



Revised Statement of Community Involvement

**Consultation on Revised Statement of Community Involvement 21st September – 3rd
November 2023**

Consultation Statement

Stratford-on-Avon District Council

February 2024

Components of consultation undertaken on the Revised Statement of Community Involvement

The Revised Statement of Community Involvement was published on Thursday 21st September 2023 for a six-week consultation period until 3rd November 2023.

The consultation comprised the following:

1. A public notice in the Stratford Herald and the Stratford and Leamington editions of the Observer newspapers, which circulate in the Stratford-upon-Avon and Warwick/Leamington Spa areas;
2. A specific page on the District Council's website providing links to the consultation documents and interactive comments form;
3. Email and letters sent on 21st September to Parish Councils and District Councillors in the local area; agencies and organisations, and residents on the planning policy database that had previously requested communications on Policy matters;
4. Paper copies of the Revised Statement of Community Involvement made available for inspection at the District Council offices.
5. A drop-in session was held on the 23rd October at Stratford-on-Avon District Council offices between 10am – 3pm.
6. A press release was issued on social media channels.

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 24 responses were submitted from individual sources, including statutory agencies, specialist bodies, Parish Councils and members of the public.

The following schedule provides an outline of the comments received through the consultation, together with an assessment of them. It also identifies changes to be made in the final version of the Revised Statement of Community Involvement in response to these comments.

No.	Respondent	Summary of response	Council Response	Amendments
1	Environment Agency	No comments	Noted	No amendments required
2	Nuneaton and Bedworth Council	No comments	Noted	No amendments required
3	National Highways	National Highways request the Council continues to comply with current legislation and consult us on any applications that have the potential to impact the operation and performance of the SRN.	Noted	No amendments required
4	Natural England	No comments	Noted	No amendments required
5	Coal Authority	No comments	Noted	No amendments required
6	National Trust	The National Trust welcomes the consultation on Stratford-on-Avon District Council's revised Statement of Community Involvement. Within Stratford-on-Avon District, the National Trust own and manage Charlecote Park, Coughton Court, Upton House, Farnborough Hall, Kinwarton Dovecote and Earlswood Moathouse, and associated land, resulting in our role as a key stakeholder within the District. The National Trust welcomes the opportunity to continue its engagement with Stratford-on-Avon District Council as a statutory / general consultee on planning applications and relevant planning matters.	Noted	No amendments required
7	Warwickshire Bat Group	The Development Requirements Supplementary Planning Document (SPD) Section N2 says that householders and developers are advised to consult with Warwickshire County Council Ecology Services planningecology@warwickshire.gov.uk before submitting an application. While this is theoretically good, I would also like to see a reference to the free checklist developed by a group of wildlife organisations: https://www.biodiversityinplanning.org/wildlife-assessment-check/	This comment relates to Supplementary Planning Document Part N "Biodiversity and Green Infrastructure" as adopted in December 2018. The current consultation relates to the SCI and is therefore considered that the matter raised is beyond the scope of this consultation. However, amendments are proposed to make links to the District Local List more apparent within the SCI which includes links to the Warwickshire Ecology Website (see responses to consultee comments 12 (3) and 15 and the amendments to para 6.1).	No proposed amendments

