefore, within the relatively limited time that will be available, the Council will make every effort to publicise, and to explain to as many groups and individuals as possible, the importance of these later stages and the part played by the 'tests of soundness', both in the run-up to and during the subsequent stage of 'examination' by an independent Inspector.

No Change.

Paragraph: 7.2

SCI/35/5

S.D Sadler

It is not clear how or when the local community will be involved in, or notified of the results of, this process.

SCI/36/8

John Duncan

It is not clear how residents can make representations during the submission stage.

SCI/40/7

Will Harding

It is unclear how further submission is made during the six week period of formal consultation.

Appendix 1

SCI/34/7

R Greenwood

From: Bramdean and Hinton Ampner PC

How and through whom has the Council attempted to engage with hard to reach groups?

These comments are noted. The response given immediately above will, if read together with the information (pages 16-23 of the Consultation Draft SCI) on the various stages in the emergence of Local Development Documents (of which, the SCI is a special example), clarify the remaining stages and consultation processes that are yet to be negotiated by the SCI.

All those who have contributed to the development and improvement of the SCI will be kept informed of the progress of the Council's Statement, during the sequence of 'Submission', 'Examination' and 'Adoption' stages.

No Change.

A response to the question contained in this comment has been partly provided in the answer to an earlier general comment (SCI/4/5), which has been dealt with after the section on paragraphs 4.9-4.11.

In instances where any representative group or organisation is known to exist, that organisation was specifically contacted to notify them of the SCI's initial preparation and the Council's particular interest in reaching out to those who may not have previously participated in District planning or other community-related activity.

In addition, schools, local colleges and universities were specifically contacted and leaflet publicity was used to attract the attention of those using Winchester's park-and-ride and public transport network.

## No Change.

Paragraph: General Comments
SCI/10/1 Vera Osborne
From: Parish Council of Denmead

How many people have seen the draft SCI and/or the A4 three-fold summary? There have not been any in the Parish Council's office until some arrived for Councillors in mid April.

Large numbers of the Consultation Draft and the accompanying summary leaflet were distributed throughout the District. Varying numbers of the main document (depending on the size of the parish - large parishes receiving 20/25 copies), together with a covering letter, were sent direct, by the 'Friday mail-out' system, to Clerks of all Town and Parish Councils and to chairs of Parish Meetings. They were despatched at the start of the six-week consultation period, on Friday the 17<sup>th</sup> March.

## No Change.

SCI/33/4 Marie O'Sullivan
From: Government Office for the
South East

The document is very comprehensive, but at the next stage a separate accompanying leaflet would encourage more people to read the SCI.

SCI/4/48 John Hayter

The SCI will not be adopted until 2008, with the next full update in 2011. Before then there will need to be consultation on major changes in new LDF

documents. The SCI should be explicit on the processes to be used in the interim. I would expect them to be defined in the SCI, as amended after this consultation.

Such a leaflet was produced to accompany the Consultation Draft document and was widely distributed throughout the District. However, this fact may not have come to the attention of the Government Office.

It is the Council's intention to produce a further leaflet, to accompany and explain the purposes of the Submission and later stages, and this will be similarly distributed throughout the District.

The leaflet will also emphasise the role and application of the Tests of Soundness. Copies of the leaflet will be sent to the Government Office.

The comment relating to timing and the production of further LDF documents is noted. It is the Council's intention to work to the provisions and requirements of the SCI, in whatever form this document takes at the relevant time.

No Change.

Issue: General Comments

Appendix 1C

SCI/10/6 Vera Osborne

From: Parish Council of Denmead

The analysis of the SCI questionnaire shows twice as many people responding in paper form, than did so electronically. Therefore, at the present time, WCC's increasing reliance on electronic methods risks generating poorer levels of communication with its public.

The Council is committed to taking full advantage of the internet, e-mail and other forms of communications technology, not only to keep pace with the growing ability of others to use and benefit from these advances but, also to be able to share information and opinions, more directly and with greater speed.

However, the Council remains conscious of the fact that many within the community are unable, or unwilling, to use these particular forms of distribution and access. It is, therefore, essential that the Council should maintain and, wherever possible, improve the quality of its contact by more

traditional paper- and telephone-based methods.

