



**Statement of Community Involvement (SCI)**  
**Consultation on Draft SCI 25 September – 24 October 2018**

**Consultation Statement**

**Stratford-on-Avon District Council**  
**December 2018**

## Components of consultation undertaken on the draft SCI

The draft SCI was published on Thursday 25 September for a four week consultation period until 24 October 2018.

The consultation comprised the following:

1. A specific page on the District Council's website providing links to the consultation documents and comments form;
2. Email and letters sent on 25 September to Ward Members, Parish Councils in the local area, statutory consultees, agents and developers, agencies, voluntary organisations and other stakeholders;
3. Paper copies of the Draft SPD made available for inspection at the District Council offices;

These means of consultation are consistent with the provisions of the District Council's Statement of Community Involvement.

## Responses to the draft SPD

A total of 13 responses were submitted from individual sources, including statutory agencies, specialist bodies, Parish Councils and members of the public. Within these responses there were 39 individual comments made.

The following schedule provides an outline of the comments by topic, together with an assessment of them. It also identifies changes to be made in the final version of the SPD in response to these comments.

If text is to be deleted from the draft SPD it is shown ~~struck through~~. If new text is to be inserted it is shown underlined.

## Index of respondents

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<b>Ref</b>	<b>Doc ref</b>	<b>Summary of comments</b>	<b>Officer response</b>	<b>Action</b>
n/a	Internal SDC comment – Housing Policy	The respondent suggests that it would be prudent to refer to the Public Sector Equality Duty, even if only to demonstrate that we've had regard to our legal obligations. An appropriate point to do this might be after existing para. 1.9. The two 'protected characteristics' most likely to be relevant in this case are those of 'age' and 'disability'.	Agree	<p>Add the following wording after the Contents page: Public Sector Equality Duty</p> <p><u>"Stratford-on-Avon District Council must have regard to the Public Sector Equality Duty (Equality Act 2010) as set out within its Single Equality Scheme. An up-to-date SCI demonstrates that the Council has had due regard to this statutory duty in terms of public consultation on planning documents and applications.</u></p> <p><u>The SCI embraces the principles of the Council's equality duties and recognises the need to consider the 'protected characteristics' of its residents. (The Act lists 'protected characteristics' as: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.) Consultation can help it to do this, especially by considering 'seldom heard' or 'hard to reach groups' who do not take part in consultation through choice, circumstances or lack of opportunity, which may also mean they are underrepresented in both decision-making and the wider community. By relating the SCI to the equality and consultation frameworks, the Council intends to foster better community relations and improve access to services for all within the district."</u></p>
n/a	Internal SDC comment – Housing Policy	In paragraph 6.4 it is not clear whether this specifically also applies to S106 Agreements and requests for Deeds of Variation thereto.	Agree that further clarification within the SCI would be helpful.	<p>Table 5. Process for Planning Applications, Decision Making</p> <p>1. Process and requirements. Add final paragraph to read:</p> <p><u>"Post decision Deeds of Variation to S106 Agreements are also subject to consultation."</u></p>

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				2. Engagement Add second paragraph to read: <u>"Applications for Deeds of Variation to S106 Agreements will be subject to consultation with Ward Members, Parish/Town Councils and relevant interested parties."</u>
n/a	Internal SDC comment – Development Management	Request a number of minor typographical, presentational and factual amendments to the SCI.	Minor typographical and factual comments noted and agreed.	All minor typographical and factual amendments incorporated into final version of the SCI. Due to their minor nature the proposed changes are not listed individually.
n/a	Internal SDC comment – Development Management	Table 5. Process for Planning Applications, Pre-application consultation. Request additional text stating that the Council makes a charge for pre application submissions.	Agreed	Add following sentence (including link to relevant Stratford-on-Avon District Council webpage) to the end of the first bullet point: <u>"A charge for pre-application submissions will be made and more information on this process can be found on the Council's website."</u>
n/a	Internal SDC comment – Development Management	Table 5. Process for Planning Applications, Pre-application consultation. Request additional text setting out mandatory community consultation on applications involving 2 or more wind turbines or where the hub height of any turbine exceeds 15 metres.	Agreed	Add following sentence to the end of the second bullet point: <u>"Pre-application consultation with the local community is however mandatory for planning applications involving more than 2 wind turbines or where the hub height of any turbine exceeds 15 metres."</u>
n/a	Internal SDC comment – Development Management	Table 5. Process for Planning Applications, Pre-application consultation. Request additional fourth bullet point encouraging applicants to engage to undertake local consultation on small scale schemes prior to submission of an application.	Agreed	Add new fourth bullet point to read as follows: <u>"For small-scale schemes the Council encourages applicants to engage with the owners and occupiers of adjacent land and other key local stakeholders prior to the submission of an application."</u>