No.	Respondent	Summary of response	Council Response	Amendments
8	Resident	<p>Table 2: Process for producing a Supplementary Planning Document (SPD) An example of failing process is the SPD for the Wellesbourne Campus site. We support the development but not the process. This site was in SAP until a decision was made to produce a SPD. During the SAP process, several consultations, analysis and revisions to the the site development proposals were made. Also during SAP the Technical Evidence base for the site was consulted on, analysed and revised and updated. The site development proposals might change but it is unlikely the site Technical Evidence will change. There is very little supporting Technical Evidence for this SPD whereas in SAP the Technical Evidence base is vast. It is not evident that the produced SPD utilised the already consulted on proposals or the site specific Technical Evidence contained in SAP. In the case of Flood Risk (our area of interest) it appears that the SPD actually contravenes the requirements of the adopted Level 2 Flood Risk Assessment for the site. Looking at responses from Statutory Consultees and others to the draft SPD and comparing them to almost identical development proposals in SAP it appears confusion of what was going on was commonplace, and some had obviously got bored being asked to consult on the same sort of proposals again. Nevertheless, we raised comments in the consultation on the draft stage of the SPD to highlight the issues, but it appears our comments were of no interest and not even read.. We even included some interesting photographs and historical references to try and spark an interest but to no avail. There appears little point in us making comments on proposals if the SPD process is not changed and a more thorough review of previous reincarnations of the same development are not carried out. Does this matter? Well maybe is the answer. We have already told you what risks we think you are not aware of, you only have to chose to read our response to the draft SPD, and it also might help if you read your own SAP site specific report.</p>	<p>Table 2 "Process for producing a Supplementary Planning Document" (SPDs) accords with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the requirements for producing SPDs.</p> <p>The Wellesbourne SPD consultation attracted 51 responses from individuals, statutory agencies and organisations including the Environment Agency and Severn Trent Water neither of whom objected or raised concerns regarding flood-risk. The details of the Wellesbourne SPD can be viewed within the Consultation Statement on the Council's website.</p>	No proposed amendments

No.	Respondent	Summary of response	Council Response	Amendments
9	Resident	<p>Covid provided an opportunity to increase the communication with all parties and consideration should be given to retaining the use of stable ICT (information Communication Technologies) to retain enhanced communication of planning matters. As part of the public consultation and in line with NPPF, it is disappointing that there is no mention of community engagement with respect to our heritage assets. Under NPPF the County Planning Archaeologist may as part of a Written Scheme of Investigation (WSI) require local community engagement. However, local planning approval has been given to a number of significant sites where not only has no consideration been given to community engagement or engagement poor, there has been no consultation with the County Archeologist or the local finds register. As a result oversight of planning applications from a historical point has been lacking and certainly not transparent of visible to the local community. I therefore ask you to consider specifically community engagement with respect to local historical / potential historical context, including the use of methods to engage with the Planning Archeologist and any WSI requiring community engagement. Currently SDC do not appear to give much weight to this element within the document or elsewhere.</p>	<p>The SCI sets out the framework and the overarching approach of the council in engaging and consulting with the public be it in relation to the development of Development Plan Documents, development of Supplementary Planning Documents, the review of Community Infrastructure Levy and the processing of pre-application proposals and of formal planning applications. In all instances the authority works closely with key stakeholders including Historic England and Warwickshire County Council (eg County Archaeologist) which are defined statutory consultees who must be consulted in prescribed circumstances.</p> <p>Requirements related to archaeological assessments are set out in the Stratford on Avon Local List. As the development management process the Council has the ability to require (where appropriate) the provision of a Written Scheme of Investigation (WSI).</p>	No proposed amendments
10	Resident	<p>Why do you always have consultation drop in sessions during the day. You are narrowing the public demographic to the retired and the unemployed. It's not much of a consultation if you deliberately exclude everyone that goes to work during the day.</p>	<p>In updating the SCI the Council has utilised a variety of reasonable methods to communicate the public consultation including public notices, emails and letters to organisations and residents, consultation documents available on the council's webpage, paper copies in the Council office together with daytime drop-in sessions. In addition, officers have been available over this same period to answer (email and telephone) any queries the public may have. It is considered that sufficient opportunity has been accorded to facilitate public comment through this consultation.</p>	No proposed amendments

