

CABINET

15 November 2006

STATEMENT OF COMMUNITY INVOLVEMENT: PUBLIC RESPONSE TO THE  
SUBMISSION DRAFT

REPORT OF THE CHIEF EXECUTIVE

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RECENT REFERENCES:

CAB1215, Statement of Community Involvement: Consultation Draft. 1<sup>st</sup> March 2006,

CAB1302, Statement of Community Involvement: Results Of The Public Consultation Exercise, 26<sup>th</sup> July 2006.

CAB1310, Statement of Community Involvement: Results Of The Public Consultation Exercise (Updated Recommendations). 21<sup>st</sup> August 2006.

EXECUTIVE SUMMARY:

This report updates the position in relation to the City Council's Statement of Community Involvement (SCI). The SCI is a formal requirement of the recently revised planning system and will form a key component of the District's Local Development Framework (LDF) which will, in future, plan for and guide Winchester's development needs.

At its meeting on the 26<sup>th</sup> July 2006 and subsequently, at a further meeting on the 21<sup>st</sup> August, Cabinet received reports on this matter, detailing the representations received in response to the publication of the Consultation Draft version of the SCI in March of this year. The reports referred to went on to recommend a series of amendments and revisions to the Draft, in order to arrive at a revised Submission Draft as the next stage in the SCI's emergence.

That stage having been reached, the Submission version of the SCI was published for a six-week period of further public consultation, to coincide with the revised document's formal submission to the Secretary of State on the 31<sup>st</sup> August. The end of that consultation period has now passed and, in order to meet the timetable pre-set by the Local Development Scheme (LDS), the representations received have been forwarded to the Planning Inspectorate, so that these can be used to further inform the SCI's 'examination' by an independent Inspector appointed by the Secretary of State. This examination will then be followed by the final stages of the process, leading towards the SCI's eventual adoption which is currently programmed for March 2007.

RECOMMENDATION:

That Cabinet notes all the responses received on the Council's Submission SCI and indicates to the Planning Inspectorate that, in order to inform the Inspectorate's examination of the Council's Statement of Community Involvement, it accepts and would support minor changes to the Submission SCI, as set out set out in Appendix 1 to this report.

CABINET15 November 2006STATEMENT OF COMMUNITY INVOLVEMENT: PUBLIC RESPONSE TO THE SUBMISSION DRAFTREPORT OF THE CHIEF EXECUTIVEDETAIL:1 Introduction

- 1.1 At two recent meetings, on the 26<sup>th</sup> July and 21<sup>st</sup> August, Cabinet considered reports (CAB1302 and CAB1310) which detailed recent work on the development of a Statement of Community Involvement (SCI). The reports also set out the results of the consultation exercise held in March and April of this year, which was based on the publication of a Consultation Draft version of the Council's SCI.
- 1.2 As well as detailing the results of that consultation, the reports went on to set out a series of recommendations for changes, updates and other refinements to be made to the draft Statement. Those amendments were approved by Cabinet, and authority given to proceed with preparing a revised Submission Draft Statement.
- 1.3 In order to comply with the timetable, previously agreed with the Government Office and set out in Winchester's Local Development Scheme, this Submission version then had to be submitted to the Secretary of State, before the end of August 2006, as a preliminary to the following stage - 'examination' by an independent Inspector. In the event, the Statement was submitted on time and this also marked the beginning of a six-week period of further public consultation, commencing on the 31<sup>st</sup> August and concluding on the 12<sup>th</sup> October.

2 The Results of the Submission SCI's Consultation Exercise

- 2.1 During this six-week period of consultation a total of 21 individuals and organisations, including Parish Councils, submitted responses to the publication of the City Council's Submission SCI. In total, the issues raised related to some 35 different aspects of the document. Of these, 15 were supportive of the Council's Statement. The responses were largely, though not entirely, based on the Government's nine 'Tests of Soundness', against which the Submission SCI will now be 'examined' by the Inspector already appointed by the Planning Inspectorate. Those Tests are set out in Appendix 2 to this report.

3 Public views as to the 'soundness' of the Submission SCI

- 3.1 Although some of the responses contain criticism of particular elements within the SCI, or question certain aspects of its soundness, the issues raised are primarily intended to contribute to the 'iterative' and constructive process for developing SCIs, which is the Government's intention. Therefore, where appropriate, respondents have been encouraged to include in their comments regarding the SCI, positive suggestions for change or further improvement to the Council's Statement.

3.2 All these responses are listed and summarised in the schedule attached to this report, at Appendix 1. The schedule also contains officer responses to the matters referred to, together with recommendations as to whether or not the Council should support a change to the SCI. However, it is important to bear in mind that all the responses made during this final period of public consultation are addressed to the Inspector and his formal 'examination' of the SCI and it is not, therefore, open to the Council to actually make any further changes to the SCI.

3.3 Nevertheless, at the examination stage now underway the Planning Inspectorate and, in particular, the appointed Inspector would find it helpful to have a clear indication as to whether or not the Council would agree with certain changes put forward in the public responses. Consequently, it is for Cabinet to consider the suggestions referred to in Appendix 1 and indicate to the Inspectorate any instances where it would support a proposed change to the SCI, in the interests of improving its form or content and, consequently, benefiting the Inspector's conclusions as to the overall 'soundness' of the document.

#### 4 Conclusions and Recommendation

4.1 The 'examination' of the Council's Submission Statement of Community Involvement, followed by the Inspector's binding report, represents a key point in the final stages of the SCI's emergence. Therefore, where responses to the publication of the Submission document are considered to contain suggestions for its further strengthening or enhancement, these should be accepted and promoted for the assistance of the examining Inspector. This would underline the advantages of this adaptable process, which is aimed at delivering a Statement of Community Involvement that can be considered 'sound' in all respects and can, therefore, be adopted by the Council.

4.2 Consequently, it is recommended that Cabinet should note all the responses received, and promote those suggested changes recommended in Appendix 1 to this report. This information would then be notified to the Inspector, who would take it into account as part of his examination of the SCI's overall soundness.

#### OTHER CONSIDERATIONS:

##### 5 CORPORATE STRATEGY (RELEVANCE TO):

The Submission Statement of Community Involvement is in keeping with, and helps to carry forward, those Corporate Strategies for the Council to encourage and participate in open debate with our residents, to be a learning organisation, sharing best practice and to ensure that everyone can play a full part in the life of their community

##### 6 RESOURCE IMPLICATIONS:

Provision is made within the Strategic Planning Division's budget and the Local Plan Reserve, to meet the expected costs of producing and adopting the SCI.

#### BACKGROUND DOCUMENTS:

Files, correspondence and background papers held in the Chief Executive's Unit and the Development Directorate.

APPENDIX:

Appendix 1: 'Statement of Community Involvement, Submission Draft (August 2006)': Schedule of Public Responses, Proposed changes to the SCI and Recommendations as to whether or not these should be endorsed by the City Council.

*Because of its size, this document has only been attached for Cabinet Members, Group Leaders and the Chairmen and Vice-Chairmen of both Principal Scrutiny Committee, Environment Scrutiny Panel and Planning Development Control Committee. A copy is available in the Members' Library and can be viewed on the Council's Website:*

Appendix 2: the Government's 'Tests of Soundness' for assessing the Submission SCI.

