



Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Statement of Community Involvement

Joint Consultation Report

July 2015

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Introduction

This Joint Consultation Report sets out how the consultation on the Draft Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Statement of Community Involvement (SCI) was undertaken, who was consulted, a summary of main issues raised in the consultation responses and a summary of how these issues have been considered. The SCI was adopted by Newcastle-under-Lyme Borough Council on the 15th July 2015 and by Stoke-on-Trent City Council on the 9th July 2015.

Prior to adoption, Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council respective committees and Cabinets have considered the documents. Newcastle-under-Lyme Borough Council's Planning Committee considered a report on the consultation responses and suggested changes to the SCI on the 3RD June 2015 and recommended a grammatical change at paragraph 2.9 (replacing the word which with who) and this was reported to DMPG on the 9th June 2015. Newcastle-under-Lyme Borough Council' Cabinet considered the SCI on the 10th June 2015. Their cabinet decision was that it be commended to Council to adopt the submitted Newcastle-under-Lyme Borough Council and Stoke-on-Trent Statement City Council Statement of Community Involvement. Stoke-on-Trent City Council Cabinet approved the document on the 23rd June 2015 and referred it to Council for adoption. The grammatical change to the SCI Final Version was made prior to consideration by Council.

Regulations

The Planning and Compulsory Purchase Act 2004 section 18 requires that a Council produces a Statement of Community Involvement (SCI). The SCI sets out how and when the local community can be involved in the planning process.

Consultation

How was the consultation on the Draft Joint SCI undertaken and who was consulted

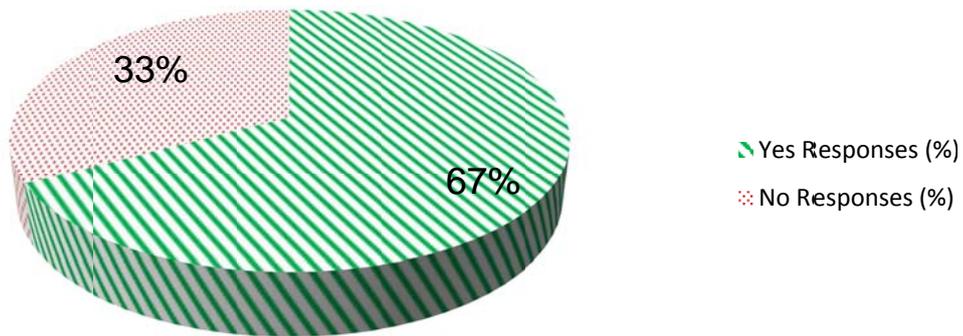
- 6 week public consultation between 10th November 2014 and 19th December 2014
- The council sent 971 letters by post and 560 emails to contacts on the Local Plan database including specific consultees; residents groups; organisations and interested parties. (Appendix 2 provides a summary list of who was consulted on the Draft SCI)
- A joint press release was released on the 7 November 2014 by Newcastle-under-Lyme Borough Council on behalf of both Councils (Appendix 1)
- The SCI was publicised on each council's website during the consultation period.
- An article encouraging the public 'to have their say' appeared in the November edition of Newcastle-under-Lyme Borough Council's paper, The Reporter
- The SCI was publicised via social media i.e. Twitter
- There were 23 respondents to the consultation. Of these 14 were groups/ MPs (6 of these were Newcastle-under-Lyme specific), 9 appear to be members of the public (7 of these provided a Newcastle-under-Lyme Borough postcode and 2 did not provide a postcode but from analysis of the responses they appear to be related to Newcastle-under-Lyme). Therefore approximately 65% of the respondents were

responding in relation to Newcastle-Under-Lyme Borough, and the rest appear to be responding to both. Copies of the SCI were available for inspection in libraries, customer service venues and the civic offices.

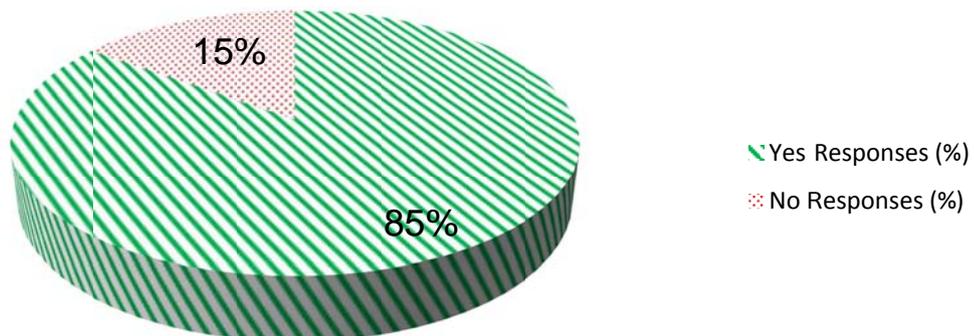
Main issues raised in consultation responses on Draft Joint SCI

The responses of those who responded to the questions asking for a Yes or No answer are shown in the charts below:

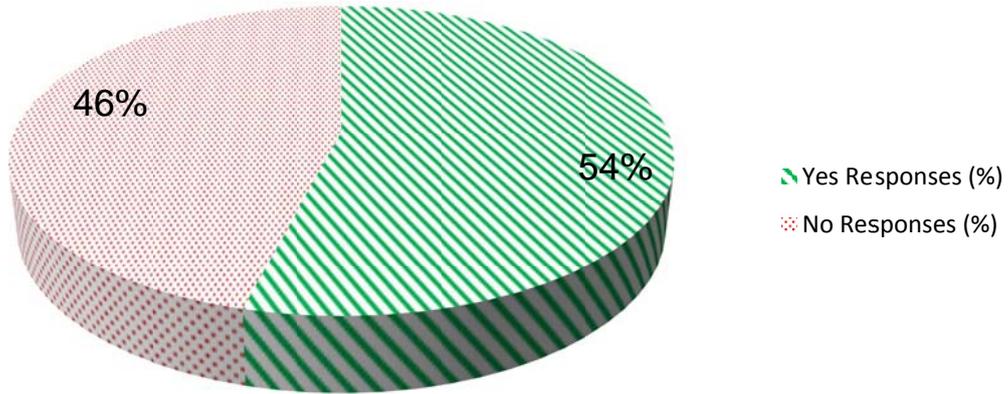
1. Having considered the Draft SCI responses do you feel sufficiently informed in plan-making and decision-taking?



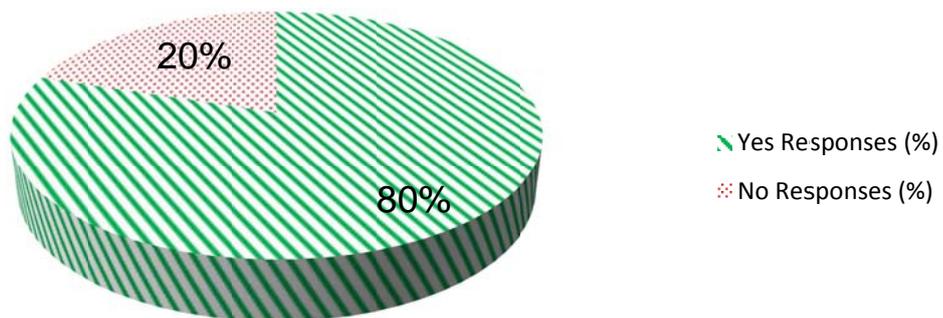
2. Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?



3. Are the consultation proposals described in the Draft SCI sufficient and appropriate?



4. Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?



Main issues raised in consultation responses on Draft Joint SCI

The document is split into three parts incorporating an Introduction and Background; a Planning Policy Section and Development Management Section. The document has been prepared jointly with Newcastle-under-Lyme and there are sections within the document which identify where engagement processes differ across the two authorities as well as where they are the same. In summary the key issues which have been highlighted through the consultation process are:

Part 1 – Introduction and Background

- A number of queries as to the resources available to carry out public consultation effectively, information needs to be more readily available, it must be transparent, sincere, true and open consultation with positive inclusion.
- Concerns from Newcastle residents regarding the decision to prepare a Joint Plan with Stoke-on-Trent City Council.

Part 2 – Planning Policy

- A number supporting the publication of a Joint SCI to inform the Joint Local Plan process.
- Queries around how general members of the public will find out about policy areas. The document needs more explanation on how the plan is being drawn up (more background information required) and then how they can engage in the process. Document not always easy to understand.
- A number of queries around Newcastle-under-Lyme's Cabinet Report in November 2014, regarding the sale of council owned land for development and their inclusion in the Joint Local Plan 'call for sites'.
- Representations from Staffordshire Police with regard the Duty to Co-operate process and the potential to draw up a joint protocol between planning departments and police that serve to identify development requiring automatic consultation with the police. To ensure crime prevention is a key material consideration in both policy development and decision-making.
- Clearer reference is required to Neighbourhood Planning.
- More explanation on the different types of consultation methods to be used in plain English and better use of visual means of engagement.
- More use of the display of notices for proposed development areas, notification by letter and public meetings.

Part 3 – Development Management

- The wording needs to make it clearer that representations to planning applications will not necessarily be taken on board – what people can and cannot influence (clearer explanation on the balance of issues).
- Good summary of how decisions are actually taken – useful tool.
- Concerns relating to the future capacity of planning officers to be able to effectively work with an applicant, the community, elected members and other statutory consultees.
- Better system required (Newcastle website) to enable people to inform themselves on applications which do not require publicity. The saved search suggestion is inadequate.
- Meaningful and productive consultation between developers and communities needs to be given greater weight in planning law.
- There should be a list of issues which are material planning considerations not just those that are not.
- Support for the councils commitment to early and on-going consultation.
- The current planning application process does not allow the public to receive regular updates on what is happening with planning applications in Newcastle-under-Lyme.

- Newcastle-under-Lyme's 'guillotine policy' - a cut off of four days for consultation comments to be submitted before a planning application is determined seems unreasonable. It is not implemented flexibly particularly if a decision is deferred, it is noted that Stoke-on-Trent adopts a different practice. The guillotine's practical operation could be reviewed as part of this SCI exercise - and to ensure all important views by statutory consultees are in the public domain, too, so that full representations can be made.
- The ability for members of the public to address planning committee is not always operated in Newcastle-under-Lyme.
- A more rigorous enforcement regime should be implemented (Newcastle-under-Lyme).
- Too much information is given to the public with unclear outcomes – decision-taking does not appear to be transparent (Newcastle-under-Lyme).
- Newcastle-under-Lyme should adopt the same practices as Stoke-on-Trent with regard to allowing comments up to the date of the Planning Committee and providing acknowledgement letters.
- Staffordshire Police request for a Joint Protocol (further details provided under Part 2 – Planning Policy).

Appendices

- A number of queries relating to whether the list of stakeholders should be expanded to specify each group including parish councils and residents associations and list specific consultation bodies.
- Clarification on whether the definition of neighbours affected by planning applications in rural area is different to urban areas.

Main Changes made to the Draft SCI

The main suggested changes to the Draft SCI are summarised below:

Part 1 – Introduction and Background

- **Paragraph 1.4** update the section to identify that “In many cases the proposals in the SCI go beyond the minimum legal requirements. However, both councils have also recognised the need to deliver a service which is both effective and cost efficient.”
- **Paragraph 1.17** update to reflect the Equality Act 2010 and that both councils have processes established for assessing the potential impacts of planning policy documents on equality called Equality Impact Assessment (EIA). Both councils will undertake EIA of planning policy documents that are to be produced in line with the respective council's requirements and that the EIA will be published on their websites. It identifies that the Councils, in their endeavour to work in an inclusive manner will consider the way they deliver planning services from the perspective of a range of users, including 'hard to reach' groups (definition of 'hard to reach' added to the glossary).
- Insert **new paragraph before 1.20** further explaining the planning system and NPPF requirements.
- Add **new sections** within 'The Planning System: plan-making and decision-taking' on '**Local authority plans**' and '**Neighbourhood plans**'. Within the neighbourhood plans section include that further information will be available on both councils' websites.

