

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

LETTERS

Name of Respondee:
Contact and Organisation Name

Response Code:

LET Letters (pages 1 – 39)
FP Statutory Consultees
FY General Consultees
FB LSP comments
FG Parish Councils
FI Councillors & MP
EM email responses
(and date or the order received)

Comments:

Sarah Hunt
Northern
Division
Government
Office for the
West Midlands

LET 18/08/04

Thank you for sending me a copy of your draft SCI.

Overall, I consider the quality of the document to be good. Both the structure and content of the document are very clear and I support the authority's recognition of making a "step" change from community consultation to community engagement.

I do, however, have concerns over the length of the document (including the appendices). Government guidance advises that SCIs should be approximately 10-15 pages in length. Whilst the main body of the SCI is of a broadly acceptable length (19 pages) the appendices extend to an additional 70 pages. I would advise you to reconsider which of the appendices are necessary for inclusion within the SCI and which could be included in a more succinct format.

Detailed comments on the document are set out below:

Section 1

This Section should include the SC1 as one of the types of documents being consulted upon within the Table on Page 1.

Vision

My understanding is that the vision should specifically refer to the Council's vision in respect of engaging the community in the planning process. This is different to a vision for service provision more generally. It may be possible for your authority to develop a corporate vision on community engagement or for a shared vision to be developed with the LSP. You may also wish to explain what the Council is hoping to achieve through community involvement.

Section 3

Paragraph 3.3 sets out a series of criteria to assess the soundness of the SCI, which largely reproduce the criteria set out in the draft of "Creating Local Development Documents". Given that this section already refers to these criteria being set out in Government Guidance, there is no need to duplicate them within the text.

Whilst the pro-forma's to establish that LDDs and significant planning applications have been produced in accordance with the SCI may greatly assist with providing an audit trail and evidence of compliance, you may

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Section 4

Paragraphs 6.2 and 6.3 identify the community groups that will be involved in the Local Development Framework (LDF) process. It would be helpful if the purpose and composition of the group was briefly explained. You may wish to specifically refer to Parish Plan and Village Design Statement groups and how they will feed into the plan-making process.

A list of standard consultees is included as an appendix for significant planning applications. The SCI should also include a list of the groups who will be consulted on different types of LDD. Draft Regulations and Annex D of draft PPS12 set out a list of statutory consultees. Draft PPS12 also provides a wider list of bodies the authority may consider consulting. You may wish to build on the information within Section 6 to include a list of the types of groups the authority proposes to involve, and to explain how such a list will be kept up-to-date.

Section 8

This section identifies the “hard to reach groups” within the District. Through what methods and at what stage in the planning process these groups will be actively engaged should be included (see comments to Appendix 11).

Section 10

I welcome the inclusion of performance indicators which will be used to inform the review of the SCI. This section could be expanded to set out how the results of community involvement will be fed into the preparation of DPDs and SPDs.

Section 11

This section refers to identifying opportunities for joined-up approaches to community involvement with other Council Services. This joined-up approach could be extended to include the LSP and work on the Community Strategy.

Section 13

It may be helpful to include a simple diagram of the LDF components within this section or to include a reference to the ODPM's simple guide to the Planning System (forthcoming).

Section 16

The thorough approach to dealing with significant planning applications is welcomed. Whilst I am not aware of the content of the Development Control Customer Charter you may consider whether it would be appropriate to incorporate it within the SCI?

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Section 18

Regional Planning Guidance for the West Midland was issued in June 2004. It is no longer a draft document.

Appendix 3

Whilst this document is very clear, it does not make mention of the Issues and Options stage which forms part of the production stage (see Figure 4.1 of draft PPS12). I am unclear as to why the draft SPD does not link to the LDs in the same way as the SCIs and DPDs.

Appendix 4

This appendix provides a thorough audit of consultation techniques. I am not clear how the results of this audit have informed the proposed consultation methods included at Appendix 11. This audit should be used to identify which types of involvement are appropriate for different Local Development Documents.

You may wish to include reference to the “area forums” that are referred to at Appendix 9.

Appendix 7

You may wish to clarify that the consultation list applies to “significant” planning applications.

Appendix 8

This diagram is clear and helpful. I would prefer to see a two-way communication between the forward planning team and the LSP.

Appendix 11

I consider that this appendix could be made more succinct, possibly by incorporating the information into a single table. I would advise you to principally concentrate on providing the following information:-

- (i) which groups that the authority will engage;
- (ii) at what stage(s) in the planning process
- (iii) what methods of engagement will be used

As currently drafted I consider there is insufficient guidance explaining the type of involvement that particular groups can expect to occur and as such there is limited evidence that the SCI reflects local circumstances. In addition, whilst “hard to reach” groups have been identified, the SCI does not explain “how” the Council intends to engage them in the planning process (ie at what stage and through using what methods).

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In recognition of the Government's emphasis on "frontloading" the preparation of LDDs, you may wish to consider the use of methods which will actively "engage" people during the early preparation stages. You may also need to widen whom you engage at an early stage as the emphasis at present appears to concentrate on statutory bodies. In terms of the procedures to be followed in the production of the SCI, I understand that the Government is looking to simplify this process. The requirements for SCI preparation will be contained within the forthcoming Regulations and PPS12 which are expected to be available early in September.

I trust these comments are helpful. Please contact me if you wish to discuss any matter in further detail.

M J Pope

LET 5 - 13/10/04

You wrote to me on 6 October enclosing various publications regarding the above matter and asked for my comment.

I do not propose to comment in detail quite simply because I cannot comprehend the ludicrous jargon. How you can possibly expect Joe Public to consider this document I do not know. Why don't you re-issue it in plain simple English?

Design
Consultant
Associate

LET 7 - 25/10/04

Thank you for your letter and enclosures dated 6 October 2004 relating to the above.

The details contained with the letter and statement may not directly involve or affect the above Internal Drainage Board. Therefore a response from them would not be appropriate.

John Clark
Conservation
Officer
The Garden
History Society

LET 8 - 14/10/04

Thank you for your letter of 6 October 2004.

The Garden History Society believes that the importance of parks, gardens and landscapes of historic or architectural interest should be recognised and supported by the inclusion of policies for their protection in local plans. Under PPG15 (2.26) local planning authorities have a significant role in the conservation of the wider historic landscape and should define planning policies for the countryside taking into account the historic dimension of the landscape. We would, therefore, argue that the protection of undesignated historic parks, gardens and landscapes is covered by this guidance and local development plans should, therefore, incorporate appropriate policies or guidance.

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The Garden History Society would ask you to include a single policy in the plan to afford protection to all the historic parks and gardens in the plan area including the sites of national importance on the English Heritage Register and those of local interest on the local register of historic parks and gardens. We would also ask that your policy indicates that there is a presumption against enabling development to accord with the English Heritage Policy Statement “Enabling Development and the Conservation of Historic Assets.”

The policy might be worded as follows:

“Development, including changes to the existing land form, will not be permitted which would adversely affect the character, appearance, amenity or setting of any of the historic parks gardens and landscapes in the English Heritage Register or the Local Register. Particular attention will also be paid to the protection or enhancement of views into or out of a registered park or garden.

John Clark
Conservation
Officer
The Garden
History Society

Proposals for the restoration of these parks, gardens and landscapes will be encouraged, provided that it is based on thorough historical research. There shall be a presumption against “enabling development” in these parks and gardens.”

Your Council may also like to consider preparing Supplementary Planning Guidance for historic parks and gardens. If so The Society would be pleased to offer help and advice.

Robin Tetlow
Tetlow King
Planning

LET 10 - 20/10/04

We represent the West Midlands RSL Planning Consortium, which is supported by the National Housing Federation West Midlands and includes leading registered social landlords (RSLs) active in the Staffordshire area, with a concern that opportunities for the provision of social/ affordable housing are optimised over the plan period.

Tetlow King Planning has extensive experience of the interrelationship between social/affordable housing and the development plan system. We are retained by the National Housing Federation and the Housing Corporation, and have acted for over 250 RSLs and over 50 local authorities to advise on land, planning and housing issues. In particular, we have acted for the National Housing Federation and leading member RSLs in relation to more than 200 development plans over the past nine years. Government Ministers have encouraged RSLs to become directly involved in the planning process, and see it as an important means of enabling social/ affordable housing provision.

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Our representations are as follows:-

Purpose of the Statement of Community Involvement (Draft SCI page 1)

We support the SCI intention of ensuring that all sections of the community and other interested parties have an opportunity to engage with the plan making process.

Draft Statement of Community Involvement Vision (Draft SCI page 2)

We fully support the Council's vision.

Statement of Compliance Proformas (Draft SCI page 4 and Appendix 6) and Statement of Compliance - Planning Applicants (Draft SCI pg 4 and Appendix 6)

We support the Council's Statement of Compliance proformas and their intention to producing Statements of Compliance ensuring that the Authority and applicants of significant planning applications have met the requirements of the Statement of Community Involvement.

Hard to Reach Groups - Mechanisms (Draft SCI page 7)

We fully support the Council's draft mechanisms for seeking engagement by hard to reach groups.

Performance Indicators (Draft SCI page 8)

We consider that the performance indicators in the Draft SCI are appropriate for measuring the effectiveness of the consultation process.

Techniques for publicising Significant and Fast Track Planning Applications (Draft SCI pages 16-17)

We fully support the suggested techniques for publicising significant and fast track planning applications.

Techniques for Local Development Documents consultation and participation (Draft SCI pages 9-12 and Appendix 11)

We consider that all the techniques recommended for consultation and participation on Local Development Documents are appropriate.

Techniques for Significant Planning Application Consultation and Participation (Draft SCI page 16 and Appendix 13)

We consider that all the techniques recommended for consultation and participation on significant planning applications are appropriate.

We would wish to be consulted at all stages of the production of the Local Development Framework. We would like to establish a meaningful dialogue with the Council as the LDF progresses. Registered Social Landlords are the main providers of affordable housing and it is important that their views are heard on affordable housing and planning issues.

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Ann Bagehot
Secretary
The Gypsy
Council for
Education,
Culture, Welfare
and Civil Rights

LET 13 - 21/10/04

We have received a copy of your Draft Statement of Community Involvement. Having quickly looked through this, there appears to be no specific mention of Gypsy and Traveller families, on sites and unauthorised encampments, and how they will be included in the consultation process.

We did write to you on the 9th October 2004, after receiving the Stafford Borough Local Development Framework, again pointing out that we could not find the relevant section on the provision of sites for Gypsy and Traveller people and asking if you would send us copies of the relevant documents. To date, we have not received a reply from you. We would, therefore, be pleased if you could send us the requested information, together with;

- Policy on managing unauthorised sites
- The management structure and lead department dealing with the provision of legal caravan sites
- The policy in the Structure Plans for the provision of sites
The policy under the Homelessness Act 2000 for preventing homelessness among Gypsy and Traveller families, and that means sites as well as bricks and mortar
- An estimation of the level of Gypsy and Traveller families in bricks and mortar
- The policy under the Race Relations Act on not only preventing racism towards Gypsy and Traveller families, but positively promoting good relations and social inclusion in the future.

We enclose a copy of the latest government figures for Stafford. *** See attached page at back.

The Gypsy
Council for
Education,
Culture, Welfare
and Civil Rights

LET 13 - 9/10/04

Thank you for consulting us on the above. However, we cannot find any relevant section on the provision of sites for Gypsy and Traveller people. Could you please be kind enough to send us copies of the relevant documents?

Thanking you in advance for your kind co-operation.

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Commission for
Racial Equality
News Release

LET 13 - 18/10/04

No Room in Britain for “Respectable Racism” says CRE Chief Trevor Phillips

Gypsy and Traveller Scrutiny Launched by CRE

The Commission for Racial Equality (CRE) today called on councillors, council officers, police officers, Gypsies and Irish Travellers and support bodies, to help them to find out what local authorities are doing to promote race equality in relation to Gypsies and Irish Travellers. The research will focus on planning, site provision and eviction.

Trevor Phillips, Chair of the CRE said: “Discrimination against Gypsies and Travellers appears to be the last “respectable” form of racism in Britain. There is no room in Britain for discrimination of any kind. And yet complaints of racism from Gypsies and Travellers are on the increase.

“We need to find out exactly what is happening on the ground in local authorities - are they providing sites? If so, are these close to basic facilities such as schools and health services? Are they addressing the needs and responsibilities of all groups within their areas? Do they play an active role in minimising any tensions that arise between Gypsies and Irish Travellers and other communities? We also need to know where local authorities are solving problems and managing to provide decent services for Gypsies and Travellers.”

The CRE is interested in hearing from people who have information on local authority planning policies and practices, site management, eviction and homelessness provision. The CRE will also look at the use of police powers of eviction and the effect of accommodation provision on education and health.