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## **Appendix 1: Statement of Community Involvement. Schedule of responses to Submission Draft with recommendations**

**Paragraph Number(S): 5.18**

**Test of soundness 1 Representation number: 2001**

**Susan Southern Water  
Solbra**

Southern Water indicates that, in paragraph 5.18 of the Submission SCI, it is correctly stated that any alternative sites put forward at the the submission stage of DPDs will be published for consultation. However, the respondent points out that the text then fails to make it clear that the addresses of any such sites will be sent to the statutory consultation bodies, as is required under Regulation 32c of The Town and Country Planning (Local Development) (England) Regulations 2004. On this issue the respondent is, therefore, unable to support the Statement as being sound, on the grounds that it does not meet the minimum standard for consultation.

### **Change Sought**

The addition of a further sentence to the first bullet point on page 22 (paragraph 5.18): 'Statutory consultees will be notified and sent addresses of the sites (Regulation 32)'.

**City Council's Response to Representation**

Although it is the Council's intention to advise all specific consultation bodies of the address details of any alternative sites put forward at the submission stage of DPDs, in accordance with current Planning Regulations, the Submission SCI's failure to make this absolutely clear is accepted. Additional wording should, therefore, be included in order to correct this omission.

### **Change Proposed**

Support the following change:

Paragraph 5.18, 'Submission to the Secretary of State', first bullet point on page 22, add additional sentence: ' Statutory consultees will be given details of any alternative sites'.

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**Paragraph Number(S): 5.20**

**Test of soundness** 1 **Representation number:** 2002

**Susan Southern Water Solbra**

Southern Water indicates that Regulation 17 (2) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004 requires the planning authority to send draft Supplementary Planning Documents (SPDs) to statutory consultation bodies, if the authority considers that the SPD affects the body concerned. The respondent points out that paragraph 5.20 of the Submission SCI does not specify that this action will be undertaken as and when appropriate. Therefore, on this particular issue, the respondent is unable to agree that the SCI meets the minimum requirement for consultation and does not, therefore, support the Statement in terms of Test 1.

**Change Sought**

Under the 'Public Consultation Stage', in paragraph 5.20 (page 23), the insertion of a new bullet point, following the first bullet-point: 'The draft SPD will be sent to relevant statutory consultees (Regulation 17)'.

**City Council's Response to Representation**

The Council's acknowledges this omission in the Submission text of the SCI and accepts the need to make specific reference in the text to the Regulations' requirement to send draft Supplementary Planning Documents to statutory consultation bodies, where it is relevant to do so.

**Change Proposed**

Support the following change:

Paragraph 5.20, page 23, 'Public Consultation Stage', insert a new bullet point after the first: 'The draft SPD will be sent to relevant statutory consultees (Regulation 17)'.

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**Paragraph Number(S): 5.26**

**Test of soundness 1 Representation number: 2003**

**Ed Peacock & Smith  
Kemsley**

Whilst generally supporting the proposals for future consultation, set out in the Submission SCI, Wm. Morrison Supermarkets plc is concerned that the requirements for pre-application consultation, as set out in Diagram 7 at paragraph 5.26, exceed the terms of the guidance set out in the 'Companion Guide to PPS12: Creating Local Development Frameworks' (ODPM 2004). Paragraph 7.7 of the Companion Guide states that: 'Statements of Community Involvement should encourage developers to undertake pre-application discussions and early community consultation although they cannot prescribe that this is done'. The respondent submits that the SCI, as currently drafted, is not consistent with the Companion Guide and in 'expecting' applicants to carry out pre-application discussions and early community involvement, appropriate to the scale and nature of the proposed development, the SCI fails Test of Soundness 1, in not complying with the minimum requirements for consultation, as set out in the current Regulations.

**Change Sought**

That the introductory text, before Diagram 7 on page 26, should be amended to read: 'The following table indicates the forms of notification/consultation which applicants will be encouraged to undertake before submitting planning applications'.

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**City Council's Response to Representation**

The Council is concerned that, in terms of openness, fairness, early consultation and community engagement, the respondent's proposed change to the text of paragraph 5.26 would have the result of reducing the SCI's effectiveness and relevance. The Council maintains the view that a primary purpose of current Planning legislation and the Government's 'adaptable approach' to community involvement is to encourage 'front-loading', as an integral part of greater community participation, in all aspects of producing and subsequently applying the policies and provisions contained in Local Development Frameworks.

The Council has further concerns that its SCI can only be operated within the framework set down in legislation and that, in practice, this provides limited sanction against those applicants who may be unwilling to cooperate in regard to matters of early consultation and community engagement. Consequently, the Council intends to maintain its position and contends that the text wording which precedes Diagram 7 is a reasonable and justified expression of the importance which it attaches to the role of the applicant in regard to all significant development proposals.

**Change Proposed**

No change.



**Paragraph Number(S):      Section 5. Part B**

**Test of soundness      1      Representation number:      2004**

**Ian                      Southern Planning  
Ellis                      Practice**

**City Council's Response to Representation**

The Southern Planning Practice submits that the SCI, as drafted, goes beyond its appropriate area of concern, which should be centred on consulting with the community on planning proposals which are controversial, sensitive or significant in scale by combining: matters of community involvement; commenting on planning applications; making planning decisions; the role of the Planning Committee and; the appeals process in a manner which is both confusing and unnecessary. The respondent goes on to suggest that such "extraneous" information should, if necessary, be included in appendices to the main Statement.

With particular reference to Diagram 7 (paragraph 5.26), the respondent submits that the Submission SCI fails to interpret Government intentions correctly and is drawn up in a manner likely to inhibit all forms of development.

In regard to publicity and site notices, the respondent makes the point that the matter of applicants' taking responsibility for the display of site notices is not subject to any statutory requirement.

The Southern Planning Practice's response is noted. The general comment that the Submission SCI 'muddles' community involvement with other, more specific, planning matters is not accepted. On the contrary, it is submitted that the Submission document achieves a reasonable balance, and degree of integration, between those planning aspects which it is required to focus on and a broader intention, on the part of the Council, to achieve greater community involvement in all areas of its activity.

In paragraph 5.22, the Council sees no particular relevance in making an additional reference to Hampshire County Council's Minerals and Waste responsibilities. HCC has produced its own SCI, relating to its responsibilities in these areas and this has been recently adopted.

With regard to Diagram 7 (page 26) the Council does not accept that the structure or content of the diagram are unclear or unhelpful. The categorisation of development/application types is intended to be indicative, and give a straightforward guide, as to varying physical scales of development and/or degrees of impact on the public realm and the wider environment.

Reference to advertisements is included in the 'medium scale' group to give an indication that what may be a physically modest development can have a significant impact, for example, on a historic town centre. All the examples included are, therefore, intended to be illustrative. It does not seem necessary or appropriate, therefore, to expand these lists by the addition of further specific examples, such as development proposals that involve the introduction, or loss, of community facilities/services.

In regard to paragraph 5.29, the Council does not agree that its approach in seeking reliable and comprehensive information in support of all development applications, in order to enable and improve community involvement from the earliest possible stage, is inappropriate or in any sense heavy-handed. As set out, paragraph 5.29 is intended to make this overall objective quite clear, without adding levels of precise detail which would tend to make for an unnecessarily prescriptive approach. Furthermore, the Council does not accept that its approach would provide ' a major obstacle to

practically all development'.