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n/a	Internal SDC comment – Development Management	<p>Table 5. Process for Planning Applications, Pre-application consultation. Engagement column.</p> <p>Request amendments to the Engagement column text in order to clarify that officers may facilitate engagement on large scale developments.</p> <p>In addition, request the inclusion of examples of different types of engagement taken at the pre-application stage.</p>	Agreed	<p>Amend text within the Engagement column to read as follows:</p> <p>“No formal role in terms of engagement for Stratford-on-Avon District Council <u>but on large scale developments officers may facilitate stakeholder engagement.</u></p> <p>Type of engagement will be set by the applicant but often includes <del>a public exhibition and/or short survey</del>:</p> <ul style="list-style-type: none"> <li>- <u>Public exhibition</u></li> <li>- <u>Stakeholder meetings</u></li> <li>- <u>Online questionnaires</u></li> <li>- <u>Comment forms</u></li> </ul> <p><u>Key Stakeholders may include:</u></p> <ul style="list-style-type: none"> <li>- <u>Ward Members (District Councillors)</u></li> <li>- <u>Parish/Town Councils</u></li> <li>- <u>Owners/occupiers of neighbouring land</u></li> <li>- <u>Local Community groups and organisations”</u></li> </ul>
n/a	Internal SDC comment – Development Management	<p>Table 5. Process for Planning Applications, Stage 2. Publicity and Consulting on Planning Applications. Engagement column.</p> <p>Request new fourth bullet point highlighting the possibility to sign up to the Council’s email alerts for applications in any given parish.</p>	Agree although covered in Process and Requirements text which should be deleted and replaced.	<p>In Table 5 delete second paragraph of Stage 2. from the Process and Requirements column:</p> <p><del>“The Council also provides a <a href="#">Planning Application Email Alert</a> service. Parishes within the District can be selected and an email alert is sent out when new applications become available in that area.”</del></p> <p>Add new fourth paragraph to in Engagement column (including link to relevant Stratford-on-Avon District Council webpage) to read as follows:</p> <p><u>“It is also possible to sign up for <a href="#">Planning Application Email Alerts</a> to be notified of all applications in a given parish.”</u></p>

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n/a	Internal SDC comment – Development Management	<p>Table 5. Process for Planning Applications, Pre-application consultation. Engagement column.</p> <p>Request an additional final paragraph advising that the Council may consult nearby Parishes and Ward Members if there is a potential impact from a development proposal.</p>	Agreed	<p>Add new final paragraph to read:</p> <p><u>“Where applications are near to parish boundaries or the proposals may have impacts on surrounding parish areas, the Council will consider whether it is necessary to also consult nearby Parishes and ward Members.”</u></p>
n/a	Internal SDC comment – Development Management	<p>Table 6. Process for obtaining Permission in Principle.</p> <p>Suggest an additional section to Table 6. Setting out the process for obtaining Technical Details Consent.</p>	Agreed	<p>Amend Table 6. to incorporate details on the process for obtaining technical details consent as follows:</p> <p>A. Application for Permission in Principle Stage 2. Publicity and Consultation add new bullet point to read:</p> <p><u>“The technical details application is made public for not less than 21 days for a site notice and 14 days for an online notice during which relevant statutory consultees (DMPO Schedule 4) and interested parties can make representations”</u></p> <p>Stage 3. Decision add new fourth bullet point to read:</p> <p><u>“The Council has 5 weeks to determine a technical details application.”</u></p> <p>B. Entering a site in Part 2 of a Brownfield Land Register</p> <p>Stage 2. Publicity and Consultation add new bullet point to read:</p> <p><u>“See Part A above for Technical Details Consent.”</u></p> <p>Stage 3. Decision add new fourth bullet point to read:</p> <p><u>“The Council has 10 weeks to determine a technical details application for major development and 5 weeks for other forms of development.”</u></p>