Part 2 – Planning Policy

- **Delete part of paragraph 2.2** on consultation methods having taken into account Newcastle-under-Lyme Borough Council's public consultation exercise in 2012 to determine the scope and methods to be used in public consultation on the allocations and local planning policies and replace with text explaining that the councils recognise that there are groups with existing communication networks in their areas, that can be key contributors in increasing awareness at the local level, particularly in the rural area.
- **Add a new sentence at paragraph 2.8** that the councils will put in place a shared data agreement to ensure the protection of personal data submitted with consultation responses and identified on the respective planning policy consultation database of each council.
- Further explanation suggested to be added to **paragraph 2.9** explaining that Appendix 1 only contains those consultees and stakeholders which must be consulted in order to meet the requirements of section 18 and that both councils are committed to informing all those who have made requests to the councils that they wish to be informed of future consultation by including them on the consultation database. Also, that due to the timescales involved in producing planning policy documents and the number of people wishing to be kept informed, the councils have not listed them in Appendix 1.
- Add a new sub-section 'Availability of Information on the councils Websites' and a **new paragraph 2.11** that both councils will endeavour to ensure that the information on plan-making activities, including stages in the process, can easily be located on their websites by the use of shortcut links. During consultation periods each council will endeavour to provide a link on their respective homepage to help you access relevant information, including the council's evidence base. (Subsequent paragraph numbers in Part 2 to be changed to reflect this change).
- Add to **paragraph 2.13** further explanation as to who may be involved in duty to cooperate discussions.
- Add **further text to Diagram 1**: The Joint Local Plan production process after "At this stage it is only possible to comment on whether the plan is sound" and insert "meets procedural requirements (set out in the regulations) and has complied with the Duty to Cooperate. The council cannot make substantive changes to the Final Draft Plan without undertaking further consultation."

Part 3 – Development Management

- Add to the end of **paragraph 3.1** that the NPPF paragraph 196 and 197 on the planning process being plan-led and there being a presumption in favour of sustainable development.
- Amend the second sentence of **paragraph 3.8** to in the case of both councils these applications are available for members of the public to view on its website but the council takes no proactive steps to invite comment upon them.
- Add to **paragraph 3.16** further explanation in relation to pre-application engagement and that the Planning Practice Guidance states that "Pre-application engagement with the community is encouraged where it will add value to the process and the outcome."¹
- Add to **paragraph 3.33** examples of material planning considerations but that the list is not exhaustive and that it should also be noted that the weight given to any material consideration is determined on a case by case basis.
- At **paragraph 3.41** substitute the word 'single' to replace 'solitary'.

¹ Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 20-009-20140306

Appendices

Appendix 1

- Add to other Organisations Staffordshire Police and Crime Commissioner and in the Relevant Government Agencies & Departments explain that this includes those listed in the Regulations as “specific consultation bodies” the Coal Authority, the Environment Agency, Historic England, the Marine Management Organisation, Natural England, Network Rail Infrastructure Limited, the Highways England and Homes and Communities Agency.
- Add a note explaining that any person/ group/ organisation who is not listed in Appendix 1 who wishes to be notified of future consultation on planning policy documents should notify the relevant Council or Councils so that they can be added to the consultation database to be informed of future consultation and that it is their responsibility to notify the Council if their contact details change.

Appendix 2

- Delete final row at the end of Appendix 2 (titled ‘Modification or discharge of affordable housing requirements’) and amend the definition in the row above regarding ‘Householder’.

Appendix 4

- Relevant to both authorities now therefore delete the reference to Newcastle.
- Add a bullet point explaining that where a site is isolated and there are no neighbours that can be identified that a site notice will be displayed.

Appendix 6

- Changes to the table on methods of publicity regarding direct notices.

Appendix 7

- Changes to the table on methods of publicity.

Appendix 8

- Add to glossary a definition of the Equality Act 2010 – protects people from discrimination and replaces previous anti-discrimination laws with a single Act and that the Act identifies a number of characteristics which are protected characteristics and that these are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- Add to the glossary a definition of ‘Hard to reach’ groups – groups that may traditionally be under represented in consultation exercises, such as young people, minority groups, those with disabilities, those living in rural areas and the local business community.
- Add to the glossary a definition of Section 106 (S.106) – that it is a mechanism for securing planning obligations.
- Add to glossary a definition of “sound” – that a Local Plan is considered “sound” if it meets the tests of soundness set out in paragraph 182 of the NPPF. This requires that a plan is positively prepared, justified, effective and consistent with national policy.

Back Page

- Add to text that to obtain the document in other formats, please contact one of the councils

Appendix 1 – Copy of the Joint Press Release

7 November 2014

HAVE YOUR SAY ON HOW PLANNING WORKS

Residents, businesses, parish councils and other stakeholders are being asked for their views on how they should be consulted during the development of key planning documents.

Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council are running a six-week consultation exercise to get people's views on their joint Statement of Community Involvement (SCI).

The consultation begins on Monday, 10 November and runs until Friday, 19 December. The SCI document and response form can be downloaded at www.newcastle-staffs.gov.uk/sci or www.stoke.gov.uk/ldf and copies can be viewed in council offices, libraries or the borough's contact centres. Comments can be e-mailed to either council at planningpolicy@newcastle-staffs.gov.uk and planning.policy@stoke.gov.uk or sent by post using the addresses on the response form.

The draft document contains a number of proposed ways the public can get involved in developing key planning documents and the planning application process.

The borough and city councils are working together to produce a Joint Local Plan that will set out a shared vision along with a set of agreed priorities for the sustainable development of the area.

Cllr. Mike Stubbs, Leader of Newcastle-under-Lyme Borough Council, said: "The draft statement provides a structured approach to engaging with local people and organisations on all planning matters and its adoption is an important first step towards the preparation of the Joint Local Plan.

"It reflects our aim of providing transparent, user friendly and accessible ways to encourage public participation in planning, including when determining planning applications.

"It's essential we have a consistent and effective approach to consultation that will enable the proper involvement of the local community in the development of the Joint Local Plan.

"All comments received will be reviewed and necessary changes made before the statement is adopted."

Cllr. Ruth Rosenau, Cabinet member for planning at Stoke-on-Trent City Council, added: "We welcome community groups, residents and all those interested in planning to feed into the consultation process. This will help us understand everyone's views, so they can be fully involved in what happens in their area."

A Joint Advisory Group made up of councillors and officers from both councils has been set up to take the Joint Local Plan forward.

Information gathered during a recent "call for sites" initiative is also being analysed. The exercise was designed to establish sites likely to be available in the borough and the city over the next 15-20 years.

Councillors at both local authorities encouraged the public, landowners, agents, developers and any other interested parties to come forward and help with the process.

Ends

Media contact: Simone Bridgewater – 01782 742606/simone.bridgewater@newcastle-staffs.gov.uk

Appendix 2 – Summary list of who was consulted on the Draft SCI

971 letters sent and 560 emails

Specific consultees; residents groups; organisations and interested parties sent postal letters (does not include individuals)

Aggregate Industries
Airport Operators Association
Alan J Bateman
Alsager Town Council
Ancer Spa (Midlands) Ltd
Ancient Monuments Society
Andrew Martin Associates
Anne Eisenhower Inc
ARCH North Staffs
Armstrong Burton Planning
Arriva Midlands
Arriva North West
ASDA
Aspire Housing
Association for Industrial Archaeology
Audley Parish Council
Baddeley Green and Stockton Brook Community Association
Bagshaws LLP
Balfour Beatty
Ball Green & Ridway Residents Association
Bar 360
Barlaston Parish Council
Barratt Homes Ltd
Beat The Cold
Bennett's Travel
Bereavement Care
Betley, Balterley & Wrinehill Parish Council
Biddulph Parish Council
Birches Head Residents Association
Blatchford Close Neighbourhood Voice Group
Blurton Farm Residents Association
Brighter Futures
Brindley Ford Residents Association
Britannia Building Society
British Ceramic Research Ltd

British Chemical Distributors and Traders Association
British Holiday & Home Parks Association
British Horse Society
British Motorcycle Federation (Staffordshire Representative)
British Pipeline Agency Ltd
British Red Cross
Broad Street Properties Limited
Broadway RA
Brown Edge Parish Council
Burslem Chamber of Trade
Business in the Environment
Canals Regeneration Group
Capital Shopping Centres Plc
Carmountside Residents Association
Caverswall Parish Council
Cemetery of Friends
Central Networks
Central Trains Ltd
Centre for Ecology and Hydrology (Bangor)
Ceramic and Allied Trades Union
CH Design Europe Ltd
Cheshire East Council
Chessington Crescent & Meadow Lane Action Group
Choices Housing Association
Church Commissioners
Church Lawton Parish Council
Citizens' Advice Bureau
City Auto Repairs
Civil Aviation Authority (Safety Regulation Group)
Clowes Coaches
Community Council of Staffordshire
Council for British Archaeology
Country Land & Business Association (Staffordshire Branch)
Countryside Properties Plc
Cycle 2000
Dalton Warner Davies LLP
David Wilson Homes (North West)
Deaflinks
Dee Set Logistics Ltd

Deloitte LLP
Department for Work and Pensions
Derwent Living
Design Construction Management Services Ltd
Destination Staffordshire
Devplan UK
Directorate of Health Promotion
Disability Rights Commission
District Valuer
Dolphin Land & Development
Don Bur (Bodies and Trailers) Ltd
DPP LTD
Draycott in the Moors Parish Council
Dresden Residents Association
East Staffordshire Borough Council
Eaton Park Residents Association
Emery Planning Partnership
Endon and Stanley Parish Council
English Golf Union
English, Welsh and Scottish Railway Ltd
Entec UK Limited
Environmental Services Association
EPIC
Fegg Hayes Residents Association
Fenton Residents Association
First City Ltd
Ford Green Residents Association
Forestry Enterprise (West Midlands Forest District)
Forsbrook Parish Council
Forshaw Greaves and Partners
Francesco Group
Fraylings Holdings Limited
Freedom Bridleways Assoc
Freight Transport Association (Midlands Region)
Friends of Chatterley Whitfield
Friends of Forest Park
Friends of the Spode Museum
Fulford Parish Council
GL Hearn
Gleeds (Nottingham)
Graham Bolton Planning Partnership Ltd

Great Places
Greenfields Residents Association
Greenpeace
Groundwork, Stoke on Trent
Halletec Environmental
Hamil Heights Residents Assocaition
Hancock Town Planning
Hanford Village Residents Association
Hanley Economic Business Society
Hanley One Residents Association
Harris Lamb
Harrow Estates plc
HCA West Midlands
Headway
Heaton Planning Ltd
Helical Retail Ltd
Highways Agency
Highways Agency (Lands)
Hillside Residents Association
Hindu Cultural Centre
Holden Lane Residents Association
Hourigan Connolly
HSBC Bank plc
Huntingson's Diease Association
Inland Waterways Association (Stoke on Trent Branch)
Innes England
Inspired Developments
Islamic Cultural Centre
Islamic Educational and Community Centre
J & S Seddon (Building) Limited
John Emms Commercial
Joiners Square Residents Association
Jones Lang LaSalle
Josiah Wedgwood & Sons Ltd
KBF Properties
Keele Parish Council
Keele University
Keep Fit Association
Kidsgrove Local Action Partnerships
Kidsgrove Parish Council
KJD
Knight & Sons

Knights Solicitors LLP
Lafarge Aggregates
Lands Improvement Holdings
Leek United Building Society
Lichfield Diocesan Office
Lisbon Place Retirement Complex (Housing 21)
Loggerheads Parish Council
Longton and District Chamber of Trade
Longton Hall Residents Association
Lovell
Lovell Johns
Madeley Conservation Group (Madeley Centre)
Madeley Parish Council
Malahat Properties Limited
Manchester Methodist Housing Group
Marine Management Organisation
Marksan Ltd
Marwalk Developments
Mason Richards Planning
Matthews and Goodman
May Solutions
McDonald's Restaurants Ltd
Meir AMI Community Steering Group
Meir Park Residents Association
MENCAP
Michelin Site Action Group
Middleport AMI Community Steering Group
Middleport Environment Centre
Midland Heart Housing Group
Midland Red (North)
Mill Hill Residents Association
Milton Park Community Group
Milwood Homes Ltd
Moorlands Buses
Moorlands Housing Limited
Morris Homs
Morston Assets
Moss Green Residents Association
Muller Property Group
Nash Peake Street Residents Associatiaon

National Federation of Gypsy Liaison Groups
New Victoria Theatre
Newcastle-under-Lyme Civic Society
Newchapel Residents Association
Newshaw Walk Residents Association
Nexus Planning
NFGLG
NFU West Midlands
NHS Stoke on Trent
NHS Stoke on Trent PCT
North Staffordshire Bridleways Association
North Staffordshire Combined Health Care (Estates Department)
North Staffordshire Combined Health Care NHS Trust
North Staffordshire Hospital Trust
North Staffordshire Rail Forum
North Staffordshire Rail Promotion Group
North Staffordshire Society of Architects
North Staffs Asperger / Autism Association
North Staffs Carers Association
North Staffs Landlords Association
North Staffs Mind
North Staffs Public Services Alliance
North Staffs Users Group
Northern Rail Ltd
Norton Green Residents Association
npower
NSB Stone Products
NTL UK
Odd Rode Parish Council
Office of Government Commerce
Old Blurton Community Association
One Creative Design
Open Spaces Society
Outdoor Advertising Association
P.R.D. Properties
Parish Office
Park Grange Assoc Ltd
Peacock & Smith
Pegasus Planning Group
Phab Freewheelers

