

West Lancashire
Statement of Community Involvement

Consultation Report

May 2016

This report lists the representations made to West Lancashire Borough Council during the consultation on the draft Statement of Community Involvement (4 February – 18 March 2016) and the Council's responses to these representations.

No.	Name	Organisation	Section	Comments	Response
1	David Allcock	Natural England	-	No comments	Noted.
2	Emily Hrycan	Historic England	-	No comments	Noted.
3	Development Management Team	WLBC	Table 4.1 (P.30)	The table which provides examples of prior notifications should also include change of use of buildings (e.g. offices and agricultural buildings to dwellings).	Amend Table 4.1 to include these categories of development.
			4.4.9 (P.34)	Should also refer to appeals against enforcement notices.	Amend paragraph 4.4.9 to refer to such appeals.
			4.3.3	Section referring to wind energy pre-apps should reflect the new Statutory Instruments tabled by Government that will eventually remove onshore wind projects from the Planning Act 2008. This honours the election pledge that local people would have a final say on wind farm planning applications	Amend Section 4.3.3 accordingly.
4	Strategic Planning Team	WLBC	Table 4.1/2.3	Reference should be made in the SCI to Local Development Orders (LDOs). This could be either in the planning policy section after the section on Development Briefs, or built into Table 4.1 which refers to types of planning applications.	Point noted. Since LDOs may be superseded at some point in the future, add in a paragraph after Table 4.1 to acknowledge the possibility of there being new initiatives through which planning permission may be obtained and which may require consultation (in line with government regulations). We will meet the minimum requirements set out by government regulations in such scenarios.
5	Gavin Rattray	Burscough Action Group	1.4 (3 rd sentence)	Change, “Local authorities have a duty to act fairly” to “local authorities have a legal duty to act fairly”	Agree in part. The fact that this is a duty in law is made clear in the subsequent section 1.5 which lists the Acts and Regulations that place legal duty upon Local Authorities in relation to public consultation. However paragraph 1.4 will be amended accordingly.

No.	Name	Organisation	Section	Comments	Response
			1.4 (general)	Add "Local authorities have a legal duty to provide a balanced case and also a duty not to omit material planning evidence."	We consider that this is alluded to in s. 1.4 which states: "Local Authorities have a duty to act fairly" and therefore not necessary to refer to this separately. (No change)
			1.4 (3 rd & 4 th para.)	These paragraphs are unnecessary and should be removed because they insult residents' intelligence, who of course understand that planning is a balance.	We consider that this section is a clear and concise explanation of the Planning System which may prove helpful to those who have no experience of planning procedures or principles. (No change)
			1.4 (2 nd sentence)	Change, "engagement with local communities and other stakeholders can increase public acceptability of developments" to "real meaningful consultation with local communities and other stakeholders can increase public support for developments."	Agree in part. Change first part of sentence to read "meaningful engagement with local communities..." Change final part of sentence to read: "increase public support for developments."
			1.4 (general)	Add "When local authorities consult they have a legal duty to ensure that the consultation is meaningful".	The legal requirements in relation to public consultation set out minimum standards for who should be consulted and at what stage of the planning process (which is referred to in s.1.5). This is to ensure consultation is meaningful. The Council follows these standards in its consultations. Given it is proposed to add the word "meaningful" above, it is not considered necessary to repeat it here. (No change)
			2.1.2 (general)	Add "Greenfield sites need to be subject to a sustainability appraisal if they are to undergo conversion/development to house building or employment land. Loss of jobs and the economic cost should be calculated and form a factor within the planning application; and whether or not the applicant has chosen to leave the land fallow or allowed ditches and hedges and farm buildings to deteriorate should not form part of the material factors. Instead the economic impact should be ascertained by comparing it with similar quality land in full production."	The impacts of developing land upon biodiversity (and other matters referred to in this representation) are taken into account by seeking specialist advice as part of the Planning Application process. It is not considered necessary to state these points in a generic document such as the SCI. (No change). Sustainability appraisal is not always required for planning applications on greenfield sites. The Local Plan, which may allocate greenfield sites for development, is subject to a sustainability appraisal. (No change).