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001	General Comment	<p>The Respondent is supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: <a href="https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals">https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</a></p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a></p> <p>This system enables us to deliver the most efficient and effective service to our customers.</p>	Noted	<p>No change to SCI.</p> <p>Ensure the District Council holds the most up to date contact details for Natural England.</p>
002	General Comment	<p>Although not directly related to Highways England's area of jurisdiction as a Highway Authority, it is noted that the current Draft SCI does not make reference to the Conservation of Habitats and Species Regulations (SI 2017/1012) Article 63(3) which requires the LPA to "consult the appropriate nature</p>	<p>Comments noted. Tables 1 and 5. of the SCI already set out that the Council will undertake consultation with stakeholders in accordance with</p>	No change to SCI.

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		<p>conservation body" to ensure the potential implications of a site's conservation objectives can be appropriately assessed. Highways England is committed to supporting the Council in its preparation and delivery of Local Plans. Further detail of how we will engage with the planning system is set out in <i>DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development</i>.</p> <p>With regards to other matters considered within the draft SCI we do not have specific comments on the detailed measures to be used in public consultation.</p>	<p>regulations. The Conservation of Habitats and Species Regulations (SI 2017/1012) Article 63(3) refers to European Sites. There are no such sites in Stratford-on-Avon District.</p>	
004	General Comment	<p>The Woodland Trust would like to be consulted on your Local Plan at all stages and on any supplementary planning documents. The Trust would also like to be consulted on any neighbourhood plans in the Stratford District area and on any planning applications which may have a direct or indirect adverse impact on ancient woodland or ancient or veteran trees.</p>	Noted	<p>No change to SCI. Check/update contact details for Local Plan consultations and inform SDC Development Management.</p>
006	General Comment	<p>The Parish Council has no comment to make on the document itself but it would be helpful if you could summarise the changes since the last document was published. Please would you consider doing this in future?</p>	<p>Noted. Where appropriate summaries of key changes to Local Plan documents will be incorporated at consultation stages.</p>	<p>No change to the SCI</p>

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013	General Comment	The Respondent's main concern about community involvement is the incomprehensibility of planning 'language' to most people. As the Respondent found when preparing Neighbourhood Plan for Long Compton, people are interested in and keen to have their views taken into account when planning proposals or decisions are made but they are deterred by the terminology so give up. So, wherever possible the Respondent suggests publicity for a draft document or a planning application should start with a couple of sentences or a short paragraph in plain English outlining what the document aims to do and what it addresses before advising that the document should be read in full. In addition, response forms are often unhelpful and confusing to the general public, perhaps inevitably they are designed for planning professionals, so it could be emphasised more strongly that an e-mail or note is acceptable on just the matter the writer is concerned or interested in.	Noted. One of the roles of the SCI is to set out the consultation processes within the planning system in a simplified and transparent way. Through the various consultations methods set out in the SCI, the Council will endeavour to simplify planning information whenever possible and also provide summaries of documents and reports when appropriate.	No change to SCI.
	013 General Comment	The Respondent appreciates this is largely a matter for the Inspectorate, Hearings or Enquiries are very public unfriendly. Interested people are discouraged from attending or giving any views by the 'courtroom' feel and often the presence of solicitors and barristers. Perhaps a day, or	Noted	No change to SCI but comment to be forwarded to The Planning Inspectorate for consideration.

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		even a few hours, could be reserved to hear resident's views, following a short briefing by officers of the main issues they should talk about.		
009	4. Neighbourhood Plans	There is a good deal of detail on consultations required in respect of the creation of a Neighbourhood Plan. There is however nothing on the level of consultation expected when an existing Plan is being reviewed to ensure that it continues to be up to date. Long Compton, as an early Parish with a "made" NDP, is currently considering how it should review the Plan. The Respondent would welcome advice on the subject of consultation being included in your Statement of Community Involvement.	Comments noted. Planning Practice Guidance covers <a href="#">Updating a Neighbourhood Plan</a> and the consultation requirements depending whether the updates are minor (no consultation) or more substantial and require consultation and examination.	Add new sentence to para.4.7 to read as follows: <u>"Details of the process for reviewing a 'made' NDP can be found via the Government Guidance link below."</u>
003	6. Planning Applications	Network Rail is a statutory consultee for any planning applications within 10m of relevant railway land (as the Rail Infrastructure Managers for the railway) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition the Council is required to consult the Office of Rail and Road.	Noted. Table 5 (Process for Planning Applications) states that the Council will notify stakeholders in accordance with regulations.	No change to SCI.