Pittshill and Great Chell Residents Association
Pittshill Residents Association
Planning Issues Ltd
Planning Prospects
Planware Ltd
Platts (Longton) Ltd
Pochin Developments Limited
Polycarter
Portmeirion Potteries Ltd
Potteries Antique Centre
Potteries Environment Network
Potteries Heritage Society
Powergen PLC
Prima 200 Ltd
Priory Fields Residents Association
QPA
Radleigh Homes
Rail Passenger Council (Midlands)
Rapleys LLP
Redrow Homes
Rees Jones Solicitors
Relate
Residents Association
Residents Who Care
Ripon Road Residents Association
Road Haulage Association
Roger Tym & Partners
Royal Mail Address Management
Royal Society for the Protection of Birds
RPS
S.A.G.E.
Salvation Army Housing Association
Sanctuary Housing
Savills
Scottish Power
Seddon (Stoke) Ltd
Sense of Space
Severn Trent Water Limited
Shropshire Council
Silverdale Parish Council
Simpson
Social Services Department

Society of the Protection of Ancient Buildings
SOTCC Night Time Economy Task & Finish Group
Sport Across Staffordshire and Stoke on Trent
Sport England
Springfields Residents Group
SSAFA Forces Help
St Modwen Developments Ltd
Staffordshire and Stoke-on-Trent Partnership NHS Trust
Staffordshire Bat Group
Staffordshire County Council
Staffordshire Enterprise Chamber of Commerce
Staffordshire Fire and Rescue Service
Staffordshire Gardens & Parks Trust
Staffordshire Historic Buildings Trust
Staffordshire Industrial Archaeology Society
Staffordshire Moorlands District Council
Staffordshire Moorlands Parish Assembly
Staffordshire Parish Councils Association
Staffordshire Playing Fields Association
Staffordshire Police
Staffordshire Police (Hanley LPU)
Staffordshire Probation Service
Staffordshire University
Staffordshire Wildlife Trust
Staffs Developments Ltd
Standon Parish Council
Stanfields Residents Association
Steelite International Plc
Stevensons of Uttoxeter
Stoke on Trent 6th Form College
Stoke on Trent City Archives
Stoke on Trent City Centre Chamber of Trade
Stoke on Trent College
Stoke on Trent Parent Partnership
Stoke-on-Trent and Staffordshire Local Enterprise Partnership
Stoke-on-Trent Citizen's Advice Bureau
Stoke-upon-Trent Chamber of Trade
Strokes R Us

Strutt & Parker LLP
Supercraft Windows
Swynnerton Parish Council
Talke Residents
Tawney Wood Residents Association
Terence O'Rourke PLC
The Barton Willmore Planning Partnership - Midlands
The Burslem Port Project
The Charnwood Trust
The Close Residents Association
The Coal Authority
The Compendium Group
The Grange Residents Association
The Lawn Tennis Association
The Mineral Planning Group
The Parish Church of St Mary and All Saints
The Planning Bureau
The Riverside Group
The Salvation Army
The Spode Society
The Victorian Society
The Works Trust
Thistleberry Residents' Association
Tourism West Midlands
Transport 2000
Transport and General Workers Union
Trent and Peak Archaeological Trust
Trent Vale Neighbourhood Support Group
Trent Vale Residents Support
Trent Valley Protection Society
Tunstall Community Residents Association
Turley Associates
Twentieth Century Society
Upper Shelton Residents Association
Urban Splash
URS Infrastructure & Environment UK Ltd
VAST
Verdon Guest House
Virgin Media
Virgin Trains West Coast

Visit England
Voluntary Action, Stoke on Trent
Waterhead Residents Association
Wedgwood
Werrington Parish Council
West Midlands Bird Club
Weston Park RA
White Young Green
Whitfield Valley Wildlife and Conservation Group
William Boulton Vibro Energy Limited
Williamson Brothers Ltd
Wilson Bowden Developments
Wood Goldstraw & Yorath
Woodland Trust
Woolliscroft and Sons
Worldwide Fund for Nature (Stafford)
WYG (formerly Higham & Co)
YMCA

Specific consultees; residents groups; organisations and interested parties sent emails (does not include individuals)

ABC Residents Association
Adderley Green Residents Association
Addleshaw Goddard LLP
Allan Moss Associates Ltd
Alsager Town Council
Andrew Martin Associates
Aspire Housing
Atisreal Limited
Audley Parish Council
Bache Treharne
Bagshaws LLP
Bakerbus
Barlaston Parish Council
Barratt Homes Manchester
Barthomely Parish Council
Barton Willmore
Barwood Developments Ltd
Bellway plc
Biffa Waste
Birmingham Women's NHS
Foundation Trust
Bishop of Stafford

BNP Paribas Real Estate UK
Bovis Homes Limited Central Region
BRE
Brighton Healthy City
British Astronomical Association
British Ceramic Confederation
Brown Edge Parish Council
Burslem Alliance
Butters John Bee
Byatt Oliver Associates
Campaign for Real Ale
Campaign to Protect Rural England (Staffordshire Branch)
Canal and River Trust
Caverswall Parish Council
CB Richard Ellis
Centro
Cerda Planning
Chapel & Hill Chorlton Parish Council
Cheshire East Council
Cheswardine Parish Council
Chris Thomas Ltd
Church Lawton Parish Council
City Centre Marketing
City Centre South AMI Community Steering Group
Cliff Walsingham and Co
Colliers
Colliers International
Cork Healthy City
CT Planning Ltd
CTC
Cyclists Touring Club (National Office)
Daniel & Hulme
David L Walker Chartered Surveyors
David Lock Associates
Defence Estates
Deliotte
Delta Planning
Department for Transport
Derbyshire Gypsy Liaison Group
Derry Healthy City
Design Construction Management Service Ltd
Development Enabling Ltd
Devplan UK
DfT Rail
Dialogue
Disability Solutions

Doddington Enabling Ltd
Dolphin Land & Development
DPDS Consulting Group
DPP Ltd
Dransfield Properties Ltd (North West Office)
Draycott in the Moors Parish Council
Dresden Residents Association
DTZ
Dublin Healthy City
Dudson
Eccleshall Parish Council
Ecumenical Churches City Link Officer and Rector of Stoke
Elias Topping
Emery Planning Partnership
Endon and Stanley Parish Council
English Heritage
Entec UK Limited
Environment Agency
Euan Kellie Property Solutions Limited
European Information Bureau
Fenton Community Association
Fields in Trust
First City Ltd
Fisher German LLP
Florence Residents Association
Folwells
Forestry Commission (West Midlands Conservancy)
Forsbrook Parish Council
Framptons
Freight Transport Association
Friends Families and Travellers
Fuchs Lubricants (UK) Plc
Fulford Parish Council
Fusion On Line Ltd
Galway Healthy City
Garden History Society
Gary Deane Associates
GB Contracting UK Ltd
Geens
Georgian Group
GL Hearn
Glasgow Healthy City
Gleeds (Nottingham)
Goms Mill Residents Association
Graham Bolton Planning Partnership Ltd
Gratton Planning Services

Groundwork
GVA Grimley LLP
Halletec Environmental
Harris Lamb
Hartshill & Harpfields Residents Association
Hawksmoor
Health and Safety Executive
Heaton Planning
Helical Retail
Help the Aged
HIA Gateway
Highways Agency
Holmes Antill
Home Builders Federation Ltd
Hough & Chorlton Parish Council
Hourigan Connolly
Hulme Upright
Iceni Projects Limited
IMERYS Minerals Ltd
Immediate Solutions
Indigo Planning Limited
Innes England
IOM
J&S Seddon (Building) Limited
JWPC Limited
Keele Parish Council
Keele University
King Sturge
Kirkwells
Knights LLP
Lambert Smith Hampton
Lands Improvement Holdings
Lichfield Diocesan Pastoral Committee
Lidl UK
Limerick Healthy city
Lisbon Place Retirement Complex
Housing 21
Liverpool Healthy City
Local Strategic Partnership
Loggerheads Parish Council
LSP Community Engagement Strategy Group
Madeley Parish Council
Madeley Residents Association
Maer & Aston Parish Council
Malahat Properties Limited
Marine Management Organisation

Market Drayton Town Council
Martineau
May Solutions
McDyre & Co
MPs
MEPs
Michelin Tyre PLC
Middleport, Longport & Dalehill Community Association
Mike Wolfe Associates
Milton Community Associationm
Mono Consultants Ltd
Moorland & City Railways
Morston Assets
Mosaic Town Planning
Muller Property Group
NAI Fuller Peiser
National Express Ltd
National Farmers Union (West Midlands Region)
National Grid
Natural England
Network Rail
Newcastle Healthy City
Newford Residents Association
Nexus Planning
NFGLG
NFU West Midlands
NHS Stoke on Trent (Premises)
NJL Consulting Ltd
Norcross plc
Normacot Residents Association
North Staffordshire Community Rail Partnership
North Staffordshire Rail
Northwood Residents Association
Norton Community Steering Group
Norton in Hales Parish Council
Norton Residents Association
Nottingham Healthy Cities
NBS Stone Products
Office of the Police and Crime Commissioner Staffordshire
Old Meir Residents Association
One Creative Design
Packmoor Residents Association
Paul Butler Associates
Paul Dickinson & Associates
Peak and Northern Footpaths Society
Pegasus Planning Group

Penkhull Residents Association
Pinnox Junction Residents Association
Planning Issues
Planning Potential
Planware Ltd
Pochin Developments Ltd
Port Vale (Valiant 2001) Football Club Ltd
Portland Street Residents Association
Potteries Pub Preservation Initiative
Preston Healthy City
Prime plc
Princes Trust
Radleigh Homes
Rapleys
Rowan Peak Ltd
Royal Forestry Society (N.W. Midlands)
Royal Mail Address Management
RPS
RSPB
RWE npower
Salisbury Investment Ltd
Savills
Scotia West Residents Association
Spawforths
Sport England
SSA Planning Limited
St John's RA
St Modwen Developments Limited
Stafford Borough Council
Staffordshire and Stoke-on-Trent Partnership NHS Trust
Staffordshire Badger Conservation Group
Staffordshire Bat Group
Staffordshire County Council
Staffordshire Fire and Rescue Service
Staffordshire Housing Association
Staffordshire Parish Councils Association
Staffordshire Police Liaison Officer
Staffordshire University
Staffordshire Wildlife Trust
Staffs Developments Ltd
Standon Parish Council
Steelite International Plc
Steven Abbott Associates
Stewart Ross Associates
Stirling Healthy City
Stoke Area Network for Disability

Stoke on Trent Access Group
Stoke on Trent City Archives
Stoke on Trent City Council
Stoke on Trent College
Stoke on Trent PCT
Stoke on Trent Sixth Form College
Stoke PCT
Stoke-on-Trent and Staffordshire Local Enterprise Partnership
Strutt & Parker LLP
Sunderland Healthy Cities
Sustrans (Midlands)
Sutton upon Tern Parish Council
Swithland Estates Ltd
Swynnerton Parish Council
Tennis Staffordshire
Terence O'Rourke PLC
Tetlow King Planning
The Burslem Port Project
The Coal Authority (Planning and Local Authority Liaison Department)
The Hollybush Centre
The Multiple Sclerosis Society (North Staffs. Branch)
The Planning Consultancy
The Planning Inspectorate
The Saltbox Christian Centre
The Showmen's Guild of Great Britain
The Theatres Trust
The Woodland Trust
Thomas Eggar LLP
Traveller Law and Reform Project
Tunstall North Residents Association
Turleys
Union Street & Forest Park Residents Association
Turleys
Union Street & Forest Park Residents Association
Union Co-operatives Ltd
United Utilities
University Quarter
Urban Vision North Staffordshire
URS Infrastructure & Environment UK Ltd
VAST
Vincent and Gorbing
Visit England
Wade Ceramics Ltd
Walton & Co
Wardell Armstrong
Waterford Healthy City

Waterloo Road Action Committee
Werrington Parish Council
West Midlands HARP Planning Consortium (c/o Tetlow King)
Westland, Seabridge and Clayton Residents Association
Weston and Basford Parish Council
White Young Green Planning
Whitmore Parish Council
Wilardwillard Ltd
Wood Farm Residents Association
Wood Goldstraw & Yorath
Woodwin plc
Woore Parish Council

Appendix 3 – Draft SCI Consultation Response Form

 <p>NEWCASTLE UNDER LYME BOROUGH COUNCIL</p>	<p>Newcastle-under-Lyme & Stoke-on-Trent Joint Local Plan Draft Statement of Community Involvement (SCI) Response Form</p>	 <p>city of stoke on trent</p>
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Instructions for completing this form:

- Please complete this form electronically and include your email address for any future correspondence. If this is not possible then hand written copies should be completed in **BLOCK CAPITALS**. Please return the completed form to the email or postal address listed at the end.
- The Draft Statement of Community Involvement (SCI) contains information on how the councils will consult local communities in two different areas of planning; **plan-making** (i.e. creating local planning policies to guide decisions) and **decision-taking** (i.e. deciding planning applications). There is a separate space in each consultation response box to provide further comments on each of these areas.
- To make sure we can address your views as fully as possible, please specify any paragraph or section numbers from the Draft SCI that your comments relate to. Please give reasons for any suggestions you make on how the document could be improved.
- Please note we will not automatically respond to individual submitted responses

**The deadline for consultation responses on the Draft SCI is 5pm on Friday
19th December 2014**

SECTION 1: CONTACT DETAILS			
Personal data will be used in accordance with the Data Protection Act 1998.			
Contact Name:			
Organisation: (where relevant)			
Correspondence Address:			
Telephone Number		Email Address:	

	5. Please provide any other comments you would like to make about the Draft SCI:
<i>Please give reasons for any suggestions and specify any paragraph or section numbers relating to your comments</i>	

Declaration:

I understand that the personal and other data I provide will be used to inform the council's emerging planning policy framework for its duration and may also be used to help ensure the accuracy and completeness of information held for other council purposes.