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6	Colin Atkinson	Aughton Residents Group	4.4 Managing Development Para. 4.4.1 'Who will we consult?' Para. 4.4.2 'How will we consult?'	Concerns about lack of consultation in relation to Local Plan designations and Planning Applications from developers. The current requirements / legislation set out the 'minimums' that have to be met during consultations / notifications. These requirements are totally inadequate when dealing with large proposed developments such as Parrs Lane. Hundreds if not thousands of residents would be affected, not just the residents who live in the direct vicinity of the land in question. When conducting such future consultations WLBC must ensure that the community at large are made aware by increasing the level of publicity and neighbour notifications currently employed. WLBC should vastly increase the use of postal notifications and possibly hold public meetings to enable all interested parties to have a say on what will directly affect them and completely alter the characteristics of the environment in which they live.	Para. 4.4.2 states that the level of consultation carried out for planning applications will be proportionate to the type and scale of planning applications being determined. The Council considers this to be the most appropriate course of action and the programme for consultation set out in the SCI reflects this. (No change) Representative bodies such as the Parish Council and Ward Councillors are notified of planning applications in their area. The 'community network' will be encouraged to disseminate information to other members of the community who may not have been aware of consultation exercises and planning issues that might affect them. Any other individuals or organisations are welcome to sign up to the weekly list of planning applications or can register to be notified of any applications within a given distance from their property. The Council's process for notifying the public of planning applications does in all cases meet and in some cases exceeds its statutory obligations. (No change)
7	Alexander Hazel	Environment Agency	Whole document	No comments.	Noted.
8	Mrs C A Cross	Wrightington Parish Council	Whole document	The Parish Council agree with the contents of the draft document and the means of consulting people on planning matters. The Parish Council believe that all avenues of communication on planning matters/issues should remain in place to ensure the continued roll out of planning information to rural and isolated areas, who may not have easy access to libraries, Council Offices or e-communications. Local organisations and community interest groups should also be kept in the loop on planning matters/issues in which they have expressed an interest earlier.	Comments noted. Comments noted. It is agreed that people in rural / isolated locations should be able to access planning information. The Council utilises a number of methods of communication – including paper and electronic. Local and community groups can register to join the Council's Planning Consultation database and can be kept informed of new planning documents or consultations by post or email. The weekly list of planning applications can also be viewed through the Council's website. (No change)

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9	Mrs Elizabeth-Anne Broad	Lathom South Parish Council	General comment	Table numbering in the draft SCI does not relate to the numbered paragraphs and this makes the draft unnecessarily complicated to read, quote and comment upon. Also, the draft treats both the Borough Council and the Government as plural subjects, whereas they are singular.	Change in part. Tables are numbered consecutively and are prefixed by the number of the section they are located within. They are also referred to directly in the text for clarity. There is one incidence of a table not being numbered – this will be amended. References to ‘Council’ will be amended to imply a singular entity.
			Table 2.2	This Parish Council welcomes the Borough Council’s commitment to improve consultation but doubts the value of using social media as a representative method of obtaining comments. Social media have the potential to generate uninformed bandwagons which are not necessarily indicative of local opinions.	Comments noted. Social media has not generally been used as a method of communication for planning matters to date and would only be done on a more regular basis in future with caution, and if considered appropriate. Comments received via social media will be noted but not necessarily treated as representative.
			1.3	“The Government have placed an ever-increasing emphasis on localism – to empower local communities to get involved in decision making. The Council also recognise that engagement with local communities and other ‘stakeholders’ can help in the planning process and increase public acceptability of developments.” - This general statement is welcomed.	Comments noted.
			1.4	The Town and County Planning (Local Planning) (England) Regulations 2012 (as amended) set out the minimum requirements for consultation on planning policy documents. Whilst the Borough Council must observe the minima, it may (and should be overtly prepared to) exceed them.	The Council have the flexibility to extend consultation beyond the minimum requirements where considered appropriate and in many cases the minimum standards are often exceeded (e.g. in preparing the 2012 Local Plan). The view is taken that decisions relating to the level of consultation undertaken by the Council should be taken on a case by case basis rather than being pre-determined by inclusion in the SCI – adherence to which is a legal requirement. (This comment also applies to several of the responses below.) (No change)