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005	6. Planning Applications	The Respondent would urge that all planning applicants should be required to show clearly on their plans any Rights of Way crossing the land concerned, together with their proposal for temporary or permanent diversion if needed. This would certainly count as "community involvement".	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
008	6. Planning Applications	The planning authority have recently accepted the need to consult with Parishes on meeting conditions regarding materials. Will they also consider consulting with Parishes on other conditions such as Landscaping? The respondent has recently evidenced a change to an original consent where the Condition 1 "in accordance with drawing numbers x, y and z" has been overturned by the submission (in accordance with a different condition) of a landscaping plan which allowed for a doubling in wall height and a complete change to coping design.	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
008	6. Planning Applications	The Parish Council requests earlier sight of applications than at the time of release for consultation. The Respondent has experience of two applications in the past 18 months which were found to be invalid. The Respondent would have more chance to consider (on major schemes) how requirements to meet local issues could be incorporated into the discussion between	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.

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		planning officer and developer. This is particularly relevant where Outline Applications can change significantly when emerging for Reserved Matters but the Parish is told that it cannot seek additional changes (e.g. the footpath to the school on Morris Homes site)		
008	6. Planning Applications	The Respondent requests more time at a Planning Committee meeting for Parish Council representation on significant applications (e.g. where the number of dwellings is greater than a predetermined percentage of the existing number of dwellings).	The issue of timings at Planning Committees is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
011	6. Planning Applications	With the electronic transmission of information, and the access to the e-planning website, this has certainly allowed the Respondent to review applications more quickly and benefits those Planning Workgroup councillors who are registered to receive automatic updates on all submitted applications. <i>As an observation, there have been a few cases where the associated documents haven't been uploaded to the website. An e-mail message to the Planning Department has seen these omissions promptly addressed.</i>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
011	6. Planning Applications	Planning applications are reviewed at either the monthly Planning Workgroup meeting, or the full Town Council meeting. There have been occasions where,	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.

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		<p>because of the consultation response deadline, the Respondent has had to submit a temporary holding response until we have been able to review an application in more detail.</p> <p>For the Respondent, the unique planning applications (home extensions, tree pruning etc.) aren't the priority. The Respondent tends to spend more time and effort on the complex proposals, where consent is being sought for larger development sites. This is because they will have a greater impact on Shipston, by virtue of the impact on the landscape and the infrastructure. For that reason, the Respondent's comments will apply more significantly to these applications.</p> <p>It has been the Respondent's practice to engage with prospective developers in order to seek to influence the proposals for the benefit of Shipston. In the main this approach has proved to be productive. We're aware that the applicants will normally seek some pre-application advice and guidance from SDC.</p> <p>The standard planning application form asks the question 'Has prior advice been sought from the Local Authority about this application?'. If the response is yes, further information is prompted, including the name of the Officer, a reference and date. It then asks for details of the advice</p>		

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		<p>received. As an example, if the reply is 'advice on scale, design and layout', this doesn't tell us much.</p> <p>It's possible this information may be included within any accompanying application papers, such as an Access and Design Statement, but this will be the interpretation from the applicant's point of view. This may not coincide with SDC's.</p> <p><i>The Respondent believes that, to maintain a consistent approach, relevant details of any pre-application advice should be notified to STC as early as possible, as this will help with any dialogue we have with the developers.</i></p>		
011	6. Planning Applications	<p>The Respondent tries to monitor developments on the complex applications, and to maintain on-going contact with developers where it is relevant to do so. However, there are recent examples of applications where the Respondent would benefit from monthly progress reports from SDC. The Tesco Express application on the former garage site on Church Road, and the South Lynn House (London Road) proposal for retirement units are the most recent. With no updates Resondent can only speculate on what's happening, and it means they can't accurately respond to enquiries from residents.</p> <p><i>SDC should consider issuing monthly</i></p>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.