No.	Respondent	Summary of response	Council Response	Amendments
11		<p>CS.21 Development Supplementary Planning Document part W Gypsies and Traveller and Travelling Showpeople October 2021. Section W2 of the above SPD contains a table of additional Gypsy and Traveller and Travelling Showpeople needs between 2019 and 2035. These needs were based on a study commissioned by the District Council in 2019. Section 3.19 of the study indicates that in 2019 the District already had an excess pitch provision of 36% when compared to other local authorities after correction for population density. The current policy of increasing the accommodation provision without regard to its current excess provision further exacerbates the situation. The CS.21 Gypsy and Traveller and Travelling Showpeople SPD accommodation needs should be amended to reduce the excess provision to be similar provision ratios to that of other local authorities after correction of population density.</p>	<p>This comment relates to Supplementary Planning Document Part W "Gypsies, Travellers and Travelling Showpeople" as adopted in October 2021. The current consultation relates to the SCI. It is therefore considered that the matter raised is beyond the scope of this consultation and must await a future time when SPD Part W "Gypsies, Travellers and Travelling Showpeople" is reviewed.</p>	<p>No proposed amendments</p>
12	Councillor	<p>1. Section 1 Introduction In this section on page 4 you refer to consulting with Community Forums. These ended some time before the pandemic in the Wellesbourne District and have never restarted. Including them in an updated document such as this makes no sense. Table 5 Process for planning applications.</p>	<p>1. Community Forums are no longer operating and will be removed from the SCI (paragraph 1.9 bullet 6)</p>	<p>1. Remove bullet 6 in Para 1.9 referencing Community Forums and change Bullet 5 to a sentence.</p>

No.	Respondent	Summary of response	Council Response	Amendments
12 Cont.		<p>2. We are concerned that there is no mention in this of the time frame for consultation. It is our experience that planning applications come to us late frequently not allowing us time to make informed decisions about them. Parish Councils have procedures they must follow and one is that a meeting must be held in person to comment on planning applications. Given that notice has to be given to councillors and the public about meetings, the date for responding is often after the date the meeting can be held. Recently, officers have not been prepared to allow any flexibility in our response not even the day after the closing despite our inability to hold a meeting within the time frame set. Notification of planning applications in our parish and neighbouring parishes should be sent to us at least at the same time that they are posted on the planning portal, not days afterwards.</p> <p>3. In the process there should be some reference to the quality of applications and some uniformity required. Some applications are hand written with hand drawings and little detail whilst others have more detail.</p>	<p>2. Table 6, Part 2 it states "the length of the consultation period will vary depending on the type of planning application but will commonly be 21 days. The Development Management Procedure Order (2015) (Article 22) sets out the period of time allotted for statutory consultees and other consultees to respond to planning consultations. This is repeated in part within Table 5 Part 2 where it states that this period is commonly 21 days. The Council processes are subject to this legislation.</p> <p>3. The SCI sets out the framework and the overarching approach of the council in engaging and consulting with the public. The quality of submissions is a matter that is dealt with not by the SCI but by the Stratford Local List which was last reviewed in 2023 and is available separately on the Council's website. A link is available within Table 5 to the Local List and Paragraph 6.1 is being amended to ensure that potential applicants are aware of the need planning application submissions which are supported by sufficient information and evidence to allow assessment.</p>	<p>2. No proposed amendments</p> <p>3. Amend last sentence of Paragraph 6.1 with “, following receipt applications are checked as part of a validation process against the Stratford Local List (hyperlink) which sets out the supporting documents required depending upon the type and scale of development proposed.”</p>

No.	Respondent	Summary of response	Council Response	Amendments
12 Cont.		4. In the planning process, greater significance should be given to Neighbourhood Plans in this process. All too often it seems that these are side lined by officers despite them have legal weight in the planning process. If an area is not included in a Neighbourhood Plan for development, surely that properly achieved local plan should not be thrown aside by officers in favour of the developer. Too often, decisions appear to be taken with one eye on appeals rather than using the legally weighted Neighbourhood Plan. We would also comment, that this also seems to be the case when an application goes to planning committee	4. The SCI sets out the framework and the overarching approach of the council in engaging and consulting with the public. The authority does give due consideration to Neighbourhood Development Plans in the assessment of planning applications, regardless the material weight given to individual plans and policies is a site specific matter and is not relevant to the SCI consultation which seeks to set out methods and timing of stakeholder engagement.	4. No proposed amendments
13	Town Council	Thank you for consulting us. Moreton-in-Marsh Town Council is happy with the changes.	No changes to be made	No proposed amendments