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			Table 2.1 (DPDs)	<p>This table sets out the legal requirements and shows that, at the preferred options stage, consultation and publicity are optional. It states: "If consulted upon, comments received will inform the preparation of the next [publication] stage". If the draft SCA is intended to improve community involvement, it should demonstrate the Borough Council's commitment. By stating, for such a fundamental document, only that it might decide to consult, the document fails to demonstrate such commitment.</p> <p>At stage 3 (public consultation on draft SPD), the only public notification methods that must occur are website, E-mail out, mail out and on deposit. The only groups to be notified are those who are on the database. This means that there is no automatic way of ensuring that as many residents as possible are given an opportunity to comment before the draft reaches its final stage; instead it depends upon an individual decision being made to go further. This is unsatisfactory.</p> <p>There ought also to be a minimum number of the optional methods to be met, in order for proper public notification to occur, and checks should be made to ensure that the organisations listed under Appendices A to D are included.</p>	<p>The preparation of planning documents is broken down in the Town and Country Planning (Local Planning) (England) Regulations 2012 into a number of statutory stages. It is not a legal requirement for DPDs to be consulted upon at 'preferred options' stage. However in most cases, this may well be considered beneficial – e.g. if a document is particularly complex and an early indication of consultees' views would be helpful for the development of the document. Consultation levels undertaken by the Council should be taken on a case by case basis rather than being pre-determined by inclusion in the SCI.</p> <p>Any individual resident or group is able to request to be added to the planning consultation database at any time, or do this themselves online. This ensures that they receive notifications of all planning policy consultations and have the opportunity to read the document and comment should they wish to. The database contains all statutory and general consultation bodies, including representative bodies such as Parish Councils, who are encouraged to disseminate information to those they represent.</p> <p>Circumstances, or the types of communities impacted by particular planning documents, may make it necessary for additional forms of public consultation to be employed. It is appropriate that this decision is made on a case by case basis rather than being pre-determined by inclusion in the SCI. (No change)</p>
			Table 2.2 (SPDs)	<p>This does not provide for the final SPD to be published before being considered for adoption. Although a feedback report is provided for, it is not the same to see piecemeal comments as to see the full, amended, document. This omission is a major weakness because it denies objectors to the final wording the opportunity to approach their elected representatives.</p>	<p>Noted. Whilst the Council is obliged to consider each comment received and make changes where appropriate in each case, the Regulations do not require the re-publication of a further draft. However if the Council judged that comments received or changes to Government policy necessitated substantial changes to the document, it may be considered appropriate to re-consult. (No change)</p>