This helpful comment is noted and accepted. It is, therefore, recommended that Appendix 3 to the

Consultation Draft SCI should be updated to reflect

recent changes to the LDS timetable.

No Change.

Appendix 5

Marie O'Sullivan SCI/33/3

From: Government Office for the South East

As a result of the revised Local Development Scheme the LDS timetable will need to be updated.

Change Proposed:

Appendix 3: amend to incorporate any changes to the Council's Local Development Scheme.

Availability of information

Mike Cunliffe SCI/25/2

From: Winchester Gospel Hall Trust

Significant numbers of people do not have internet access. Website development must be paralleled by a good hard copy distribution system.

SCI/4/23 John Hayter

WCC's partners HCC should be asked to establish a publicly accessible on-line system that would provide a topic heading for every PPG/PPS, with direct links to the full text. HCC should also supply on-line: a copy of the corresponding adopted plan policies in each of Hampshire's Local Plans and links to the supporting text; any particularly relevant Inspectorate or court decisions; a list of recognised issues (input only by planning officers); links to emerging pre-adoption documents in all districts and; an on-line forum open to all who sign up for it.

SCI/4/23 John Hayter

Communication on a new topic should be initiated by electronic or postal alerts, with documentation available to study online and at libraries.

SCI/4/24 John Hayter

Providing information electronically tends to be exclusive. Having email and PC "buddies" is becoming more commonplace and if offered as a volunteer service is a way of drawing in the hard to contact, as well as strengthening the community.

This comment is noted. A response on the issue of hard-copy, as opposed to the electronic distribution of information, is given under Appendix 1c, above.

These comments are noted. As part of improving and further developing its own on-line access system the City Council's Development Directorate intends to provide direct links to the appropriate Governmental web-site, to give access to the text of Government's published planning guidance in the form of its PPG and PPS documents.

With regard to Hampshire County Council's information and access systems, these are beyond the remit and scope of the City Council's SCI. It may, therefore, be more appropriate for a direct approach to be made to HCC on the other issues raised in this comment.

The further comments by respondent SCI/4 are noted. One of the benefits of internet access is that the Council can use this facility to quickly flag-up new topics of interest within the District, or any significant issues that may be emerging. Partly as the result of Government-supported initiatives to provide for e-governance the District's Town and Parish Council offices have on-line access. Public libraries within the District are similarly equipped.

As stated in response to several comments, the Council is already working towards further development of its web-site and will, in addition, be making every possible effort to eliminate those particular technical difficulties, which have recently been experienced and have caused considerable annovance and frustration to a number of users. As part of the further development referred to above, the issue of possibly creating a network of 'buddies' can be given further thought.

Consultation Methods

SCI/14/1 Pat Edwards

From: City of Winchester Trust

The number and length of documents is an issue. The cost of purchasing the SCI, or downloading 64 pages, is prohibitive. Suggest rigorous editing of paperwork to reduce volume.

SCI/15/3 F M Woodwark

SCI is not clear enough on the need to consult groups and individuals at the earliest stage possible, so that it can be true *consultation* and not *notification*.

SCI/6/5 Michael and Barbara Ellis

Early community involvement can reduce conflict, time spent in later consultation, argument and costs.

SCI/31/3 Jeremy Dolphin

From: Compton and Shawford PC

General impression that the SCI consultation process is more to do with notifying than consulting. Would suggest that some attempt is made, possibly through examples of particular types of cases of issues/decisions to be taken, where the scope and purpose of public consultation is linked to the different types of consultation identified in the ladder of participation.

SCI/4/22 John Hayter

It is important that a consultee is not deterred by being required to give a personally intrusive identifier. It should be limited to a six character postcode. The socio/demographic/economic profile is not needed at individual level and at post code level can be built up from the

council tax register and ONS data supplemented, if necessary, by commercially available data.

SCI/4/25 John Hayter

Consultation forms should have the following format: a base question that asks for three alternatives to be ranked in order of preference. The

As with a number of responses to the Consultation Draft, this comment raises the issue of balance. Throughout the production of the Draft the Council, and its officers, were conscious of the document's increasing length and, with this, the related issues of public accessibility and production/publication costs.