In particular we are interested in hearing from you:

- Councillors
- Local authority officers, especially those with responsibility for Gypsies and Irish Travellers
- Gypsies and Irish Travellers
- Members of the public
- Police officers
- Social workers and health professionals working with Travellers
- Traveller education services
- Community Support groups and race equality councils

The evidence will assist the CRE in establishing where there are barriers to change, what good practice currently exists, and what guidance is needed. Trevor Phillips emphasized the need to consult with all communities during the exercise.

“The CRE’s top priority is to secure better site provision - with this issue being identified by many Gypsies and Travellers as the most significant problem facing them in Britain today. There are not enough sites and those that exist are often in polluted environments far from

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public services”.

PJ D Goode
Hon Technical
Adviser
Campaign to
Protect Rural
England

LET 14 - 19/10/04

Responding to your letter dated 6 October 2004, the following are our responses:-

- Will you please note the change of name of our organisation' the initials CPRE remain unchanged.
- Despite the intention behind the document of a “step change” from community **consultation** to community **involvement**, it is not clear how the new system will secure **input** from the stakeholders in formulating proposals.
- **“Hard to Reach” groups.** It seems unlikely that the measures suggested in the table on page 7 will actually engage with the groups identified. We would recommend that the most important measure to be taken would be the identification of a technical staff member with outstanding communication skills to be the accepted link with the Local Strategic Partnerships. Such a named staff member should have a high publicity profile, not necessarily be a senior official but possess high qualities of empathy with these groups.
- **DPDs, SPDs, etc page 12.** It is of major importance that these documents should be finely tuned to be, of above all else, comprehensible to the layman. Without this there is no “community involvement”. The principle that the documents follow, and their basic reasoning and common sense should be transparent. If technical documents cannot easily be so treated, they should be accompanied by explanatory pamphlets. Such documents should be locally accessible to each community, and display sites should be set up and maintained in concert with Parish Councils. Such display sites should be located as part of a recognised and immediately accessible community building.
- **“Fast-Track” system, 14.2, page 3.** CPRE has strong reservations regarding the proposal for a “fast-track” system, and the choice of categories of development to benefit from such an approach. The development classes identified are by their very nature those most contentious, likely to give rise to greatest public concern and involving the greatest need for widespread consultation - or “public involvement”. The criterion for their selection seems to be entirely economic - which will be seen by the public as deferential to business interests - whereas the types of development of greatest **public** interest and concern will be those with high-profile environmental or public impact.

We would recommend a fundamental re-think of this approach which appears to run counter to the purpose of the document. It is

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suggested that rather than a “fast-track” system, specifically important development classes should rather be classified as those of **high public concern** to which staff resources will be prioritised.

- **Media** It seems obvious that press publicity should not be confined to the Staffordshire Newsletter, but should include the Sentinel for the northern part of the Borough and the Express and Star for the southern part. Free distribution papers may well have a greater circulation than these. Press notices and releases should be popularly readable, pithy and refer to fuller sources of information, and should avoid classification into the “official release” columns which go largely unread.
- **Pre-application discussions and “Front Loading” the Process.** There is a perhaps unworthy suspicion that pre-application submissions and objections are currently largely ignored, and that it is only when publicity and press attention is secured that these matters are properly addressed. By that time it is usually too late for change, decisions are “bulldozed” through and public cynicism over the whole process becomes ingrained. The whole democratic system is dishonoured and discredited. This may well be the most significant short-coming of the present state of community involvement.

The iniquities of the suggested “fast-tracking” of certain applications seems set fair to compound this problem.

- **Community Involvement Ambassadors** CPRE upholds the suggestions that Councillors should be so involved, but considers that a technical input is also needed to explain the intricacies, policies - and trade-offs in relation to the quasi-legal planning process and underlying principles. It is unreasonable to expect Councillors to undertake this role in addition to their overall duties as their constituents’ representatives.
- **Citizenship Lessons and Stafford BC Schools.** This is an eminently worthy procedure - and requires teachers of some genius to undertake it! The essential ingredient is an understanding by such teachers of the **principles** that underlie the planning process, **how** they can be implemented and **what** can be achieved. We are not wholly convinced that the planning machine itself can boost such an understanding, and that the process has consequently become a largely unthinking imposition of outside rule unrelated both to specific local conditions and indeed to the intended objective.

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Conclusion

CPRE understands the constraints imposed, notably by Government, that require the initiative of community involvement. Insofar as that process is brought about by greater understanding of planning issues, we take leave to doubt if its enormously increased complexity and volume of information will not be counter-productive and remove most of the community yet further from involvement. The need for a potential additional layer of staff, suitably qualified to conduct community involvement, is a further obstacle.

Lauren Tierney
Public Sector
Duty
Administrator and
Stakeholder Co-
ordinator
Disability Rights
Commission

LET 19 - 29/10/04

Thank you for your letter to the Disability Rights Commission inviting us to submit a response to the Draft Statement of Community Involvement.

I am afraid that we are unable to comment on individual strategies, but if you would like further information about Local Authorities and Disability Issues, we have an email bulletin which we send out three to four times a year.

If you are interested in receiving this, please forward me the relevant email address and I will add it to our database. This can either be done by email to Lauren.Tierney@drc-gb.org or by telephone on 020 7543 7032 (direct line)

Sarah Hunt
Government
Office for the
West Midlands

LET 22 - 11/11/04

Planning and Compulsory Purchase Act 2004 - Stafford Borough Council - Consultation on Draft Statement of Community Involvement Thank you for consulting the Government Office for the West Midlands on the draft Statement of Community Involvement (SCI) prepared by Stafford Borough Council.

As you are aware, I made a number of comments on an earlier draft of the SCI in a letter dated 16 August 2004 during your informal consultation with the Government Office. I attach a further copy of this letter for your information. Please treat the comments contained within this letter as representations made under the current Regulation 26 statutory consultation period. Given the emphasis on frontloading within the new planning system it is disappointing that your Council has not incorporated any of the changes suggested in my earlier letter prior to undertaking consultation with the wider community. This would have given the community greater opportunity to comment on any such changes made. May I remind you that final Regulations and PPS12 on Local Development Frameworks were published in September 2004. Please ensure that the requirements set out therein are fully taken into account in your submission SCI.

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In particular I would advise you that the SCI is now required to set out how the community will be involved in the consideration of planning applications, not just significant applications. Details of how your local authority will be able to resource and manage community involvement, including a clear understanding of the roles of members and officers should also be provided. Creating Local Development Frameworks has also recently been published. Section 7 provides guidance on managing community involvement which should be taken into account.

You will be aware that a consultation document on "Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks" was published in September 2004. You may wish to set out how the local community and stakeholders will be engaged in the production of the Sustainability Appraisal within your SCI.

I hope that these comments are helpful to you in preparing your submission SCI. I would, however, remind you that the key milestones for its production, as set out in your Council's revised submission Local Development Scheme have not yet been agreed with PINS and the Government Office.

Adam Smith
Malcolm Judd &
Partners

LET 27 - 15/11/04

Local Development Framework for Stafford

You recently published a Draft Statement of Community Involvement. We monitor development plans on behalf of National Grid Transco, as well as other clients in a range of fields, including the education and retail sectors.

We have been included on your consultation list for previous development plan publications, and although we do not have any specific comments at this stage we would wish to be included in consultation exercises on all future development plan documents. Our preferred means would be to receive hard copies of draft documents sent by post (address above).

Please contact me if you have any further questions.

Dr Anne Andrews
(Parish Clerk)
Ingestre with
Tixall Parish
Council

LET 26 - 15/11/04

Draft Statement of Community Involvement

Further to your correspondence of 6.10.04.

We are a small Parish Council who only meet 6 times a year. It is therefore difficult for the whole Council to discuss a 69 page document and complete a 7 page response during a meeting. In order to involve the whole Council as much as possible, I normally prepare a draft response, highlighting the areas of special interest to our Council and suggesting possible responses we might wish to consider. This is then circulated, discussed at the meeting, and amended as required.

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We are especially concerned at the implications of front-loading, p17, involving planners and stakeholders in pre-application discussions as we are concerned that it will then be very difficult to refuse an unsuitable or inappropriate application.

Unfortunately your lengthy green form is too complicated, incomprehensible and time consuming for us to complete; we therefore attach our agreed comments to your consultation document as an A4 sheet.

(Replacing Local Plan)

P11 13.7 "...Civic Society Groups will be approached when the Historic Development Plan Document is being consulted upon and Environmental groups ... For the National Environmental Development Plan". Need to contact Stafford Borough Heritage Groups for both of these. Environment and history are directly linked, eg Ingestre and Tixall Local History Group is interested in both the local environment and its history.

13.8 "Parish Councils specifically targeted for their views (and Village Committees)" We welcome consultation with the Parish Council, but are not sure what is meant by Village Committees - would this include Parochial Church Councils?

p14-15B Significant Planning Applications requiring public involvement: Those which:-

1(a) - Fall marginally below the thresholds of Tiers 1 and 2 (Tier 1 includes departures from the agreed Local Development Plan and Town and Country Planning guidelines; Tier 2 includes those with a significant effect on the environment due to their nature, size and location, and those in green field land

(b) require an element of affordable housing

(c) require any developer contributions

2 - Development proposals for sites "sensitive" to development pressures, eg

(a) are near a Listed Building

(b) demolition in a Conservation Area

(c) loss of employment land for housing

(d) development of windfall sites

p15 Fast Track decisions for IT companies, etc. There is a need to safeguard Conservation Areas, traffic impact, etc

p16 Community Interest Groups are able to sign up for consultation on major planning applications per wards related to their special interest or specific local area. Eg CPRE, Mid Staffs Archaeology Society and Staffordshire Industrial Archaeology Society.

p17 Front Loading - involving the community and stakeholders at an early stage before formal submission of application. May then be difficult to subsequently oppose applications - tension between collusion and bribery.

Parish Councils: 15.9/10 Information already available to the public in

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Ingestre and Tixall, eg in non working hours. Time frame for adequate consultation on significant amendments can be a problem.

16.1 Planning Guide has limited information from planning portal website p19 18.2

Planning Websites

<http://www.parliament.uk/index.cfm> gives access to the various stages of the Planning and Compulsory Purchase Act.

www.planning.odpm.gov.uk/index.htm Lots of Planning Guidance and advice eg Lighting in the countryside.

<http://www.planningportal.gov.uk> various general basic planning information

www.go-wm.gov.uk/RPG Regional Planning Guidance for the West Midlands

Mandip Dhillon
Assistant Planner
RPS

EM 8 - 17/11/04

Representations on behalf of BT Group Plc

Please find attached representations to the following Papers:

- Core Strategy Development Plan Document
- Draft Statement of Community Involvement

All of the above representations have also been posted through to the Local Planning Authority.

We have been instructed by our client BT Group Plc to submit representations to the Stafford Borough Local Development Framework, Draft Statement of Community Involvement.

Our client's principle concern is the ongoing provision, maintenance, repair, renewal and enhancement of a comprehensive telecommunications service. It is therefore essential that the Local Plan promotes such activity in line with Government guidance.

Allied to this, our client is the beneficial owner of a varied portfolio of land and buildings in the District and it is possible that as a result of advancing technologies and better work practices, some opportunities will arise for the release of these in whole or in part during the emerging plan period. As such, it is important that the LDF should also acknowledge the potential benefits or re-using and redeveloping sites in line with Government guidance.

Telecommunications

The continued supply and development of communications technology is a fundamental component of the Government's sustainable strategy helping to reduce the need to travel. PPG8 should be used as guidance for writing the policies. Paragraph 39 of PPG8: Telecommunications, August 2001 identifies that criteria in policies of local plans should be

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“Flexible enough to allow for the efficient development of the network and the demands imposed by the technology”

Paragraph 40 of PPG8 recognises that local plans should include general policies on:

“The siting and external appearance of apparatus including any location and landscaping requirements designed to minimise the impact of such apparatus on amenity, without inhibiting operational efficiency;”

It is suggested therefore that the next stage of the LDF should contain a strong presumption in favour of supply of telecommunications services, including the development of existing services. It is suggested that the telecommunications policy should read along the lines of that set out below:

“Planning permission will be granted for telecommunications development. Where there is potential conflict with environmental objectives, telecommunications development will be allowed providing:

- **It is sited and designed so as not to result in significant adverse impact, subject to operational and technical requirements**
- **There are no satisfactory alternative sites for telecommunications available**
- **There is no reasonable possibility of sharing facilities**
- **In the case of radio masts there is no reasonable possibility of erecting antenna on an existing building or structure**

It should also be noted that the suggested policy deliberately and properly excludes mention of health issues or a precautionary approach to the siting of mobile phone installations. BT feel that such aspects are fully and adequately described within PPG8 and most importantly would draw the Council’s attention to the references to the IEGMP report of 11/5/00 in Paragraph 89 which states:

“... the report concludes that “the balance of evidence indicates that there is no general risk to health ...”