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		<i>update reports on all such applications where there is a significant delay in the decision-making process, especially those where STC has lodged an objection.</i>		
011	6. Planning Applications	<p>The recent announcement that the decision-making powers delegated to officers is to change will have only a limited impact. Where STC chooses to object to an application it will still be referred to the Planning Committee, as it is now.</p> <p>During the Respondent's discussions with developers, there have been a number of occasions where agreement has been reached on such matters as the choice and colour of building materials, footpath linkages to adjoining sites, and flood water run off mitigation measures etc. Some of these are incorporated into planning consent conditions, which makes it easier for us to track compliance.</p> <p>However, this isn't always the case. For example, on the CALA development (former Norgren site), the use of permeable surfaces for the driveways was discussed with the developer and, as far as we can recall, this was agreed.</p> <p>There's no reference to this in the various on-line documentation.</p> <p><i>In the future for clarity, and the avoidance of doubt, agreements between the developer and STC should all be included</i></p>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.

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		<i>as specific conditions, as this will ensure that these aren't overlooked. In addition, it will deliver continuity because, over time, both councillors and developers' representatives will change. A verbal agreement, based on memory or hearsay, isn't worth the paper it isn't written on.</i>		
011	6. Planning Applications	<p>When attending meetings of SDC's Planning Committee, the Respondent make's their representations by way of a prepared script. However, based on experiences and observing other attendees, it's clear that the allotted time of 3 minutes is, in some cases, insufficient to cover the key issues.</p> <p><i>It's suggested that the allotted time be increased from 3 to 5 minutes, to enable more detailed representations to be made.</i></p>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
011	6. Planning Applications	<p>To assist with any final preparations for representations at Planning Committee meetings, access to the Case Officer's report is helpful as it gives us the opportunity to review the key comments. In some cases, this may then influence how we decide to proceed, and may result in us reviewing our position. Usually, the report can be found on SDC's website, but sometimes only a few days before the Planning Committee meeting.</p> <p><i>It's recommended that this be sent automatically to the Respondent, via the</i></p>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.

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		<i>Town Clerk if necessary, as soon as it's ready, to enable the document to be perused in good time.</i>		
011	6. Planning Applications	<p>Normally, direct contact, or even a face to face meeting with the relevant Case Officer isn't required. However, there may be occasions when this would be beneficial to both parties, especially where the Respondent wishes to obtain clarification on aspects of an application. Remember, the Respondent is not an expert, and guidance in some areas would save time.</p> <p><i>It's recommended that SDC Case Officers agree in principle to such meetings, where there is a mutual benefit identified. This will also help build a working relationship between the parties.</i></p>	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
002	Table 5. Process for Planning Applications	<p>In the 2014 SCI, Highways Agency (as Highways England was known at the time) was listed as a 'specific consultation body' in paragraph 3.29, and as a 'Plan Making Consultee' in Appendix 3.</p> <p>In the current draft SCI "Table 5: Process of Planning Applications" states that during the consultation stage of planning applications, <i>'The Council will also consult various statutory and non-statutory consultees, such as... the Highway Authority.'</i> Furthermore, within the 2018</p>	<p>Noted. Agree that it would be helpful to refer to a list of statutory bodies. A link to the relevant list set out within the regulations will be included in Section 2. Development Plan Documents.</p> <p>Consider that highway consultation</p>	<p>Add new paragraph 2.2 to Section 2. Development Plan Documents to read:</p> <p><u>"DPDs are also subject to the 'duty to co-operate' engagement on any cross boundary strategic matters eg. housing, transport and flood risk. The Council will address these issues with neighbouring councils and public bodies<sup>1</sup> to ensure that strategic priorities are reflected in its plans."</u></p> <p>It includes a footnote link to the <u>Town and Country Planning (Local Planning) (England) Regulations 2012 – part 2 Duty to co-operate.</u></p>

<sup>1</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 – Part 2](#)

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		<p>draft, we note there is no direct reference to Highways England and the SCI does not identify a list of relevant statutory bodies with whom the council has a Duty to Co-operate.</p> <p>A Duty to Co-operate list should identify Highways England as such a body to accord with Part 2 (4) (k) of the Town and Country Planning (Local Planning) (England) Regulations 2012. These identify each highway authority within the meaning of section 1 of the Highways Act 1980 as such a body. For avoidance of doubt Section 1 (e) of the Highways Act, as amended by the Infrastructure Act 2015, defines a strategic highway company, for example Highways England, as such a highway authority.</p>	<p>on relevant planning applications is covered by the Process and Requirements outlined in Table 5.</p>	<p>No change to SCI Table 5.</p>
007	Table 5. Process for Planning Applications	<p>Stage 1. Publicity and Consulting on Planning Applications</p> <p>Non-material Amendments:</p> <p>Currently there is no notification to Parish Councils about applications for non-material amendment. We have found on several occasions that devious applicants have made applications as non-material amendments to slip in some outrageous changes to their plans which are far from non-material. Unfortunately un-suspecting and busy or new to the case Officers may miss some of these ploys.</p> <p>Suggestion:</p>	<p>This issue is outside the scope of the SCI.</p>	<p>No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.</p>

