

Appendix B

Representations received from 1st Draft SCI consultation
Regulation 25
26th August to 17th October 2005

Forward Planning Team
Rossendale Borough Council

Summary of Representation (by theme)	Council Response/ Action Taken
Strategic Environmental Assessment (SEA)/ Sustainability Appraisal (SA)	
<ul style="list-style-type: none"> Need to expand to better explain the relation between the two processes and their integration into one appraisal process. 	<ul style="list-style-type: none"> Diagram produced in Section 1 to accompany SA and SEA paragraph.
Development Control / Planning Applications	
<ul style="list-style-type: none"> PS11 guidance states SCI should include how people will be consulted on planning applications, involved in decision making progress 	<ul style="list-style-type: none"> Incorporated into Service Review for Planning Department and addressed through outcomes of the review.
<ul style="list-style-type: none"> Expand tables indicating methods of consultation to indicate 'methods used to engage different audiences in the decision making process re. planning apps 	<ul style="list-style-type: none"> The Development Control Service has developed a range of functions on the Council's website www.rossendale.gov.uk with Planning Portal. This allows access to planning applications and the consultation process.
<ul style="list-style-type: none"> Indicate important status of DPD in decision of planning application 	
<ul style="list-style-type: none"> Include how council will consult on planning apps (site notices, weekly planning lists online/press) 	<ul style="list-style-type: none"> View the Rossendale District Local Plan - (Interactive)
<ul style="list-style-type: none"> Include pre-application consultation section, including benefits of highlighting issues early 	<ul style="list-style-type: none"> Comment on Planning Applications using our online form.
<ul style="list-style-type: none"> Council should make plans, drawings, officer reports and decision notices available online to make info accessible out-of-hours 	<ul style="list-style-type: none"> View the Planning Application Register View the Planning Applications received this week Monitor Current Planning Applications View Decisions on Planning Applications View Planning Application Plans / Drawings and Correspondance Submit a Planning Application to us
<ul style="list-style-type: none"> Why does the council make no provision for consultation on the way that the DC committee works e.g. by means of feedback form and consultation with strategic community groups that regularly attend the meetings. 	<ul style="list-style-type: none"> Pay Planning Application Fees Online Section 3: Pre application consultation has now been prepared and outlines the Council's approach to consultation on planning applications.
<ul style="list-style-type: none"> Why are reports not written in a way that enables all the consultation and notification responses and the officers advice to be read and considered together? 	
<ul style="list-style-type: none"> Can members of the public be supplied with a copy of the agenda and late issues report? 	
<ul style="list-style-type: none"> Underline the value and importance of pre-application discussions with English Heritage on proposals with the potential for major change or damage to nationally important heritage assets. 	
<ul style="list-style-type: none"> SCI fails to clarify the consultation exercises expected from applicants and development control – develop a section titled planning applications which sets out consultation exercises and statements expected from any Planning Application ranging from minor to major applications. 	

Consultation Groups	
<ul style="list-style-type: none"> Name Manchester Airport as a consultant body (Appendix 2). 	<ul style="list-style-type: none"> Inputted in Utilities and Infrastructure Section of Appendix 3.
<ul style="list-style-type: none"> Parish Councils need consulting 	<ul style="list-style-type: none"> Inputted into Elected Councillors section of Appendix 3.
<ul style="list-style-type: none"> Landowners should be explicitly recognised as a consultation category in table 2. 	<ul style="list-style-type: none"> Further detail added in Utilities and Infrastructure and developers sections of Appendix 3.
<ul style="list-style-type: none"> Include Royal Mail as statutory consultee on list of groups notified of major planning applications (table 2) 	<ul style="list-style-type: none"> Development Control
Wording / Grammar	
<ul style="list-style-type: none"> Para 1.1 – wording of first sentence does not make sense 	<ul style="list-style-type: none"> Text Revised (see Section 1)
<ul style="list-style-type: none"> Para 1.11 – vision for Rossendale unclear 	<ul style="list-style-type: none"> Text Revised (see Section 1)
<ul style="list-style-type: none"> Remove Rossendale Alive Logo 	<ul style="list-style-type: none"> Removed (see Section 2)
<ul style="list-style-type: none"> Change the generic reference to RDA in Appendix 2 to relevant RDAs for Rossendale, namely NWDA and Yorkshire Forward 	<ul style="list-style-type: none"> Government Agency and Departments section Appendix 3
<ul style="list-style-type: none"> Table 5 & 6: state that documents will be available on the website again here for clarity 	<ul style="list-style-type: none">
Community Involvement Methods	
<ul style="list-style-type: none"> Not clear how hard to reach groups will be targeted 	<ul style="list-style-type: none"> Section 2 provides text on how Council will target community and hard to reach groups via the Rossendale Partnership and Community Network. Hard to Reach Group identified in Hard to Reach Groups section in Appendix 3
<ul style="list-style-type: none"> Stronger connection between the consultation that is carried out and the decisions later taken – emphasis on improving feedback to improve confidence that consultation is worthwhile 	<ul style="list-style-type: none"> Section 2 provides text on the Representation Process with “3 Step” diagram provided in relation to Regulation 27 of the Planning Act 2004.
<ul style="list-style-type: none"> Utilise opinion polls on website as consultation procedure 	<ul style="list-style-type: none">
<ul style="list-style-type: none"> SCI should acknowledge communities comments must be balanced against other objections/considerations 	<ul style="list-style-type: none"> Section titles Representation Process (page 15)
<ul style="list-style-type: none"> Identify circumstances where shared or focused consultation arrangements may be appropriate. 	<ul style="list-style-type: none">
<ul style="list-style-type: none"> Issue a consultation statement after each consultation period – make a statutory requirement in SCI. 	<ul style="list-style-type: none"> Statements of consultation are required in Regulation 27 & 28 of the Planning Act 2004. The Council will provide documentation that presents the representations received and summaries of those representation to provide stakeholder with transparent
<ul style="list-style-type: none"> Para 2.5 – need to make people aware of which documents the council intends to produce. This can be done by sending a letter to all on database asking what documents they wish to be 	<ul style="list-style-type: none"> All documents to be produced are identified in the Local Development Scheme. However the Council will consider the approach to ensure more considered targeting of consultees is