The Council maintains that its use of the terms 'notification/consultation' make it equally clear what is intended.

Again, it is not accepted that it would be particularly helpful, or necessary, to list further examples within paragraph 5.40.

There is a statutory requirement for site notices to be displayed. Paragraph 5.43 is intended to make it clear that the Council expects applicants to play their part in notifying and providing information to the local community by undertaking this particular responsibility.

### **Change Sought**

Paragraph 5.22. Insert reference to the role of Hampshire County Council in determining minerals and waste disposal applications.

Paragraph 5.26, Diagram 7. Delete the third column headed 'Small Scale Applications'.

Paragraph 5.26, Diagram 7. More closely follow the table content set out in Table 7.4 of the PPS 12 Companion Guide "Creating Local Development Frameworks" (ODPM 2004).

Paragraph 5.26, Diagram 7. Add a reference to development proposals which involve the addition or loss of community facilities/services.

Paragraph 5.26, Diagram 7. More comprehensively describe the different categories of development proposal [An alternative categorisation is put forward by the respondent].

Paragraph 5.33, Diagram 8. Change the Diagram heading to read: 'The following table indicates the form of notification/publicity which the Council will undertake...' Delete the footnote to the Diagram which reads: 'statutory requirement for all applications'.

Paragraph 5.36. Amend the wording to read: 'The Council will meet and exceed the minimum publicity requirements through the following measures:'

Paragraph 5.40. Add further examples, in the form of : '( e.g. residential development of more than 10 dwellings, industrial development of over 1000 sq.m.,

### **Change Proposed**

No change.

development affecting a public right of way, departures from the Development Plan).

Paragraph 5.43, second sentence. Replace the word 'require' with the word 'request'.

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**Paragraph Number(S): Section 5. Part B**

**Test of soundness** 9 **Representation number:** 2005

**Ian  
Ellis**                    **Southern Planning  
Practice**

**City Council's Response to Representation**

The Southern Planning Practice submits that the SCI, as drafted, goes beyond its proper area of concern, which should be focused on consulting with the community on planning proposals which are controversial, sensitive or significant in scale by combining: matters of community involvement; commenting on planning applications; making planning decisions; the role of the Planning Committee and; the appeals process in a manner which is both confusing and unnecessary. The respondent goes on to suggest that such "extraneous" information should, if necessary, be included in appendices to the main Statement.

With particular reference to Diagram 7 (paragraph 5.26), the respondent submits that the Submission SCI fails to interpret Government intentions correctly and is drawn up in a manner likely to inhibit all forms of development.

In regard to publicity and site notices, the respondent makes the point that the matter of applicants' taking responsibility for the display of site notices is not subject to any statutory requirement.

The Southern Planning Practice's response is noted. The general comment that the Submission SCI 'muddles' community involvement with other, more specific, planning matters is not accepted. On the contrary, it is submitted that the Submission document achieves a reasonable balance, and degree of integration, between those planning aspects which it is required to focus on and a broader intention, on the part of the Council, to achieve greater community involvement in all areas of its activity.

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In regard to paragraph 5.29, the Council does not agree that its approach in seeking reliable and comprehensive information, in support of all development applications, in order to enable and improve community involvement from the earliest possible stage, is inappropriate or in any sense heavy-handed. As set out, paragraph 5.29 is intended to make this overall objective quite clear, without adding levels of precise detail which would tend to make for an unnecessarily prescriptive approach. Furthermore, the Council does not accept that its approach would provide 'a major obstacle to practically all development'.

The Council maintains that its use of the terms 'notification/consultation' make it equally clear

what is intended.

Again, it is not accepted that it would be particularly helpful, or necessary, to list further examples within paragraph 5.40.

There is a statutory requirement for site notices to be displayed. Paragraph 5.43 is intended to make it clear that the Council expects applicants to play their part in notifying and providing information to the local community by undertaking this particular responsibility.

### **Change Sought**

Paragraph 5.22. Insert reference to the role of Hampshire County Council in determining minerals and waste disposal applications.

Paragraph 5.26, Diagram 7. Delete the third column headed 'Small Scale Applications'.

Paragraph 5.26, Diagram 7. More closely follow the table content set out in Table 7.4 of the PPS 12 Companion Guide "Creating Local Development Frameworks" (ODPM 2004).

Paragraph 5.26, Diagram 7. Add a reference to development proposals which involve the addition or loss of community facilities/services.

Paragraph 5.26, Diagram 7. More comprehensively describe the different categories of development proposal [An alternative categorisation is put forward by the respondent].

Paragraph 5.35, Diagram 8. Change the Diagram heading to read: 'The following table indicates the form of notification/publicity which the Council will undertake...' Delete the footnote to the Diagram which reads: 'statutory requirement for all applications'.

Paragraph 5.36. Amend the wording to read: 'The Council will meet and exceed the minimum publicity requirements through the following measures:'

Paragraph 5.40. Add further examples, in the form of : '( e.g. residential development of more than 10 dwellings, industrial development of over 1000 sq.m., development affecting a public right of way, departures from the Development Plan).

Paragraph 5.43, second sentence. Replace

### **Change Proposed**

No change.

the word 'require' with the word 'request'.

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**Paragraph Number(S): 5.13**

**Test of soundness** 0 **Representation number:** 2006

**Paul  
Mason**

The respondent suggests that the SCI's value is diminished by the use of too many qualifying phrases and other caveats, which dilute its applicability and effectiveness. In addition, too much reliance is placed on over-structured feedback mechanisms which can have a tendency to filter responses and put too much emphasis on the presentation of the response and its subsequent analysis, as opposed to the actual feedback contained in the response.

The respondent also points to an error on the Council's web-page, where the additional words ".. and will also" inadvertently appear at the end of a sentence relating to the SCI's examination.

**Change Sought**

Where changes are made at different stages of a document of this type, a composite electronic version should be

**City Council's Response to Representation**

The response is noted. It is not the Council's intention that any formal consultation which it conducts, either public or otherwise, should be centred on response methods which filter out feedback or, in any sense, skew the overall results or edit out what individuals or organisations wish to say. The Council is, indeed, making ever greater efforts to communicate and to find out what people can and are willing to contribute to community involvement and the improved conduct of planning processes. Virtually all such information does now enter the public realm where it can be independently assessed and, in any event, for the Council to overlook or ignore such feedback would entirely negate its value, both to the authority and to the wider public participation and community engagement processes.

Given that the Council's Submission SCI does need to be a fundamentally practicable document and one which is valid in a great variety of different circumstances, it is necessary and, to an extent, unavoidable that it should contain certain cautionary phrases or provisos. These not only help to maintain a degree of flexibility, within legislative and regulatory frameworks which are susceptible to change, but are also intended to give the yet-to-be adopted version of the SCI a reasonable life-span.

The respondent also refers to a typographical error on the Council's web-page, which is regretted.

The suggestion is noted. However, the Council currently takes the view that to create and then add to a composite electronic document of the kind proposed could be of limited value, in that it would be potentially overloaded with information and, therefore, become more difficult rather than easier to disentangle the various stages of change and evolution. All Local Development Documents are required to be accompanied by a Statement of Consultation, which would draw attention to the key changes made in response to consultation.