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				<p>This refers to stages of preparation, not consultation, and only one stage (draft) contains a commitment to particular forms of “notification/consultation” there can be no assurance that the people or groups notified will have had the opportunity to comment at the pre-draft stage. Many SPDs, like this one, are revised versions of earlier documents and so if consultation does not take place at the earliest opportunity, the chance is missed to find out what people object to, approve of, or miss from, the current document.</p> <p><u>Methods to be used as a minimum:</u></p>	<p>Comments received at draft stage will be considered on the same basis as those made at earlier stages. Any individuals or organisation is able to request to be added to the planning consultation database at any time. This ensures that they receive notifications of all planning policy consultations and have the opportunity to read the document and comment should they wish to. Pre-draft consultation may be undertaken if considered necessary. It is the view of the Council that this decision be made on a case by case basis rather than being pre-determined by inclusion in the SCI.</p>
			Tables 2.3 and 2.4	<p>Website. The Council’s website will contain a consultation page to provide information on recent, current and future consultations. This will include all the relevant documents, guidance on how to comment and comments forms (online and paper based). The Council may also publish the results of consultation exercises, including any feedback reports, on the website.”</p>	<p>It is usual practice to publish such reports, but the Council is not always bound to do so (this depends on the document in question). Consultation levels undertaken by the Council should be taken on a case by case basis rather than being pre-determined by inclusion in the SCI. (No change)</p>
			2.2.4	<p>The final sentence of this statement does not commit the Borough Council to publish results but in the interests of public engagement it should do. It would be an improvement for the document to be changed by removing “may” and replacing it with “will”.</p>	<p>The use of language reflects whether this is an action required under the 2012 Regulations. The Council reserves the right to use a flexible approach - choosing consultation methods which suit the circumstances. (No change)</p>
			2.4.1	<p>There is a weakness with the website, in that it does not mention planning policy on the home page. It should be listed on the home page and the link to that page should contain links to current consultations to show that the council wants people to be involved.</p>	<p>Comments noted. However, there is only space for three ‘sub-links’ from Planning on the Council website’s home page. The three links listed are more popular than ‘Planning Policy’, and thus the corporate decision has been made not to include planning policy on the homepage. (No change).</p>
				<p>The comments made above in respect of SPDs apply also to Development Briefs. However, the emphasis on localised</p>	<p>The Council have the flexibility to extend consultation beyond the minimum requirements where considered</p>

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				consultation should be tempered to make provision for matters which have wider implications to be consulted on more widely. For example, provision for cycle tracks and public footpaths is likely to form part of a larger network and drainage proposals can affect flooding considerations downstream, rather than just in the local area.	appropriate and in many cases minimum standards are often exceeded (e.g. in preparing the 2012 Local Plan). The view is taken however, that decisions relating to the level of consultation undertaken by the Council should be taken on a case by case basis rather than being pre-determined by inclusion in the SCI – adherence to which is a legal requirement.
			4.3	<p><u>In relation to Pre-application engagement:</u> It is important to avoid creating the impression that applicants can buy a quick route to planning approval by paying an extra fee for advice. Such applications might advance more quickly as a result of proper preparation but they should not jump the queue. Otherwise, the Council will leave itself open to accusations of holding back applications which have not gone through the pre-application process and of revenue-raising, rather than regulatory control.</p>	Agree in part, however we do not consider this is the overall impression created by the text relating to pre-application advice. The wording does not infer that this service is a way of ‘buying’ or ‘fast-tracking’ permission; instead it sets out the benefits of seeking advice early on. The fee reflects only administration / officer time spent in dealing with the enquiry. Agree to remove reference to “fast-tracking” – amend the final bullet point under 4.3.1 to read: “By identifying and addressing issues at pre-application stage, this can save time when an application is submitted and may result in a quicker decision”.
			4.3.3	<p><u>Consultation on pre-application enquiries:</u> This Parish Council would like to see this paragraph strengthened to include discussions with Parish Councils and Residents’ Associations, so that areas of potential conflict at the application stage could be avoided. Positive discussions at this stage have the potential to ensure that a development is integrated into the area and accepted by the local community.</p>	Pre-application advice is treated as confidential due the potential for the commercial sensitivity of some information which may be shared. However as part of their response, planning officers may advise developers if they feel the proposals would benefit from a process of community involvement before a planning application is submitted. (No change)
			4.3.3	In order to strengthen the statement about discussions with neighbours, the following revisions to the wording are suggested: after ‘single dwellings’ insert a full stop. Begin the following sentence: ‘However, we emphasise with applicants/developers the benefits to be gained by discussing proposals with neighbours...’	Agree. Change wording to that suggested in the representation.