And paragraph 94 which emphasises,

“It is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime...”

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Re-use/redevelopment

Where property or land is no longer required for telecommunications purposes it is important that LDF policies allow consideration of viable alternative uses to prevent it from becoming vacant and falling into dereliction. In this respect we suggest that in the next stage of the LDF there should be a policy supporting the reuse and redevelopment of previously developed sites.

Emerging Government guidance, including PPG3, fully supports this by advocating making more efficient use of land and reducing pressure on greenfield sites. Furthermore, BT consider that such a policy should be flexible enough to assess each site on its merits such that it takes account of all relevant factors, including contributions to windfall housing supply or promotion of employment, retail, leisure and other opportunities.

I trust that these comments will be taken on board during the preparation of the LDF. However, should you require clarification on any matters raised above, please do not hesitate to contact me.

Sheena Terrace
Planning Aid Co-ordinator
West Midlands
Planning Aid
Service

EM 18 November 2004

Comments on Stafford Borough SCI

(1) Reference to WMPAS. Please find below the suggested paragraph that has been included in other SCI.

West Midlands Planning Aid Service provides free and independent advice on town planning issues to community groups and individuals who cannot afford professional fees. It is part of the Royal Town Planning Institute. It is a charitable organisation independent of central and local government. It has paid staff as well as a strong volunteer network.

Planning Aid can enable communities and prepare them for their involvement with local authorities and the development plan process. The more people know about and understand the planning system the easier it is for them to make a contribution to it. With additional funding from central government the focus for the new expanded Planning Aid Service will be as an outreach service working with communities.

The District Council will continue to engage with WMPAS involving the service at key stages in the preparation of its plans and strategies in order to maximise local community involvement. WMPAS can achieve this through for example providing advice and training on the new development plan process and assisting groups and individuals in preparation of their proofs of evidence.

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Contact WMPAS, Unit 319 The Custard Factory, Gibb Street,
Birmingham B9 4AA
0121 766 8044

wmcw@planningai.rtpi.org.uk

wmcp1@planningaid.rtpi.org.uk

(The CCB project has now finished.)

(2) It needs to be clear what you mean by engage, is it inform, consult, involve or collaborate?

(3) Needs to be clear that you are looking for comments not only on the SCI but also on how people want to be consulted.

(4) It is rather limited on how you will reach "hard to reach groups"

(5) How will the LPA feed back to community groups and keep them informed?

(6) Could not find a mention of resources and implementation. Resources in particular could be important to community groups.

(7) Not clear in main document that there is an onus on developers to have pre application discussions on certain applications.

(8) Understandably there is a lot of cross referencing between the main document and the appendices; therefore the emphasis for consultation for the community must be the simplified condensed version.

(9) The condensed version that goes out to the public may have more relevance for us to comment on.

Raleigh Hall
Properties Ltd

LET 28 - 19/11/04

Draft Statement of Community Involvement

Thank you for your letter of 6th October inviting representations on the Draft Statement of Community Involvement.

I enclose the completed Draft Statement Response Form as requested.

I think the emphasis on sustainability of resources must be encouraged, primarily through waste management and transportation issues and hope to have the opportunity to incorporate my suggestions in the Local Development Framework.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Defence Estates **LET 29 - 19/11/04**

Draft Statement of Community Involvement

We thank you for your letter of 6 October together with enclosures and duly obtained a copy of the Draft Statement of Community Involvement from the Borough Council's website. We should like to thank you for inviting us for our views on the Draft Statement but would advise that we have no comments to make at the present time.

Stafford Borough
Labour Group **LET 44 - 22/11/04**

Draft Statement of Community Involvement

I have been asked to write by the above Group to put forward a number of areas we feel the Statement can be improved. We are aware that in any document such as this there will always be a lot of legal and technical language. Many people in the community may want to have an overview of what is being proposed but will be put off by the jargon. We would like to propose that a summary of the main thrust of the document is produced by the lay members of our community. If they then want to have more detail they can have the document in full.

I would like to move on to more specifics

(1) One of the major areas of concern is the constant referral to appendices ie when reading 4.4 of the Statement you are referred to appendix 6, when you get there are referred on to appendix 11. There must be some way of reducing this constant back and forward.

(2) In section 7.0 Stafford Borough Councillors are referred to as "ambassadors", our Group take exception to this; we are Councillors and already have a community leadership role. We do not need a new title.

(3) We take exception to the term "disabled people". Some of us and the people in our communities have a disability; this does not stop us functioning satisfactorily. The accepted term is "people with a disability".

We have agreed that producing a document like this is a difficult task. Trying to meet the needs of all in our community is almost impossible. One of the major priorities is to reach the "hard to reach groups" in its present form we do not think it will achieve that aim.

We have tried to be constructive and hope that this letter and our submission will add value to the process.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Peacock and
Smith

LET & FAX 45 - 22/11/04

Draft Statement of Community Involvement, October 2004 Comments on Behalf of WM Morrison Supermarkets Plc

With reference to the above, and on behalf of our clients. WM Morrison Supermarkets plc, we write to thank you for consulting us on the draft statement of Community Involvement.

Wm Morrison Supermarkets plc are a major food and grocery superstore retailer who have recently acquired the Safety store at Church Street/Mill Street, Stone and are a significant employer in the Borough.

Wm Morrison Supermarkets plc thank the Council for the opportunity of commenting on the draft SCI. As an employer and operator of a significant retail facility in Stone, they confirm that they would like to be kept informed and consulted of further stages of preparation of documents which are to comprise the LDF. In particular, they wish to be informed of any potential Area Action Plans which may be prepared for Stone.

In this regard, we would be grateful if you could ensure that Peacock & Smith are placed on the database on behalf of Wm Morrison Supermarkets plc to be informed at future stages of document preparation.

We trust the above is helpful. However, if you have any queries or require any further information, please do not hesitate to contact Cassie Holland at the address above.

Doxey
Community
Association

LET 41 - 22/11/04

Draft Statement of Community Involvement

Please find enclosed comments on this document. These comments were discussed at a recent meeting of Doxey Community Association and it was agreed that they should be sent to the Council on its behalf.

As explained in the enclosed document - and agreed in a telephone conversation with you some weeks ago, the response form provided with the draft statement has not been used because it does not lend itself to the kind of observation which the Community Association wished to make.

I hope that these observations will be helpful. In particular, we wish to emphasise how important it is that the Council rethink its approach in order to enable organisation such as ours to have a real impact on the local development framework.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

We understand that all observations and responses to them will be collated and made available to the public. We would be grateful if you would let us know when and where we will be able to access this feedback.

Observations made on behalf of Doxey Community Association

The nature of the consultation document

Bearing in mind the nature of some of the groups to which it is addressed, this document is very difficult to read, for the following reasons.

There seems to be no system as to what information is put in the body of the text and what is put in appendices.

The language is difficult and the handling of technical terms is not well done.

There are too many acronyms.

It assume too much knowledge on the part of the reader.

The reader has to cope with too many abstract concepts.

It is repetitive

It is generally too long and each section has too much solid text when it could have been easier to grasp if more than use had been made of short bullet points.

The reader has to work very hard to understand what is being proposed.

The consultation document should take account of the fact that, in order to be able to comment on its proposals effectively, different community groups will probably need different amounts of information. It is suggested that there is some basic information which all groups will need to access - which should be in the main document - and one or more levels of elaboration which should be provided in appendices. For example, some groups may not need to know the detail of what is meant by a significant planning application. The top half of page 15 could have been put in an appendix.

General

To comment on the content of this document is even more difficult because it leaves unanswered so many questions about the planning process. Among these are the following.

Is involvement of the community intended to be more than token?

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

In the view of the planners are there some sections of the community which it is more important to involve than others?

To what extent is community involvement done on a take-it-or-leave-it basis? What extra efforts will be made to get a response from groups beyond simply informing them of the consultation exercise?

In view of the complexity of the proposed consultation process is it likely that how it actually operates in practice will be different from how it is supposed to work?

Answers to these questions could have a bearing on how to respond to this consultation. In their absence some assumptions will have to be made. It is hoped that these are valid. In any event, though, the point has to be made that there will be little community involvement if the community doesn't understand the process. The community will be even less likely to make the effort to respond if they have no confidence that what they say will affect the final outcome; that the error they put in will be worthwhile.

The response form

In any event, the response form provided is neither comprehensive nor systematic and does not address the issues which are of concern to this community association. Further, the form suggests that, in addition to pointing out aspects of the consultation document which are unsatisfactory, we have to do the redrafting work required to improve it. This would take a long time which one would be reluctant to devote to the exercise since there is no guarantee that the suggested alternative wording would be used. But, anyway, what is really required is a radical restructuring of the document rather than tinkering with bits of wording. For these reasons, the response form is not being used for our comments, though attempts will be made to address some of the issues it raises, shown in bold in the text below.

Questions in the response form

The document certainly does not provide **clarity about how the community will be involved in the planning process.**

The **statement of vision** is adequate, but it would be more useful if it contained something about promoting high quality; eg “.. enables the provision of appropriate, sustainable, high quality facilities ... While “high quality” is a subjective concept it does allow the mediocre to be challenged. Without such a phrase it would be more difficult to refuse a development on the grounds that it is aesthetically displeasing.

The **statement of compliance** is probably something of a technicality to community groups. Discussion of this and the proformas to be used just served to make the consultation will be required to demonstrate that it has taken the necessary steps to involve the community. Details of this procedure could then be included in an appendix.

With regard to **hard to reach groups** the question that arises is how serious the council is about reaching these groups. If it is regarded as

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

vital to receive their views about proposed developments then a lot more work needs to be done. Much of this will be concerned with breaking the ground; getting to know what groups and individuals there are, gaining their confidence, convincing them that their contributions can make a difference, establishing robust lines of communication. These groups have often become harder to reach because they are reluctant to put a lot of effort into an exercise which may well not change their lives in any way.

There is a danger that measuring **performance indicators** will be an academic exercise. It appears that it will be simply a head count, without any attempt to measure the degree of participation. Many people logging on to the website may, sadly, make no effective contribution at all because the difficulties of navigating the site will cause them to give up fairly early on. Also with these head counts, it will be necessary to specify in advance some sort of target figure. If, for example, 200 people are reckoned to have participated in consultation, is that good or bad?

The **techniques for publicising significant and fast track applications** are a good start but, in view of the point made above that potential respondents are discouraged by the thought that no notice will be taken of what they have to say, additional techniques should be used; possible mail shots to local residents and public meetings. It should be borne in mind that involvement of the community involves a lot of unpaid work by people who often have many other things to keep them busy. These people must be given sufficient time and help for their involvement to be effective.

The section on **consultation techniques for local development documents** is not at all clear. It seems that the approach may be good.

Other specific observations on the document

Section 5 purports to discuss the relationship between the LDF and the community plan. In fact it says what the latter is, but not how it relate to the former. This section does not seem to add anything to the discussion of how the community will be involved in developing the LDF, etc.

Have Councillors been consulted or even told about their role as ambassadors? What sanctions are available to ensure they perform this role effectively? Will their allowances be increased to take account of this additional role? Not all councillors have surgeries and, if they do, not always in venues where draft plans can be stored or viewed.

The diagram in Appendix 8 is not very helpful. There is no indication of the nature of the relationship indicated by arrows between the different entities in the diagram. While this is a common failing of diagrams such as this, it does not excuse the fact that it is not clear whether the various groups merely talk to one another, whether there is a formal requirement to consult or whether any one group has the

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power to influence the activities of another.

Nowhere is it explained what a supplementary planning document is.

The document mentioned in paragraph 16.1 does not seem to contain the guidance referred to. In any event, it is not clear from the web site how to access it. The full URL should be given, not just the one for the planning home page.

This consultation documents says very little about reviewing the community involvement procedures. An essential feature should be flexibility, which will mean among other things that procedures can be changed easily and quickly if serious failure to involve the community cannot be corrected otherwise.

The document mentioned in paragraph 16.1 does not seem to contain the guidance referred to. In any event, it is not clear from the web site how to access it. The full URL should be given, not just the one for the planning home page.

This consultation documents says very little about reviewing the community involvement procedures. An essential feature should be flexibility, which will mean among other things that procedures can be changed easily and quickly if serious failure to involve the community cannot be corrected otherwise.

An alternative approach

The big problem with documents written by public bodies for the purpose of communicating with a wide, loosely specified audience is that they contain what the former wants to tell the latter rather than what the latter wants to hear. Further, their structure tends to mirror the functions of the organisation instead of appealing to the mindset of the reader. This document is no exception. An alternative approach, outlined below, would be for the document to give answers to a series of questions which it is more likely that members of the community would ask.