I understand that the details submitted may be made available to the public in line with The Local Government Access to Information Act and Freedom of Information Act.

I want to be consulted on the Newcastle-under-Lyme and Stoke-on-Trent Local Plan in the future *(please tick if yes)*

Signature**Date**

This is a formal consultation stage and therefore any representations or comments need to be made in writing. Comments can be submitted to either authority, as all comments received will be combined into one report. Therefore, you only need to send comments to one of the councils. We encourage you to submit responses by email where possible.

For responses to Newcastle-under-Lyme Borough Council please return your completed form by 19th December 2014 to:

Email: planningpolicy@newcastle-staffs.gov.uk

Planning Policy
Civic Offices
Merrial Street
Newcastle-under-Lyme
Staffordshire
ST5 2AG

Telephone: 01782 742408

www.newcastle-staffs.gov.uk/SCI

For responses to Stoke-on-Trent City Council please return your completed form by 19th December 2014 to:

Email: planning.policy@stoke.gov.uk

Planning and Transportation
Policy
Civic Centre
Glebe Street
Stoke-on-Trent
ST4 1HH

Telephone: 01782 232353

www.stoke.gov.uk/ldf

Appendix 4 - Table of Representations, Officer Response and Proposed Changes

Representation No.	Chapter/Consultation Question representation is responding to	Consultee answer (yes/no)	Sections	Para. No.	Comments	Summary of Comments	Officer Response	Proposed Change	Consultee/ Organisation Name
1	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes			Plan-making Comments				Woodland Trust
5	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes							Madeley Parish Council
20	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	No			Plan-making Comments	Document not easy to understand if you do not have background information over the past few months	Comment noted but unclear as to the 'background information' they are referring to.	No changes suggested.	Lynne Porter
21	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	No			Decision-taking Comments	Too much information given to the public in general - unclear outcomes.	Comment noted. It is considered that the document needs to be sufficiently detailed enough to demonstrate how communities can get involved in the production of local planning policy and the decision making process.	No changes suggested.	Lynne Porter

26	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	No							Paul Anderton
32	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes							Roger Tait (Newcastle under Lyme Borough Council)
45	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	No			Plan-making Comments	No mention is made of Residents Associations in either a or b sections, yet they have to bear the brunt of many developments - large and small.	Comment noted. The councils provide a commitment to inform anyone on the councils' database of consultation on the Joint Local Plan but it is their responsibility to ensure the information the councils hold is kept up-to-date. It is suggested that additional text could be added to paragraph 2.9 and Appendix 1. It is not considered practical to list interest groups within Appendix 1 as these may change overtime and the councils will need to be kept informed by these interest groups of their contact details.	Add to the end of paragraph 2.9 that "This list only contains those consultees and stakeholders which must be consulted in order to meet the requirements of section 18. Both councils are committed to informing all those who have informed the councils that they wish to be informed of future consultation by including them on the consultation database. Due to the timescales involved in producing planning documents and the number of people wishing to be kept informed, the councils have not listed them in the Appendix 1." Add a note at the end of Appendix 1 stating that, "Any person/ group/ organisation who is not listed in Appendix 1 who wishes to be notified of future consultation on planning	Thistleberry Residents' Association

75	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes							Donald Butterworth
80	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes							Westland, Seabridge and Clayton Residents Association
89	Q1: Having considered the Draft SCI, do you feel sufficiently informed about how you will be involved in plan-making and decision taking?	Yes			Plan-making Comments	<p>Residents who have contacted me say there is too much information and not enough background information as to how this plan was formulated.</p> <p>They are disappointed that the consultation period was 6 weeks only - just before Christmas.</p> <p>They do not want a joint plan with Stoke - they would have preferred a Borough one.</p>	<p>It's not clear which 'plan' is being referred to, it is assumed that this is the Draft SCI. It is considered that there is an appropriate level of information in the SCI and this is well balanced with the information explaining why an SCI is being prepared (see section 1.1 - 1.13 of the Draft SCI).</p> <p>There is no minimum statutory period for consultation on an SCI. The six week period reflected the standard length of consultation at statutory stages of the plan-making process. The timing of the Draft SCI consultation was to ensure that the preparation of the Joint Local Plan was not unduly delayed and it was considered that consulting over a six week period would not significantly disadvantage the public from participating.</p> <p>The issue of preparing a Joint Local Plan with Stoke is outside</p>	No changes proposed to the Draft SCI	Marion Reddish (Newcastle-under-Lyme Borough Councillor)

76	Q2: Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?	Yes							Donald Butterworth
81	Q2: Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?	Yes							Westland, Seabridge and Clayton Residents Association
90	Q2: Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?	Yes			Plan-making Comments	<p>Residents do not accept that site notices are enough and would want those notified by letter to be greater.</p> <p>Residents feel there should have been more time/effort made publishing the SCI to those who do not have a computer.</p> <p>Residents wanted public meetings to explain more.</p>	<p>It is acknowledged that not everybody is computer literate. The councils used a variety of different measures in publicising the Draft SCI consultation, including sending letters or emailing all consultees on their respective consultation databases (which is open to any member of the public). Furthermore, hard copies of the consultation documents were put on deposit in local libraries and community centres, Parish Councils and Locality Action Partnership chairs in Newcastle-under-Lyme were consulted and the consultation was advertised in the councils' newspaper (The Reporter). However, a balance must be struck between the need to consult communities and the limited resources at the councils' disposal.</p> <p>In light of this, it is felt that the measures used in consulting on the Draft SCI were appropriate. Furthermore, it is important to note that manned exhibitions and focus groups and workshops will</p>	No changes proposed	Marion Reddish (Newcastle-under-Lyme Borough Councillor)

							both be used to engage the public in consultations on the Issues and Strategic Options and Draft Local Plan stages.		
96	Q2: Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?	Yes							Newcastle-under-Lyme Civic Society
102	Q2: Do you feel that the Draft SCI presents sufficient opportunities to get involved in plan-making and decision-taking?	Yes							Loggerheads Parish Council
3	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No		2.7	Plan-making Comments	The Woodland Trust would like to be included in the list of National and regional non-governmental organisations and interest groups, as set out in Appendix 1".	Comment noted. The councils provide a commitment to inform anyone on the councils' database of Consultation on the Joint Local Plan but it is their responsibility to ensure the information the councils holds is kept up-to-date. It is suggested that additional text could be added to paragraph 2.9 and Appendix 1. It is not considered practical to list interest groups within Appendix 1 as these may change overtime and the councils will need to be kept informed by these interest groups of their contact details.	Add to the end of paragraph 2.9 that "This list only contains those consultees and stakeholders which must be consulted in order to meet the requirements of section 18. Both councils are committed to informing all those who have made a request to the councils that they wish to be informed of future consultation by being included on their consultation database. Due to the timescales involved in producing planning documents and the number of people/ groups/organisations wishing to be kept informed, the councils have not listed them in Appendix 1." Add a note at the end of Appendix 1 stating that, "Any person/ group/ organisation who is not listed in Appendix 1 who wishes to	Woodland Trust

								be notified of future consultation on planning policy documents should notify the relevant council or councils in order that their information is added to the consultation database to be informed of future consultation. If their contact details change it is the responsibility of the person/ group/ organisation/ agent who has expressed an interest in being kept informed to notify the relevant council."	
4	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	-		3.22	Decision-making	In order to improve consultation on planning applications, we would like the SCI to commit to consulting the Woodland Trust on any planning application that affects the irreplaceable habitat of ancient woodland. The National Policy Planning Framework clearly states: "...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland..." (DCLG, March 2012, para 118). The Woodland Trust therefore needs to be informed of these development cases. Other SCIs have incorporated this provision to consult the Woodland Trust on ancient woodland cases, such as Swindon Borough Council SCI	Comment noted. It would be impractical to list all the scenarios of organisations which could be consulted on a planning application. However, it is worth noting that non-statutory consultees will be consulted in line with the NPPG Paragraph: 022 Reference ID: 15-022-20140306	Amend paragraph 3.22 to read "Non-statutory consultees will be engaged in line with the requirements of the Planning Practice Guidance, which requires that the councils should consider whether there are planning policy reasons to engage other consultees who- whilst not designated in law- are likely to have an interest in a proposed development."	Woodland Trust

						(March 2013) and South Staffordshire District Council (Oct 2013)."			
7	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	Yes							Madeley Parish Council
23	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No			Plan-making Comments	For non-computer users, it is no easy to located the relevant information. Why are we joining with Stoke - could we not stand alone?	<p>It is acknowledged that consultation information should be easily available to non-computer users. The Draft SCI proposes a broad range measures to publicise plan-making consultation events so that people do not need to rely on access to a computer. It is considered that these measures are sufficient given the resources at the councils' disposal.</p> <p>The borough council's decision to prepare a Joint Local Plan was made in March 2014 and is outside the scope of this consultation. The purpose of the Draft SCI was to describe how the two councils propose to engage with public in preparing the Joint Local Plan and determining planning applications. It does not consider the principle of whether Newcastle-under-Lyme Borough Council should prepare planning policy with Stoke-on-Trent City Council.</p>	<p>In order to ensure information on council websites is as clearly available as possible to members of the public, add a section 'Availability of Information on the Councils Websites' after the section headed 'Consultation database'</p> <p>New Paragraph 2.11 "Both councils will endeavour to ensure that information on plan-making activities, including stages in the process, can easily be located on their website by the use of shortcut links. During consultation periods each council will endeavour to provide a link on their respective homepage to help you access relevant information, including the council's evidence base."</p> <p>Change subsequent paragraph numbers in Part 2 to reflect the above change.</p>	Lynne Porter

34	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	Yes							Roger Tait (Newcastle under Lyme Borough Council)
49	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No			Plan-making Comments	<p>This section is very weak on both a and b sections. The monitoring of both appears to be non-existent and should be done in any event by an independent body such as the Audit Commission and certainly not in-house.</p> <p>The Language in both sections is weak implying that it may or may not happen depending on the discretion of the other dealing with the case.</p>	In preparing local planning policy and making decisions on planning applications, the councils are required by national legislation to comply with the consultation measures set out in their adopted Statement of Community Involvement. In respect of the Joint Local Plan a member of the Planning Inspectorate will examine whether or not the councils have fulfilled this legal requirement at the independent examination of the Plan. In decision-taking, a complaint can ultimately be made to the Local Government Ombudsman, who would fairly and independently consider whether the council had complied with the measures in the SCI.	No changes proposed	Thistleberry Residents' Association
50	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No			Decision-taking Comments	<p>3.8 - is fine if it happens in practice.</p> <p>3.12 - should be overshadow any other considerations or cloud judgment.</p> <p>3.12, 3.14, 3.15 - very weak.</p> <p>3.18 - we would like to see these protocols.</p> <p>3.19 - could be open to exploitation.</p> <p>3.25 - is ambiguous.</p> <p>3.39 - does not appear to happen in practice at the moment anyway.</p> <p>3.41 - should be 'single' not 'solitary'.</p>	3.8 & 3.9 meaning unclear. 3.12. Assuming concerns relate to S106 - any obligation sought must comply with CIL Regs and should only address impacts of a development that can't be dealt with by condition. 3.13-3.15 No legal requirement for applicant to undertake pre-app consultation with the community other than the eg given, as such this can't be strengthened. 3.25 Appendix 6 clarifies publicity methods. 3.39. This does happen as a matter of practice. 3.41 No objection to the change proposed. 3.44 See	<p>Change to paragraph 3.41 through the substitution of the word 'single' to replace 'solitary'.</p> <p>Add to the end of paragraph 2.9 that "This list only contains those consultees and stakeholders which must be consult in order to meet the requirements of section 18. Both councils are committed to informing all those who have informed the councils that they wish to be informed of future</p>	Thistleberry Residents' Association