**Change Proposed**

No change.

generated and posted on the Council's website, showing the evolution of the document and the sequence of changes as they been accepted following external consultation or introduced, for example, as ongoing corrections or updates.

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**Paragraph Number(S): 5.26**

**Test of soundness 5 Representation number: 2007**

**Brendan Denmead Parish  
Gibbs Council**

**City Council's Response to Representation**

Taking the example of the West of Waterlooville MDA, Denmead Parish Council is concerned that, at the time of submitting their response on the Submission SCI, the prospective developers of a significant part of this Major Development Area, who had recently submitted a formal planning application, had not made any direct contact with the Parish Council of this, the immediately neighbouring Parish, to the north of the application site. This has led the Parish Council to express scepticism regarding the effectiveness of the SCI in insisting that developers should liaise directly with affected Parish Councils, at the earliest possible stage in the development process.

The response is noted. The Major Development Area West of Waterlooville is a large-scale development project, confirmed through the Hampshire County Structure Plan Review 1996-2011 (adopted in 2000) and more recently given expression through the Winchester District Local Plan Review (adopted July 2005). During this time, various fundamental options have been considered and proposals have begun to take shape, most recently culminating in the submission, in July of this year, of a formal planning application for the development of part of the MDA area.

Throughout this lengthy period there have been numerous meetings of the West of Waterlooville Forum (to which the Parish Councils affected have always been invited), public consultations, stakeholder meetings, Committee Meetings and public exhibitions, conducted or participated in by the two affected authorities, Winchester and Havant. Local representative bodies, including Parish Councils, have been invited to attend/participate in most, if not all, such events and to contribute their views to the ongoing development planning of the MDA. From the City Council's point of view, there is no doubt that Denmead Parish Council has been kept fully informed and given every relevant opportunity to participate in this process. The Council maintains that the consultation and engagement objectives expressed through its SCI have been, and are continuing to be, rigorously pursued in the specific case referred to by the Parish Council.

Because of the scale and potential impact of the MDA, both authorities have taken unusual steps to bring landowner/developer interests into all the early stages of community consultation and engagement. In the case of the current planning application, a detailed presentation/discussion has already been hosted by the Parish Council and attended by the Council's Director of Development and its MDA Project Manager and, currently, the applicant/developers are making arrangements to follow this with their own presentation to the Parish Council.

In addition, and throughout the period leading up to the determination of this and any subsequent applications, the process of examining and giving detailed consideration to such complex proposals will be supported by the contact,

consultation and response mechanisms put in place by the two neighbouring authorities. Therefore, although the City Council's SCI was not in existence in the early stages of this particular development project, all the requirements of the SCI's Diagram 7 have been met.

**Change Sought**

None specified.

**Change Proposed**

No change.

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**Paragraph Number(S): 5.15**

**Test of soundness** 7 **Representation number:** 2008

**Ian Hassall**

The respondent maintains that references to consultation with bodies representing different ethnic, racial or religious groups imply positive discrimination based on race or religion. Such references should, therefore, be deleted from the list of community groups and other stakeholders included in paragraph 5.15.

**City Council's Response to Representation**

This response is noted. The Council regards it as being equitable and entirely appropriate that, in terms of all its activities, it should seek to include and involve all those individuals and groups which go to make up the district-wide community. As part of extending this approach, it is fully committed to increasing its efforts to establish contact with those people who, historically, have not tended to be involved in dialogue about their own local area. The Council makes no apology for any positive discrimination and it is a requirement of Government guidance that special efforts should be made to engage with all minority groups.

**Change Sought**

Paragraph 5.15. Delete second and fourth bullet-point categories.

**Change Proposed**

No change.

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**Paragraph Number(S): Sections 3,4,5,6**

**Test of soundness** 1 **Representation number:** 2009

**John Hayter**

The respondent points out that the online version of the Submission SCI contains the word 'Draft' as a footer to each page. This may have had the effect of making some respondents confused as to which version of the SCI they were being asked to comment on. The hard-copy representation form correctly asks for representations on the Submission stage document, but no electronic version of this was provided on-line.

The respondent indicates that the soundness tests have to be considered in relation to the minimum commitment of the SCI. It cannot, therefore, be determined whether the SCI will meet the Regulations, because in many cases its processes are either said to be subject to resource availability or are not specified, in order to maintain flexibility. Furthermore, the SCI gives no minimum resource commitment and is, in any event, over-reliant on the unpaid contribution made by Parish Councils and other voluntary organisations.

The respondent further indicates that the Consultation Draft SCI was described as 'the best that could be provided from existing resources', yet did not contain provision for sustainability appraisals or Strategic Environmental Assessment. Although these have been included in the Submission version it is not made clear whether extra resources will be provided to deliver these additional commitments, or whether other aims of the SCI will be removed or compromised in order to compensate for these.

**Change Sought**

**City Council's Response to Representation**

The respondent's comments are noted. It is not accepted that the inclusion of the word 'Draft', as part of the page footer to what was otherwise clearly shown to be the Submission Statement, would have had any significantly confusing effect. However, it is accepted that, regrettably, the on-line version of the representation form was not posted on the Council's web-site, to accompany the Submission Statement and those other relevant documents which were. However, this omission was only brought to the Council's attention as a direct consequence of Mr Hayter's own submissions, which reached the Council some three days before the close of the six-week consultation, leaving little time to correct the situation. Nevertheless, respondents were able to submit responses electronically, by e-mail, and the SCI consultation did, therefore, meet the relevant regulatory requirements.

The respondent's assertion that it cannot be determined whether or not the SCI will meet the Regulations, in regard to the minimum requirements for consultation, is not accepted. The reference to resource availability contained in Section 6 of the Submission document, at paragraph 6.6, represents a carefully considered statement as to the broad relationship between resource considerations and the application of the Council's SCI. The overall issue of resource availability and the potential, consequential effects on the SCI is raised in several of the respondent's submissions. These are addressed by the Council at each appropriate point.

A detailed section relating to Sustainability Appraisals and Strategic Environmental Assessments was included in the evolving SCI. The Council is required to implement the matters referred to, regardless of whether this requirement is referred to in the SCI. The SA/SEA regulations and the requirements for SCIs are separate and must both be met. There is no reason why one should impact on the other. Notwithstanding this, it is not anticipated that fulfilling these other obligations will have adverse effects on the scope or objectives of the SCI.

**Change Proposed**

Repeat the public comment process on a final submission stage SCI.

No change.

Amend the SCI, to remove all reference to 'subject to resources', or where a process is unspecified in order to provide flexibility.

Amend the SCI, to minimise the dependency on Parish Councils and other voluntary organisations, by placing more emphasis on both new and existing alternatives.

Amend the SCI to include a clear statement that its commitments can be met, but with resources that are further defined by skill and amount.

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**Paragraph Number(S):**      **SCI (all), Appendix 4**

**Test of soundness**      2    **Representation number:**    2010

**John Hayter**

**City Council's Response to Representation**

The respondent submits that the Submission SCI does not sufficiently emphasise links to other strategies and community involvement initiatives and makes suggestions to remedy this shortcoming.