Nevertheless, there are topic areas covered by the document which have to be described and explained in some depth, in order to provide a reasoned account and over-view of the Council's future intentions.

It is also necessary to provide practical information, some of it relating to planning policy-making issues and development control procedures, that is set out in sufficient detail to give valid and accurate guidance to a mixed readership.

These and other, similar, comments on the benefits to be gained from consultation from the earliest possible stage, as distinct from 'notification', are accepted and fully agreed. The changes to the Consultation Draft, which are being recommended, are intended to strengthen the Statement of Community Involvement, in this and other areas, and allow it to then play a constructive part in the Council's ongoing programme to build on, and improve, its relationships within the District community.

These comments, relating to consultation techniques and their relative effectiveness, raise interesting and potentially helpful issues. The comments have been passed on to the Council's Research Officer, who will wish to consider these suggestions and their possible future application for certain types of consultation.

However, precise formats for questionnaires are considered too detailed for inclusion in the SCI and the three-option method may not always be the most relevant or appropriate.

The suggestion made in the response SCI/4/26 is accepted and agreed.

accompanying text should explain the issues the consultation is intended to explore and set out the pros and cons of each alternative (using the user-friendly indicators required by a sustainability appraisal). It should include the postcode for respondent profiling. This is the only part of a consultation where all respondents carry equal weight.

A second question will explore with those willing and able to do so the reasons for their preferences and the response analysis thus has to take account of both questions. There is a need to collect this information in a way that will facilitate summarising the response. The question would therefore have 3 sub-questions: Do you agree? (If not, explain the most significant issues that have been identified). No other significantly different options need to be considered? The main pros and cons have been identified? There should also be space for comments of the respondent's own choice, that are relevant to the consultation.

SCI/4/26 John Hayter

Each consultation should offer the respondent the opportunity to register for the individual data base.

Feedback

SCI/14/7 Pat Edwards

From: City of Winchester Trust

However good the process of consultation is, feedback is needed to clearly demonstrate that the Council has listened.

SCI/4/8 John Hayter

Test of soundness (vii) "shows how the results of community involvement will be fed in". The SCI only describes the collection of results in the context of public participation. It does not show how any results are formally fed in, particularly

As with comments listed above, which relate to the far-reaching benefits of early and continuing consultation, the Council is mindful of the value and importance of consistently feeding back relevant information on outcomes and decisions reached, to those individuals, groups and other partners within the District who have taken the trouble to communicate their views and opinions to the Council.

However, as already pointed out in other responses, any change to the present arrangements would present unavoidable resource difficulties and concerns for the Council; matters which it is currently seeking to address. Although no decision has yet been made, this is regarded as an important matter in terms of community involvement and it will, therefore, receive active consideration.

The Council needs to retain the flexibility to

because the Local Plan Committee, that was the previous primary way of doing this for LDF documents, is omitted from the SCI process.

establish and, if necessary change, its decisionmaking structures, as appropriate to the Local Development Document or other matter in hand. The need to provide for adequate public input is recognised, but it is not considered appropriate to specify the details of Committee structures in the SCI.

## No Change.

## General comment

SCI/12/2 Helen Chambers

While the SCI goes some way to listening to local people, there appear to be a number of get-out clauses e.g. "constraints due to costs".

SCI/26/3 Christine Ashford

Need to be involved from the beginning of the planning process

SCI/38/1 Nicki Oliver

From: Whiteley Parish Council

Attended the workshop on 2nd December. The overriding message from the workshop groups was that there should be full consultation with Parish Councils, from an early stage on all strategic planning issues. It was strongly recommended that the new SCI policy document should ensure that such a process is mandatory.

SCI/27/2 John Heady

Ensure the local community is informed and involved at the earliest stage possible of the planning 'process', with minuted meetings.

SCI/27/3 John Heady

Ensure that there are no loopholes for developers to exploit.

SCI/29/2 Cheryl Gosling

From: Fair oak and Horton Heath PC

Pleased to see that neighbouring parish councils in other districts are being consulted on cross-boundary issues.

The support is appreciated. However, as with all organisations and, not least, those funded through taxation, limitations on the availability of financial and other resources do, inevitably, have an effect on the scope, timing and implementation of virtually all projects, service provisions and other activity.