1 *What is this all about?*

This would say, in almost as many words, that the government required local authorities to introduce new ways of planning land use in their areas and that this required the production of certain documents and procedures. These would be named and brief outlines of what they were for would be given. More detail could be given in appendices if this were thought necessary.

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2 *Where does the community come in?*

This section would describe the role which it is expected that the community will play in developing these plans and procedures.

3 *How will we know when something has been produced on which we have the opportunity to make observations?*

This will set out procedures for publicising the start of a consultation process, including enabling people or groups to register to be informed by post or e-mail on all such occasions.

4 *Who will be consulted?*

This will list those organisations and individuals - perhaps by category rather than individually, though there must be the facility for each such to check that they are included in the list - which will be automatically consulted.

5 *How can I/we make sure that I/we can have my/our say even if I/we haven't been consulted directly?*

6 *What techniques of consultation will be used?*

7 *We have difficulty understanding what the proposals are and in deciding what our views are. What help will be available to enable us to make our proper contribution to the exercise?*

This will set out how the council proposes to build a long-term support structure for relevant interested groups, not tied to a specific consultation exercise. In particular it will describe what special approaches will be made in respect of sections of the community for whom it is suspected that plans may not take sufficient account of their needs and preferences - the so-called "hard to reach" groups.

8 *Will our councillors help us?*

This will say what help from councils can realistically be expected.

9 *What checks will be applied to make sure that consultation has taken place properly?*

A brief account of the compliance procedure may be useful. There could be a discussion of performance indicators if useful ones can be found.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

- 10 *Will we be told what changes have been made and get responses to the suggestions we have made?*
- 11 *What scope is there for changing these consultations arrangements?*

This section will set out the borough's commitment to operating a system which maximises the ability of the community to be involved in the planning process, which includes preparedness to make changes to the system of consultation, as soon as is feasible, if it is found that some section of the community are unreasonably excluded from the process.

As far as possible, answers to these questions would be brief and in bullet point form. In some cases, the wording required would be not much more than that given within each heading above.

A Guy Simmons
12 Bartholomew
Street
Leicester

EM 34 - 21/11/04
Draft Statement of Community Involvement

Thank you for your letter dated 6 October 2004 inviting me to comment on the draft SCI. You will find my response attached.

Yours with deep respect.

Consultation November 2004

The draft SCI does not satisfactorily meet the requirements of the Aarhus Convention [the United National Economic Council on Europe Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environment Matters adopted in 1998 in the Danish city of Aarhus], which suggests that in any decision-making process people should have rights to information, participation and redress.

It is my experience that there are certain things that make it difficult to engage in the planning process. The SCI needs to show how it will overcome these barriers:

- The cost of information
- Lack of time to comment. This includes being able to get information and advice and discuss the matter with other members of the public
- Incomprehensive "planner" speak
- Complex procedures
- Negative attitudes to all objectors

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- Lack of understanding as to what issues can be dealt with under the planning system and when they need to be addressed. People are most likely to react when they learn about a planning application for a site near where they live. At that stage they will not be able to object to the site if it has been allocated at an earlier stage in the planning process

Purpose of the Statement of Community Involvement

NOT APPROPRIATE

Access to information

- The cost of information could be a barrier to participation. Some people may not be able to spend the time studying the information where it is available free to the public, or may find it uncomfortable to do so, or may be culturally inhibited from doing so (eg some Muslim women). It must be as easy for members of the public to study documents in their homes as it is for businesses to do so in their offices. Cost should not prohibit such access.
- It is unclear whether documents will be available in other languages or at least translation support provided (paragraph 8.4). Although this will only affect a small number of people in Stafford Borough, confidence with English could be a barrier to their participation.
- It is unclear how easy it will be to access supporting documents (eg Environmental Statements associated with significant planning applications). Cost could be a barrier
- It is unclear whether anyone will have the right to see all information on a planning file
- Headline information on a proposed Section 106 agreement needs to be published on the planning register prior to final signature, so people can make known their views on the agreement

Participation in planning

- The relationship between the SCI and the Community Plan is not made clear by paragraph 5.1 to 5.3, which describe the Community Plan process
- The SCI needs to be binding on the Community in making process. The SCI appears to have a larger database of consultees than the Community Plan (see paragraph 6.3), yet the Community Plan could define key elements of the Local Development Framework
- A more robust approach to pre-application community consultation is needed (paragraph 4.4), otherwise the credibility of the process will be undermined and this will reflect as badly on Stafford Borough Council as the applicant. Stafford Borough Council must be clearly seen to be overseeing the process. It needs to approve the proposed consultation strategy before it takes place and be prepared to intervene with promotion of roundtable and individual discussion with objectors and offers of effective mediation. If this fails the public must have the right to put its case at committee.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

- Standard community response forms needs to be available and their use promoted to help people make comments on planning applications. This needs to be part of providing accessible, educational material on planning for local communities.

Redress

- There is no mention of how the public can obtain redress if it believes planning permission has been granted inappropriately. Stafford Borough Council needs to:
 - provide effective information on how to make a complaint to the Local Government Ombudsman or Information Commissioner
 - establish an internal complaints process that gives people the opportunity to get redress if the Local Authority departs from its SCI. This could be done through the Standards Committee hearing such complaints and making recommendations for future practice
 - provide information on judicial review and on the existence of bodies such as the Environmental Law Foundation (ELF)
- This needs to be done because there is a fundamental inequality in planning. Third parties have no right of appeal against the grant of planning permission

Performance Indicators

NOT APPROPRIATE

It is not clear what criteria will be analysed to judge whether the respondents are representative of Stafford Borough's resident community (see paragraph 10.2 on page 9). As far as possible these must address the issues raised in the Statement of Commitment to Equality (see paragraph 9.2)

Supplementary Planning Documents

- Paragraph 13.16 on page 12. It needs to be made clear that an area specific SPD will be subject to a comprehensive and inclusive community involvement approach as well as the welcome targeting of the local community affected. (Presumably DPD's at the beginning of the paragraph needs to read SPD's.)

Citizenship Lessons in Stafford Borough Schools

- **Paragraph 17.5 on page 18, last sentence.** This needs to refer to the natural environment as well as the built environment. Civic pride is defined by the natural environment as well as the built environment. There are major issues over the provision of green space (eg school playground), the use of greenfields, and biodiversity. For instance in Stafford town there are major concerns about Doxey Marshes, the River Sow, Castlefields and Riverway. (*Congratulations to Stafford Borough Council for taking this initiative.*)

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Community Training

- **Section 17.0 on page 18/19.** Training needs to be made available to enable organisations, groups, businesses and members of the public to participate more effectively in the planning process. Perhaps this could be done in conjunction with Stafford College. This would help overcome lack of understanding, the sixth barrier to participation mentioned at the beginning of this response
- **Changing the culture of planners and members**
Section 17.0 on page 18/19. The attitude of planning officers and Council members needs to be monitored to ensure that people who try to participate in the planning process are not seen as a problem. The SCI needs to make clear that such an attitude is not acceptable and it will be addressed by effective training programmes, clear leadership and closer long-term contacts with community-based organisations (building on what the Council is already doing).

Communicating with people and allowing them to participate fully is not a peripheral activity to planning, it is central to producing plans that are fit for purpose, reflect community views and provide a sustainable vision for the future. Planning departments need to reflect a spirit of openness and a willingness to take on board views even when these are expressed in non-expert language.

- **Section 17.0 on page 18/19** The language used in documents and by planning officers can exclude people unfamiliar with planning jargon. Specialist terms must always be explained and a glossary needs to be available. This has been done for the draft SCI. This standard needs to be required for all other planning documents. Planners need to be trained how to communicate so that people are not confused or feel inferior because specialist terms are used or an understanding of the process is assumed.

Consultation Methods

- **Table.** The list of Consultation Techniques To Be Used needs to include the opportunity to use proactive participation tools such as Planning for Real and Roundtables as well as the Ideas Wall. There are occasions when these would be better methods. The use of the most effective participation tool should not be restrained by cost.
-

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

LET WD 48 (L)

N Gough/G
Brown
(Bigwood
Associates)

After consideration, it has been decided that we wish to withdraw the shorter objections submitted yesterday on behalf of our clients and apologise for any inconvenience.

Objection was: On behalf of Spectre Developments Ltd and Castle Properties (Staffordshire) Ltd we wish to object to aspects of the Draft Statement of Community Involvement and we will send our detailed response on the Response Form by post to you today.

In particular, the Visions part of the document does not give sufficient emphasis to the economic welfare of Stafford Borough or include sufficient response by the business community to the future economic welfare of the town. Further, there should be a much greater emphasis on providing housing in and close to the town centre.

LET WD 51 (L)

Sebastian
Tibenham - The
Development
Planning
Partnership

I write with regard to the above document on behalf of our clients, Tesco Stores Limited. Enclosed you will find a completed response form which includes various recommendations.

Tesco note the contents of the draft document and appreciate Council's desire to front load and rationalise the consultation process for Local Development Framework documents (statutory or non-statutory) and planning applications in line with the Government's recent reforms in planning legislation.

Comments are provided on the response form and attached pages. However, there are two main issues that we would like to emphasise at this stage, and which should support and complement the comments made on the response form.

Firstly, it is important the Council recognise that developers should be seen as a fundamental component to the successful planning of a singular development, neighbourhood, or borough. Together with landowners, community groups, elected members, Council officers, various public sector groups and private sector service providers, and local residents, developers should be fully consulted on all of the emerging documents that will make up Stafford's Local Development Framework.

Indeed, it is anticipated this will take place given the reference to developers in paragraph 6.3 of the Draft SC1. However, we would like to take the opportunity to ensure that Tesco are consulted on all forthcoming documents that will make up the Local Development Framework, be it the Core Strategy, Area Action Plans or Site Specific SPG.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Whilst this may be deemed excessive, it is important to note that Tesco are one of the biggest users of the planning system, being the UK's largest and most successful retailer and one of the UK's largest employers. In bringing forward developments, Tesco utilise all aspects of the planning system and often provide substantial planning gain aspects. Furthermore Tesco have continually been developing the range of formats at which they trade and the range of products they provide. Tesco Extra stores, dependant on their location, will often require thought at a strategic level, but the expanding number of Tesco Express stores has meant Tesco's interests at a local and neighbourhood level have become increasingly relevant and important in ensuring communities are provided with necessary retail facilities in close proximity to where they live. Tesco are also becoming increasingly involved in mixed use schemes which comprise of development types not often associated with the company.

As such, we request that Tesco are placed on the LDF consultee database and all correspondence passed through DPP. We suspect this may already have occurred and instigated the notification of the publication of the Draft SCI.

In the same regard, we would also like to request that developers are able to sign up for inclusion on the database referred to in paragraph 15.6, whereby groups are informed of various types of development per ward.

The second point is in relation to the consultation process, which is to be undertaken by the applicant for Major and Significant Planning Applications.

Tesco do not disagree with the type of consultation methods advocated in the Draft SCI. However, given the various types of developments which make up either a Tier 2 Major Application or a Significant Application, it is considered the consultation process needs to be sufficiently flexible to recognise and accommodate the fact that different developments will require varying degrees of consultation.

It is anticipated that the Council will expect a Tier 1 Major Application to be subject to a large degree of pre-application consultation. However, even under these circumstances the consultation programme should be based on an assessment of the proposal.

For example, a large supermarket is likely to fall within the Tier 1 - Major Planning Application category. Whilst being a Major Planning Application, the proposal could be fully policy compliant due to it being located within a town centre boundary or on an allocated retail site in the local plan. By virtue of this, the proposal may require a less extensive pre-application consultation programme.

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There are other factors, however other than the site's allocated status, that may affect the pre-application consultation programme. Such factors could include the sensitivity of the surrounding land users, the political environment, media interest, or the need for the development etc.

It is anticipated that early discussions with the Council will reveal whether an application is to be categorised as either a Tier 1 or Tier 2 Major Application, a Significant Application, a Fast Track Application, or an Application whereby the applicant will not be expected to undertake pre-application consultation. If the applicant is to be expected to undertake such a task, there should be an early understanding between the Council and the applicant as to how much consultation the Council will expect (ie how wide a mail shot to neighbours surrounding the development (actual neighbours, visually adjacent, or a wider area), which organisations to consult, and the type of presentations or meetings that should be organised).

A suitable suggestion would be for the applicant to draw up a pre-application consultation plan that could be based on a best practice guide. The plan would identify who is to be consulted and via which method. A suggested timeframe may also be appropriate. This plan should be presented to the Council prior to any consultation and agreed or amended accordingly. It is recognised that the applicant is expected to justify the extent of consultation undertaken as part of a Statement of Compliance to the SCI. However, if this is the first point at which the Council sees the pre-application consultation programme there is a danger the much needed proposals could be delayed or present a situation whereby the Council give additional weight to objections because they disagree with the consultation process undertaken.