The respondent's suggestions for amendments to the Submission SCI are noted. Section 2 of the Submission SCI is intended to be a straightforward expression of the Council's 'Values and Principles'. Without seeking to undermine the importance of the Community Strategy, it is not considered necessary, or appropriate, to include any specific examples to add greater weight to this element of the SCI.

The Council also maintains that an appropriate emphasis on links with other strategies and community engagement initiatives is provided through the SCI and, not least, in Section 3 of the document: 'Methods We Will Use And Support'. However, it is accepted that a valid reference to the Local Strategic Partnership, by way of an example, could be introduced to the 'Presentations' section in Diagram 5: 'Consultation for Development Plan Documents', on page 22.

Appendix 4 (page 59), is intended to illustrate the organisational structure of the Winchester District Local Strategic Partnership. The Council would not, therefore, consider it necessary or appropriate to add reference to particular 'outputs' of the Partnership, such as the Community Strategy or the 'One Compact for Hampshire'.

**Change Sought**

Paragraphs 2.2, 2.3, Diagram 5 and its supporting text. Amend to refer to the Local Strategic Partnership and the Community Strategy, which is the formal expression of the Partnership's position.

Appendix 4. Amend to include reference to the Community Strategy, in a way which is consistent with its description in the SCI's Glossary. Also amend the chart to include the 'One Compact for Hampshire'.

**Change Proposed**

Page 22, Diagram 5, box headed 'Presentations': insert after '...including... the Local Strategic Partnership... and those attended by hard-to-reach groups'.

**Paragraph Number(S):** all

**Test of soundness** 4 **Representation number:** 2011

**John Hayter**

The respondent indicates that the Submission SCI does not identify how the most 'hard-to-reach' groups can be involved in a timely and accessible manner. The respondent goes on to suggest that certain hard-to-reach individuals are perceived as belonging to a group, because of certain common characteristics, although in practice they may not form any such 'group' and may be scattered across the District. The respondent goes on to give examples such as gypsies/travellers, the homeless, those who lack an affordable home, those who suffer deprivation or have mobility, speech, hearing, language or associated difficulties in communicating, as well as those who live in, but work away from, the District.

The respondent makes the further point that on issues such as housing provision, the interests of the hard-to-reach are unlikely to correspond to those expressed by the majority within a community, or by those who represent them. The respondent also suggests that the Submission SCI continues to place too much reliance on established and wholly conventional methods of community engagement and that this approach will continue to disadvantage the hard-to-reach within the District.

#### **Change Sought**

Modify the approach taken by the SCI, to emphasise the value of drawing on local sources of information such as periodic Housing Needs Surveys and the Social Inclusion, Health and Housing Partnerships within the Local Strategic Partnership. The SCI should also emphasise the importance of engaging more effectively with local agencies such as 'Meals on Wheels', groups representing the disabled or handicapped, or ex-offenders associations. Such bodies may well be able to supply basic contact information.

Include reference in the SCI to more unconventional methods of making contact with the hard-to-reach, for example, through

#### **City Council's Response to Representation**

The respondent's comments and suggestions are noted. The Council is well aware of the need to make greater and more targeted efforts to connect with the hard-to-reach and, particularly, in ways which help to generate a genuine involvement, through the two-way exchange of ideas and opinions. Certain officer actions have already been initiated and these are designed to create or strengthen links with other organisations which, in some instances, do have a more established access to individuals and groupings which the Council has generally found it hard to engage with. Although references in the Submission SCI, to this particular aspect of the Council's determination to involve all elements within the community, are meant to set out a clear statement of its intent it is, nevertheless, accepted that meeting this particular objective will require a consistent and ongoing commitment by the Council and its officers, coupled with the use of imaginative and innovative methods, if this particular challenge is to be successfully met.

In answer to the respondent's point regarding sources of local information, it is considered that whilst the examples he suggests are valid in themselves, the Submission document already contains a generally sufficient number of illustrative examples. To continue adding further examples could have the effect of narrowing the document's focus and run the associated risk of producing a manual, rather than a clear 'Statement' of purpose.

#### **Change Proposed**

No change.

face-to-face surveys at pubs, betting shops and charity shops and among those who might sleep rough or congregate in town centres.

---

**Paragraph Number(S): 1.5, SCI (all)**

**Test of soundness** 5 **Representation number:** 2012

**John Hayter**

**City Council's Response to Representation**

The respondent suggests that the consultation methods contained in the Submission SCI place too much emphasis on consultation with 'groups' and, in addition, the assumption is made that such groups are sufficiently organised to be able to identify and express group concerns at forum or other front-loading events. The respondent also makes the point that most Parish Councils and even some well organised amenity groups find it difficult to disseminate the necessary information, mobilise opinion and respond properly to a consultation, or series of consultations, which are generally conducted on the basis of a six-week time-frame for each consultation exercise. In the event, many groups commonly find that they can only respond on single issue matters.

The respondent repeats the point, made in representation 2012, that the Submission SCI does not identify how the most 'hard-to-reach' groups can be involved in a timely and accessible manner. The respondent goes on to suggest that certain hard-to-reach individuals are perceived as belonging to a group, because of certain common characteristics, although in practice they may not form any such 'group' and may be scattered across the District. The respondent goes on to give examples such as gypsies/travellers, the homeless, those who lack an affordable home, those who suffer deprivation or have mobility, speech, hearing, language or associated difficulties in communicating, as well as those who live in, but work away from, the District.

The respondent makes the further point that on issues such as housing provision, the interests of the hard-to-reach are unlikely to correspond to those expressed by the majority within a community, or by those who represent them. The respondent also suggests that the Submission SCI continues to place too much reliance on established and wholly conventional methods of community engagement and that this approach will continue to disadvantage the hard-to-reach within the District.

The respondent then goes on to suggest

The points raised by the respondent are noted with interest. However, these are considered to have been broadly addressed in answer to other submissions by the respondent, both at the earlier Consultation Draft and present stages. The particular point made in regard to time pressures put on Parish Councils and organised amenity groups is understood. Nevertheless, it is most often the case that the time-frame for formal public consultation, in regard to planning and certain other areas of City Council responsibility, is set through legislation or Government regulation and, in such instances, the Council and its consultees/respondents are required to observe this.

The point regarding 'templates' is noted. Consultation documents and associated response forms are already made publicly available and it would, in any event, be the Council's intention to maintain consistency and transparency in the structure of these, for both the consultation draft and submission stages.

The respondent's point regarding the sequence of stages in Diagram 4 (page 20), which illustrate the DPD Consultation Structure, is accepted. The content of the Diagram should, therefore, be amplified to make it clear that the 'front-loading' stage of the process should include an additional reference to the identification of 'options'.



that the 'second stage' in the DPD preparation process, as depicted in Diagram 4 on page 20, moves from identifying and assessing 'Issues', to preparing and publishing a 'Preferred Option', without any intermediate stage of choosing between 'Options' being referred to. The respondent makes the further point that a process of focusing on and, in most cases, ordering options is a helpful process, not least in terms of reaching out to and involving the community.

### **Change Sought**

Include, as a further Appendix to the SCI, the templates for responses to be made at each stage of consultation, ensuring that at both the draft and deposit stages the response forms are consistent in their structure.