consulted on (tick relevant) or send letter at very beginning of each process so they are aware it has started.	achieved.
<ul style="list-style-type: none"> Minimum statutory requirement of 5 days notice prior to a key decision is too short. Denies time for community groups to debate proposals and give a considered response, denies public debate as the free press is only published weekly. Therefore 5 day rule incompatible with genuine process of community involvement in planning so needs to be addressed in SCI. 	<ul style="list-style-type: none"> Information on the Council's consultation is provided in Appendix 5
<ul style="list-style-type: none"> Three planks to community involvement: Access to Information; Access to Decision-Making; and Access to Justice – should these be addressed and referred to in the SCI? 	<ul style="list-style-type: none"> Addressed in Appendix 2: Stages and Methods of Consultation and Appendix 5: The Council Constitution. Further information provided in Section 2, Figure 4: The Basic Steps of LDF Preparation, Consultation and the Forward Plan Process.
<ul style="list-style-type: none"> What provision will be made for complaints about the process so they can be resolved prior to representations stage? 	<ul style="list-style-type: none"> The Council will prepare all documents that will form the LDF in accordance with the regulatory requirements by the Planning and Compulsory Purchase Act 2004. The new planning system provides opportunity for consultation in several stages where comments received during the stages of Regulation 25, 26, 27 and 28 will ensure that the Council comment on all representation received.
<ul style="list-style-type: none"> SCI should state a commitment to incorporate various methods as appropriate. 	<ul style="list-style-type: none"> Addressed in Appendix 2: Stages and Methods of Consultation Table.
<ul style="list-style-type: none"> The SCI needs to set standards for analysis of the results of consultation in both quantitative and qualitative terms and ensure that the basis of monitor evaluation is relevant to the aim of involving the community and is not tick boxed. 	<ul style="list-style-type: none"> Appendix 1 provides text on the approach to consultation and the need to record all comments on the Council's approach to consultation. This will provide the basis for developing thresholds whereby a review on methods of consultation can be based.
<ul style="list-style-type: none"> Section 2, Para 2.4: Not clear from the document layout how the LA will seek to engage with the different bodies 	<ul style="list-style-type: none"> Addressed in Appendix 2 Stages and Methods of Consultation Table.
<ul style="list-style-type: none"> Section 2, Para 2.7: Whilst steps of consultation is listed, again no clarity of engaging the different groups is present 	<ul style="list-style-type: none"> Addressed in Appendix 2: Stages and Methods of Consultation Table.
<ul style="list-style-type: none"> Appendix 2, Para 4: Wish to see highways agency listed. 	<ul style="list-style-type: none"> Addressed in Appendix 3: Consultees Schedule
<ul style="list-style-type: none"> SCI would seem to fail the test for soundness on iv and ix as there seems no clear definition of engaging with the different bodies – needs to be set out more clearly and easier to follow. 	<ul style="list-style-type: none"> Addressed in Appendix 2: Stages and Methods of Consultation and Appendix 5: The Council Constitution.
Resources	
<ul style="list-style-type: none"> Show how the process of involvement will be resourced and managed 	<ul style="list-style-type: none"> Section 2 provides sections on preparation stages and the