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		It would be helpful for Parish Councils to receive a notification - that the non material application has been made with a note to say the Case Officer has determined that it is a valid non-material and no further statutory consultation is planned. A notification of the application would at least allow the Parish Council to be aware of it and bring attention to any key concerns if necessary.		
007	Table 5. Process for Planning Applications	<p>Stage 3. Decision Making</p> <p>Whilst Case Officers' Reports do generally summarise the third party comments and consultation responses effectively, it is not always clear that the reasoning in the Report addresses the <i>key matters</i> that have been raised by third party comments and consultation responses.</p> <p>Committee Meetings. The process of permitting Committee Chairman to extend the Planning Committee Meeting beyond 10pm to deal with agenda items (i.e to consider a planning application which has not yet been started as an agenda item before 10pm) does not instil confidence in the notion that this is a democratic process where our viewpoint can be properly heard and given due consideration</p>	NThis issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
002	7. Permission in Principle	The Respondent notes that although developments suitable for obtaining Permission in Principle (PIP), as outlined	Comments noted. Highways England are a statutory	No change to SCI.

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		in Chapter 7, are unlikely to impact on the safe and efficient operation of the SRN in terms of traffic generation there may be, depending on their location, boundary issues and certain statutory liabilities (relating to noise, visual intrusion, drainage, etc.) which will need to be assessed by Highways England. The Respondent therefore requests that Highways England be consulted on these applications if there is potential for a development to impact on the SRN.	consultee and will be consulted on permissions in principle. This is stated in Table 6. of the SCI.	
010	7. Permission in Principle	Essentially this allows a developer to suggest a site for a development of up to 9 houses, gives the District Council 14 days to say yes or no and then, if yes, the developer puts forward plans - Technical Details Consent (TDC) which, if agreed are effectively planning permission. This is all part of Government attempts to ease planning permissions for developers but can have serious impacts on smaller villages where an additional 9 houses is a major development.	Noted. The process for permission in principle is set out within Government Regulations.	No change to SCI.
010	7. Permission in Principle	The Respondent has concerns with the granting of PIP's bearing in mind what appears to be a very high turnover in Planning staff at SDC.	This issue is outside the scope of the SCI.	No change to SCI but comments to be forwarded to the Council's Development Management Section for consideration.
009	Table 6. Process for obtaining Permission in	SDC's policies in respect of consultation with Parish Councils on planning applications are welcome (as the Council will be aware the Respondent tries to take	The Council will consult Parish/Town Councils on applications for	Add new sentence within Table 6. Stage 2. (Publicity and Consultation, Engagement) to read: <u>"Parish/Town Councils will be consulted on applications within their area for 14 days."</u>

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	Principle	<p>full advantage of the opportunity to comment on applications and, where appropriate, to present their views to the District Planning Committee). The Respondent was disturbed therefore to note that such consultation would not be available for applications for Permission in Principle.</p> <p>Table 5 (Planning Applications) includes the following paragraph:  <i>"The Council will also consult various statutory and non-statutory consultees, such as Ward Members, the relevant Parish/Town Council, the Highway Authority, the Environment Agency and drainage companies. Various interest/community groups may also be notified."</i></p> <p>Table 6 (Permission in Principle) has no such paragraph. Instead it simply says:  <i>"Parish Councils must be notified of the 'terms of the decision'"</i></p> <p>This, the Respondent believes, is wrong. Permissions in Principle seem to this Parish Council to have similar weight to outline planning permission and, as such, are very significant for any Parish affected by them. It is surely inappropriate for there to be no formal obligation on the District explicitly to consult an affected Parish before reaching a decision and, where the Parish and District Officers</p>	permission in principle in their area.	