Amend Diagram 4 and its supporting text, to make the consideration of options a central part of the second stage in the DPD preparation process.

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### **Change Proposed**

Support the following change:

Page 20, Diagram 4. Amplify the front-loading Stage 1, to add further reference to the identification of 'issues and options'.

**Paragraph Number(S): 3.1- 6.6**

**Test of soundness 6 Representation number: 2013**

**John Hayter**

The respondent submits that the value and effectiveness of the SCI are compromised as the result of possible, or projected, resource constraints being used to cloud, or defer, issues which may require action in the future. It is also suggested that parts of the SCI have been drafted in such a way as to create flexibility and 'room to manoeuvre', rather than to follow through with the desired course of action.

The respondent makes the further point that the SCI places an over-reliance on the capacities and abilities of Parish Council's and other, mostly voluntary, organisations. It is unreasonable, in the respondent's view, to put additional burdens, such as contacting the hard-to-reach, onto local organisations which are already struggling to meet the various demands placed upon them. The shortfalls which, in practice, are likely to occur as the result of these organisations' more limited capacity, can only be met by adding more WCC resources than originally planned, or by not fulfilling all of the commitments contained in the SCI.

**Change Sought**

Amend the SCI, to remove all reference to 'subject to resources', or where a process is unspecified in order to provide flexibility.

Amend the SCI, to minimise the

**City Council's Response to Representation**

The response is noted. It is not accepted that the Council's drafting of its SCI has been unduly influenced by possible future resource constraints. On the contrary, the SCI has from the outset been regarded by the Council as an open-minded, albeit serious, attempt to meet the need for improved consultation and community engagement in a realistic and affordable way, but without this being driven forward by an overriding concern for resourcing issues. Notwithstanding this, it remains true, as similarly indicated in the WCC response to representation 2016, that the SCI is intended to incorporate some reasonable and cautionary elements of flexibility, in order to be able to respond to, and deal with, some degree of uncertainty regarding future resourcing or other constraining factors, whilst recognising the fact that the precise effect of any future constraints on action cannot be known, or readily anticipated, at the present time.

The respondent's point regarding the burdens placed on voluntary organisations, and Town/Parish Councils in particular, is fully accepted. The Council is, however, conscious of the critically important role played by such organisations. Although every reasonable effort is made to co-ordinate and combine planning and other forms of Council contact/consultation, an inescapable fact appears to be that Town/Parish Councils and other locally representative organisations are, increasingly, at the forefront of community affairs, especially in rural areas. Consequently, their involvement and overall workloads will almost certainly continue to grow. The Council is committed to an innovative approach to these and other involvement issues and the SCI's reference to the possibility of 'clustering' some Parishes is with a view to encouraging certain Parish Councils of varying size and capacities to share some administrative or other workload pressures. With regard to the respondent's point related to the issue of future resourcing for such organisations, this is considered to be beyond the scope of this SCI.

**Change Proposed**

No change.

dependency on Parish Councils and other voluntary organisations, by placing more emphasis on both new and existing alternatives.

Modify the approach taken by the SCI, to emphasise the value of drawing on local sources of information such as periodic Housing Needs Surveys and the Social Inclusion, Health and Housing Partnerships within the Local Strategic Partnership. The SCI should also emphasise the importance of engaging more effectively with local agencies such as 'Meals on Wheels', groups representing the disabled or handicapped, or ex-offenders associations. Such bodies may well be able to supply basic contact information.

Include reference in the SCI to more unconventional methods of making contact with the hard-to-reach, for example, through face-to-face surveys at pubs, betting shops and charity shops and among those who might sleep rough or congregate in town centres.

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**Paragraph Number(S):** SCI (all), 4.10, 4.11

**Test of soundness** 7 **Representation number:** 2014

**John Hayter**

The respondent submits that the SCI focuses on describing the collection of representations and/or consultation results, but does not describe how these are formally fed into the decision-making process. Consequently, it is not made apparent that matters relating to DPDs, SPDs and Sustainability Appraisals are brought before four different Scrutiny Panels and only 'come together' at the level of the Principal Scrutiny Committee. Due to the timing of Panel meetings these usually occur after the Principal Scrutiny Committee and not before. Furthermore, although the final decision has to be taken either in Cabinet, or by the full Council, the SCI does not stipulate a need for prior consideration by any particular Committee or Panel.

**Change Sought**

Amend the SCI to reinstate the function and procedures of the former Local Plan Committee, which usefully guided and supervised the emergence of previous District Local Plans.

**City Council's Response to Representation**

The respondent's comments are noted. The value and relevance of a Council Committee, charged with guiding and informing the preparation of the Local Development Framework, and which would have consultation procedures for other members of the Council, interested bodies and the public, are fully accepted. Measures to achieve this, including the establishment of terms of reference for such a Committee, are currently in hand.

**Change Proposed**

Support the following change:

To advise the Planning Inspectorate that measures are currently in hand to secure the establishment of a Cabinet (Local Development Framework) Committee charged with guiding and informing the preparation and production of the Council's Local Development Framework. Such a Committee would have participation procedures for other members of the Council, interested bodies and the public. It is anticipated that further details of these arrangements, including the new Committee's terms of reference, can be submitted to the Inspectorate before the close of the 'examination' stage.

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**Paragraph Number(S): Section 6**

**Test of soundness** 8 **Representation number:** 2015

**John Hayter**

The respondent submits that in Section 6 of the Submission SCI it is made clear that the Annual Monitoring Report will be used to assess the extent to which planning policies are being successfully implemented.

However, no additional mechanism is described whereby an annual policy report, or a planning process report, can be taken to a Committee for Member review and, if necessary, the authorisation of any further action.

**Change Sought**

Amend the provisions of the SCI to confirm the reinstatement of a Committee to resume and carry forward the role of the former Local Plan Committee.

**City Council's Response to Representation**

See the preceding response to Representation 2014. It should, however, be noted that the former Local Plan Committee (and the proposed Cabinet LDF Committee) are concerned with developing planning policy, not scrutinising or monitoring this. The relevant Scrutiny Panel will, therefore, continue to monitor the implementation of planning policy and key indicators.

**Change Proposed**

No change, but see Representation 2014

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**Paragraph Number(S): 5.21 - 5.55, Appendix 6**

**Test of soundness** 9 **Representation number:** 2016

**John Hayter**

The respondent indicates that the criteria for neighbour notification are not specified in the Submission SCI but are only available on the Council's web-site and are subject to change. Although the criteria for referring certain planning applications to the Council's Development Control Committee for decision and the procedures governing public-speaking at that Committee are included in the SCI, the Submission document does go on to state that these rules and procedures, as currently adopted, are not included as a formal part of the SCI.

**Change Sought**

Amend the SCI to include the neighbour notification criteria currently only available on the Council's web-site.

Paragraph 4.7. Delete the last two sentences.

Paragraph 5.50. Delete.

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**City Council's Response to Representation**

The response and accompanying suggestions for changes to the SCI are noted. However, the Council regards it as both necessary and realistic to retain a reasonable degree of flexibility and, importantly, the ability to adapt to changes in the SCI's operating environment, including those of a legislative, regulatory or procedural nature.