77	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	Yes							Donald Butterworth
82	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No							Westland, Seabridge and Clayton Residents Association
91	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	No			Plan-making Comments	<p>Residents do not accept that site notices are enough and would want those notified by letter to be greater.</p> <p>Residents feel there should have been more time/effort made publishing the SCI to those who do not have a computer.</p> <p>Residents wanted public meetings to explain more.</p> <p>Public need to be better informed about where and when applications are publicised. There doesn't appear to be consistency - major/minor different.</p> <p>Amendments do need to be publicised and further scrutinised.</p>	<p>Appendix 4 sets out which neighbours are notified of an application. A site notice is likely to make more aware of an application than neighbour notification letters. It is acknowledged that consultation information should be easily available to non-computer users . The Draft SCI consultation was publicised using a broad range of measures so that it could be accessed by people without access to a computer. It is considered that these consultation measures were sufficient in light of the limited resources available to the council. However, measures such as focus groups, workshops and manned exhibitions will be used in consulting at key stages of the Joint Local Plan production process, as outlined in Table 2 of the Draft SCI.</p> <p>The SCI seeks to inform the public about how applications will be publicised. In addition, the SCI indicates that further consultation will be undertaken on amended</p>	No changes proposed.	Marion Reddish (Newcastle-under-Lyme Borough Councillor)

							applications in certain circumstances. It is not justified to re-consult on all amendments as this would introduce an unnecessary delay in reaching a decision and will cost more.		
97	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	Yes							Newcastle-under-Lyme Civic Society
103	Q3: Are the consultation proposals described in the Draft SCI sufficient and appropriate?	Yes							Loggerheads Parish Council
8	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	Yes							Madeley Parish Council
24	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	Yes							Lynne Porter
35	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	Yes							Roger Tait (Newcastle under Lyme Borough Council)

51	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	No			Plan-making Comments	How do (a) and (b) work out in practice so that comments are take on board particularly those which Las might not like or want to incorporate or agree with. More transparency is needed re how plan-making and decision-making take place. It is not clear at all in this document.	The Draft SCI outlines how public comments are to be considered objectively in both plan-making (in paragraphs 2.17-2.19) and decision-making (in paragraphs 3.23-3.34). The councils are ultimately required to consider all comments in so as far as they relate to material planning considerations and the requirements of the development plan, and this is made clear in the above sections. To help clarify relevant matters in respect of decision-taking, the SCI could include a section on what are material considerations and include a more explicit statement about the framework that plan-making and decision-taking occur within.	Add at the end of paragraph 3.1 of the Draft SCI "The NPPF paragraphs 196 and 197 identify that "The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Framework is a material consideration in planning decisions." It goes on to state that "In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development." Also at the end of paragraph 3.16 of the Draft SCI add "As detailed above there are only limited number of situations where it is mandatory to carry out pre-application consultation with the local community. These are explained in the Planning Practice Guidance, which states that "Pre-application engagement with the community is encouraged where it will add value to the process and the outcome."" Insert footnote Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 20-009-20140306	Thistleberry Residents' Association
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								<p>Add to paragraph 3.33 examples of material planning considerations. "Material planning considerations include the following:</p> <ul style="list-style-type: none"> • Overlooking and loss of privacy • Loss of light or overshadowing • Parking • Highway safety • Traffic • Noise • Effect on listed building and conservation area • Layout and density of building • Design, appearance and materials • Government policy • Disabled persons' access • Previous planning decisions (including appeal decisions) • Nature conservation • Economic factors including job creation and New Homes Bonus <p>Please note that the above list is not exhaustive but provides examples of material planning consideration. It should also be noted that the weight given to any material consideration is determined on a case by case basis."</p>	
52	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond	No			Decision-taking Comments	Decision-making does not appear to be transparent - i.e. why has a decision been arrived at, what is the	Reports are prepared on all applications, other than those which seek approval of details required by condition. Such	No changes proposed.	Thistleberry Residents' Association

92	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	Yes			Additional Comments	Residents are wanting more explanation but in a simpler form. They have very much looked at Land Sales as the issue, rather than SCI on a larger scale. It is disappointing and confusing that the NBC Cabinet Agenda of Nove listed Sites and then they received this consultation. They will not separate the two.	The councils have attempted to strike a balance between providing sufficient information and avoiding the risk of overloading the reader with too much information. Without specific suggestions it is difficult to know which parts of the Draft SCI need to be amended to address this concern. Comment noted. In November 2014, Newcastle-under-Lyme Borough Council's Cabinet made a decision to participate in the Call for Sites initiative and made a separate decision to proceed with the disposal of several sites in its ownership, which had been subject to public consultation. These two and entirely separate decisions, relating to different sites across the borough, appear to have been confused. This is unfortunate but nevertheless issues raised regarding the Call for Sites initiative are outside the scope of the SCI.	No change proposed	Marion Reddish (Newcastle-under-Lyme Borough Councillor)
98	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	Yes							Newcastle-under-Lyme Civic Society
104	Q4: Has the Draft SCI sufficiently explained how the councils will consider and respond to comments received in plan-making and decision-taking?	No			Decision-taking Comments	At para 3.28 Stoke City Council will allow comments up to the date of the Planning Committee but NuLBC do not. At Para 3.29 City Council will provide and an acknowledgement, NuLBC do not.	1The operation of a guillotine on late representations was introduced by Newcastle's Planning Committee in July 2008 following a number of cases where members had been asked to consider at the Planning Committee itself significant new information material to the	No changes suggested	Loggerheads Parish Council

						<p>I would like to see NuLBC adopt the same standards as Stoke.</p>	<p>determination of an application. It has been operated with due regard to the legal requirement that a Local Planning Authority takes into account any material planning consideration and does not take into account any immaterial consideration. It is applied in a manner so that it does not cut down any period for comment referred to in publicity. It is considered an essential part of the efficient and effective decision making of the Planning Committee. 2. It is possible to establish whether a representation has been received without an acknowledgement being sent and the practice takes up resources (support officer time and cost) which could be deployed elsewhere and would improve the performance of the section. It is possible for the two authorities to have different approaches, each aligned to their respective needs.</p>		
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9	Part 1: Introduction and Background	-		1.15	Additional Comments	Madeley Parish Council has concerns relating to the future capacity of Planning officers to be able to effectively work with an applicant, the community, elected members and other statutory consultees.(3.7) As is stated in 1.15 cost is a major factor in delivering genuine consultation and with future resource reductions it is difficult to see how expectations within the community could be managed.	<p>Comment noted. The SCI seeks to find a balance between meeting regulatory requirements, and going beyond these where the Councils consider it to be appropriate, and resource implications of doing so. This is explained at paragraph 1.15 of the Draft SCI.</p> <p>In respect of Newcastle-under-Lyme, consideration is being given to working practices in an attempt to create greater time and capacity for such matters.</p> <p>It is also recognised that groups with existing communication networks within the local community can play an important role in increasing awareness of planning consultations at the local level. The SCI will therefore be amended to emphasise this point.</p>	In paragraph 2.2, delete "These methods have taken into account the outcomes of Newcastle-Under-Lyme Borough Council's public consultation exercise in 2012 to determine the scope and methods to be used in public consultation on site allocations and local planning policies1." and the associated footnote at the bottom of page 8 of the Draft SCI. Replace with the following text "We also recognise that there are groups with existing communication networks in their areas, such as Parish and Town Councils, Resident's Associations and Locality Action Partnerships. These groups can be key contributors in increasing awareness at the local level, particularly in the rural area."	Madeley Parish Council
13	Part 1: Introduction and Background	-		1.18	Additional Comments	<p>We ... will seek to clarify the relevance of planning to people's everyday lives'.</p> <p>The need is also for authorities to UNDERSTAND the relevance of planning to people's everyday lives and the impact of their decisions on people's everyday lives.</p>	<p>Comment noted. This is recognised in national guidance, NPPF, paragraph 9, "Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life..." The NPPF is a material consideration in the determination of planning applications (see paragraph 13 of the NPPF).</p>	No changes suggested.	Judith Oppenheimer
29	Part 1: Introduction and Background	-		1.15	Additional Comments	Your website is far too difficult to negotiate and the Draft Statement and Response Form were only found after considerable effort and third	It is worth noting that all consultees on the councils' consultation databases were provided with a web address linking them directly to the	In order to ensure information on council websites is as clearly available as possible to members of the public, add a	Paul Anderton

						party guidance.	relevant web page, where the Draft SCI and response form could be accessed. Nevertheless the comment draws attention to the importance of being able to find plan-making consultation material easily on each councils website. Every effort is made to achieve this, but consideration could be given to how it might be possible to improve the prominence of each plan-making consultation, for example by trying to ensure that each consultation stage of the Joint Local Plan is prominently featured on each respective council's /home page. However, it is considered that the Draft SCI proposes a broad range measures to inform people of planning consultation events, and that these combined measures should ensure that the public are able to access the necessary information to participate in plan-making, particularly given the limited resources at the councils' disposal.	section 'Availability of Information on the Councils Websites' after the section headed 'Consultation database' New Paragraph 2.11 "Both councils will endeavour to ensure that information on plan-making activities, including stages in the process, can easily be located on their website by the use of shortcut links. During consultation periods each council will endeavour to provide a link on their respective homepage to help you access relevant information, including the council's evidence base." Change subsequent paragraph numbers in Part 2 to reflect the above change.	
39	Part 1: Introduction and Background	-		1.7	Additional Comments	If we wanted to plan anything with Stoke Council - we would live in Stoke.... We do not want any connection with Stoke.	This matter is outside the scope of the Draft SCI consultation. The Draft SCI sets out how the two councils propose to engage with public in preparing the Joint Local Plan and determining planning applications. It does not consider the principle of whether a Joint Local Plan should be prepared, which was agreed in March 2014.	This matter is outside the scope of the SCI. Therefore, no change is proposed.	Andy Smith
44	Part 1: Introduction and Background	-		1.7	Additional Comments	Again I get the feeling though that it does not really matter what the public think and this is just a pointless paper exercise.	The Draft SCI outlines how public comments are to be considered objectively in both plan-making (in paragraphs 2.17-2.19) and decision-making (in paragraphs	Add to paragraph 3.33 examples of material planning considerations. "Material planning considerations include the	William Doorbar

						<p>The decision has no doubt already been take behind the scenes.</p>	<p>3.23-3.34). The councils are ultimately required to consider all comments in so as far as they relate to material planning considerations and the requirements of the development plan, and this is made clear in the above sections. To help clarify relevant matters in respect of decision-taking, the SCI could include examples of what are material planning considerations.</p>	<p>following:</p> <ul style="list-style-type: none"> • Overlooking and loss of privacy • Loss of light or overshadowing • Parking • Highway safety • Traffic • Noise • Effect on listed building and conservation area • Layout and density of building • Design, appearance and materials • Government policy • Disabled persons' access • Previous planning decisions (including appeal decisions) • Nature conservation • Economic factors including job creation and New Homes Bonus <p>Please note that the above list is not exhaustive but provides examples of material planning consideration. It should also be noted that the weight given to any material consideration is determined on a case by case basis."</p>	
53	Part 1: Introduction and Background	-	General		Additional Comments	<p>Overall, this document gives the impression of paying lip service to community engagement and of going through the motions, rather than being sincere in its intent.</p>	<p>Comment noted. The Draft SCI at paragraph 1.1 and 1.2 sets out the purpose of the SCI and that "The SCI is extremely important as it will establish a minimum standard of consultation on planning matters and these requirements are closely scrutinised when planning policy documents are independently examined."</p>	<p>No changes suggested.</p>	<p>Thistleberry Residents' Association</p>