14	Tiddington Village Resident Association	<p>The TVRA would like to comment on engagement with communities regarding planning applications (Section 6) We would like stratford district council planning department to make the production of a Community Involvement Statement mandatory prior to any planning applications classed as large(greater than 10 dwellings.and mandatory to engage with the Development Department. At present this is advisory and recommended to liaise with the planning development department(table 5, stage1) At present we feel This places stake holders and local communities in a disadvantaged position with repeated applications for larger scale developments being submitted with statutory short notice/comment periods. This places planners,councillors and residents in a difficult position to be able to produce a timely well informed response .</p>	<p>The SCI (Table 5 Stage 1 third bullet) and the Local List already requires that all major developments be accompanied with a SCI in order to meet local validation requirements. Whilst this matter is already highlighted it is proposed that it be more clear within the document by the addition of text in new paragraph 1.3</p>	<p>Include new text 1.3</p> <p>“1.3 Whilst the SCI primarily sets out how the Council will engage with communities in the planning process, it also provides guidance for external groups in undertaking community consultations including for example developers involved in major developments who are required to undertake an SCI and together with neighbourhood planning groups consulting upon Neighbourhood Development Plans.”</p> <p>Modify Bullet 3 of Table 5 to read</p> <p>“• For all major development proposals, the Council expects the applicant to submit a Statement of Community Involvement in order to validate a planning application. The Council’s Local List explains what the Statement of</p>
----	---	---	---	--

No.	Respondent	Summary of response	Council Response	Amendments
				Community Involvement should contain. Major Development is defined as residential development where the number of dwellings is 10 or more or with a site area of 0.5 hectares or more; and for non-residential uses where the floorspace proposed is 1,000 square meters or one hectare or more.”
15	Bishop's Tachbrook Parish Council	Bishop's Tachbrook Parish Council considered the revised statement at its meeting on 12th October. It was is noted that the vast majority of alterations are as a result of removing all changes introduced during the COVID. The one change/enhancement we would like to see considered is about the information an applicant has to supply with an application. The documentation supplied seems to vary widely; some will have a planning statement, some won't. In a recent case when considering two developers plans on next door plots of land on a larger development one had an energy plan, the other didn't. A standard list of documentation would help Parish Councils structure their approach to consultation. In Table 5, Point 2 Publicity and consulting on planning applications - page 23, adding a link to a list of required/suggested documentation would be useful	The SCI sets out the framework and the overarching approach of the council in engaging and consulting with the public. The form and content of planning application submissions is a matter that is dealt with, not by the SCI, but by the Stratford Local List which was last reviewed in 2023 and is available separately on the Council's website . A link is already available within Table 5 of the SCI to the Local List however given the importance of this matter a second link and additional text is proposed for inclusion in para 6.1.	No proposed amendments

No.	Respondent	Summary of response	Council Response	Amendments
16	Resident	<p>I read a letter in the Stratford Herald this week, that said we could use this consultation on the Draft Revised Statement of Community Involvement (21st Sept - 3rd Nov) to comment on the excess provision of Gypsy and Traveller pitches in the Stratford District. The Gypsy and Traveller Accommodation Assessment Update Study that was commissioned by Stratford district council in 2019, indicates in section 3.19 that Stratford District accommodated 36% more Gypsy and Traveller pitches than other regional authorities, when corrected for population density in 2019. Since many authorities that have a pre-existing excess provision of Gypsy and Traveller pitches have adopted a policy of equalisation of pitch numbers to gradually reduce the number of pitches to that of the average of other local authorities, I believe that Stratford District should adopt such a policy of equalisation to reduce the number of Gypsy and Traveller pitches in Stratford District. There are totally unsuitable planning applications currently in progress for Gypsy and Traveller pitches, including in my parish - applications which contravene multiple planning policies. Hence my interest in this matter, and my wish to comment on it. I hope you take my views into consideration.</p>	<p>The current consultation relates to the SCI not to the provision of plots for gypsy, traveller and travelling showpersons. It is therefore considered that the matter raised is beyond the scope of this specific consultation and it would not be appropriate to make any amendments to the SCI on this basis.</p>	<p>No proposed amendments</p>