The adopted SCI will be relied on to guide and monitor further key stages in the production of the Council's LDF and it is intended, therefore, that the SCI should continue to be relevant to that purpose, without the need for major revisions or updating in the very near future. Therefore, where matters of Council procedure, such as Committee arrangements, are particularly susceptible to change it is considered more appropriate, and sparing of resources, to publicise and make these available in a form, or forms, which can be more independently altered and brought up-to-date. Consequently, the Council considers that it would be wholly inappropriate for it to have to make a formal change to the SCI, in order to amend its neighbour notification or Committee procedures. Acceptance of the respondent's suggested changes would require this.

**Change Proposed**

No change.

**Paragraph Number(S): 5.15, 5.18**

**Test of soundness 3 Representation number: 2017**

**James Grainger Trust Matcham**

The Grainger Trust plc indicates that paragraph 5.15 states that, in the development process, the Council will consult with a range of stakeholders , including landowners/ development interests and or their agents. However, this statement is not carried through to paragraph 5.18, which fails to reflect the important role of the housebuilding industry in the LDF process. The respondent considers that the involvement of of landowners and development interests is critical at the early stages in the production of key Development Plan Documents, such as the Core Strategy. In addition, the respondent points out that paragraph 5.20 fails to make reference to the equally important role of, and the need for early consultation with, landowners and developers in the production of Supplementary Planning Documents.

**Change Sought**

Unspecified amendments to paragraphs 5.18 and 5.20 to emphasise the constructive part which can be played by landowners, development interests and their agents.

**City Council's Response to Representation**

These comments are noted. The Council accepts that the 'front-loading' or Pre-Production Stage, referred to in Paragraph 5.18 of the Submission SCI, could helpfully, and appropriately, make a more specific reference to the early consultative role to be played at this stage, by landowners, development interests and their agents. This paragraph should, therefore, be amplified by the addition of a further bullet-point. The consultative role of landowners, development interests and their agents is considered to be less specific in regard to the preparation of Supplementary Planning Documents. It is maintained, therefore, that the Submission SCI's reference to 'stakeholder participation', in paragraph 5.20 'Participation and Production Stage', is sufficient to make proper provision for participation by landowner and development interests, where this is relevant to the subject matter of a particular SPD.

**Change Proposed**

Support the following change:

Page 19, Paragraph 5.18, 'Pre-Production Stage', at end of second bullet-point, add : '... and including landowners, developers and their agents, as appropriate'.

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**Paragraph Number(S): 5.26, 5.30**

**Test of soundness** 0 **Representation number:** 2018

**James Grainger Trust Matcham**

**City Council's Response to Representation**

The Grainger Trust plc acknowledges the importance that the Submission SCI attaches to pre-application discussions which are appropriate to the scale and nature of development proposals and accepts that these play a vital part in dealing with most major planning applications. However, the respondent points out that paragraph 5.26 does not make any corresponding reference to the importance of inter-departmental communication within the Council, in terms of reacting to pre-application proposals.

This comment is noted. It is not, however, considered appropriate for the SCI to make specific reference to the Council's internal or inter-departmental working.

**Change Sought**

**Change Proposed**

An unspecified amendment to paragraph 5.30, to emphasise the importance of inter-departmental communication within the Council.

No change.

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**Paragraph Number(S): 5.18**

**Test of soundness** 0 **Representation number:** 2019

**James Grainger Trust Matcham**

**City Council's Response to Representation**

The Grainger Trust plc indicates that, in regard to preparing for and producing the LDF, the Submission SCI makes a number of references to the 'evidence base'. However, the Submission document does not go on to give examples of Council-commissioned surveys or assessments, such as an up-to-date Housing Needs Assessment, which could form an important element in any evidence base to be used in the preparation of a Core Strategy, Development Control Policies DPD or Affordable Housing SPD.

The importance of locally derived information, as part of an 'evidence base', is recognised. However, the evidence base is only mentioned in paragraph 5.18 as a means of feeding community views into the DPD process. Whilst there will be many other studies that make up the evidence base, it is not considered necessary to list these in the SCI.

**Change Sought**

**Change Proposed**

Amend the SCI to make reference to the role of existing and proposed Council studies and other relevant documents, in preparing an evidence base for the different components of the LDF.

No change.

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**Paragraph Number(S): Section 5.**

**Test of soundness** 0 **Representation number:** 2020

**J.D  
Selby**

The respondent expresses disappointment that the Submission SCI's strategy for encouraging and promoting far more community involvement and early consultation by planning applicants does not yet appear to be influencing, in any meaningful way, pre-application activity at the local level. The respondent also makes the general point that the SCI is too complex and 'aspirational' and is, therefore, likely to be of less interest or relevance to the wider community as a result. Finally, the respondent expresses the view that the the SCI could be improved by incorporating a clear commitment to a timetabled review of its overall application and effectiveness.

**City Council's Response to Representation**

The respondent's criticisms are noted. However, the SCI is not yet adopted and it is not, therefore, surprising that it is not yet having a noticeable effect. This is not, however, a reason for undertaking a review of the SCI, or for planning a review at such an early stage. Should significantly changed circumstances warrant such action in the future, then it is likely that the Council would wish to undertake such a review, in order to restore the currency and validity of its SCI.

Notwithstanding that cautionary approach with reard to the SCI, the Council's Annual Monitoring Report, which is published in December each year, is specifically intended to monitor the effectiveness of planning policies and to determine whether or not targets contained in the Local Development Documents are being met. A further purpose of the Annual Monitoring Report is to determine whether or not an early review of any such Local Development Documents is required, because their effectiveness has been limited or they have become out-of-date sooner than was expected.

**Change Sought**

An unspecified change to Section 6, to include a more precise reference to a timetable for periodic review of the SCI.

**Change Proposed**

No change.

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**Paragraph Number(S): all**

**Test of soundness** 0 **Representation number:** 2021

**Selina Test Valley Borough  
Crocombe Council**

Test Valley Borough Council has no comment to make on the Submission SCI.

**City Council's Response to Representation**

The representation is noted.

**Change Sought**

None.

**Change Proposed**

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2022

**John Pounder** South East England Regional Assembly

**City Council's Response to Representation**

The South East Regional Assembly has no comments to make.

The representation is noted.

**Change Sought**

**Change Proposed**

None.

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2023

**Alan Jones** Sainsbury's Supermarkets Ltd

**City Council's Response to Representation**

Sainsbury's Supermarkets Ltd does not have any detailed comments to make at this point.

The representation is noted.

**Change Sought**

**Change Proposed**

None.

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2024

**Cheryl Gosling** Fair oak and Horton Heath Parish Council

**City Council's Response to Representation**

Fair Oak and Horton Heath Parish Council finds the Submission SCI to be sound.

The support is welcomed.

**Change Sought**

**Change Proposed**

None.

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2025

**Charlotte Stride** Environment Agency

**City Council's Response to Representation**

The Environment Agency finds the SCI to be generally sound

The support is welcomed.

**Change Sought**

**Change Proposed**

None.

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2026

**A R Portsmouth Water  
Neve Ltd**

**City Council's Response to Representation**

Portsmouth Water Ltd has no particular comment to make at this, the SCI stage, of the Local Development Framework process.

The representation is noted and the additional comments/request, made in regard to the forthcoming Core Strategy, will be actioned.