efficiently and how results will feed into preparation of LDDs	Representation process with Figures 2 & 3 providing diagrams of the process.
<ul style="list-style-type: none"> Seek to address the balance between consultation fatigue, which is timely and costly, and the need for the community to be consulted properly. 	<ul style="list-style-type: none"> The Council has considered this view and will address this through the revised Local Development Scheme, whereby timetables will consider the amount and timing of preparation stages in relation to achieving effective community engagement and consultation.
<ul style="list-style-type: none"> Set out resources available / needed to comply with consultation requirements 	<ul style="list-style-type: none"> Addressed in Appendix 1, Table 1
Procedure Queries	
<ul style="list-style-type: none"> What stage does the SoS have to get an external examiner in to review the SCI? 	<ul style="list-style-type: none"> Addressed in Stages and Methods of Consultation Table in Appendix 2.
<ul style="list-style-type: none"> Who is responsible for different levels of decision –making, advice and information to the community on the various plan proposals; specify a main contact for queries and a standard response time. 	<ul style="list-style-type: none"> Appendix 1, Table 1 provides a structure and hierarchy of officers. Appendix 6 provides contact details for Council services.
<ul style="list-style-type: none"> Clarify the decision process at each stage of any plan development with particular reference to the roll of full council and of O&S policy Development Committee. 	<ul style="list-style-type: none"> Addressed in Stages and Methods of Consultation Table in Appendix 2 and in Figure 4: The Basic Steps of LDF Preparation, Consultation and the Forward Plan Process.
Additional comments	
<ul style="list-style-type: none"> Reflect in SCI how engage communities on landscape, access and recreation interests 	<ul style="list-style-type: none"> Section 3: Pre application consultation has now been prepared and outlines the Council's approach to consultation on planning applications. Addressed in Stages and Methods of Consultation Table in Appendix 2 and in
<ul style="list-style-type: none"> Advise National Trust of DPD and SPD consultations 	<ul style="list-style-type: none"> Appendix 3 prepared National Trust included in Schedule of Consultees.
<ul style="list-style-type: none"> Send hard copy of any correspondence and documents relating to the LDF or SPD top ensure they can fully engage in the process. 	<ul style="list-style-type: none"> The Council will provide paper copies o to consultees where it considered appropriate. During period of consultation copies will be provided in the Council's One Stop Shop.
<ul style="list-style-type: none"> Never have more than 3 to 5 specific issues consulted at one time 	<ul style="list-style-type: none"> The Council recognises the need to present information in a range of formats to meet the requirements of Stakeholders. Where appropriate summaries will be provided, however the broad remit of planning issues will sometimes require a level of detail in order for the Council to demonstrate transparency in its decision making.
<ul style="list-style-type: none"> Councillors need to be properly briefed on LDS etc, training should include the ODPM guidance on community involvement and specific requirements set out in PPS12. 	<ul style="list-style-type: none"> Member Development in Planning issues has been addressed by the Council's Senior Management Team and will commence in 2006.
<ul style="list-style-type: none"> The council needs to set up and maintain robust systems for monitoring community involvement in its meetings 	<ul style="list-style-type: none"> The Council recognises and has begun to develop a framework from which methods of consultation can be monitored

<p>(currently got all structural elements in place but level of participation is poor to non-existent). Also outline role and objectives of key community involvement groups – <i>this could perhaps be outlined in SCI.</i></p>	<p>including:</p> <ul style="list-style-type: none"> ▪ Analysis of amount and methods of returning representation. ▪ The development of the Council's website and related reporting functions such as number of hits per section and number of times documents are viewed and downloaded.
<ul style="list-style-type: none"> ▪ Clear guidelines need to be included in the SCI regarding confidentiality, including in respect of feedback to consultation by all categories. 	<ul style="list-style-type: none"> ▪ All representation received by individual members of the public will remain hidden when representation are published and will adhere to the Data Protection Act 1998.
<ul style="list-style-type: none"> ▪ The council needs to set clear standards for each of the main categories that will ensure equality, equity and engagement. 	<ul style="list-style-type: none"> ▪ Addressed in Stages and Methods of Consultation Table in Appendix 2.
<ul style="list-style-type: none"> ▪ Essential private sector adequately consulted in preparation of LDF so welcomes inclusion of 'commercial interests' and 'developers' in Table 2. 	<ul style="list-style-type: none"> ▪ Further consultees added in Appendix 3 Schedule of Consultees.
<ul style="list-style-type: none"> ▪ Ensure comprehensive consultation at all stages of LDF including office, employment, quarrying, waste and renewable energy development. 	<ul style="list-style-type: none"> ▪ Addressed in Stages and Methods of Consultation Table in Appendix 2. ▪ Further consultees added in Appendix 3 Schedule of Consultees.