The signing of a pre-application consultation plan by the Council would provide the developer with a degree of certainty that they are on the right track at an early stage. This is not to say that the plan could not be altered. Indeed, initial consultation may reveal that greater or lesser consultation may be required when compared to what was previously envisaged.

Such methods are utilised by the telecoms industry, which works towards a 'Traffic Light Model', which has been agreed as a best practice guide with the Government.

Under this model, a quick assessment of the proposal determines the degree of pre-application consultation that should take place. The assessment incorporates a number of factors previously referred to (ie sitting, allocation, policy basis, media coverage, political environment, surrounding land uses etc).

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

A telecoms proposal that acquires a Red rating is generally located in a sensitive area, be it in planning policy terms (re: conservation area), or a politically sensitive area (ie near a school). As such a greater degree of pre-application consultation is advocated.

Proposals with a Green rating are generally policy compliant and do not impact on neighbouring properties to any great extent. As such, a lesser degree of pre-application consultation is required. Proposals with an Amber rating tend to accommodate the middle ground.

The aforementioned Traffic Light Model is obviously based on a quite specific form of development and therefore is not endorsed for all types of development. As such, a revised assessment model would be required in this instance. However, we would endorse an assessment model that provides a flexible approach, and which seeks to provide an initial understanding and rationale of the consultation process for development whereby the applicant will be expected to consult the wider public. As such the tables in Appendix 13 should refer to a pre-consultation stage whereby the applicant and the

Council agree a consultation plan based on an initial appraisal of the proposal.

Such a framework will remove any ambiguity in the consultation process. Furthermore, it will assist in ensuring the Statement of Compliance to the SCI, which has to be produced as part of the submission of any Major or Significant planning application, is more meaningful and relevant to the actual proposal and associated consultation that has been undertaken.

I trust the above presentation is clear and useful, however, if you have any queries please do not hesitate to contact me.

B Metcalf
31 The Oval
Stafford
ST17 4LQ

LET 65 - 24/11/04

Page 4 The Community Plan

It is not at all clear what if any involvement most of the 300 key organizations had in the current formulation of the LSP Community Plan since the Executive proposed a rewritten version at the 2004 AGM, the political control of the council having changed in 2003.

Having served on the Executive of the LSP 2002-2003 I am aware that there has been no other consultation about rewrite with Sustainable Staffordshire which is one of the 300 organisations. The "Vision" in 5.3 is unfamiliar and presumably recent. Had I seen it I would have been making representations about looking to a sustainable community alongside one with pure "prosperity" as its aim. All communities and nations heading for growth without conservation of resources are heading for disaster within our children's lifetimes if not within our own.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

ie Somebody is deluding themselves if they think the current LSP plan is the product of the active and caring community involvement in the LSP since 2001. Up until autumn 2003 there was a strong lobby for sustainability in the LSP which is not reflected in the current plan and presumably will not feed through to the planning criteria proposed except where councillors have shared concerns.

Page 5/6

The statements on ethnicity and nationality need revising because they are confused. Indians may be Hindu, Sikh or Muslim and there are far more active Christians in India than in England. Muslims may be from India, Pakistan, Bangladesh or a host of other countries including the Balkan states and Somalia. Balkan Muslims from Bosnia are ethnically white. Some Muslims are even converted Anglo-Saxons. It is therefore important to distinguish issues where nationality or ethnicity may be relevant.

Stafford at the 2001 Census had

503	Muslim
354	Sikh
298	Hindu
146	Buddhist
94	Jews
278	“other”
<u>1648</u>	non-Christians of other faiths
<u>3321</u>	non-Christians with some faith

ie there are far more than your consultation suggests

As regards ethnicity we have

white	95.57%
mixed white/black	
Caribbean	.36% (ie 434)
other mixed	.47% (ie 567)
Indian (British or Asian	.6% (ie 724)
Pakistani (ditto)	.19% (ie 229)
Bangladeshi (ditto)	.03%
Other Asian (ditto)	.15% (ie 181)
Black or black British	
Caribbean	.34% (ie 411)
Black or black British	
African	.1% (ie 121)
Other Black	.04%
Chinese	.19% (ie 230)
Other	.11%

ie there could be 5345 non-white residents of the Borough although the oddments do not add to 4.43% so it is hard to understand who the others are. Could be Latinos from USA etc? Students from abroad?

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Admittedly given the census counting, a considerable number of these are students. However the planners and politicians who think there are only 721 Indians and 500 Muslim (8.3) need to do their homework. There could be an overlap. Indeed all the Muslim could be Indian in principle. And there are 3 or 4 times as many ethnic residents who are neither Indian nor Muslim

8.4

It is correct that these groups are hard to reach because of the small numbers and lack of community organizations. Many nationalities are involved. The Race Equality Council may know of more but I only know of one Asian organisation and one Sikh temple and a handful of black churches.

The students should not be regarded as term time transients. (8.9) Some are but the reason that they were counted at their university address and not their parents in 2001 is that increasing numbers stay in their university town all year. Some have no parental home to which to return. Students may have as much stake in the facilities of a town as anyone else.

I would suggest that rather than trying to consult organisations of which few exist, representing a very low proportion of ethnicity, some attempt be made to create ethnic focus groups.

6.3

Community group categories. The voluntary sector appears in various guises in these lists but its position as the last of the afterthoughts in 6.3 is indicative of its low esteem and influence in the LSP process. The Voluntary sector needs to be at least in the Community Group Categories as a strong third force with statutory services and business.

I do note the presence of Faith groups and environmental groups. It is good to see them recognised but it is hard to see why they have precedence over SDVS, the CAB and Age Concern for instance.

6.2 8.9

Hard to reach groups. Given that lone parents are 8% of HH and perhaps 10% + of the population; disabled people with long term limiting illness around 17% of a population, students perhaps 4-6%, commuters perhaps 10%, ethnic minorities 4.5%, new residents 10% etc it would seem that over half the population is "hard to reach".

Disability in particular is mainstream and all proposals should have regard to it if we are not to exclude disabled people. For example, 80% of households have cars. But I would be surprised if 50% of people with disabilities have cars and it might be as low as 20%. Hence at the very least, all proposals have to consider the pedestrian.

CONSULTATION METHODS

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

The world is not waiting on tenterhooks to comment on general planning issues but it is prepared to protest about proposals that will adversely affect them

In a real world where politicians are being robbed of power, and politicians straining to be significant, it is unrealistic to expect any of the proposed methods to have any appreciable effect on any of the plans apart from a little tweaking to keep the peace. One needs to pitch consultation (and I do not deceive myself that there will any appreciable participation) at a level where it will inform the decision-makers.

It is hard to see what ambassadors would do that they are not doing as councillors. Indeed why should councillors' views be discounted since they are the people most conversant with the neighbourhoods they represent?

Exhibitions: these are expensive because the size of pictures and quality of presentation has increased. Do they need to be lavish?

Website: in theory a good option but trawling websites with loads of text - as all Stafford documents seem to have - is soul destroying and unlikely to yield much of an audience unless something is controversial. Even computer buffs have better things to do.

Ideas wall: yes. And indeed walls in the railway station, Guildhall shopping centre and Riverside centre would probably be seen by 50% of the population and represent a strong element of consultation. I fail to understand why a passive wall with a large piece of paper on it and a few blowups of drawings for proposals would be expensive.

App 5 1.2

Race Equality Scheme and impact assessments. How can officers usefully do this when they have so little appreciation of which minorities live here and their cultural and religious aspirations?

App 5 1.5

Disability discrimination. The use of the disliked term "disabled people" betrays a lack of consultation with people of disabilities or understanding of their needs. This is apparent when one still sees new houses being built locally on flattish sites with steps up to the front door.

App 5 1.6

Increase community involvement in decision making by 5% by 2006. I think I approve of this but then a local council is a democratic and community-based way of doing things. So should we given decisions back to councillors? That does not seem to be the idea. I don't understand what the 5% is 5% of, let alone how one would measure it.

App 5 1.7

Voluntary Sector National Compact. An excellent document but it

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

specifies that consultation periods for voluntary bodies that meet infrequently must be maximized. This was incompatible with most planning timetables when it took 8 years to decide on an airport. What chance has any voluntary body to comment if all decisions have to be made in 3 months and fast-track ones even quicker? Could this be pointed out to the ODPM?

I recall for instance that the West Midlands Churches Committee met three times a year. Groups like this are formed of capable leaders. They don't need "capacity building" - all they need are 72-hour days. It is well nigh impossible for such groups to discuss planning proposals though they might delegate someone to respond for them. They do just occasionally comment when their timetable fits the planning timetable.

The creation of multifaith constituencies takes this to further levels of obscurity since virtually no time exists in meetings of such people to explore attitudes and issues to specific questions. How can they produce meaningful spokespeople?

App 5 1.9

Aarhus. Hurrah for sustainable development. Is this compatible with fast-tracking?

App 5 1.10

Strategic Environmental Assessment

App 6

Equal opportunities d. Range of Participation. As stated I am sceptical whether any real participation will occur anywhere in the country. (This is not a criticism of the Stafford DSCI). But the SDVS is a key community group for Stafford and should be mentioned in this DSCI as an important participant for all major issues.

App 6

Consistency and certainty. (e) this seems to say that an applicant who consults must not take any notice of anything significant that is said since the application has to be materially unchanged. Does this mean that it is a waste of time for the community to make any challenges to any planning proposals except cosmetically? What if the concept needs modification?

A20/21

Consultees should be in alphabetical order

App 9

LSP 2003-2006 did not consider planning issues at all. Does the LSP need to discuss the proposed planning strategies for the Borough?

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Area Forums: were being held twice a year. Current frequency of once a year is too little to input planning regimes.

Plethora of SBC publications. Well it was your word, but are there too many SBC publications?

App 10

Publications: Partnership Plus seems the thinnest of these. Could it have a page or two of "Newslines" instead?

Process

Seems to require huge amounts of secondary data collecting out of all proportion to the small size of the planning team in a small authority. Am particularly concerned about the scope for dealing adequately with larger applications now that the county is to be excluded. Should the smaller authorities commission the County Planning Department (if it still exists) for these?

A26

Document inspection: it is a slow and inconvenient process to consult planning documents at the council offices.

- (a) no suitable table on which to open plans
- (b) only one dog-eared copy usually available
Buying documents occasionally possible at huge expense. Have not succeeded in borrowing in Stafford but have occasionally been given a document. If the documents are at the Public Library, they will not be lent out. This usually means that people cannot make substantial responses.
- (c) plans not openly available to peruse at the Borough Offices - counter service only - which can be slow. One cannot "browse as in a library but have to ask for each thing - so you have to know in advance what you are looking for. Is it better for councillors?
- (d) room for only about 2 consultees at a time.
There ought to be somewhere in the borough offices one can go and sit in a room to read local authority strategic documents on this and that and consultation documents. Ideally one might have a computer terminal there where one could make responses.

A27

Preferred options, core strategy, DPDs and AAPs: it may be a national timetable but given the almost impossible availability of documents (including the fact that it is much much slower reading a website than flicking through a paper report with maps and diagrams) - it requires a heroic effort to respond in 6 weeks. Voluntary sector respondents will mostly not be able to amass supporting evidence in that time - and this is especially important for strategic policies and for major development planning applications.

Voluntary organisations which insist on approving representations made for them by members, will almost never be able to meet the consultation timetable and will be excluded.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

In contrast the 6 week + timetable for the invitations to the Examination seem positively relaxed. However there would seem to be many more examinations necessary and the paperwork may deter preparation of DPD's and AAP's. Will we find most things done by SPD's locally?

Process

Given that all these documents except site specific DPDs are likely to be broad brush and bland giving little detail, it will be difficult to object to them. But when principles are established without detail, one may find that the only decisions to be taken about building proposals are issues of conformity to a plan which is without internal boundaries.

App 12 Major Planning Applications

It is disturbing that the only matter for decision will be conformity to the development plan, given that the development plan is very broad brush. A presumption that all major applications will be approved unless non-conforming is disturbing. There may be all sorts of reasons why a particular implementation would be unsatisfactory and out to be modified or refused. As seen the presumption is against any modification. Alas for England!

One might think this was only for major applications but it will get mixed with Grade II Listed Buildings and minor demolition in conservation areas.

App 12 1.8 Call-in Procedures

I don't know if I have misunderstood, but will called-in applications exclude representations from the community in the same way that the local council will be by-passed? If so, all rhetoric of participation in planning decisions is so much hot air. The central government will have acquired total power over everything affecting our locality as a whole. If this is not the case then the document needs to clarify this.