As explained elsewhere in these responses, there are also limits set by the extent of the Authority's legal, moral and ethical responsibilities. Indeed, there are sufficiently complex constraints on the Council's actions to ensure that any statement, or other policy document, including the SCI, must be governed by a realistic awareness of what is 'reasonable' and, also what is actually capable of being satisfactorily delivered.

The comments SCI/26/3, SCI/38/1, SCI/27/2 and SCI/27/3 are duly noted. It is hoped that the Council's commitment to improving public participation will enable this, which is a fundamental objective of the entire SCI programme. In the Council's view, all of the District's Town and Parish Councils, and Parish Meetings, have a key role to play in achieving this. The related issue of recording and verifying the results of direct discussion and consultations between applicants and the local community has been dealt with in the response given under paragraph 5.20.

The support given in the comment from this neighbouring Parish Council to the Winchester District is appreciated.

This comment from Compton and Shawford Parish Council is noted. Statements of Community Involvement are intended to be an important element in the new planning system which has been introduced under recent legislation. It is, therefore, entirely appropriate that this Council's SCI should pay considerable attention to matters regarding the future development of planning policies for the District, as well as local and community involvement in all significant day-to-day development issues.

SCI/31/2 Jeremy Dolphin

From: Compton and Shawford PC

It is not clear whether the SCI is limited to planning matters or to wider issues that could effect the community.

SCI/32/3 Ron Cassidy MBE

From: Highcliffe Community Action Group

It is important that once a strategy is published then all should abide by it (in particular WCC officers). The Highcliffe hostel is an example of the City Council not doing so.

SCI/33/2 Marie O'Sullivan

From: Government Office for the South East

It would be helpful if the telephone number for obtaining alternative forms of the document was made more obvious, as not everyone has access to the internet.

SCI/4/4 John Hayter

Test of soundness (ii) "Links with other community involvement initiatives e.g. The Community Strategy." Links to not only this strategy but also others have not been identified. It is only referred to in the Glossary and Annex 1d.

SCI/4/47 John Hayter

There is no mention of consultation on the comments the Council makes on the SE Region Plan. It is not an LDF document but should be viewed as a means to better inform consultation on the LDF, by separating national/regional policies and issues from local ones. Importantly, it is a complete reversal of SCI roles. If the council with a large full-time infrastructure cannot properly reflect the opinion and values of its constituency in this way then it cannot expect parish councils and other largely, or wholly, volunteer groups to make quality or, indeed, any comments on the SCI

Nevertheless, it is also the Council's intention that the SCI should clearly set out the need for improved community participation, and dialogue with the Council, in regard to all those activities which the Council undertakes and that the SCI should also, therefore, indicate the methods by which this can happen.

This comment, from the Highcliffe Community Action Group is noted. It is agreed that the Council should abide by its own duly made decisions regarding matters of policy or strategy.

This comment by the Government Office is accepted. It is recommended that this information should be clearly shown at the beginning of the SCI.

The comment SCI/4/4 appears to overlook the attention given to such links, in Sections 3, 4 and 5 of the Consultation Draft SCI.

The comment SCI/4/47 is noted. However, the production and development of a South East Regional Plan are the responsibility of the South East England Regional Assembly. That organisation has undertaken its own widespread consultation in order to generate interest in, and produce reactions to, its Regional Plan. This Council has endeavoured to assist that process of engagement, by additionally publicising the Plan and organising meetings for the particular benefit of the District's Parish Councils. Whilst the Council may wish to help to enlarge similar important debates in the future, it is not considered appropriate to commit to this in advance, through the SCI.

This comment from Kings Worthy Parish Council is noted. It is accepted that, ultimately, certain decisions must be taken at a higher level than that of the local authority.

Nevertheless, as the District's principle representative body, the City Council is making determined efforts to successfully implement changes which may originate in a programme instigated by central Government but, in the Council's view, are extremely important in terms of local democracy and community affairs. The Council, therefore, remains confident that its overall approach, as expressed through the SCI, will be accepted and endorsed by Government.

The Hampshire Association's suggestion is noted.

process.

SCI/43/1 Colin Arnett

From: Kings Worthy Parish Council

Whilst Kings Worthy Parish Council applaud the initiatives taken, they consider that the political agenda at a national level is such that any decisions taken as the result of local consultation could be disregarded.