**Change Sought**

None.

**Change Proposed**

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2027

**Dominic Fareham Borough  
Lyster Council**

**City Council's Response to Representation**

Fareham Borough Council does not wish to submit any comments.

The representation is noted.

**Change Sought**

None.

**Change Proposed**

No change.

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**Paragraph Number(S): all**

Test of soundness 0 Representation number: 2028

**K R Hampshire & Isle of  
Clarke Wight Area Team,  
GOSE**

**City Council's Response to Representation**

The Government Office For The South East welcomes the Council's efforts to create a young person's network and also encourages: the development of further links with Parish Councils, in order to reach rural communities and; increasing contact with the voluntary and community sector, through the 'One Compact for Hampshire', in order to strengthen connections with those organisations which specifically deal with 'hard to reach' members of the community. The Government Office also welcomes the use of an explanatory leaflet to accompany the publication of the Submission version of the SCI and encourages the use of a similar leaflet to accompany the publication of a final version.

In order to maintain the currency and, therefore, the usefulness of the information in Appendix 3 to the SCI, the Council has elected not to name specific voluntary organisations, of which a considerable number operate within the Winchester District. However, the important role played by Community Action Hampshire, with its particular emphasis on community interests, suggests that this organisation should be named and added to the list of 'Other Consultation Bodies', in Appendix 3 (page 58).

**Change Sought**

The inclusion of 'Community Action Hampshire' in the SCI's list of Consultation Bodies (Local Development Framework Consultees: Appendix 3).

**Change Proposed**

Page 58, Appendix 3, Local Development Framework Consultees,' Other Consultation Bodies', add: 'Community Action Hampshire'.

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**Paragraph Number(S): 5.34**

**Test of soundness** 0 **Representation number:** 2029

**George Natural England  
Gittis**

Natural England welcomes the opportunity, emphasised through the SCI, for local nature conservation organisations and other environmental stakeholders to engage effectively in the preparation of elements of the Local Development Framework.

**City Council's Response to Representation**

Given that The National Trust has significant property, land-owning and farming interests within the District and has close links to many aspects of rural communities within the District it is considered appropriate that this particular organisation should be included in the list of Other Consultation Bodies.

The Council also recognises the need to update the SCI's list of Statutory Consultation Bodies, by reference to Natural England, as the successor body to English Nature.

**Change Sought**

The addition of The National Trust to the SCI's list of 'Other Consultation Bodies'

**Change Proposed**

Appendix 3, page 58, after 'National Playing Fields Association', add 'The National Trust'.  
Appendix 3, page 57....delete 'English Nature' and replace with 'Natural England'.

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**Paragraph Number(S): all**

**Test of soundness** 0 **Representation number:** 2030

**G.M  
Wandling**

The respondent supports sustainable development, by means which include the careful location of new development and other measures to reduce reliance on travel by car.

**City Council's Response to Representation**

This response is noted.

**Change Sought**

None specified.

**Change Proposed**

No change.

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**Paragraph Number(S):** all

**Test of soundness** 0 **Representation number:** 2031

**Alison Mathews** **Itchen Valley Parish Council**

**City Council's Response to Representation**

The Itchen Valley Parish Council considers the Submission SCI to be 'sound'.

As set out in the section on Parish Plans, on page 11 of the Submission document, the SCI seeks in part to illustrate the evolution of Parish Plans within the District, by reference to 'some early examples of completed plans'. A Parish Plan for Itchen Abbas was inadvertently chosen as one of these examples when, in fact, Itchen Abbas has a Village Design Statement and not a Villlage Plan.

The following paragraph on page 11 is intended to give an equally compact summary of the processes involved in developing Village Design Statements. Given that comparatively large numbers of such Statements have now been adopted within the District it is not considered necessary, or particularly helpful, to highlight examples from among those villages which now have a VDS in place.

The Council again notes the Parish's comment regarding neighbour notification, where this concerns agricultural land. A full response was given following the Consultation Draft stage and, accordingly, the Council did not consider it necessary to amend its normal notification procedures. However, it should be re-emphasised that where a residential property is situated on 'neighbouring' agricultural land, but happens to be within reasonable proximity to the planning application site, the case officer's initial assessment may well indicate that a notification would be appropriate.

### **Change Sought**

Notwithstanding the general support for the SCI, the respondent draws attention to what the Parish Council considers to be a factual error on page 11, where reference is made to a completed Parish Plan for Itchen Abbas. The representation goes on to suggest that recognition should, instead, be given to the fact that Itchen Abbas has a completed and adopted Vilage Design Statement.

This representation also points out that, in terms of planning applications and neighbour notification, where the 'neighbouring property' consists of agricultural land, a notification is not issued to the owner or occupier.

### **Change Proposed**

Support the foolowing change:

Page 11, Parish Plan, fourth sentence, delete: 'Itchen Abbas',

**Paragraph Number(S): Section 5**

**Test of soundness** 0 **Representation number:** 2032

**James Grainger Trust Matcham**

The Grainger Trust plc welcomes the inclusion of planning consultants within Group C, as contained in Diagram 5.

**City Council's Response to Representation**

The support is welcomed. Clear reference is made in the SCI to the importance the Council attaches to the role of the landowner and developer in helping to initiate early community involvement and, in particular, with regard to larger-scale and more sensitive development proposals. Given that planning consultants often play a key part in advising, guiding and representing the landowner or prospective developer, it is considered to be implicit in the SCI that their contribution to the LDF process is valued.

**Change Sought**

No specific change.

**Change Proposed**

No change.

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**Paragraph Number(S): 5.26, 5.28**

**Test of soundness** 0 **Representation number:** 2033

**James Grainger Trust Matcham**

The Grainger Trust plc supports the Council's pro-active approach towards early consultation and community involvement for larger schemes and, in particular, welcomes the SCI's recognition of the positive consultation process for the West of Waterlooville MDA, which has involved the local community and other stakeholders from the outset.

**City Council's Response to Representation**

The support is welcomed.

**Change Sought**

None.

**Change Proposed**

No change.

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**Paragraph Number(S): all**

**Test of soundness** 0 **Representation number:** 2034

**Mobile Operators Association**

The Mobile Operators Association welcomes the inclusion of the Telecommunications Companies in the SCI's list of Statutory Consultees, as confirmation of the Council's intention to consult these bodies on forthcoming Local Development Documents.

**City Council's Response to Representation**

The response is noted.

**Change Sought**

None.

**Change Proposed**

No change.

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**Paragraph Number(S):** all

**Test of soundness** 3 **Representation number:** 2035

**John  
Hayter**

**City Council's Response to Representation**

The respondent submits that the SCI is sound, when considered in the light of Test of Soundness 3.

The support is welcomed.

**Change Sought**

**Change Proposed**

None.

No change.

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## The criteria for testing the soundness of the SCI

At the examination, the Inspector will consider whether this document is sound by determining whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in Regulations;
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- vi. resources are available to manage community involvement effectively;
- vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- viii. authority has mechanisms for reviewing the statement of community involvement; and
- ix. statement clearly describes the planning authority's policy for consultation on planning applications.

*(Source: Planning Policy Statement 12: Local Development Frameworks. Paragraph 3.10)*