App 12 1.11

Playing fields: given this proposal, the local authority needs to adopt criteria of provision. eg within so many metres of every home. I would also like to see this as an aspiration for local playgrounds and informal recreation areas. Why should planning exclude the recreation of oldies?

A64

Poster in Planning reception. Are there enough walls? Request it is pinned relatively low because high posters are unreadable if you wear bifocal glasses. A duplicate in a loose-leaf file might be a good supplement for people with reading problems with posters.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Peacock & Smith **LET 45 - 22/11/04**

Chartered Town

Planners

Development

Consultants

Comments on behalf of Wm Morrison Supermarkets Plc

With reference to the above, and on behalf of our clients, Wm Morrison Supermarkets plc, we write to thank you for consulting us on the draft Statement of Community Involvement.

Wm Morrison Supermarkets plc are a major food and grocery superstore retailer who have recently acquired the Safeway store at Church Street/Mill Street, Stone and are a significant employer in the Borough.

Wm Morrison Supermarkets plc thank the Council for the opportunity of commenting on the draft SCI. As an employer and operator of a significant retail facility in Stone, they confirm that they would like to be kept informed and consulted on further stages of preparation of documents which are to comprise the LDF. In particular, they wish to be informed of any potential Area Action Plans which may be prepared for Stone.

In this regard, we would be grateful if you could ensure that Peacock and Smith are placed on the database on behalf of Wm Morrison Supermarkets plc to be informed at future stages of document preparation.

We trust the above is helpful. However, if you have any queries or require any further information, please do not hesitate to contact Cassie Holland at the address above.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

FORMS AND EMAILS

Question 1

Question No 1B

Do you have any suggestions in order to improve the clarity or certainty of the Draft Statement of Community Involvement?

If so please state your suggestions below:

- | | |
|---|--|
| Sport England | EM3
Letters are sent to “statutory bodies” and “interested parties”. Meetings are also to take place with “stakeholders” where appropriate. Sport England could be regarded and any of these (statutory consultee for some but not all planning applications for example). |
| A L Murray for Mr P Till of Wolseley Park Farm - Planning Consultant | EM15
My client wishes to see consideration given in the forthcoming LDF exercise to the scope for inclusion in the plan of a housing proposal on land which he currently farms which lies at the extreme edge of the Borough abutting the town of Rugeley, and Bower Lane which is currently the boundary between the two authorities. Public concerns about such a proposal are likely to arise chiefly from adjoining residents living in Cannock Chase and Lichfield Districts whilst strategic needs assessment and plan proposals will in this respect need to relate primarily to those of the town of Rugeley. This requirement is not explicitly provided for in the various Appendices indicating how plan proposals or planning applications will be publicised. |
| Reverend E Cockbill Sandon Road Baptist Church & Beacon Community Project | FB18
I believe there was little real involvement and consultation with interested parties when the 2003-2006 Stafford Borough Community Plan was written and as I hear from local Councillors and charities such as Homestart, who’ve had vital funding withdrawn, there appears to be little on-going informing, involving or consulting. Words on documents are one thing: “By their deeds shall ye know them” as Jesus put it. |
| R O Foulkes Ramblers Association | FY36 - 20/11/04
1 Insufficient emphasis on pre-application consultation, I suggest you look at making this aspect clearer.
2 Too much duplication in the text. |

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Judy Palmer **FG37 - 20/11/04 - 22/11/04**
Norbury
Parish
Council
We thought that the document was wordy and quite difficult to understand. It would have helped if the definitions of words such as “stakeholders” and significant “planning applications” were in the documents rather than the appendices.

South **EM42**
Western
Staffordshire
Primary
Care Trust
This document is very comprehensive and detailed; is there an opportunity for a summary?

Y Pynenburg **FY54 - 24/11/04**
The High
House
What is a significant planning application?
In a village like Swynnerton building 27 houses is a significant planning application - but you have only informed 10 residents - all 200 should be informed.

Mrs C M **FY55 - 24/11/04**
Edwards
Retired
Local
Government
Officer
6.1 to 6.4 no mention of disabled, blind or elderly groups and Associations.

Pam Morris **FG58 - 24/11/04**
Colwich
Parish
Council
Rather too wordy for ordinary use in its introduction.

D L Jones **59 - 24/11/04**
Seighford
Parish
Council
I have read through this document twice and do not understand it.
I am not therefore in a position to comment.

S Lawley **60 - 24/11/04**
Staffordshire
Wildlife Trust
It appears to be difficult to tell how Staffordshire Wildlife Trust will be consulted. The Trust is listed as a “standard consultee”, but this term only seems to appear in Appendix 7. Para 13.8 appears to indicate that consultees will only be involved in certain documents at Stafford Borough Council’s discretion. The Trust would prefer wider involvement, because many policies etc can affect nature conservation.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

No Name Given **FY63 - 24/11/04**
In places it is rather verbose and in planning speak.

B Metcalf
31 The Oval **65 - 24/11/04**
No idea.
Needs clarity - ethnic and nationality issues confused - needs total re-write.
SDVS does not have enough prominence.

Question No 1C

Please give reasons for your alternative suggestions for the Draft Statement of Community Involvement:

Sport England **EM3**
To ensure that Sport England are regarded as a stakeholder should it be appropriate and that we will get consulted at all stages of the LDF preparation and application determination (whether a statutory body or interested party).

A L Murray
for Mr P Till of
Wolseley
Park Farm -
Planning
Consultant **EM15**
Earlier representations have been made to the Borough Council with regard to this proposal which is still considered by my client to have merit and has been further assisted by the decisions now reached on the funding and programming of the final phase of the Rugeley bypass which is capable of further amendment to take a redirected Bower Lane connection thus forming the potential development site.

R O Foulkes
Ramblers
Association **FY36 - 20/11/04**
There is a common conception by applicants that consultees will delay the planning process and that pre-application consultation will result in objections, whereas the opposite is frequently the case. Benefit of pre-consultation is that unforeseen problems can be dealt with before expensive design work is undertaken also results in a more satisfied general public.

Judy Palmer
Norbury
Parish
Council **FG37 - 20/11/04 - 22/11/04**
Clarity for non officials and Council members. Jargon!

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Y Pynenburg
The High
House

FY54 - 24/11/04

This draft Statement of Community Involvement must look at “The Big Picture” regarding villages, not just adjoining properties. The whole village should be contacted if a significant building proposal is put forward i.e. 27 houses in a village of less than 200, or a conversion of barn buildings into industrial or office rentals, something that will change the whole character of the village. We need to look at protecting green space in villages and in the Country. We need to look at what kind of landlords we have and are they good **social** landlords. People’s views must be taken into account when deciding on planning applications. Communications between the borough and the Highways Department needs improving.

Mrs C Heelis
Eccleshall
Parish
Council

FG57 - 24/11/04

1 The proliferation of abbreviations such as - SCI LDF LDD make understanding difficult and slow to the first time reader.

A footnote on each page giving the abbreviations full meanings would speed up understanding.

E.g.

SGI - Statement of Community Involvement
LDF - Local Development Framework
LDD - Local Development Document
arranged alphabetically would be even better.

2 For ease of reference the Appendices should be numbered on each page, so each page of Appendix 1 should carry the heading Appendix 1 page 1, 2 etc.

Pam Morris
Colwich
Parish
Council

FG58 - 24/11/04

Responses from those who have read it.

S Lawley
Staffordshire
Wildlife Trust

60 - 24/11/04

While it is clear which consultation technique will be applied at each stage, it is not clear which consultation technique will be used for which type of organisation.

Overall, the statement and Appendices are rather complex, especially for those who are new to consultation processes.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Question No 2B

Do you have a more suitable alternative if you think the Vision is not appropriate?

If so please state your alternative vision below:

Emma
Claridge
Tetlow King
Planning

FY9 - 18/10/04

Please see attached letter

M W Price
Cannock
Chase District
Council

FP20

Although the vision is appropriate, as written it makes heavy reading. It could be significantly improved if a "Plain English" form of wording was used.

David Kidney
MP
House of
Commons

FY24 - 15/11/04

Repeating the Development Control Service vision does not make sense. The vision for community involvement is wider - it should build on the excellent aim set out in paragraph 1.6 above, namely achieving a step change from community consultation to community involvement.

R O Foulkes
Ramblers
Association

FY36 - 20/11/04

Vision is clear but Draft Statement text is too complex for general public to understand.

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04

Sounds too good to be true!

James
Cheadle
Laburnum
Cottage

FY39 - 20/11/04 - 22/11/04

The history of the people involved should be looked at. The vision seems too rigid.

J Blount -
Stowe by
Chartley
Parish
Council

FG 49 (L)

Insert 'sustainable' between 'positive' and 'future' in the first sentence.

The SCI should state the Council's overall vision but gives instead a different version from the Development Control Customer Services Charter.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Sebastian Tibenham - The Development Planning Partnership **WD 51 (L)**
Add the word 'convenient' to the following: "enables the provision of appropriate, convenient and sustainable facilities for living, working and leisure ..."

Y Pynenburg The High House **FY54 - 24/11/04**
There should not be an inner "Cabinet" of Councillors. It should be a full Council agreeing on borough matters. There should be no closed meetings. Objectors to applications should be able to speak at planning meetings.

Question No 2C

Please give reasons for your alternative Vision:

David Kidney MP House of Commons **FY24 - 15/11/04**
In a sense this has to be a social contract requiring all the "partners" or "stakeholders" to play their part - rights and responsibilities go together.

J Blount - Stowe by Chartley Parish Council **FG WD 49 (L)**
Clarifies and underlines the importance of sustainability in Borough Council policies.
To comply with Secretary of States requirements.

Sebastian Tibenham - The Development Planning Partnership **WD 51 (L)**
To ensure those facilities are either conveniently located or provide a convenient service to those it intends to serve.

Y Pynenburg The High House **FY54 - 24/11/04**
You are biting off more than you can chew. Staffordshire is a rural county and all and hear is about building on green belt land farmers provide is with food and meat. They need our support not alternative sources of income.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Question No 3B

Do you have a more suitable alternative if you think the contents within the Statement of Compliance Proformas are not appropriate?

If so please state your alternative suggestions:

M W Price Cannock Chase District Council	FP20 A less onerous approach may be suitable, perhaps utilising a checklist type approach.
Sebastian Tibenham - The Development Planning Partnership	Let 51 (white) (L) Should have a section relating to the agreed pre-consultation plan as recommended toward the end of this representation form in relation to the tables in Appendix 13.
Y Pynenburg The High House	FY54 - 24/11/04 Information must be made available to a much wider section of the community. It is up to them if they do or do not want a planning application to success. Community involvement will ensure community harmony.
B Metcalf 31 The Oval	FY65 - 24/11/04 I would put after btc, it will undoubtedly be done badly because of the lack of handle on what groups there are ie these in reality are fairly empty words that will be parroted anyway whatever the real situation just to comply.

Question No 3C

Please give reasons for your alternative suggestions:

M W Price Cannock Chase District Council	FP20 The proformas proposed appear like a set of exam questions. This seems quite a heavy approach to a relatively straightforward process.
Mrs C Spencer Gnosall Parish Council	FG22 The Parish Council considers that the requirement to complete these proformas is an inappropriate use of resources for little or no benefit.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04
It's a very ideal proposal.

We feel that people will only be truly involved in the decision making if the meaning is explained to them in ways they can easily understand.

Sebastian
Tibenham -
The
Development
Planning
Partnership

Let 51
See covering letter for rationale

Y Pynenburg
The High
House

FY54 - 24/11/04
A statement of compliance is only a way of justifying impartiality it doesn't really look at the problem. It doesn't take into account locals' objections reasons.

B Metcalf
31 The Oval

FY65 - 24/11/04
I suspect the info is too much in reality for all but the most significant applications. This is a **small** planning department with more urgent things to do then make full reports on who was asked and all the publicity ie the content of consultation is more important than the not so long as ethnic, religious and voluntary groups get included. Also disabilities.

Question No 4B

Do you have a more suitable alternative if you think the contents within the Statement of Compliance Proformas are not appropriate? If so please state your alternative suggestions:

Sport
England

EM3
These generally relate to community/public only

M W Price
Cannock
Chase District
Council

FP20
See previous question - A less onerous approach may be suitable, perhaps utilising a checklist type approach.

David Kidney
MP
House of
Commons

FY24 - 15/11/04
Looking at the proposed performance indicators on page 8/9 (paragraph 10.2) shouldn't the pro forma seek information in a format compatible with these measures!

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

R O Foulkes
Ramblers
Association

FY36 - 20/11/04
Pro forma 2 (Appendix 6) - There is no guarantee that the "Range of Participation" by community groups will be correctly chosen by the applicant.