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			4.4.2	The Borough Council's interpretation of the terms 'neighbouring residents' and 'Parish Councils' has been a most contentious matter in recent years. It has not met the spirit of the term 'consulting widely' used in the opening statement of paragraph 4.4.1. Legislation sets out minimum requirements but does not limit notification and consultation arrangements to those minima.	Public consultation has to be balanced with the constraints of budget and staff resources. Individually addressed letters are an expensive method of consultation; therefore these are only sent to adjoining neighbours, as required in the Regulations. Electronic communications can be circulated much more widely and is much more cost-effective, therefore a weekly list of planning applications submitted is made available on the Council website and emailed to Local Councillors and amenity groups. People can request to be added to this distribution list. (No change)
			4.4.2	In a situation in which the Council is required to consult neighbouring authorities over proposals which affect their areas, it is nonsensical for officers to draw rigid boundaries between residents, and organisations which represent them, on either side of a Ward or Parish boundary in determining who should be consulted and who might be represented at Planning Committee meetings.	Electoral wards are the spatial units used to elect local Councillors and are fixed and only subject to periodic review. The Council's protocol allows representatives of a Parish Council to speak at Planning Committee in relation to developments within their ward. The protocol does not allow representatives of neighbouring Authorities to speak at Planning Committee. They are however able to submit written comments, these are reported to the Planning Committee and given due consideration in the decision making process. (No change)
			4.4.2	It is also nonsense to consult only neighbours who share a boundary with the application site when there are wider local planning issues at stake, such as road safety and neighbourhood character. It seems sensible to define "local amenity groups" by reference to the Appendices. With the current tendency to close local libraries it would seem sensible to attempt to find alternative locations for displaying the weekly list when a library is to be closed.	See earlier response (p4) in relation to public consultation: this should be taken on a case by case basis rather than being pre-determined by inclusion in the SCI. (No change) Agree. Make reference to the Appendices. Agree. This will be considered if and when this situation arises. Amend the SCI to acknowledge that existing library services may not be available indefinitely.
			4.4.4	This paragraph mixes the terms 'Case Officers' and 'Planning Officers' as though they are inter-changeable. Maybe it would improve the document to indicate that phone	Agree – refer to 'Case Officers' only to avoid potential confusion. The wording of the fifth paragraph under 4.4.4 will be amended to read: "The name and phone number of

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				<p>appointments with case officers can be made available, since it would often be unproductive to attempt to discuss a particular case with the planning officer who happens to answer the phone.</p> <p>It might be simpler just to refer to Appendix E after ‘...material planning applications’.</p>	<p>the case officer dealing with the application is available on the Council’s website and on notification letters. Telephone discussions may be held with the relevant case officer during office hours and meetings made by appointment”. It is considered a better approach to provide a summary outline at this point in the text, referring readers to the fuller explanation provided in the Appendix.</p>
			4.4.6	This section of the paragraph referring to the Case Officer’s Report belongs in 4.4.7.	A report is written by the case officer for delegated applications as well as for those going to Planning Committee, therefore this should not be moved to the section ‘Applications referred to Planning Committee’. (No change)
			4.4.6	Comments received are not currently ‘set out’, as they should be in the Planning Officer’s report but summarised, often to the detriment of the points that have been made. Where evidence supporting a particular point has been supplied it should be included. It is then open to the Planning Officer to comment on the validity of such evidence.	The expression ‘set out’ does not require that all comments be included in full. It is not practical for a Planning Officer to transcribe all responses to Planning Applications as written into the Report. Some applications receive hundreds of comments; therefore a summary is the only suitable method of reflecting these. Whether or not evidence is not directly referred to within the Officer’s Report is not an accurate reflection of the consideration given it by the officer. Decision makers (and the public) can view all comments made in full on the Council’s website. (No change)
			4.4.7	The statement excludes parties who object in writing and raise points which go beyond the concerns of immediate neighbours and those who do not feel that the Officers’ report covers the issues in a balanced way. It also excludes bodies which have borough-wide interests and consultees who wish to explain their comments. These exclusions are detrimental to the process and generate public suspicion and resentment.	The rules relating to Planning Committee are in place to ensure that these long and complex meetings are effectively managed and also to ensure that the process remains fair and avoids the risk of bias. (No change)

