



Pre-submission Participation Statement: Statement of Community Involvement (SCI)

This statement sets out details of the consultation conducted by Epsom & Ewell Borough Council on the Draft Statement of Community Involvement (Government refers to this as the pre-submission participation stage). This consultation was carried out in accordance with regulation 26 of The Town and Country Planning (Local Development) (England) Regulations 2004.

This statement contains the following information:

- 1) Who was consulted and the number of representations made
- 2) A summary of the main issues raised in the representations and how they have been addressed in the Statement of Community Involvement
- 3) A table containing a more detailed summary of responses from the questionnaire and how they have been addressed

Who was consulted and the number of representations made

On 14 February 2004, the Council wrote to over 250 'stakeholders' to invite their comments on the Draft Statement of Community Involvement. These stakeholders comprised the Specific Consultation Bodies (as identified in Annex E, PPS12), Government departments/agencies, national/regional organisations, service/utility providers and a wide range of community/interest groups. A variety of local organisations and residents were also consulted. The consultation period ran from 14 February – 1 April 2005 (6 weeks) and a 'Comment's Response Form' was provided alongside the document. The document was also made available on the Council's website and at a variety of locations, including the Town Hall and local libraries.

Any comments received were fed into the preparation of the final document, to be submitted to the Secretary of State on 3 June 2005.

Of the 258 forms mailed out, a total of 51 responses were received with 32 making specific comments. This equates to a return rate of 20%.

The responses can be broken down into the following groups:

Groups	Number of Responses	% of Total
Specific Consultees	10	19.6
Government Departments	0	0
National/regional agencies and organisations	8	15.6
Utility Providers	1	1.9
Local Groups and Bodies	21	41.1
Local Strategic Partnership	5	9.8
General Public/other interested parties	6	11.7
Total	51	99.7

It can be seen that a most of the groups were represented in the responses, with Local Groups and Bodies providing almost half of the feedback.

The Comments Response Form posed a number of questions relating to the Draft Statement of Community Involvement, and many of those consulted chose to use this method to respond.

All responses were recorded, considered and acted upon if deemed relevant.

A summary of the main issues raised from the consultation and how they have been addressed in the SCI

In general the Draft Statement of Community Involvement was accepted and drew many positive comments. Comments ranged from being very broad in nature (i.e. the document is too long) to being highly specific (i.e. detailed responses on a particular point). The 'Statement of Community Involvement' was developed to reflect these views.

Many respondents expressed a wish to be added to Appendix 2. This contained a list of organisations that were to be consulted with regard the Local Development Framework. However, due to the increasing size of this list and its changeable nature (as noted in the Companion Guide to PPS 12), it was decided that this list should be removed altogether. Consultees' details are now collated on a Contact Database, which is regularly reviewed and updated. A few respondents usefully suggested a number of new contacts that should be included in future consultations. These contacts have now been added to the database.

A number of respondents, particularly those from local groups/organisations, stated that the document was too long and at times unclear, especially to those from a non-planning background. As a result the document has been reduced in length and changes have been made to improve its clarity and format. As recommended, a clearer distinction has been made between the consultation processes for:

- The production & revision of Development Plan Documents and
- Planning Applications

Particular attention has been paid to the 'Planning Application' section as this drew a number of specific comments. However, it was important that the revised document remained succinct and did not become overly prescriptive.

Many respondents advocated an increase in use of the Internet and e-mail to communicate with the community. These methods will be increasingly used in the future. The development of the Council's new website should help promote this use and steps will be taken to develop interactive comments sheets. Consultees will be given the option of providing an e-mail address for consultation purposes, which will be added to the Contact Database. However, the option of being consulted by paper format will remain.

Table containing summarised responses from the questionnaire and how they have been addressed

Responses have been grouped under the following categories:

- A) Specific consultees
- B) Government departments
- C) National / regional agencies and organisations
- D) Utility providers
- E) Local groups and bodies
- F) Local Strategic Partnership
- G) General public / other interested parties