							Paragraph 155 of the NPPF states that "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."		
54	Part 1: Introduction and Background	-	General-Support		Additional Comments	This is an opportune moment to revisit the issue of crime prevention responsibilities under Sec 17 of the Crime and Disorder Act 1998 which places a legal duty for authorities (i.e. the joint Councils) to consider crime prevention in all that they do, which does of course include the planning process.	Comment noted.	No changes suggested.	Staffordshire Police
79	Part 1: Introduction and Background	-	General		Additional Comments	It is important for both the City and Borough Councils to fully appreciate the definition of the word "consult" and its derivatives as used in the Draft SCI. The policy of "consultation" would appear to indicate a significant shift in the current workings of the Borough Council and particularly the Planning Department which lacks credibility probably resulting from "management" issues. Whilst the Draft SCI says all the right things the City and Borough Councils must be prepared to "practice	In preparing local planning policy and making decisions on planning applications, the councils are required by national legislation to comply with the consultation measures set out in their adopted Statement of Community Involvement. In plan-making, a member of the Planning Inspectorate will examine whether or not the councils have fulfilled this legal requirement in preparing the Joint Local Plan at the plan's independent examination. In decision-taking, a complaint can ultimately be made to the Local Government Ombudsman, who would fairly and independently	No changes proposed	Donald Butterworth

						what they preach" in an open and transparent way. Any failure to do so then the offending parties must be held publicly responsible as would be the case in a commercial environment within a clearly defined and transparent disciplinary code with formal procedures.	consider whether the council had complied with the measures in the SCI. Both Councils also have procedures for the review of formal complaints.		
107	Part 1: Introduction and Background	-	General		Additional Comments	We have concluded that we have no representation to make on this occasion. This is because your consultation request is not concerned with the potential encroachment of future development on the consultation zones of major hazard installations or MAHPs. As the request is not relevant to the HSE's land-use planning policy, we do not need to be informed of the next stages in the adoption of the Joint Draft Statement of Community Involvement.	Comment noted.	No changes suggested.	Health and Safety Executive
14	Part 2: Planning Policy	-		2.5	Additional Comments	<p>many people ... may find the bureaucratic and cumbersome nature of the process both frustrating and off-putting'.</p> <p>Planners need to think 'outside THEIR box' and work and communicate with the public in ways that are not bureaucratic, cumbersome, frustrating and off-putting. They need to communicate in plain English. They also need to welcome and really take on board public comment. They are planning for people and communities, not for themselves and not for</p>	Comment noted. The Draft SCI sets out the councils' approach to community involvement at paragraph 1.13 and Diagram 1. A variety of methods are set out in Tables 1 to 4. However it also must be noted that whilst the councils will seek to communicate in 'plain english' it also needs to be recognised that as planning policy documents will be used in the determination of planning applications they need to be written in a way that meets statutory and regulatory requirements. The Draft SCI at paragraph 1.15 explains that	No suggested changes	Judith Oppenheimer

						developers.	"although the current planning system seeks to open up the process, there are still many technical terms and expressions. Plain English will be used wherever possible, and glossaries provided within each planning policy document;" Add reference to the NPPF setting out the role of planning authorities in plan-making and decision- taking and that "The relationship between decision-taking and plan-making should be seamless, translating plans into high quality development on the ground." (NPPF paragraph 186)		
15	Part 2: Planning Policy	-		2.10	Additional Comments	<p>anyone can respond ... they do not need to be notified directly ... for planning policy ... that covers only a limited area or topic ... will engage ... any others who have requested it.'</p> <p>How will you notify members of the public? They may have an interest in a policy area that they didn't even know existed. How will they find out about it?</p>	Comment noted. Tables 1 to 4 set out the methods of consultation that will be used for the production of planning policy documents.	No changes suggested.	Judith Oppenheimer
25	Part 2: Planning Policy	-	General		Additional Comments	<p>In the Cabinet Report of November 12 2014, I note "The Butts" in Thistleberry, Newcastle, Staffs in included for development.</p> <p>I think that this is totally inappropriate. In your Local Plan you state needs need to complete with environment issues. In "The Butts" case, environmental issues outweigh</p>	This matter is outside the scope of the Draft SCI consultation as it relates to Newcastle-under-Lyme Borough Council's decision to participate in the 'Call for Sites' exercise carried out between 8 September 2014 and 31 October 2014.	This matter is not within the scope of the SCI consultation. Therefore, no change is proposed.	Lynne Porter

						needs. In "The Butts" case, there is long term sewage and drainage problems. This is a well used community asset and an open space which enhances your "Green" strategy. To develop this area with houses would seriously affect the infrastructure of the area.			
28	Part 2: Planning Policy	-	General		Additional Comments	Enclosed with this letter is a copy of the Response Form to the Draft Statement of Community Involvement which indicates my dissatisfaction with the process being followed by Newcastle Borough Council in the matter of preparing yet another Local Plan to determine the course of land development in the borough for the next however many years before the next plan is called for.	Comment noted, however, the decision to prepare a Joint Local Plan was made in March 2014 and is outside the scope of this consultation. The Draft SCI sets out how the two councils propose to engage with public in preparing the Joint Local Plan and determining planning applications. It does not consider the principle of whether Newcastle-under-Lyme Borough Council should prepare planning policy with Stoke-on-Trent City Council.	This matter is outside the scope of the SCI. Therefore, no change is proposed.	Paul Anderton
31	Part 2: Planning Policy	-	General		Additional Comments	The council may have admirable aims in drawing up a new Local Plan in conjunction with Stoke on Trent to determine future land uses, but it should cease to pre-determine what the Plan will contain by selling land now in such a way as to open up building possibilities.	In November 2014, Newcastle-under-Lyme Borough Council's Cabinet made a decision to participate in the Call for Sites initiative and made a separate decision to proceed with the disposal of several sites in its ownership, which had been subject to public consultation. These two and entirely separate decisions, relating to different sites across the borough, appear to have been confused. This is unfortunate but nevertheless the issues raised are outside the scope of the SCI.	This matter is outside the scope of the SCI. Therefore, no change is proposed.	Paul Anderton

36	Part 2: Planning Policy	-	The Joint Plan		Additional Comments	<p>We are supportive of the principle of meaningful and early engagement of the general community by the public, community and other organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult, can be found on our website.</p>	Support noted.	No changes suggested.	Natural England
38	Part 2: Planning Policy	-	General		Additional Comments	I can confirm that the MMO has no comments to submit in relation to this consultation.	Response noted.	No changes suggested.	Marine Management Organisation
40	Part 2: Planning Policy	-	General - Support		Additional Comments	The Highways Agency is pleased the SCI recognises our position as a statutory consultee in the local plan process and the development management process.	Support noted.	No changes suggested.	Highways Agency (now Highways England)
43	Part 2: Planning Policy	-	General		Additional Comments	<p>However, I am concerned that it is just an attempt at take over by Stoke on Trent City Council and as such I most definitely and resolutely against it.</p> <p>If larger means better, which it does not, then if this desired then why not have a single planning body for the whole of North Staffordshire and South</p>	The decision to prepare a Joint Local Plan was made in March 2014 and is outside the scope of this consultation. The Draft SCI sets out how the two councils propose to engage with public in preparing the Joint Local Plan and determining planning applications. It does not consider the principle of whether Newcastle-under-Lyme Borough Council should prepare planning policy with Stoke-on-	This matter is outside the scope of the SCI. Therefore, no change is proposed.	William Doorbar

						Cheshire.	Trent City Council or any other neighbouring authority.		
56	Part 2: Planning Policy	-		2.13	Additional Comments	On page 14 of the Draft SCI it talks about the duty to co-operate via discussions and liaison with statutory consultees, stakeholders and partners. In the case of the Police and their Crime Prevention specialists the question to ask is "What criteria drive the decision to consult?" An agreed joint protocol should be established between planning departments and police that serve to identify development requiring automatic consultation with the police. However, all applicants (under the agreed protocol) should be encouraged, at the pre application stage, to consider security and crime prevention, and to determine their proposals in this regard. This will serve to evidence that crime prevention is being given reasonable consideration under Sec 17 Crime and disorder Act 1998. These actions would also evidence effective community involvement as it should not be forgotten that crime prevention is indeed a material planning consideration.	Comments noted. Suggest the addition of further explanation of other organisations that discussions may be entered into, as appropriate, under the Duty to Cooperate.	Add to the end of paragraph 2.14 "This will involve discussions with other organisations, Government Agencies and Departments as appropriate including: •Staffordshire Police • Staffordshire and Stoke-on-Trent Local Enterprise Partnership • NHS Trust • Utility Companies • Relevant Government Agencies and Departments Please note that the above list is not exhaustive and may be subject to change over time." At Appendix 1 add under 'Other Organisations' and "Staffordshire Police and Crime Commissioner"	Staffordshire Police
57	Part 2: Planning Policy	-		2.25	Additional Comments	Many planning applications, such as dwellings, commercial units, shutters and licensing may overlap council policies, issues around policing, and crime prevention. It is important therefore that crime	Comments noted. Staffordshire Police are listed at Appendix 1 of the Draft SCI and therefore will be consulted in the production of the Joint Local Plan. Regarding consultation on SPDs the Councils will follow the	No changes suggested.	Staffordshire Police

						prevention is not overlooked with regard to Supplementary Planning Documents (SPDs) and to this end I again recommend early consultation with police specialists (Architectural Liaison Officers) regarding SPDs.	requirements set out in The Town and Country Planning (Local Planning) (England) Regulations 2012. Table 4 : SPD production sets out that at both the 'Evidence Gathering and SPD Preparation Stage' and 'Publication Stage' that the Councils will 'Liaise with statutory consultees/ partnerships'		
71	Part 2: Planning Policy	-	General		Additional Comments	There should be clearer reference (none currently) to any emerging Neighbourhood Plans and how these fit into the process - in the event of some being drawn up alongside the Local Plan. What support and links are there to the JLT if communities/developers choose to follow this approach? How would these be adopted within the timescale....	Comment noted. In accordance with the Localism Act 2011, a SCI is not intended to explain the process of neighbourhood planning and the role of a local planning authority in that process, rather its purpose is to focus on setting out the process for involving the community in the local development documents to be prepared by the Local Planning Authority. Nevertheless there is merit in including some text on Neighbourhood Planning to explain its role within the planning system.	Suggest amendments to the 'Plan-making' section in Part 1 to explain the role of Neighbourhood Plans alongside Local Plans: "Insert new paragraphs after 1.21: Plan-making 1.21 Plan-making involves thinking ahead about where it might be best to build new development to provide new homes and new jobs, whilst at the same time thinking about the necessary support facilities such as shops, schools, doctors etc. Local authority plans 1.22 The type of plans normally prepared by a local authority (see Part 2: Planning Policy) usually deal with strategic issues i.e. issues that affect the whole of a local authority area and might impact on neighbouring local authorities, for example planning to ensure the housing needs of the whole local authority area can be fully met. Neighbourhood plans 1.23 Since the Localism Act	Keele Parish Council

								in 2011 the community is able to prepare neighbourhood development plans. These set out how a community wants their neighbourhood to be i.e. a vision for that area, and policies and proposals for the use and development of land. The decision to prepare a neighbourhood plan has to be made by the relevant designated bodies, such as parish and town councils, business forums and neighbourhood forums. Further information will be available on both councils' websites." Amend other paragraph numbers as required	
72	Part 2: Planning Policy	-		2.5	Additional Comments	More explanation on the different types of consultation methods to be used for lay people ... how will you explain the bigger picture visually so that people can see the impact of the suggestions/your proposals. Heavy text documents and reliance on the electronic maps is not considered to be suitable to reach all user groups ... Large scale maps on a planning for real basis for more appropriate.	Comment noted. 'Diagram 1: The Joint Local Plan production process' sets out the stages involved in the Joint Local Plan production process and Tables 1, 2 and 3 set out the methods of communication to be used by the councils in preparing the Joint Local Plan. A variety of methods are set out in Tables 1 to 4. However it also must be noted that whilst the councils will seek to communicate in 'plain english' it also needs to be recognised that as planning policy documents will be used in the determination of planning applications they need to be written in a way that meets statutory and regulatory requirements. Paragraph 2.2 of the Draft SCI makes a commitment that "A range of	No changes suggested.	Keele Parish Council

							methods and techniques will be used to involve the communities of both local authorities." The methods set out in Tables 1 to 4 have also taken into account the outcomes of Newcastle-Under-Lyme Borough Council's public consultation exercise in 2012 to determine the scope and methods to be used in public consultation on site allocations and local planning policies.		
74	Part 2: Planning Policy	-	General		Additional Comments	<p>Regarding the 'Call for Sites' exercise, which is part of the statutory Local Plan sequence, clearly as I am not a site owner this did not involve me, or most of the members of the public.</p> <p>I see, too, that the Borough itself responded to the call submitting a survey, effectively, of land the Council owns.</p>	This issue is outside the scope of the Draft SCI consultation as it relates to the decision of Newcastle-under-Lyme Borough Council to participate in the Call for Sites in its role as landowner.	No changes proposed	Paul Farrelly MP
83	Part 2: Planning Policy	-		2.23	Additional Comments	<p>1.1 Publication of documents on the Internet (IN) and availability in public venues requiring frequent visits to both 'in case' of proposals existing which might be of concern. Your reference to newspapers OK provided notices are strongly headlined - more than once,</p>	<p>This representation appears to suggest that consultations should be advertised in newspapers through multiple press notices. However, there would be significant costs associated with increasing the number of press notices.</p> <p>In respect of plan-making consultations, the Draft SCI explains at paragraphs 2.6-2.10 that residents are welcome to contact the councils and request they are added to the councils' consultation database, ensuring they are automatically notified on any plan-making consultations. In</p>	No changes proposed	Westland, Seabridge and Clayton Residents Association