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		disagree, for the matter to be considered and determined by Members.		
010	Table 6. Process for obtaining Permission in Principle	Table 6.2 implies that Parish Councils will not be notified of applications for PIP and will rely on site notices which often have different consultation dates on them to those shown on the SDC website. Otherwise it relies on Parish Councils continuously checking the SDC website. The Respondent is not comfortable with no communication as it might give no time to consult residents.	The Council will consult Parish/Town Councils on applications for permission in principle in their area.	Add new sentence within Table 6. Stage 2. (Publicity and Consultation, Engagement) to read: <u>"Parish/Town Councils will be consulted on applications within their area for 14 days."</u>
010	Table 6. Process for obtaining Permission in Principle	SDC say they only have 5 weeks to issue a decision so they propose a 14 day period when applications will be posted on the Council web site. This is quite different from the normal planning application process where Parish Councils get email and written notification of applications. Then once a decision is made on the PIP then Parish Councils are notified of the terms of the decision. Too late, developer has already got a bit of a green light and then works up the technical details.	The 5 week timescale is set out within Government Regulations. SDC will consult Parish/Town Councils on applications for permission in principle in their area.	Add new sentence within Table 6. Stage 2. (Publicity and Consultation, Engagement) to read: <u>"Parish/Town Councils will be consulted on applications within their area for 14 days."</u>
010	Table 6. Process for obtaining Permission in Principle	It's not clear what the consultation is for the Technical Details Consent but we would be fighting an uphill battle if we were only brought into the loop once the PIP is granted. The Respondent suggests a Parish or Town Council should be given the 14 days to respond which would still allow for a decision to be made within 5 weeks. The Respondent queries whether	Agreed SDC will consult Parish/Town Councils for 14 days and bank holidays will be allowed for. See above comment.	Stage 2. Publicity and Consultation, Process and Requirements add new bullet point to read: <u>"The technical details application is made public for not less than 21 days for a site notice and 14 days for an online notice during which relevant statutory consultees (DMPO Schedule 4) and interested parties can make representations"</u>

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		the 14 days working days as issues could arise over Bank Holidays or the festive period when SDC is closed for a week as no officer would be available to reply to any questions.		
012	Table 6. Process for obtaining Permission in Principle	<p>Table 6, Section 2 Publicity and Consultation Time.</p> <p>This section states that bodies have 14 days to respond to these Permission in Principle Applications. The Respondent feels that this is unreasonable.</p> <p>The Respondent has sought the advice of their MP, Jeremy Wright and includes his comment:</p> <p><i>Dear Councillor Prior,</i></p> <p><i>Thank you for your email. I apologise for the delay in responding to you. I can understand the Parish Council's concerns. The regulations do allow for a period of longer</i></p> <p><i>than 14 days if agreed with the planning authority. If you have not done so already, it might be beneficial to submit a consultation response to inform the District Council of the Parish's concerns and request due consideration when longer periods are sought.</i></p> <p><i>I will also write to the relevant minister on this.</i></p> <p><i>Yours sincerely,</i></p> <p><b>JEREMY WRIGHT QC MP</b></p>	The Local Planning Authority has a statutory requirement to determine applications for permission in principle within 5 weeks. This is why the consultation period of 14 days is less than the 21 days permitted on a standard planning application.	<p>Add new sentence within Table 6. Stage 2. (Publicity and Consultation, Engagement) to read:</p> <p><u>"Parish/Town Councils will be consulted on applications."</u></p> <p>Stage 2. Publicity and Consultation, Process and Requirements add new bullet point to read:</p> <p><u>"The technical details application is made public for not less than 21 days for a site notice and 14 days for an online notice during which relevant statutory consultees (DMPO Schedule 4) and interested parties can make representations"</u></p>

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		<p><b><i>Member of Parliament for Kenilworth and Southam</i></b></p> <p>The Respondent considers that the 14 days is not compulsory, and asks that the document is changed to give the current time frame of 21 days. This allows local councils to respond with due consideration and better reflects the pattern of meetings in local councils.</p> <p>The Respondent is very concerned that if the timing of 14 days remains, that application will not be considered fully, and planning will go through with possibly detrimental consequences for the Parish concerned. The Respondent's strong representation is that this timing is changed. If it is not, that it is made clear to relevant bodies that they can request and should receive extra time to respond.</p>		