Response Group / Name	Comment	Response to comment
A Surrey County Council	The LDF: SCI should cover how public consultation on associated SA / SAE reports will be dealt with	The SA Scoping Report sets out the methodology for sustainability appraisals. A sustainability appraisal will be attached to each DPD and comments will be invited when it is sent out for consultation. Now Included in text.
	Planning Applications: 1) Paragraph 16 of Schedule 6 of the Planning & Compulsory Act 2004 updates the consultation arrangements on planning applications between local planning authorities and county councils which should be reflected in the SCI.	Now included in Planning Application section.
	Planning Applications: 2) Welcome references to the SLGA approved 'Infrastructure - A good Practice Guide' to ensure early consultation on the infrastructure and services required to support new developments	Now included in Planning Application section
	Planning Applications: 3) Reference to consultation with non-statutory bodies and organisations which represent specialist interest groups could also be referred to	Now included in Planning Application section

A Highways Agency	Wish to continue to be consulted about any planning applications likely to impact on the M25.	Noted
A English Nature	Wish to be involved in one of the 'one to one' stakeholder meetings	Noted
A English Heritage	Contact statutory environmental agencies as early as possible in the plan making process including sending a copy of the LDS to help inform involvement and use of resources.	As stated in the SCI, consultees are contacted early in the plan making process and given a number of weeks to respond with their comments. Can provide a copy of the LDS or mention in future consultation letters that it is available on the website.
	Endorse the value of wider community engagement. The statutory and NGOs within the heritage sector that should be consulted are: CABE, Ancient Monuments Society, Council for British Archaeology, Society for the Protection of Ancient Buildings, The Georgian Group, The Victorian Society, The Twentieth Century Society, Garden History Society, National Trust, Local Civic/Amenity Society, Local Building Preservation Trust, Local Archaeological and Antiquarian Societies.	A number of these are included on the consultation database
C	Local planning authorities may wish to consider informing local communities about renewable energy, its potential benefits and any potential effects of development, before any schemes are submitted for planning permission in their area. It is important to offer a balanced view to the public, before any schemes are discussed, as a better-informed public is more likely to look at a proposal objectively and realistically.	Noted. This issue will be dealt with accordingly, should the situation arise in the Borough.
	Issues that may need to be addressed could include: 1) A lack of awareness about the technology and concerns about noise, visual effects, odour and other perceived hazards. 2) Juxtaposition between the importance of addressing a long term global impact threat such as climate change, and the specific, immediate local impacts arising from a particular project. 3) Difficulties in making the link between regional policy and local delivery.	As above

	Wish to emphasize the importance of local planning authorities highlighting in their SCI what level of community involvement they consider appropriate.	This is now identified in table 4. However, some issues will be decided on a case by case basis.
C	Please add name to Appendix 2	This was not intended to be a comprehensive list (now removed from Appendices). The organisation is included on the contact database.
C	Table (Planning Applications statutory minimum requirements) does not refer to the requirement to consult Sport England on all applications affecting a playing field as defined in statutory instruments.	Sports England are a Statutory consultee on planning applications affecting playing fields (by virtue of Statutory Instrument No 1817 of 1996). However Table 5 was not intended to be a prescriptive list.
	Newsletter and email alerts to publicise new documents	May be used depending on the scale of the community involvement and the resources available. Email alerts can be used and depend on the number of email addresses that may be obtained.
C	Any proposal for development of the rail network or of railway facilities must be developed in consultation with the SRA to ensure compatibility and feasibility.	Noted
C	Only wish to be consulted on Core Strategy and generic development control policies and on SPD concerning outdoor sport, children's play and planning obligations. Organisation will be providing a set of model policies which will provide the essence of the organisation's representations at "preferred options stage".	Noted
C	Recommend that geological/environmental information be acquired from the British Geological Survey early in the process as an essential requirement towards the District's forward planning and development.	Noted
D	Appendix 2 should be amended to refer to 'specific consultation bodies' rather than 'statutory consultees'	Appendix 2 has now been removed. However 'specific consultation bodies' are now referred to in the text
	Refer to Guide for LPAs on Planning Application & Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewage Undertaker	Remain as a consultee.