							<p>respect of decision-taking, a number of measures other than use of public venues and the internet are used to ensure members of the public are notified of planning applications. These include press notices, site notices, direct neighbour notification and a "saved search" function, which offers automatic notification of any applications coming forward on a specified property or area.</p> <p>Given the limited resources available to the councils and the need to reach a wide cross-section of the public, it is considered that it is not appropriate to focus resources into a singular consultation method, such as newspaper advertisements.</p>		
84	Part 2: Planning Policy	-	Tables 1, 2 and 3	2.23		1.2 Residents who do not have IN access should not be penalised by having to pay for hard copies.	<p>Given the substantial cost involved in producing hard copies of Joint Local Plan documents and the limited financial resources available to the council, it is not possible for these to be provided for free . However, the councils also recognise that not everyone has access to a computer or is computer literate. Therefore, the measures identified in Tables 1-3 and Appendix 8 of the Draft SCI make it clear that a range of public venues will be used as deposit locations for documents prepared at key stages of the Joint Local Plan preparation process. Furthermore, computers with internet access are available to use at many of the public venues used as deposit locations,</p>	No changes proposed.	Westland, Seabridge and Clayton Residents Association

							including customer contact centres and most libraries.		
85	Part 2: Planning Policy	-	Table 2	2.23	Additional Comments	<p>1.3 Display Notices in proposed development areas. More than the minimum legal requirements in terms of numbers of notices displayed is essential. Residents responses - Westlands, Seabridge and Clayton - on issues at the Road Show 2012 confirmed that very many had not seen posters. A 'hands up' poll at my request showed that only one person originally come across the issue on the Internet!!</p>	<p>It is not clear whether this is referring to the publicity associated with a consultation event or the notices proposed to be displayed on an 'allocation' site.</p> <p>There is no legal requirement to display notices proposing the allocation of land for development and there is no legal requirement to post notices informing the public of a plan-making consultation event. However, the Draft SCI does propose that site notices will be displayed in publicly accessible and visible locations at site boundaries when the councils are proposing the allocation of such sites for development and also display 'posters' to promote publicity events.</p> <p>The decision to display a poster in a particular location is a question of judgement, but there is always going to be a risk that it won't be seen. However, it would be inappropriate to deal with this by saturating an area with posters, particularly since the Draft SCI contains a wide range of methods for publicising consultation events. The community can help to overcome the limitation of posters by helping to spread information by word of mouth. Perhaps what is the most helpful way of addressing this issue is to ensure that the posters publicising</p>	<p>No change is proposed to the Draft SCI, but the councils will endeavour to ensure that posters are displayed in prominent locations well in advance of a consultation event</p>	<p>Westland, Seabridge and Clayton Residents Association</p>

						consultations are put on display well in advance of a consultation event. In addition to site notices, a number of other measures, such as social media, the councils' websites and any other new technologies where resources permit will be used to inform people of proposals			
86	Part 2: Planning Policy	-		2.7	Additional Comments	2.0 Your 2.7 Consultation Database. Resident Associations should be listed. It is not evident from the list that such bodies are included.	As there is no requirement for Resident Associations to register themselves with the councils, such organisations are included on the consultation database as and when they notify the councils of the interest in planning policy issues. It is ultimately up to individual Resident Associations to decide if they have an interest in local planning policy and therefore want to be added to the consultation database (in which case the Draft SCI provides instructions of how they can ensure they are added to the database).	Add a note at the end of Appendix 1 stating that, "Any person/ group/ organisation who is not listed in Appendix 1 who wishes to be notified of future consultation on planning policy documents should notify the relevant council or councils in order that their information is added to the consultation database to be informed of future consultation. If their contact details change it is the responsibility of the person/ group/ organisation/ agent who has expressed an interest in being kept informed to notify the relevant council."	Westland, Seabridge and Clayton Residents Association
94	Part 2: Planning Policy	-	General		Additional Comments	Opposition to 'call for sites' and the inclusion of "The Butts" site.	This matter is outside the scope of the Draft SCI consultation as it relates to Newcastle-under-Lyme Borough Council's decision to participate in the 'Call for Sites' exercise carried out between 8 September 2014 and 31 October 2014 .	No change proposed.	Marion Reddish (Newcastle-under-Lyme Borough Councillor)

10	Part 3: Development Management	-		3.16	Additional Comments	<p>There does need to be somewhere in the document a clear message to consultees that although effective community involvement does give the opportunity to help shape proposals from an early stage by drawing on their local knowledge and experience (3.16), their views will not necessarily be taken on board. Clearly this has been illustrated recently where there has been strong local opposition to dwelling developments at Keele, Madeley and Whitmore. There needs to be an honest and open approach to exactly what people can and cannot influence. The difference between "consultation" and "engagement" needs to be made clearer.</p>	<p>Comments noted. It is suggested that a reference could be added at paragraph 3.1 to the NPPF paragraphs 196 and 197 that "The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Framework is a material consideration in planning decisions." It goes on to state that "In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development."</p>	<p>Add at the end of paragraph 3.1 of the Draft SCI "The NPPF paragraphs 196 and 197 identify that "The planning system is plan-led. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The Framework is a material consideration in planning decisions." It goes on to state that "In assessing and determining development proposals, local planning authorities should apply the presumption in favour of sustainable development." Also at the end of paragraph 3.16 of the Draft SCI add "As detailed above there are only limited number of situations where it is mandatory to carry out pre-application consultation with the local community. These are explained in the Planning Practice Guidance, which states that "Pre-application engagement with the community is encouraged where it will add value to the process and the outcome." Insert footnote Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 20-009-20140306</p>	Madeley Parish Council
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11	Part 3: Development Management	-		3.35-3.43	Additional Comments	The section on "Decisions", 3.35-3.43 is a concise summary of how decisions are actually taken and a very useful tool for communities to refer to.	Comment noted.	No changes suggested	Madeley Parish Council
12	Part 3: Development Management	-		3.7	Additional Comments	Madeley Parish Council has concerns relating to the future capacity of Planning officers to be able to effectively work with an applicant, the community, elected members and other statutory consultees.(3.7) As is stated in 1.15 cost is a major factor in delivering genuine consultation and with future resource reductions it is difficult to see how expectations within the community could be managed.	Comment noted. The SCI seeks to find a balance between meeting regulatory requirements, and going beyond these where the councils consider it to be appropriate, and resource implications of doing so. This is set out at paragraph 1.15 of the Draft SCI. In respect of Newcastle-under-Lyme, consideration is being given to working practices in an attempt to create greater time and capacity for such matters. The change to a 4 week planning committee cycle is part of this process.	No changes suggested.	Madeley Parish Council
16	Part 3: Development Management	-		3.8	Additional Comments	<p>many types of applications ... which do not require to be subject of any publicity. ... it is possible to set up a 'saved search' on a property'.</p> <p>This is a wholly inadequate means of enabling the public to INFORM THEMSELVES, which is what you are asking them to do. Suppose that there is a planning application that does not have to be publicised, that is of interest to the public, and that no member of the public has created a saved search on the property in question. How many saved searches would a person have to make in order</p>	Comment noted. It is appropriate that the SCI draws attention to this tool that is available to members of the public to use. It is recognised that the help function on the Newcastle website could be improved, and the need to do this has already been identified in the Action Plan arising from the Council's Planning Peer Review. The current version of the Council's website enables searches to be saved based upon areas such as a ward, a parish, by address or by the extent of a map. This search facility is also available in Stoke and this should be made clear in the SCI.	Amend the second sentence of paragraph 3.8 to read "In the case of both councils these applications are available for members of the public to view on its website but the council takes no proactive steps to invite comment upon them."	Judith Oppenheimer

						to keep informed about planning applications in their neighbourhood? I cannot even work out how to make a single saved search on my neighbourhood to keep myself informed - the help text on the NuL website is inadequate.			
17	Part 3: Development Management	-		3.14-3.17	Additional Comments	A local by-law is needed that requires MEANINGFUL and PRODUCTIVE consultation between developers and communities. If the result of consultation and input of local knowledge is identification that a development is inappropriate, then the developer and the planners should respect that result.	Parliament has decided where pre-application consultation is mandatory and the local planning authorities cannot extend these legislative requirements	At the end of paragraph 3.16 of the Draft SCI add "As detailed above there are only limited number of situations where it is mandatory to carry out pre-application consultation with the local community. These are explained in the Planning Practice Guidance, which states that "Pre-application engagement with the community is encouraged where it will add value to the process and the outcome" "Insert footnote Planning Practice Guidance (2014) Paragraph: 009 Reference ID: 20-009-20140306	Judith Oppenheimer
18	Part 3: Development Management	-		3.33-3.34	Additional Comments	Material planning considerations' (MPCs). The document lists only items that are NOT MPCs. This document is written for the general public. If the general public is to be involved in planning decisions it needs to know what ARE MPCs. This example illustrates very well the comments above re paras 1.18 and 2.5. Planners need to put themselves into the shoes of ordinary people.	Comment noted. Additional text suggested at paragraph 3.33 to provide examples of material planning considerations. The list is not exhaustive and a note to this effect is also suggested.	Add to paragraph 3.33 examples of material planning considerations. "Material planning considerations include the following: <ul style="list-style-type: none"> • Overlooking and loss of privacy • Loss of light or overshadowing • Parking • Highway safety • Traffic • Noise • Effect on listed building and conservation area 	Judith Oppenheimer

								<ul style="list-style-type: none"> • Layout and density of building • Design, appearance and materials • Government policy • Disabled persons' access • Previous planning decisions (including appeal decisions) • Nature conservation • Economic factors including job creation and New Homes Bonus <p>Please note that the above list is not exhaustive but provides examples of material planning consideration. It should also be noted that the weight given to any material consideration is determined on a case by case basis."</p>	
30	Part 3: Development Management	-	General		Additional Comments	<p>The response form does not allow for objections to be raised about the actual situation which exists whereby preparations are in hand for making a Local Plan to determine land uses in the future, while at the same time, if not in, advance, decision are being made about proposed sales of council owned land with a view to allowing buildings to be erected which pre-empt the implementation of the Local Plan. This is to put the cart before the horse.</p>	<p>In November 2014, Newcastle-under-Lyme Borough Council's Cabinet made a decision to participate in the Call for Sites initiative and made a separate decision to proceed with the disposal of several sites in its ownership, which had been subject to public consultation. These two and entirely separate decisions, relating to different sites across the borough, appear to have been confused. This is unfortunate but nevertheless the issues raised are outside the scope of the SCI.</p>	<p>This matter is outside the scope of the SCI. Therefore, no change is proposed.</p>	Paul Anderton

37	Part 3: Development Management	-		3.22	Additional Comments	We now ask that all planning consultations are sent electronically to the central hub for our planning and development and advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.	Comment noted. Council database checked to ensure that consultations are sent to the email address provided.	No changes suggested.	Natural England
41	Part 3: Development Management	-	General - Support		Additional Comments	We welcome the council's commitment to early and ongoing consultation, and request that the council continues to comply with current legislation and consult the Agency on any applications that have the potential to impact on the operation and performance of the named routes. This includes applications that may alter access arrangements or affect the safety and free flow of the SRN.	This is outside the scope of the SCI as it is not the function of a SCI to identify when a specific consultation is to be undertaken prior to the decision on a planning application	No changes suggested	Highways Agency (now Highways England)
42	Part 3: Development Management	-	General		Additional Comments	Should any development be proposed then as a matter of consideration it should be referred as a matter of course particularly if it is likely to impinge upon others area.	Meaning unclear.	No changes proposed.	William Doorbar
55	Part 3: Development Management	-		3.10	Additional Comments	It is the intention of Staffordshire Police to assist planning applicants wherever possible to include measures and sensible design features which help to mitigate potential crime threats to subjects of the application. Many forms of advice are given by police	Comment noted. This matter is outside the scope of the SCI	No changes suggested.	Staffordshire Police