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			4.4.7	The paragraph fails to mention the current requirement to state in advance the matters that will be covered in a three-minute long speech which has yet to be written; this is highly questionable in terms of being a) required and b) reasonable.	The Council asks people who register to speak at Planning Committee to list the matters they wish to address. This is a reasonable approach as it is often not possible for all residents who register to speak to be allowed to address the Committee. Residents may only address the Committee at the Chair's discretion and where several people register to speak about the same topic, the Chair asks that a spokesperson be appointed. This prevents Committee meetings from potentially being too long and ensures that the Committee is able to deal with the whole agenda. (No change)
			4.4.6	It makes little sense to refer (note 7) to a temporary job title in a long term document. We suggest that the word 'interim' be deleted and 'or successor title' be added.	This reference was to reflect the position at the time the draft SCI was written. This final SCI will refer to the current post: Director of Development and Regeneration.
			4.4.7	Although Planning Committee reports are published five days before the meeting date, there can be late information and even later information published, even on the day of the meeting. Changes to conditions or deferrals might be added to the Officers' recommendations and this might operate to the disadvantage of speakers. It is in the interests of justice being done, and being seen to be done, that fundamental late recommendations should result in deferral to the next meeting.	The Council ensures that late information is published prior to the Planning Committee meeting. In cases where the submission of late information would fundamentally alter the officer recommendation, the item is deferred to allow consideration of the information. In many cases a deferral is not necessary as the late information results in only minor changes to the officer report or conditions. (No change)
			4.4.7	Groups (e.g. of residents) are asked to nominate one person to speak on their behalf. In the case of large and complex schemes if two objectors are heard they must avoid duplicating points made by other speakers..." It should be accepted that different groups might have different points to make but that the points might overlap between groups. It is not practicable for groups completely to avoid duplication and so the word 'must' should be changed to 'should try to'.	The rules relating to Planning Committee are in place to ensure that these long and complex meetings are effectively managed. The rules relating to duplication are important in order to ensure that speakers address different concerns so that a full picture of residents' concerns can be provided. Change 'must' to 'should'.

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			4.4.7	Also, although not mentioned in the draft, it is not in the interests of justice for people who have spoken at one meeting (only for the item to be deferred) to be denied the chance to speak again if significant changes in the Officers recommendations are made in the interim period.	Comments are noted by Committee even if the application is deferred. This will be considered as part of the planning balance by the Committee prior to a decision being made. If comments are made and an application is deferred and amended, either the concerns raised by the speaker have been addressed (in which case there is no need for them to speak again), or else they have not been addressed (in which case Committee will have heard the concerns and will know – through the Case Officer’s Report – that they have not been addressed).
			4.4.8	The Council publishes a weekly list of applications determined under delegated powers but it is not readily available on the website. It should be included in a readily accessible place.	Comments noted. However, there are only so many pages that can be made “readily accessible” on the Council website. Planning sits alongside other services, each of which has valid claims for being “readily accessible”. (No change)
			4.4.8	A post-meeting list of decisions of the Planning Committee is published on the day after the meeting but it takes three clicks to reach it from the Home Page (Planning entry). This situation could be improved significantly.	Comments noted. As above, there are many matters ‘vying for ready accessibility’ on the Council website. (No change)
			4.4.8	It is not practicable for people constantly to follow particular applications over a period that can remain live for several months. It should be possible for the Council at least to send E mail notifications (where possible) when cases which have been delayed significantly are approaching a decision, so that a) if required, further representations can be made and {subsequently} b) people are alerted to look on the website for the decision.	This generally applies to major applications which may be the subject of hundreds of comments. It is not considered practical to provide email notifications due to limitations on staff time. This may also be seen as unfair to those who are not contactable via email – postal correspondence would add a further burden of cost and time. (No change)
			7.2 (Table)	“Planning is a public process, and so we have to make names and comments publically available.” The correct spelling is ‘publicly’.	Agree – amend accordingly.