No.	Respondent	Summary of response	Council Response	Amendments
17	Priors Marston Parish Council	<p>1. Under Table 5, item 2 it is proposed that there is no requirement to advise PC's of amendments or changes to Planning Applications. We do not think that this is acceptable, and don't believe it should be at the Planning Officer's discretion whether these changes are reported to PC's. Much is made of the need to listen to, and consider, the wishes of local residents.</p> <p>2. However, this is totally ignored in the planning process. The financial burden and time involved in preparing a Neighbourhood Plan is well known, and consequently out of the reach of most small communities. Parish Plans are given very little attention despite this being the only affordable way to formally set out the wishes of our residents. Parish Plans need to be given equal status if the planning process genuinely wants to seriously consider the views of smaller communities.</p> <p>3. *The other area of concern is the role of the Planning Committee. I wonder whether having a couple of non council (independent) members on the committee might create a fairer playing field with the Committee less likely to overlook the wishes of Parish Councils and follow the recommendations of the Planning Officer.</p>	<p>1. Whilst there is no statutory requirement to re-notify consultees of amended plans Stratford District Council constitution includes a scheme of delegation for officers. The scheme of delegation gives officers the discretionary authority to undertake re-notification consultations following amendments to planning applications. Such decisions are discretionary because of the need for officers to assess individual circumstances to conclude whether such changes to the scale and nature of the proposal are of material significance. In this context it is considered that the Councils Delegated Scheme is justified given that it provides additional opportunities for stakeholders to offer further comment on amended development proposals over and above those provided for by national statute.</p> <p>2. Parish Plans have an important role to play locally but they do not have the same status in planning decisions as neighbourhood plans. Neighbourhood Plans form part of the development plan which is the starting point for determination of planning applications. Unlike Parish Plans, neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are also tested through an independent examination.</p> <p>3. The political makeup of the Council is outside of the scope of the SCI.</p>	<p>1. No proposed amendment</p> <p>2. No proposed amendment</p> <p>3. No proposed amendment</p>

No.	Respondent	Summary of response	Council Response	Amendments
18	Resident	<p>1. Today your social media team advertised on facebook a drop-in session for the draft Statement of Community Involvement at Elizabeth House at 10am-3pm on Monday 23rd October.</p> <p>2. I questioned whether there will be other sessions as this is during work hours, and so there is a large proportion of the population who will be unable to attend. I was told that there will be no other sessions.</p> <p>3. Considering this is consultation about community involvement, organising it at a time when a large proportion of the community cannot attend seems very short sighted.</p> <p>4. It also means that you cannot claim in your equality impact assessment that you have consulted with a representative area of the local community, which in turn will mean you are failing to meet your Public Sector Equality Duty and could be open to discrimination lawsuits if there are issues with your Statement of Community Involvement that could have been picked up in public consultation. The main issue would be age discrimination as a higher proportion of the population aged 18-65 are employed so unable to attend.</p> <p>5. I, therefore, urge you to put on more sessions at a range of times and accessible locations, and also ensure there are a range of consultation methods including online, paper, phone, and face to face sessions. Collecting the demographic data of those you consult with will also help you demonstrate that you have met your legal obligations.</p> <p>6. SDC does have an equalities contract with WCC who can offer advice on how to consult in an inclusive and legal way. It may be worth you getting in touch with them: equalities@warwickshire.gov.uk</p>	<p>(1-6) In updating the SCI the Council has utilised a variety of reasonable methods to communicate the public consultation including public notices, emails and letters to organisations and residents, consultation documents available on the council's webpage, paper copies in the Council office together with daytime drop in sessions. In addition officers have been available over this same period to answer (email and telephone) any queries the public may have. Whilst it is understood that the variety of methods utilised wont always meet everyone's needs it is considered that sufficient opportunity has been afforded to facilitate public comment through this consultation especially in the context of the relatively minor amendments to the SCI which are primarily designed to remove the extra public safety precautions required during the Covid Pandemic.</p>	No proposed amendments