	Consultations must be carried out early with utilities providers to provide adequate time for an informed response. Modelling water and sewerage infrastructure systems take a long time to carry out.	Added in to Planning Applications section
E	Other local forums the Council could use for consultation: 1) RA Committee Meeting 2) RA AGM's	Will depend on resources but open evenings will be held at the Council where residents associations will be invited along.
	Neighbourhood notification - serving a notice on adjoining owner occupiers, does not work well in the college ward. It is very irregular and have cases where consultation does not take place at all. CWRA ensures, where possible, that the dissemination of details on planning applications has reached all interested parties locally. Poor notification applies to both major and other applications (Table 5).	General comment - Development Control Issue
E	More use of the internet due to a high number of users	Consultation documents are already available for comment on the internet. The new website design which will soon be introduced, should result in a higher number of users. Its effect will be monitored.
	Very good consultation	Noted
E	Consult the Environment Forum (LA21)	Already a contact on Consultation Database
	Might benefit from shortening and gain readers?	The SCI is a comprehensive document produced following government guidelines. It has been shortened and clarified.
	1) Table 5: MDS and other applications. Adjoining owners insufficient, needs to be extended to nearby owners and over a wider area for MDS. The area potentially affected will vary according to impact of development. 2) Revised applications. Original consultees and those commenting on the application to be advised.	There are a number of proposed arrangements in addition to the statutory minimum requirements. If all these are adopted, this should satisfy these comments. Presume this also applies to revised applications.
E	Concerned with the length of the document. Very daunting for any organisation not expert in planning. Could a summary version be produced?	Document has been produced in line with government guidance but has now been slimmed down
	The overall title does not make it clear as to what the 'community involvement' is in - presumably it is in 'new planning systems and applications'? Could this not say so in the title?	Clarify titles

	Not clear if sections 3-9 are concerned only with community involvement in the new planning system, or with both the system and individual planning applications. This could be clarified in Section 1.	Further explanation has been added into introduction stating that the SCI covers both 1) The preparation and revision of LDD's 2) Planning applications. The distinction between these two sections has been made clearer
	The document could be shortened if the lengthy section 5 and appendix 5 (not appendix 3 as indicated on pg 17?) could be amalgamated and simplified. Also there is a tendency towards 'management speak' which becomes somewhat close to gobbledegook at times (e.g. what does the third stanza on pg 8 actually mean?)	These could be condensed and some of the language simplified. Can find no reference in document to 'third stanza'?
	Realise it is a difficult task to produce a document that satisfies a large group of interested parties and that matches new statutory requirements. However in attempting to cover all angles, it could be at risk of being so complicated that it is of less use to the potential consultees than it could be.	Document could be summarised but in covering all angles it acts a good point of reference when consultation is required.
E	Would like to see greater use of the internet eg plans for road improvement measures that affect many people	New website will improve this method of delivery of information.
	Would like to see public meetings where the developer can explain the proposals for major development schemes e.g. the station	For major applications, the SCI encourages developers to consult the public at the pre-application stage. However this is not a legal requirement.
	Appendix 2 : Consultation groups. Change 'Residential Association' to 'Residents Association'. Add LA21 Open Spaces, Transport and Recycling Groups & CPRE. Should certain developers be included in the list? They should be excluded unless they build places of high quality.	Wording changed to 'Residents Associations'. The other groups mentioned are already consulted; the Appendix was not intended to be a comprehensive list of consultees. Anyone who expresses an interest in the LDF should be given an opportunity to comment, even developers. Cannot withhold information.
E	A planning officer to attend local meetings of Residents Associations to explain the statement. Association wish to negotiate with EEBC to arrange one?	Will depend on resources but open evenings will be held at the Council where residents associations will be invited along.
	Websites: SCORA, Individual RA websites & any other organisations with websites	Provide website owners with links to relevant sections of the EEBC website
	Add to Appendix 2: 'Epsom Islamic Society'? Also change to 'Residents Associations' from 'Residential Associations'	Amended RA. Appendix was not intended to be a comprehensive list and has now been removed. The Epsom & Ewell Islamic Society is on the contact database.