Para (c) needs to be more specific applicant should seek guidance from planning officer on bodies to be consulted.

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04
This does include major application Tier 1 and 2, significant applications Tier 3 and Fast Track applications doesn't it?

Mandip
Dhillon (RPS)
On behalf of
BT plc

FP53 - 22/11/04
This section needs more clarity on the level of detail that is required from an applicant.

Y Pynenburg
The High
House

FY54 - 24/11/04
I have been unable to obtain Appendix 6 from your internet website.

No Name
Given

FG64 - 24/11/04
Appropriate providing requirements of large developers do not override requirements of local residents of the Borough.

B Metcalf
31 The Oval

FY65 - 24/11/04
I am uneasy about (e) if prior consultations happen, are they to make no difference - or is this splitting hairs?

Question No 4C

Please give reasons for your alternative suggestions:

David Kidney
MP
House of
Commons

FY24 - 15/11/04
To enable the Council to assess performance against the indicators. To be consistent. To reduce the burden on Officers assessing and reporting on them.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

R O Foulkes
Ramblers
Association

FY36 - 20/11/04
There is a natural reluctance to pre-consult with interested bodies - pre-consultation may awaken unforeseen objections to application which applicant would hope to avoid. Pre-consultation is beneficial to all concerned and applicants should be persuaded to consult as widely as possible.

Question No 5B:

Do you have any further suggestions of mechanisms for engagement if you think those identified are not appropriate?

If so please state your suggestions below:

None

FB2 - 11/10/04
Use Youth Forum, target university.
What about other people?

Reverend E
Cockbill
Sandon Road
Baptist
Church &
Beacon
Community
Project

FB18
Ethnic minority groups in Stafford are **not** well served by LSP links and other measures need considering. I am trying to establish an "International Centre" on the Staffordshire Technology Park, to help with this.

David Kidney
MP
House of
Commons

FY24 - 15/11/04
First I cannot find in the text the requirement to use these mechanisms (paragraph 8.9 appears to say the exact opposite!) Secondly too little use is made of specialist support groups and peers of the groups themselves.

RAF Stafford

EM31
In addition to the transient student population there is also a transient RAF community within the Borough. For each of these groups perhaps a representative could be invited to join the LSP, and through these contacts disseminate information as appropriate

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04
Older people.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

James Cheadle Laburnum Cottage	FY39 - 20/11/04 - 22/11/04 E-mail at various stages to keep people informed. The English must be plain.
South Western Staffordshire Primary Care Trust	EM42 Stafford District Voluntary Services has contact with many affiliated and unaffiliated groups which would meet this criteria. Could this resource be used to support this process? Older people, learning disabilities and travellers could also be considered as marginalised or hard to reach groups
Y Pynenburg The High House	FY54 - 24/11/04 Councillors should be fulfilling this role already.
Mrs C M Edwards Retired Local Government Officer	FY55 - 24/11/04 Disabled groups do not have computers.
Mrs C Heelis Eccleshall Parish Council	FG57 - 24/11/04 The Council considers that almost all members of society could be classed as hard to reach groups and to single out young people transient population etc is artificial discrimination against the average citizen. All members of the community must be encouraged to participate.
D L Jones Seighford Parish Council	FG59 - 24/11/04 Schools should not be included in Hard to Reach Groups. Highly successful contact has been made in local/primary schools.
R S Jeffries Ranton Parish Council	FG62 - 24/11/04 Students use of University notice boards/Students Union.
No Name Given	FY63 - 24/11/04 For students - publication on University notice boards etc or use Students Union.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

No Name Given **FG64 - 24/11/04**
Think care should be taken that minority lobby groups do not be seen to be representing majority view when in fact they are not.

B Metcalf
31 The Oval **FY65 - 24/11/04**
Crèches needed for lone parents.

Focus groups better for tiny minorities who may not access local media much - transients, new residents, ethnic groups etc.

Question No 5C:

Please give reasons for your suggestions:

English Nature **EM6**
English Nature does not feel able to comment on

Mrs C Spencer
Gnosall Parish Council **FG22**
The Parish Council does not believe that the mechanisms will succeed in reaching young people or transient population but has no alternative suggestions to other.

David Kidney MP
House of Commons **FY24 - 15/11/04**
Just as examples of support:-
Youth: Connexions Youth and Communities, Churches Students
Students Union
Ethnic Minorities
Community Leaders, Church/Temple, Disabled groups, Access Groups, support groups, lone parents, playgroups, churches, HVs.

RAF Stafford **EM31**
As Community Development Worker at RAF Stafford, I believe that stronger links could be made between the RAF and the wider community.

Judy Palmer
Norbury Parish Council **FG37 - 20/11/04 - 22/11/04**
Efforts, need to be made to persuade hard to reach individuals (as most are **NOT** part of groups) that their opinion are valuable and valid.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Y Pynenburg
The High
House

FY54 - 24/11/04
Councillors will need enough hard copies of applications to deliver to all the residents. He will need an office in order for the plans to be seen locally. He will need a list of names and telephone numbers of Borough employees who can answer any queries regarding planning applications. Parish Councillors should share this role in order that the information is distributed at ground level.

Mrs C M
Edwards
Retired Local
Government
Officer

FY55 - 24/11/04
My husband is partially sighted and on the Staffordshire County Council Register - so this could be used to access ????? / disabled / lone parents and elderly and infirmed? Data Protection.

Pam Morris
Colwich
Parish
Council

FG58 - 24/11/04
Successful achievements.

R S Jeffries
Ranton
Parish
Council

FG62 - 24/11/04
Students are unlikely to use SBC website.

No Name
Given

63 - 24/11/04
Students are unlikely to look at SBC publication or website.

Question No 6B

Do you have any suitable alternatives or improvements if you think the Performance Indicators are not appropriate?

If so please state your alternative suggestions below:

None

FB2 - 11/10/04
What about monitoring returns from hard to reach groups.

A L Murray
for Mr P Till of
Wolseley
Park Farm

EM15
Need to give explicit recognition to the views of adjoining Planning Authorities as to development need and to adjoining residents who live in Cannock Chase District as explained above.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Reverend E Cockbill Sandon Road Baptist Church & Beacon Community Project

FB18
Real community involvement and consultation is encouraged and developed by people seeing that their views have been considered and that their involvement has made a difference. Merely recording numbers contacted won't do. You need openness and honesty from Borough Councillors and Officers re the good and bad parts of their community relationships.

Mrs C Spencer Gnosall Parish Council

FG22
Given general public apathy performance indicators will not reflect the effort made. It is the Parish Council's opinion members of the public are only interested when a planning application affects them personally and they are not interested in planning policies by themselves.

Judy Palmer Norbury Parish Council

FG37 - 20/11/04 - 22/11/04
A performance indicator needs to be a quality indicator not a quantity indicator.

Mrs C Heelis Eccleshall Parish Council

FG57 - 24/11/04
How will the numbers of people participating in consultations on the number logging on be quantified in terms of success of consultation?

S Lawley Staffordshire Wildlife Trust

60 - 24/11/04
Number of responses needs to be compared to previous similar consultations.

Website responses do not usually distinguish between, say, 10 visits by one person or one visit by each of 10 people.

No Name Given

FG64 - 24/11/04
A large number of people may be against a development but take no part in any active involvement this would call into question accuracy of performance indicators.

B Metcalf 31 The Oval

FY65 - 24/11/04
A jargon than task unlikely to have much impact on what is said and done.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Question No 6C

Please give reasons for your alternative suggestions:

English Nature	EM6 Whilst English Nature has 'ticked' the 'appropriate' box, you may wish to consider a Performance Indicator that monitors the Borough's effectiveness in terms of consulting Appendix 7 consultees ie are they being consulted over all applications that relate to their specific interest and not being sent consultations that do not affect them.
Y Pynenburg The High House	FY54 - 24/11/04 You can prove anything you like with statistics what we need is action, not statistics.
Mrs C M Edwards Retired Local Government Officer	FY55 - 24/11/04 If it wasn't for Creswell Parish Council I would not have known about the Development by the mile slip road - as I'm in the Borough.
S Lawley Staffordshire Wildlife Trust	60 - 24/11/04 If the public have been made aware of a proposal through the LDF process, the number of responses should be equal to the number of responses that would be received for a corresponding planning application.
B Metcalf 31 The Oval	FY65 - 24/11/04 Don't know. Perhaps we need to have a go - but think it a fairly unrewarding task.

Question No 7B

Do you have any further suggestions of techniques for publicising Significant and Fast Track Planning Applications if you think those identified are not appropriate? If so please state your suggestions below:

David Kidney MP House of Commons	FY24 - 15/11/04 The pro forma mentions public meetings but these are not mentioned here. The Community Interest Consultees should include other groups than just those who have registered (eg community leaders, hard to reach groups, neighbours in appropriate cases).
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STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

- R O Foulkes
Ramblers
Association
- FY36 - 20/11/04**
- 1 Page 17 (para 15.7, 15.8) pre-application discussions are of considerable importance and should be placed in the Statement immediately following para (15.1).
 - 2 Appendix - Consultation Techniques (1) Community Interest consultees should be included with residents.
-
- Judy Palmer
Norbury
Parish
Council
- FG37 - 20/11/04 - 22/11/04**
- We are concerned over lack of neighbourhood letters and exclusion of Parish Council input.
-
- Tanya
Rountree
West
Midlands
Regional
Assembly
- 46**
- There may be scope to set up links with the KEN (knowledge engine) and the WMRA website for regionally significant applications.
-
- Sebastian
Tibenham -
The
Development
Planning
Partnership
- LET 51**
- Paragraph 15.6 should read: "Community Groups, key stakeholders and other sectors of the community will be able to sign up for inclusion on a database recognising their interest in Major Planning applications per word(s) or by type of proposed development".
-
- No Name
Given
- FG52 - 22/11/04**
- Item 15.9, it could be difficult for the smaller Parish Councils to assist in this way due to lack of premises and suitable resources.
-
- Y Pynenburg
The High
House
- FY54 - 24/11/04**
- I like points 15.7 and 15.8 where pre-application consultation happens. This is good. The points 15.2 and 15.3 about the media appears pointless as you exonerate yourselves from liability if the media do not publish your notices. I think the 21 site notice is too short. Four to six weeks would be more appropriate. There should be no fast-track applications. They should all be considered carefully.
-
- Mrs C M
Edwards
Retired Local
Government
Officer
- FY55 - 24/11/04**
- But more use of leaflets to each household in ½ mile radius.
-

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Mrs C Heelis **FG57 - 24/11/04**
Eccleshall How will pre-applications be conducted with the community and
Parish Stakeholders, Councillor. Surgeries are not held in this Parish to allow for
Council consultation.

Pam Morris **FG58 - 24/11/04**
Colwich Concern here that smaller developments can lead to fast track system
Parish which we find worrying.
Council

No Name **FG64 - 24/11/04**
Given The number of people reading local paper, particularly public notices, will
limit the number seeing the information.

B Metcalf **FY65 - 24/11/04**
31 The Oval 15.3 - It would help if we know **which** newspaper and a particular one was
always used and any others.

Website listings should stay for a fortnight at least after doing date.

Question No 7C

Please give reason for your suggestions:

David Kidney **FY24 - 15/11/04**
MP For adequate coverage. Please also refer to Parish Councils as more
House of valuable than conduits (paras 15.9 and 15.10).
Commons

R O Foulkes **FY36 - 20/11/04**
Ramblers To place greater emphasis on the need for pre-application consultation
Association before attitudes become family fixed in the minds of applicants and officials
- unnecessary arguments and disagreements delays can be avoided by
use of preliminary discussion.

Judy Palmer **FG37 - 20/11/04 - 22/11/04**
Norbury Significant and fast applications are by their very nature big and important
Parish ones.
Council

They need local input Parish Councils could work within shortened
response times.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Sebastian Tibenham - The Development Planning Partnership

LET 51
To ensure the database option is available to all and can be utilised in order to monitor Major Applications by word or type.

Y Pynenburg
The High House

FY54 - 24/11/04
See my comments under section "Statement of Compliance Pro formas" and "Hard to Reach Groups". There must be more information at village level.

Mrs C M Edwards
Retired Local Government Officer

FY55 - 24/11/04
This wouldn't cost much with - "Free Newspapers" acting as delivery agents. Use local shops and post offices for posters.

Pam Morris
Colwich Parish Council

FG58 - 24/11/04
Insufficient time for due consideration.

B Metcalf
31 The Oval

FY65 - 24/11/04
To ensure people don't miss things.