No.	Respondent	Summary of response	Council Response	Amendments
19	Stratford Town Strategic Partnership	<p>1. The Town Centre Strategic partnership is supportive of the approach set out which demonstrates a clear commitment to find ways to hear the Community's views on key plans and projects. They particularly appreciate the willingness of the Council to engage face to face- a valuable consultation method for all organisations but in particular those, like the Partnership, that represent a cross section of interests.</p> <p>2. What perhaps is less clear in the document is an equal commitment to accountability in the consultation process. We of course make no suggestion that the Council lack this commitment but experience reveals that it is one thing to listen but very much another to ensure feedback on the key points that have been input into the consultation. Something in the document on these lines would be welcome. Getting back on key points is not only reassuring to the consultee but helps to demonstrate that the community has been heard and that there are sound and cogently express reasons why their views may not have been accepted.</p>	<p>1. Noted</p> <p>2. Consultation and engagement is at the heart of the planning process indeed (SI.767) the Town and Country Planning (England) Regulations 2012 Part 5 (Supplementary Planning Documents) regulation 12(a) requires the production of a Consultation Statement which sets out the comments received and how the issues have been addressed. The production of consultation statements ensures that stakeholders can be clear on how their comments have been considered this is made clear in Table 2 which outlines the SPD process. Indeed this current consultation will generate a consultation report which will be presented alongside the final SCI SPD which will demonstrate that the community has been heard and the considerations in accepting or rejecting amendments to the SCI.</p>	<p>1. No amendments required</p> <p>2. No proposed amendments</p>
20	Welford on Avon Parish Council	The Parish Council supports the changes made to the SCI	Noted	No amendments required
21	Napton on the Hill Parish Council	Napton Parish Council has reviewed the Community Involvement document and as far as they can tell this document is just an update to reflect the latest/current situation as regards to the effect on council business of the Coronavirus pandemic being downgraded. The proposed changes are non-controversial so NPC are happy to accept these proposed changes without any negative comments.	Noted	No amendments required

No.	Respondent	Summary of response	Council Response	Amendments
22	Bishops Itchington Parish Council	The parish council would appreciate, as a statutory consultee, a longer period of time (one calendar month) to respond to planning applications to make it easier to fit in with parish council meeting schedules	The Development Management Procedure Order (2015) (Article 22) sets out the period of time allotted for statutory consultees and other consultees to respond to planning consultations. This is repeated in part within Table 5 Part 2 where it states that this period is commonly 21 days. The Council processes are subject to this legislation.	No proposed amendments
23	Resident	<p>1. I am concerned that you are making planning issues even more complicated to let in the greed and disruptive elements of the development industry with a view to putting wealth in their pockets and reducing the resident abused population of quality of life.</p> <p>2. You have not defined what a stakeholder <u>(Redacted Text)</u></p> <p>3. Look at Bidford, houses built that cannot be occupied! You passed the planning!</p> <p>4. The planet is over populated.! Earthquakes and other events are occurring. <u>(Redacted Text)</u></p>	<p>1. These matters are beyond the scope of the SCI consultation.</p> <p>2. The draft SCI does not define the meaning of stakeholders but does give examples of the groups that may constitute Key Stakeholders in Table 5 Stage 1 as Ward Members (District Councillor); Parish / Town Councils; Owners/Occupiers of neighbouring land and local community groups and organisations. It is agreed that the inclusion of a stakeholder definition would be beneficial to the reader. An explanation of the word stakeholder has been included within para 1.2 of the SCI.</p> <p>3. These matters are beyond the scope of the SCI consultation</p> <p>4. These matters are beyond the scope of the SCI consultation.</p>	<p>1. No proposed amendments</p> <p>2. Insert new para 1.2 “1.2 The SCI identifies the types of stakeholders Stratford-on-Avon will engage with including residents, businesses, organisations, politicians, government agencies and other individuals and groups with an interest in development here in the District.”</p> <p>3. No proposed amendments</p> <p>4. No proposed amendments</p>

No.	Respondent	Summary of response	Council Response	Amendments
24	British Horse Society	Pre-application discussion with organisations such as the British Horse Society are welcomed. Although developments may not impact directly on Rights of Way, there may be opportunities to connect between bridleways etc and to provide multi-user paths rather than excluding equestrians from plans at the outset.	Noted	No amendments required