E	Should consult Residents Associations	As mentioned before
E	Selected monthly RA meetings, displays and presentations at local events such as Hook Road boot sales / carnivals & Hereld of Spring	Resources may limit the ability to attend events such as these, but they could be used as another source to promote awareness of the consultation process. Will depend on the level of consultation required.
E	General meetings of resident's societies and their members	Dependent on resources
E	Relates to Section 10: Understood that many planning applications are decided by council officers without reference to the planning committee. This circumstances in which this is done should be explained in the document	Decisions are made by planning officers under 'delegated powers'. The more controversial or larger schemes are considered by a formal planning committee. This is now explained in the Planning Application section.
E	Wish for a planning officer to visit one of their 'Open Spaces Groups'	Dependent on available resources. Groups would be able request visits.
	Please add name to Appendix 2. Also CPRE should be added	All these groups are included on the contact database
E	Wish to continue to be consulted and will respond after consultation with their members	Remain on contact database
E	University of the 3rd Age and Friends of the Earth (Epsom and Ewell Branch) should also be contacted	Enquire if they wish to be consulted
	Organisation is against Regional Government & campaigns for restoration of County Council Decisions making a local democracy. The SCI involves too much bureaucracy and is too complex. Decisions will be taken out of the hands of local authorities - a bad thing.	SCI is a formal document, which is written according to government guidance which is very specific. It is intended to be a guide to ensure adequate consultation for all future LDF documents. Many of the consultees are local which ensures that local input is a central part of the development of any documents.
	With regards to table 1: If a 'questionnaire' is to be accompanied by a consultation document then the 'giving info' column should have three ticks not one.	This is true, now incorporated into table
	Pg 22 Formal Consultation: Very satisfactory to know the public can consult the Sec of State on a DPD draft. What happens if the Sec of State rejects or modifies the draft DPD?	The comments will be considered alongside other consultees
E	Wish to be added to Appendix 2	Remain on contact database

F	As a CVS, link well with the voluntary and community sector in EEBC. May wish to use them to obtain the voluntary & community sector views	All comments are welcome in the consultation process. Perhaps consultation letter to local groups could be differentiated and mention that any other contacts views and comments are welcome.
F	Provide consultation documents in The Edge, Longmead Centre, libraries, colleges, Rosebery Housing Association	Copies are already available in libraries. Additional copies could be left in other local centres
F	Would like to be included in Appendix 2 (Consultation Groups)	This was not intended to be a comprehensive list (now removed). Surrey Business Advice are included on the contact database.
F	The value of focus group discussions is under valued by describing them as 'optional'	All types of consultation are valuable but the resources available may limit the options. The phrase 'optional' is not intended to de-value the method, but implies that it may be used if it is felt that type of input is needed to ensure a satisfactory consultation. This is dependent on the scale of consultation required (refer to table 6 in SCI for example). No amendments.
	Reference needs to made to the Worcester Park part of Epsom and Ewell, which is becoming increasingly marginalised	Residents associations are consulted and given an equal opportunity to express their opinions. This ensures a good spread of consultees across the Borough.
	This work needs to be tied to a new version of the Council's strategic plan to galvanise interest and participation from the community	The 'Community Strategy' involves consultation with key stakeholders and is reviewed on an annual basis. The LDF is key to delivering many of the objectives in this document, therefore they are closely tied.
F	Residents/tenants associations. Other local housing associations	These are included in the consultation
	Organisation is satisfied that the SCI is a comprehensive and clear statement. Its clarity has helped develop an understanding of the engagement and involvement process in a planning context.	Noted
G	Further details of a formal project plan (pg29) should be set out and it should be made clear that this document is not a statutory requirement and can be open to review, to reflect the unpredictability in the development industry	Paragraph now included to explain when the SCI is to be reviewed
	EEBC should seek to utilise email to notify and exchange information to save both costs and time. In addition open days and other events should also be held in the evenings outside of normal working hours.	Email addresses are being collated. However previous experience has shown that many organisations prefer hard copies. Open evenings are a part of the consultation process.
	The Epsom and Walton Downs Conservators	Add to consultation list

	Section 10 sets out the role of the applicant. It should be made clear, in line with advice in PPG12, a companion guide, local planning authorities should adopt a 'menu' approach in terms of the type of community involvement required for each application and should not be specific. Therefore should be made clear that the types of consultation set out in table 6 (pg 28) are not prescriptive and that a menu approach can be adopted, tailored to each application.	Now mentioned in text under 'Role of the Applicant' that table 6 is only a guide and the type of community involvement required depends on the individual case. The list of possible methods is now referred to as a 'menu' of options and the level and type of consultation required can be tailored from the list.
	Response forms should be made available in word format on the internet to allow for easy access.	Something to look into
G	More targeted consultation should take place with housebuilders and developers in relation to housing delivery.	Noted. Housebuilders will be targeted during consultation, particularly for the Housing Site Allocation DPD.

A number of consultees responded to the consultation but did not make any specific comments

These comprised of:

- 6 - Specific consultees
- 2 - National / regional agencies and organisations
- 7 - Local groups and bodies
- 4 - General public / other interested parties