Am very uneasy about fast track decisions. Think they cannot be quality decisions.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Question No 8b

Do you have any further suggestions of techniques for consultation and participation on Local Development Documents if you think those identified are not appropriate? If so please state your suggestions below:

Sport England	EM3 Subject to Sport England being consulted at all
A L Murray for Mr P Till of Wolseley Park Farm	EM15 There is a need to ensure that in the light of the Barker Review of housing development in the UK adequate consultation mechanisms are in place to ensure a full understanding of the nature and trends in the local housing market including that of adjoining areas to the Borough, through involvement of agencies concerned with servicing of development land, new housing development and the financing of development and house purchase
Reverend E Cockbill Sandon Road Baptist Church & Beacon Community Project	FB18 I think fast-track systems are for minor development matters and NOT for industrial and commercial plans which need wider community consultation.
David Kidney MP House of Commons	FY24 - 15/11/04 More use of the variety referred to in my last answer eg public meeting, community leaders etc.
Judy Palmer Norbury Parish Council	FG37 - 20/11/04 - 22/11/04 Please ensure that Parish Council participation is in an easy to use format.
Tanya Rountree West Midlands Regional Assembly	46 The RPB would anticipate involvement in the frontloading stage of LDD development via the Regional Conformity Advisors.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Y Pynenburg **FY54 - 24/11/04**
The High House
I believe that the Local Development Documents should favour the farming community, not the building sector. We are a **rural** county. We need to help our farmers.

S Lawley **60 - 24/11/04**
Staffordshire Wildlife Trust
Plans showing development proposals need to be displayed on or near land affected.

No Name **FG64 - 24/11/04**
Given
Practical and suitable timetable for consultation is important. Any delay in making information available should not be made up by shortening consultation period. Query effectiveness of posters in Council Offices - very limited audience.

B Metcalf **FY65 - 24/11/04**
31 The Oval
SDV's requires priority.
Focus groups where appropriate.

Question No 8c

Please give reasons for your suggestions:

Reverend E **FB18**
Cockbill
Sandon Road
Baptist
Church &
Beacon
Community
Project
We are the community and Stafford to be affected by industrial/commercial developments and shouldn't be excluded from proper consultation by fast-tracking certain plans simply based on prosperity - there are other factors affecting the quality of our lives.

Judy Palmer **FG37 - 20/11/04 - 22/11/04**
Norbury
Parish
Council
There should be opportunity for people to initiate change and ideas rather than just commenting on what's put forward.

S Lawley **60 - 24/11/04**
Staffordshire Wildlife Trust
SWT have been concerned for a long time that the public do not engage with strategic planning processes. Our experience shows that public usually become involved at planning application stage when it becomes clear that they are directly affected.

**STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY
INVOLVEMENT SCHEDULE OF REPRESENTATIONS**

Question No 9B

Do you have any further suggestions of techniques for consultation and participation on Significant Planning Applications if you think those identified are not appropriate? If so please state your suggestions below:

Sport England **EM3**
Subject to Sport England being consulted on all major development proposals, even where not a statutory consultee, if additional demand will arise (eg from new housing) for community sports facilities.

Mrs C Spencer Gnosall Parish Council **FG22**
Will Parish Councils automatically be included on the database for consultation on major planning applications?

R O Foulkes Ramblers Association **FY36 - 20/11/04**
1 Page 17 (para 15.7, 15.8) pre-application discussions are of considerable importance and should be placed in the Statement immediately following para (15.1).
2 Appendix - Consultation Techniques (1) Community Interest consultees should be included with residents.

Judy Palmer Norbury Parish Council **FG37 - 20/11/04 - 22/11/04**
We are concerned over lack of neighbourhood letters and exclusion of Parish Council input.

South Western Staffordshire Primary Care Trust **EM42**
The Community Interest consultees database

Tanya Rountree West Midlands Regional Assembly **46**
Page 17, para 15.7, 15.8 - The Regional Planning Body will have a statutory duty to provide an opinion on Regional Significant planning applications from Spring 2005. We would anticipate the involvement of Regional Conformity Advisors in frontloading discussions.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Sebastian Tibenham - The Development Planning Partnership **LET 51**
There should be a pre-consultation stage whereby the Applicant, together with the Council, agree a pre-application consultation plan, which is based on an initial assessment of the proposal and identifies the extent and type of consultation to be undertaken.

Y Pynenburg The High House **FY54 - 24/11/04**
See comments on question about Techniques for Publicising Significant and Fast Track Planning Applications.

No Name Given **FY63 - 24/11/04**
Essential that Parish Councils are fully involved.

Question No 9C

Please give reasons for your suggestions:

Sport England **EM3**
New housing and employment sites can generate additional demand for community sports facilities. If existing provision does not have the capacity to absorb the extra demand then planning obligations may be needed to provide required investment to address the demand.

A L Murray for Mr P Till of Wolseley Park Farm **EM15**
Section: Appendix 4
Paragraph Ref No: Target audience to incl other adjoining residents
Page No: Appendix 5
Appendix No: Reference to adjoining District's LDDs required
These amendments reflect the concerns of my client that the plan proposal which he wishes to see considered in the plan will not be given a fair hearing unless the needs of adjoining plans and the legitimate concerns of affected adjoining residents outside the borough are planned to be incorporated into the overall community assessment process. Appendix 8 and 11 could also make explicit reference to the interests of adjoining District Councils.

Mrs C Spencer Gnosall Parish Council **FG22**
How will groups be made aware of the possibility of signing up for inclusion on this database.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

R O Foulkes
Ramblers
Association

FY36 - 20/11/04
To place greater emphasis on the need for pre-application consultation before attitudes become family fixed in the minds of applicants and officials - unnecessary arguments and disagreements delays can be avoided by use of preliminary discussion.

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04
Significant and fast applications are by their very nature big and important ones.

They need local input Parish Councils could work within shortened response times.

Tanya
Rountree
West
Midlands
Regional
Assembly

46
Page 13-15 - Regionally significant planning applications are defined in the RPB conformity protocol. ODPM has asked each RPB to determine "regionally significant".
It is likely that RPBs will have 21 days to form a view.

Sebastian
Tibenham -
The
Development
Planning
Partnership

LET 51
See covering letter for reasons and rationale

Question No 10b Comments

Sport
England

EM3
Section: -
Paragraph Ref No: 6.4
Page No: 5
Appendix No: 7
Ref to the 'Sports Council' in Appx 7 should be changed to 'Sport England'

English
Heritage

EM6
Section: -
Paragraph Ref No: -
Page No: A4 & A20
Appendix No: Appendix 3 & Appendix 7

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

Appendix 3 - at what point in the process will the assessment under the terms of the Strategic Environmental Assessment Regulations take place

Appendix 7 - Section 73 of The Countryside and Rights of Way Act 2000 formally changed The Nature Conservancy Council for England into English Nature and this name should be used in Appendix 7

The Statement of Compliance Pro forma will help measure the local authorities responsibilities in meeting Equal Opportunities and Disability Discrimination Act requirements.

Carol Muston
House
Builders
Federation

FY17

The Council should produce a Standard Consultee list for DPD's and this should be included in an Appendix, based on the categories set out in 6.2 and 6.3 on page 5.

David Kidney
MP
House of
Commons

FY24 - 15/11/04

I like the Q&A summary document "Introducing the Stafford Borough Draft Statement of Community Involvement".

Would it be possible to produce a similar easy - to read summary of the Statement of Community Involvement for wide distribution alerting everyone to the existence of the full document.

R O Foulkes
Ramblers
Association

FY36 - 20/11/04

General - My apologies for appearing to repeat myself in my replies - I think this is largely due to a significant amount of repetition in the draft document - you may wish to look at this in the final document - it would probably make it easier for the general public to understand.

Judy Palmer
Norbury
Parish
Council

FG37 - 20/11/04 - 22/11/04

It is very confusing to have a headline title of - "Significant Planning Application".

The "sub headings" of

Tier 1 Major applications

Tier 2 Major applications

Tier 3 Significant applications

Fast track application

The use of significant twice is very confusing as it is difficult to realise if you are talking about all 4 levels or just tier 3.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

We feel that all the effort put into planning consultation/community involvement should be rolled out into other areas eg street lighting, housing quality and need, road speeds etc.

Public transport requirements.

This would be much better value for money.

M
Buckingham

FY38 - 20/11/04 - 22/11/04

I expect you will put the good of the town and community first.

I just hope that the small amount of green spaces on estates will be kept green spaces.

So many ideas are being put forward for playgrounds which cause problems for the people who live by the greens.

James
Cheadle
Laburnum
Cottage

FY39 - 20/11/04 - 22/11/04

I find the English difficult.

There is also no stages' ladder to follow as to what happens when.

Roddy
Bushnell
Stafford
Gospel Trust

FY40 - 20/11/04 - 22/11/04

I am not sure which is the best section so please excuse not filling in the above boxes. The concern of the Stafford Gospel Trust is that in the current Local Plan there is no specific provision for allocation of land for churches. The new Local Development Framework needs to have this provision included.

The Stafford Gospel Trust will gladly be involved in the LDF and would request provision in the Statement of Community Involvement.

Thank you.

South
Western
Staffordshire
Primary Care
Trust

EM42

This document is very clear and concise, leaving no room for misinterpretation.

The vision is a clear statement of intent and direction of travel. Evidencing how the criteria was met in the Statement of Compliance Pro forma will contribute to monitoring the effectiveness of consultation techniques and community involvement participation levels.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

M J Manley
Fulford Parish
Council

FG43
Borough Ambassadors need to be identified. Further clarification is thought necessary as to the provision of surgeries and if, as likely, existing community buildings will be utilised, is adequate finance going to be available?

Tanya
Rountree
West
Midlands
Regional
Assembly

46
Appendices 2 (Glossary) and 3 (process diagram) refer to monitoring. The linkages between LDF monitoring and regional monitoring and how outputs are feedback to the community may be an issue to include in a SCI in the future for additional information contact Paul Bayliss 021 6781027, p.bayliss@wmlga.gov.uk.

J Blount -
Stowe by
Chartley
Parish
Council

FG WD 49 (L)
Citizenship lessons. Perhaps these lessons should explain that we are subjects and not citizens and the importance of this distinction

Ben McDyre,
McDyre and
Co

FY WD 50 (L)
Fast track applications.
Should include housing developments
Creating 10 or more directing units

Mandip
Dhillon (RPS)
On behalf of
BT plc

FP53 - 22/11/04
See attached letter.

Y Pynenburg
The High
House

FY54 - 24/11/04
We need to protect our open space inside and outside the village. Green space in the village is important as a buffer between our neighbours. This reduces domestic disputes. Green space is relaxing. It is good for our health and good for our minds.

Consultation at village level has to improve significantly. Parish and Borough Councillors *must* be given the tools to do this work effectively. They, and we, need more information and more time for consultation.

Allotments should be cultivated. Health chiefs tell us to buy locally grown produce. Allotments have a lot to offer; locally grown produce, good exercise, relaxing atmosphere, melting like minded people growing your own flowers, fruits. It is an excellent use of open space and its cheap to do. We can track our children so much about mature too.

STAFFORD BOROUGH DRAFT STATEMENT OF COMMUNITY INVOLVEMENT SCHEDULE OF REPRESENTATIONS

We are a usual county. We need to protect and support farming and rural pursuits. We must discourage unnecessary building and promote the unique “green” aspect of our county.

Your department do not even talk to each other “Apple Store, Early Lane” - exit on to highway - exception dangerous. But because it is not adopted it was even referred to Highways. Each department thinks they done the right thing yet this dangerous result is allowed to get through. No overseer for obv dangers occurred by inter departmental ?????

Sharon Jones
Highways
Agency

FP56 - 24/11/04

The SCI clearly sets out its purpose and how it intends to achieve its objectives, however it is felt that the Highways Agency would like to request the following amendments to the SCI.

The SCI should include text to highlight that it is a legal requirement to consult the Highways Agency on certain applications close to the trunk road network.

Paragraph 6.4 of the SCI should say that standard consultees will be consulted on the LDDs such as the Core Strategy and Site Specific Allocations as well as on major applications.

The definition of “significant” and “major” planning applications should be included within the SCI, in relation to applications that Standard Consultees can comment on.

With regard to the Policy Based DPDs, the Council needs to clarify whether transport is included in the “specific topics”. If so then the SCI should include text recognising the Highways Agency as a consultee.

The Site Specific DPDs should include text to state that the Highways Agency should be consulted if the specific areas for future development are in close vicinity to the trunk road network. This also applies to the Area Action Plan DPDs.

Development adjacent to trunk road junctions need to be classed as “sensitive” under the Tier 3 point (2) definitions.

Appendix 13 needs to include text to ensure that the Highways Agency are consulted at pre-application stage for significant and fast track planning applications, in particular where they may have an impact on the trunk road network.

The procedures for co-ordination between Stafford Borough Council and the Highways Agency should be set out within the SCI.