						<p>specialists that involve no or very little cost. Some forms of recommendation by the specialists may include the attainment of the Secured by Design award, a proven and well researched standard that features elements of crime prevention by environmental design and target hardening of individual units to minimum security standards. These issues are very much entwined with issues of sustainable communities and quality of life issues that feature in the Draft Statement of Community Involvement consultation document.Planning applications which do not consider security and crime prevention may become subject to a police objection and therefore it is extremely important that early discussions take place.</p>			
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58	Part 3: Development Management	-			Additional Comments	<p>Many planning applications, such as dwellings, commercial units, shutters and licensing may overlap council policies, issues around policing, and crime prevention. It is important therefore that crime prevention is not overlooked with regard to Supplementary Planning Documents (SPDs) and to this end I again recommend early consultation with police specialists (Architectural Liaison Officers) regarding SPDs.</p> <p>I would suggest that the above content in this report particularly underpins paragraphs on page 22 namely 3.10 and 3.11 and 3.12 (early engagement), and paragraphs 3.14, 3.15, 3.16, 3.17 (community involvement).</p>	See response to representation 57. It would also be impractical to list all the scenarios of organisations which could be consulted on a planning application. However, it is worth noting that non-statutory consultees will be consulted in line with the NPPG Paragraph: 022 Reference ID: 15-022-20140306	Amend paragraph 3.22 to read "Non-statutory consultees will be engaged in line with the requirements of the Planning Practice Guidance which requires that the councils should consider whether there are planning policy reasons to engage other consultees who- whilst not designated in law- are likely to have an interest in a proposed development."	Staffordshire Police
59	Part 3: Development Management	-		3.22	Additional Comments	<p>In writing this report I recognise that paragraph 3.22 on page 23 of the Draft SCI explains that there are different forms of consultation, and that the Draft SCI specifically refers to consultation with the public, however I have taken the opportunity to make observations that are intended to assist members of the public and applicants in effectively addressing crime intervention issues and therefore avoiding problems that may arise via future police consultation as part of the planning process.</p>	Comment noted.	No changes suggested.	Staffordshire Police

64	Part 3: Development Management	-		3.29	Additional Comments	<p>I hope that those affected by any Planning Application will be consulted throughout the whole of the project.</p> <p>At the moment Audley Parish/Bignall End/Talke Pits are being affected by a Planning Application by UK Coal for an Opencast on Great Oak. All seems to have gone quiet and even through the application deadline was September 2014. We are still in the dark as to what is happening. We need more information and updates on a regular basis.</p>	<p>Comment noted. The Draft SCI sets out how the councils will undertake consultation in future, once the SCI is adopted. Both councils display up to date application material on their websites including representations, consultations, reports. In the event of a significant amendment to the proposals, appropriate publicity will be given.</p>	No changes suggested.	Dawn Dobson
70	Part 3: Development Management	-		3.29	Additional Comments	<p>KPC would like to have clearer understanding of the detail in terms of how exactly will Parish Councils and residents be involved - are you passively or actively seeking comments ... bearing in mind in the past few months Keele have actively provided comments on planning applications but it is felt that these have been dismissed, only later to be validated by other parties.</p>	<p>The SCI seeks to provide such a clearer understanding.</p>	No changes proposed.	Keele Parish Council

73	Part 3: Development Management	-		3.28	Additional Comments	<p>I have had the opportunity to consider the draft SCI in detail and the consultation process appears to be very much in line with good practice and the procedures adopted previously.</p> <p>Regarding the draft SCI, it is only in respect of the Borough's 'guillotine' that I have any substantive comments to make, and I note that Stoke-on-Trent adopts a different practice.</p> <p>While, on the face of it, the 'guillotine policy' - a cut off of four days before the application is determined seems reasonable, I have some concerns about my experience of its operation in practice.</p> <p>In particular, I seem to remember occasions when the 'guillotine' has been put into effect more than four days in advance of a meeting where an application is actually determined.</p> <p>In particular, when a major application has been made, but the planning meeting has been deferred - on occasion several times - beyond the normal statutory deadline for determination, I recall frustration in the past that the 'guillotine' has not been extended.</p>	<p>The operation of a guillotine on late representations was introduced by Newcastle's Planning Committee in July 2008 following a number of cases where members had been asked to consider at the Planning Committee itself significant new information material to the determination of an application. It has been operated with due regard to the legal requirement that a Local Planning Authority takes into account any material planning consideration and does not take into account any immaterial consideration. It is applied in a manner so that it does not cut down any period for comment referred to in publicity. It is considered an essential part of the efficient and effective decision making of the Planning Committee. The guillotine policy as adopted and subsequently reaffirmed after a trial period refers to working days rather than days. If a decision on an application is deferred (by the Planning Committee) the guillotine should be lifted, before being reimposed. Officers operating the guillotine will be reminded of the required procedures</p>	No changes suggested	Paul Farrelly MP
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						<p>I would be grateful, therefore, if the guillotine's practical operation could be reviewed as part of this SCI exercise - and to ensure all important views by statutory consultees are in the public domain, too, so that full representations can be made by the public, including myself.</p> <p>Separately, I also remember on one occasion when I submitted representations under the 'guillotine' at 6pm in the evening from my Westminster Officer - only to be told by Guy Benson, the Head of Development Control, that he had deemed the cut-off to be at 5pm, the Council's 'normal office hours', so they would not be reported to the Planning Committee.</p> <p>This seemed to me to be rather harsh and inflexible (and the actual time is not in the Committee's 'guillotine' resolution), but my protests were to no avail. I would be grateful if a little leeway (up to midnight) in this aspect of the guillotine's practical operation could also be considered as part of this consultation on the draft SCI.</p>			
88	Part 3: Development Management	-		3.32	Additional Comments	3.3 Representations. The document should include a list of what are 'material considerations'.	Comment noted. Additional text suggested at paragraph 3.33 to provide examples of material planning considerations. The list is not exhaustive and a note to	Add to paragraph 3.33 examples of material planning considerations. "Material planning considerations include the	Westland, Seabridge and Clayton Residents Association

							<p>this effect is also suggested.</p>	<p>following:</p> <ul style="list-style-type: none"> • Overlooking and loss of privacy • Loss of light or overshadowing • Parking • Highway safety • Traffic • Noise • Effect on listed building and conservation area • Layout and density of building • Design, appearance and materials • Government policy • Disabled persons' access • Previous planning decisions (including appeal decisions) • Nature conservation • Economic factors including job creation and New Homes Bonus <p>Please note that the above list is not exhaustive but provides examples of material planning consideration. It should also be noted that the weight given to any material consideration is determined on a case by case basis."</p>	
93	Part 3: Development Management	-		3.17	Additional Comments	<p>I think there needs to be more explanation about the difference between Section 106 and the suggested Community Involvement Statement.</p>	<p>Comment noted. A Section 106 (S.106) is a way of securing a planning obligation. Paragraph 3.12 of the Draft SCI explains "For all planning applications, the borough council and the city council can advise on what is required to support an application and how planning policies will be applied when considering the</p>	<p>Add Section 106 to Appendix 8 Glossary "Section 106 (S.106): A mechanism for securing planning obligations."</p>	<p>Marion Reddish (Newcastle-under-Lyme Borough Councillor)</p>

							proposal. In some cases, both councils will also negotiate Planning Obligations (see Glossary) via S.106 agreements and undertakings." Appendix 8: Glossary defines what a Statement of Community Involvement is and what a Consultation Statement is.		
99	Part 3: Development Management	-		3.39	Additional Comments	However on a matter of some specific practices described in the draft, one of our members questions whether the practice described in 3.39 (opportunities for objectors to see planning officers reports and to address the planning committee) has in fact been operating and wonders whether it will be operated better in the future.	The practice has been operating and will continue to be operated.	No changes proposed.	Newcastle-under-Lyme Civic Society
100	Part 3: Development Management	-		3.44	Additional Comments	Also more than one of our members have a belief that enforcement action against unauthorised development has often been weak up to now and the relevant section in the draft (SCI 3.44) in talking about what is expedient does not seem to hold out much hope for a more vigorous enforcement regime.	An Enforcement Plan is being prepared, in accordance with the National Planning Policy Framework, to manage enforcement proactively. It will set out how the council will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so.	No changes proposed.	Newcastle-under-Lyme Civic Society

106	Part 3: Development Management	-		3.22	Additional Comments	COMMENT - It is noted that the Councils recognise that they have an obligation to consult Statutory Consultees in the development management process. The Coal Authority is such a Statutory Consultee.	Comment noted. Suggest additional text after relevant Government Agencies & Departments to further explain that this includes the Coal Authority.	Add to 'Appendix 1: Joint Local Plan consultation bodies' after Relevant Government Agencies & Departments "(including those listed in the Regulations as "specific consultation bodies" the Coal Authority, the Environment Agency, Historic England, the Marine Management Organisation, Natural England, Network Rail Infrastructure Limited, Highways England and Homes and Communities Agency"	The Coal Authority (Planning and Local Authority Liaison Department)
69	Appendix 1	-			Additional Comments	<p>KPC would like to see more reference to community involvement, bearing in mind it is a draft SCI. Currently it is very heavy towards other stakeholders more so that Parish Councils and residents of the borough.</p> <p>No mention of the LAPs in the process or as a stakeholder? Residents Associations?</p>	<p>It is acknowledged that Parish Councils, LAPs and residents associations are an important means of helping to communicate information to and from the councils. However, specific groups are not generally identified in detail due to vast number of potential groups which could be named across the two authority areas. Nonetheless, the councils did make all Parish Councils and Locality Action Partnership chairs aware of the Draft SCI consultation and will continue to consult these groups throughout the preparation of the Joint Local Plan.</p> <p>There is no requirement for Resident Associations to register themselves with the councils, therefore such organisations are included on the consultation database as and when they notify the councils of their interest in</p>	Add a note at the end of Appendix 1 stating that, " Any person/ group/ organisation who is not listed in Appendix 1 who wishes to be notified of future consultation on planning policy documents should notify the relevant council or councils in order that their information is added to the consultation database to be informed of future consultation. If their contact details change it is the responsibility of the person/ group/ organisation/ agent who has expressed an interest in being kept informed to notify the relevant council".	Keele Parish Council

							planning policy issues and request to be added. It is ultimately up to individual Resident Associations to decide if they have an interest in local plan-making and therefore want to be added to the consultation database. The Draft SCI provides instructions on how to be added to each council's consultation database.		
87	Appendix 1	-			Additional Comments	2.0 Your 2.7 Consultation Database. Resident Associations should be listed. It is not evident from the list that such bodies are included.	As there is no requirement for Resident Associations to register themselves with the councils, such organisations are included on the consultation database as and when they notify the councils of the interest in planning policy issues and request to be added. It is ultimately up to individual Resident Associations to decide if they have an interest in local planning policy and therefore want to be added to the consultation database (in which case the Draft SCI provides instructions of how they can ensure they are added to the database).	Add a note at the end of Appendix 1 stating that, "Any person/ group/ organisation who is not listed in Appendix 1 who wishes to be notified of future consultation on planning policy documents should notify the relevant council or councils in order that their information is added to the consultation database to be informed of future consultation. If their contact details change it is the responsibility of the person/ group/ organisation/ agent who has expressed an interest in being kept informed to notify the relevant council."	Westland, Seabridge and Claytom Residents Association
105	Appendix 1	-			Additional Comments	OBJECT - In this appendix you rightly refer to the Town and Country Planning (Local Planning)(England) Regulations 2012, in relation to Specific Consultation Bodies. However you do not specify precisely who these are, the description 'Relevant Government Agencies & Departments' is considered to be imprecise and unclear. The Coal Authority is a Specific	Comment noted. Suggest additional text after relevant Government Agencies & Departments to further explain that this includes the Coal Authority.	Add to 'Appendix 1: Joint Local Plan consultation bodies' after Relevant Government Agencies & Departments "(including those listed in the Regulations as "specific consultation bodies" the Coal Authority, the Environment Agency, Historic England, the Marine Management Organisation, Natural England, Network	The Coal Authority (Planning and Local Authority Liaison Department)

					<p>Consultation Body under these Regulations, however this fact is not made clear and it appears that the councils may not appreciate this fact. I note that we were sent the General Consultee Letter for the SCI which appears to demonstrate a misunderstanding of our legal status... Regulation 2 clearly indicated The Coal Authority to be a Specific Consultation Body. Appendix 1 should be amended to clearly specify the full list of bodies defined under the Regulations as the Specific Consultation Bodies.</p>		<p>Rail Infrastructure Limited, the Highways England and Homes and Communities Agency"</p>	
19	Appendix 4	-			<p>Additional Comments</p> <p>This method of identifying 'neighbours' may be adequate in urban areas. It is totally inadequate in rural areas where populations are dispersed and terms such as 'neighbour' and 'community' have quite a different meaning and even developments defined as 'minor' can have a significant impact on the environment of the community."</p>	<p>Clarify the use of site notices in Appendix 4</p>	<p>In Appendix 4, add in a bullet point saying: "Where a site is isolated and there are no neighbours that can be identified, a site notice will be displayed"</p>	<p>Judith Oppenheimer</p>