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			7.4	“The Council is required under the Freedom of Information Act (FOIA) 2000 to pass on certain information if requested by third parties or government departments unless the Act allows us to withhold that information.” The Freedom of Information Act forms a substantial part of the Government’s commitment to open government. It would be more pertinent to change ‘allows us’ to ‘requires us’.	The exemptions within the FOIA are enabling provisions. As such, even if an exemption did apply, it does not require the Council to apply it and the information could still be disclosed. (No change)
			7.4	Also In paragraph 7.4 there is a spurious letter i.	Amend paragraph 7.4 accordingly.
			Appendix C	Campaign for Rural England should be Campaign to Protect Rural England (CPRE)	Amend Appendix C accordingly.
			Appendix D	This Parish Council takes the view that the residents should be able to call upon the services of any residents’ or other associations which have a particular interest in the subject of an application. There is a particularly strong case for areas which are unparished, two of which cover more than 50% of the Borough’s population. However, Parish Councils have problems with the timing of some applications because the consultation period is shorter than the time to the next meeting. There are also sometimes cases in which all or most of the Parish Councillors have a conflict of interest. Local residents’ associations and some others listed in this Appendix and in Appendix C can perform a useful role for residents and also assist the process by combining the views of several individuals into a single representation. When this creates concern about the number of speakers it can be overcome by discussion and agreement between the parties, or ultimately the Chairman’s decision. The area covered by a Residents’ Association might extend into more than one Ward, especially where Wards are geographically small. That creates an anomaly when Parish Councils are restricted by Parish boundaries and when Ward	Residents or Parish Councils are able to seek advice from third parties and may submit comments on applications to the Council. Any such comments are given due consideration in the assessment of a planning application. The statutory consultation period is set down by legislation and adhered to by the Council. The Council has a duty to determine planning applications within a statutory time frame so would not be in a position to extend consultation periods for Parish Council as this would affect the performance figures of the Local Planning Authority. Local residents groups do not have the same status as Parish Councils as they are not democratically elected bodies therefore it is not considered appropriate that they should be afforded the same rights to speak at Planning Committee meetings. (No change) The Council’s protocol allows Ward Councillors to address Planning Committee about developments that are in their wards which should allow a suitable level of representation for local residents.

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				<p>Councillors are not allowed to speak about applications in neighbouring wards. This can be resolved quite easily by allowing for exceptions when application sites are close to Parish or Ward boundaries.</p> <p>Such a decision should not be influenced by the Council's planning officers, who have a professional interest in ensuring that their recommendations are followed. Again it is a matter of ensuring that justice is seen to be done.</p> <p>The appendices are useful additions to the document.</p>	<p>Whilst it would be possible to allow elected representatives to address Planning Committee about developments in other wards if they are close to the ward boundary, this would introduce discretion into the system and make it more difficult to ensure consistency when requests to speak are accepted or declined. The current system strikes a balance between allowing speakers and ensuring that Committee meetings are not too long and unwieldy. The ultimate decision whether to hear speakers remains with the Chair of Planning Committee and is not taken by professional officers. (No change)</p> <p>Comment noted.</p>
10	Clerk to the Council	Aughton Parish Council	<p>Whole document</p> <p>4.4.2</p>	<p>Aughton Parish Council has read and noted the Draft Statement of Community Involvement, the contents of which appear to cover most areas of consultation with the local communities, businesses and other local organisations, including Parish Councils.</p> <p>Pre-application enquiries / non-validated planning applications / Prior Notification applications / certificate of lawfulness requests etc, should be notified via a weekly list to Parish Councils (to be kept out of the public domain until after the verification stage), similar to the list made available to all Borough Councillors. This request, if taken on board, would keep the Parish Councils, as Specific Consultation Bodies, better informed of 'what was happening' in each Parish rather than by finding out by default.</p>	<p>Comments noted.</p> <p>Pre-application advice is treated as confidential due the potential for the commercial sensitivity of some information which may be shared. However as part of their response, planning officers may advise developers if they feel the proposals would benefit from a process of community involvement before a planning application is submitted. Prior notification applications and certificate of lawfulness requests are already included on the weekly list. To distribute an additional weekly list of non-validated applications and pre-application enquiries is considered an onerous requirement. As stated above, pre-application enquiries are confidential. (No change)</p>