SCI/7/5 Steven Lugg

Hampshire Association of Parish & Town Councils

Would like to see Winchester City fully 'parished'.

SCI/49/1 Julie Delcroix

From: The Countryside Agency

The SCI should set out: ways of involving all sectors of the community. including those in smaller settlements. rural areas and areas in the rural/urban fringe who may have difficulty in accessing some methods used to engage communities; the techniques that will be used to ensure that the rural communities have the opportunity to engage fully with the LDF; how local initiatives such as VDSs, as well as other local evidence or survey work provided by the local community, will be used to inform the LDF and: the weight that such community initiatives will be given by the Council and how the influence of local community involvement on policy development will be monitored.

The issue of the City's un-parished structure and the difficulties for local representation and participation which this gives rise to have been a cause for concern for many years. A response on this issue has been given under paragraph 3.7.

These comments by the Countryside Agency are noted. The Council's SCI is intended to operate throughout the District and to be adapted in its application, as necessary, in order to take account of any variations in perception, or levels of community activity, which may be distinguished between the District's rural, and more developed, areas. Given that Winchester is a mixed District with few, if any, rural areas that are entirely remote from larger villages, market towns or more urban centres, it is not considered necessary, or appropriate, to construct an SCI which contains different provisions for different parts of the District, or different types of community within it.

Nevertheless, the SCI does fully recognise the need to make increased efforts to engage with hard-to-reach groups and it is accepted that some, for example, gypsy and traveller groups may well be resident in the more rural areas, or on the rural/urban fringe.

The value and important contribution made by local community initiatives throughout the District, such as Parish Plans and Village Design Statements, is fully recognised by the Council, and not least, through its SCI.

Change Proposed:

Reverse of SCI Title page: 'Further copies of this document, or alternative formats, can be obtained by contacting the Council's Strategic Planning Team, at:

www.strategicplanning@winchester.gov.uk, or by telephoning 01962 848222/ faxing 01962 849101.

| Issue: No comment   |        |
|---|--------|
| SCI/44/1 Julia Rex From: Disability Rights Commission   | Noted. |
| The DRC is unable to evaluate the SCI. However would like to draw attention to the Disability Equality Duty which is being incorporated into the Disability |        |

| Discrimination Act via the 2005  |  |
|--|--|
| Amendment Act.   |  |
| SCI/45/1 Errol O'Farrell   | Noted  |
| From: Medstead Parish Council  |  |
| No comments to make at this stage, but will welcome the opportunity to be consulted in the future on any aspects of the Local Development Framework which affect areas near the Medstead Parish. |  |
| SCI/46/1 John Pounder  | Noted.   |
| From: South East England Regional Assembly   |  |
| The Assembly only comments on Core<br>Strategy DPDs at the preferred Options<br>Stage and the Secretary of State<br>Submission Stage.  | Noted.   |
| SCI/47/1   | Noted.   |
| Sainsbury's Supermarket Ltd  |  |
| No comment.  |  |
| Additional Changes to Text/ Diagrams   |  |
| To Update and Correct Minor Errors.  |  |
|  | Page 20, page footer: correct spelling of<br>'Statement'   |
|  | Page 25, paragraph 5.18, third sentence: correct word spacing.   |
|  | Page 26, Diagram 7, key, first line: 'Will be appropriate expected'  |
|  | Page 28, Diagram 8, header: 'which the Council may undertake, or participate in, when it RECEIVES a planning application.' |
|  | Page 28, Diagram 8, first sub-heading left-hand column: 'Publicity Meeting'  |
|  | Page 28, Diagram 8, second sub-heading, centre column: $\psi$  |
|  | Page 28, Diagram 8, third sub-heading, right-hand column: √ [light tick]   |
|  | Page 28, Diagram 8, key, new third line:'®: If requested.'   |

Page 28, paragraph 5.30, second bullet point: 'follow the progress of an application'

Page 32, paragraph 5.46, last sentence: '...involvement should take place. In addition, the

Page 45, Annex 1b: re-align the information contained in the left- and right-hand columns.

Council has recently formed a Major Applications
Team to further help achieve these targets.'

51