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11	Sandra Jones	Newburgh Parish Council	Whole document	Overall, Newburgh Parish Council is happy with the proposals in the draft Statement of Community Involvement and feels that the current system works well.	Comments noted.
			7.2	The Parish Council is pleased to note the efforts made by WLBC to communicate with all sections of the Borough, including those in rural areas and those who do not have the internet.	Comments noted.
			4.4.2	The Parish Council would like West Lancashire Borough Council to consider extending the notification of planning applications, not only to just adjoining neighbours but also to other neighbours within a certain distance as there will be occasions where those neighbours may also be affected by the application proposed.	Public consultation has to be balanced with the constraints of budget and staff resources. Individually addressed letters are an expensive method of consultation so these are only sent to adjoining neighbours, as required in the Regulations. However additional letters may be sent at the discretion of the planning officer. Electronic communications can be circulated much more widely and is much more cost-effective, therefore a weekly list of planning applications submitted is made available on the Council website and emailed to Local Councillors and amenity groups. (No change)
			4.4.2	The Council should consider other locations to hold hard copies of planning documents for residents to view other than libraries and council offices. Due to cuts at County Council level, it is likely that many local libraries will be closed and the end result may be that only Skelmersdale and Ormskirk libraries will be left open, which is also where the main Council offices are. Residents in rural areas with reducing bus services will find it harder and longer to get to these locations.	Noted. The possibility of alternative venues will be considered if and when this situation arises. Amend the SCI to acknowledge that existing Library services may not be available indefinitely.
12	Alan Hubbard	National Trust	Whole document	Generally the new draft SCI is appropriately drafted and its preparation, including the important up-dates, is welcomed and supported.	Noted.

No.	Name	Organisation	Section	Comments	Response
			2.0.1 Appendix C	<p>National Trust is surprised that it is not included in the General Consultee Bodies listed in Appendix C. As a result of its important ownership at Rufford Old Hall the Trust is an important part of the West Lancashire community employing a number of local people and many more volunteers as well as providing a significant tourism and leisure resource for the enjoyment of West Lancashire residents and employees as well as for visitors from further afield.</p> <p>More particularly the Trust has been a regular and consistent contributor to planning work in the Borough over the last 15 years in particular. This has included detailed responses to a range of Development Plan Documents as well as many associated documents such as SPDs, SHLAA work, Masterplans and CIL documents. In these circumstances the Trust would be grateful if you could amend the SCI to include National Trust as one of the specified General Consultation Bodies in Appendix C.</p> <p>Whilst the ability to be included on the Council's consultee database is helpful the text in the Draft SCI Review simply refers to it being the details of those "that wish to be kept informed of planning consultations", what it does not do is to confirm that those on the database will be consulted / notified on all occasions as per the fifth column of Tables 2.1 and 2.3. Although Statutorily some consultations, in particular on SPDs, are 'optional' it is likely that the consultee bodies themselves will be best placed to gauge which documents they wish to assess and respond to and which they do not need to comment upon. Especially as consultation by e-mail is now the norm an inclusive approach to consultation should not be burdensome and will ensure that relevant consultees are not mistakenly left out.</p>	<p>Noted – amend para 2.0.1 and Appendix C to include National Trust.</p> <p>Comments noted. People registering on the database are able to choose which subjects are of interest to them, or to select “All matters”. A body such as National Trust is likely to be consulted on every matter. Amend section 2.0.1 to specify that consultees on the Database will be contacted when the Council consults on planning documents.</p>

No.	Name	Organisation	Section	Comments	Response
13	Mr J Rothwell	Resident	2.1	Recommend in terms of consulting on documents such as the Local Plan, the best approach would be for Council officers to use their objective / unbiased opinions to prepare a draft plan for the Borough, and then to consult on this draft plan, rather than to ask for initial views on issues and what options to deal with the perceived issues. Consulting on such "initial" matters can lead to biased / non-objective comments being submitted by some groups.	We consider it advantageous to seek the community's / stakeholders' views on issues and on which option(s) is / are best, in order not avoid the possibility of Officers missing any significant facts, and to seek to gain community "ownership" from an early stage. Also the Regulations require us to carry out a "scoping" consultation at the outset. (No change)