

Table 1 – Summary of Consultation responses to the draft Statement of Community Involvement

No.	Consultee	Nature of Comment	Paragraph /Section of SCI	Comment Summary	Council's Response (substantial changes shown by proposed additional wording in <i>italics and underlined</i> and proposed deletions shown struckthrough)
001	Natural England	No comment	N/A	<p>'We are supportive of the principle of meaningful and early engagement of the general community, community 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 us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals.'</p>	Comment noted.
002	Surrey County Council	No Comment	N/A	Thank you for consulting Surrey County Council on the draft Statement of Community Involvement. We have no comments to make on the document.	Comment noted.
003	Highways England	No Comment	N/A	'Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a	Comment noted.

				<p>critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M4.</p> <p>We have reviewed the consultation and have no comments.'</p>	
004	Transport for London	Support	N/A	<p>We note that in appendix 1 the consultation bodies in respect of the Duty to Cooperate lists Integrated Transport Authorities which includes TfL. We welcome continued engagement due to TfL's role in providing Elizabeth Line services within the borough</p>	Support noted.
005	Wokingham Society	General comment	General	<p>It is difficult to determine what text relates solely to this consultation and what will comprise the final document when adopted. We will address the whole document in the absence of clarity.</p>	<p>Text within the draft document is written as it is intended to be adopted. The exception is where the Draft SCI made reference to its own consultation. Upon adoption this text will be updated to reflect the change of tense from present to past. (see table 2 below for minor amendments).</p>

005	Wokingham Society	Suggest change	General	The use of the term 'Statement of Community Involvement' for both this policy document and the evidence of consultation that accompanies a planning application is confusing. Since the former is required by law, could another description be found for the latter, eg 'Evidence of Community Involvement (ECI) or Statement of Community Consultation (SCC)?	The SCI itself only uses the term Statement of Community Involvement in the context of the statutory document that Local Planning Authorities must produce. It is noted that the same term is often used to refer to statements accompanying planning applications which set out how the applicant has undertaken pre-application consultation, and this can be confusing. However, this is outside of the scope of the SCI. NO CHANGE IS REQUIRED.
005	Wokingham Society	Suggest change	Section 2	Paragraph 6.6 urges developers not to engage in a 'tick-box' exercise. Since this criticism has been levelled at the Council in respect of its own consultations (and still continues – see the consultation on Proposed Vision and Priorities which frequently asked 'Do you...?') we urge that a commitment by the Council to try and avoid such exercises be included in the general text, eg in section 2 'Wokingham's approach to consultation'.	Engagement exercises undertaken by the Council's planning functions are genuine attempts to seek opinion from residents and local businesses. Decisions must however be made within legal requirements and with regard to national planning policy and guidance. This can often conflict with local opinion. CHANGE MADE – Additional paragraph 2.7 added to read as follows: <u>'WBC will not pretend that planning decisions are a completely free choice. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and take into account technical evidence. There will also be differences of opinion. WBC</u>

					<i>wishes however to reach as many interested parties as possible, so that decisions take into account local opinion.</i>
005	Wokingham Society	Suggest change	Para 1.4	The document not only sets out how the Council consults but also describes what planning applicants need to do to consult the community. We urge that words to this effect be added to this paragraph.	Agree. CHANGE MADE - additional wording added to para 1.4 as follows: 'This Statement of Community Involvement (SCI) sets out how Wokingham Borough Council (WBC) will involve people in planning decisions. <i>It also sets out what we expect applicants / developers to do to consult communities on proposed developments.</i> The document includes an explanation of what an SCI is, provides a brief overview of the planning system, and then explains how you can get involved in planning decisions and what you can expect from us along the way.
005	Wokingham Society	Suggest change	Para 1.5	This describes the Council's purview but not a planning applicant's responsibility. We suggest the paragraph be reworded to say: In line 2 - 'how we and planning applicants seek to find out what you think.'	Agree. CHANGE MADE - additional wording added to para 1.5 as follows: 'Firstly, what actually is a Statement of Community Involvement (SCI)? An SCI is a document that sets out how we find out what you think <i>and how we expect</i>

				In line 4 – ‘in the preparation and consideration of planning applications’.	<i>applicants to go about doing the same</i> . This means how consultation will take place with the community, businesses and others during the preparation of planning policy and the <i>preparation and</i> consideration of planning applications. Councils are legally required to produce an SCI and make it available on their website for the public to access.
005	Wokingham Society	Suggest change	Para 2.1	In line 6 remove the comma after ‘engagement’ to clarify that it assists choices rather than making decisions difficult.	Agree. CHANGES MADE – comma removed.
005	Wokingham Society	Suggest change	Para 2.2	In line 5 it should be ‘includes’ since ‘community’ in line 4 is singular.	Agree. CHANGES MADE – singular changed to plural.
005	Wokingham Society	Suggest change	Para 2.3	Since developers/landowners proposing major and large scale developments are ‘required’ to (6.2 Figure 7: Pre-application stage), or told they ‘must’ (6.3) consult the local community, the word ‘expects’ in line 1 understates the need for consultation at that level. We suggest that line 1 should read: ‘WBC looks for its duty to engage the community in planning matters to be matched...’	Agree. CHANGES MADE – text altered as suggested: ‘WBC <i>looks for</i> expects that its duty to engage the community in planning matters should to be matched by the efforts of developers, through the use of the Three Principles (Figure 2):’

005	Wokingham Society	Suggest change	Para 3.5	Line 2 refers to 'made' Neighbourhood Plans. The inverted commas indicate that this is a specialised term and we suggest you define it, eg '(adopted').	Agreed. CHANGES MADE –additional footnote added to clarify the term as follows: <u>'made' is the technical term used in the regulations which simply means 'adopted'. Likewise, any reference to 'making' a neighbourhood plan means 'adopting' a neighbourhood plan.</u>
005	Wokingham Society	Suggest change	Para 4.2	The first sentence is confusing since it is not clear what 'however' refers to. We suggest that this is really two sentences, ie put a full stop after 'Local Plan' in line 2 and begin line 3 as a new sentence 'However...'.	Agreed. CHANGES MADE – sentence split into two.
005	Wokingham Society	Suggest change	Para 6.2	This paragraph describes the basic expectation in respect of a domestic planning application, but does not state the onus on developers / landowners to consult the local community in respect of major and large scale plans. We suggest a second sentence be added saying: 'For major and large proposed developments applicants need to consult more widely among the local community'.	Agreed. CHANGES MADE – Additional sentence added as follows: 'Before submitting a planning application it is recommended applicants consult with immediate neighbours and people who may be affected by proposals. <u>For major and large proposed developments applicants need to consult more widely among the local community.</u> '
005	Wokingham Society	Suggest change	Fig. 7	The last line of the fourth panel, headed 'Determination' uses the word 'listed' but does	Agreed.

				not explain it. We suggest this should read '...Applications being 'listed' (ie required to be put to the Committee) by local Councillors.'	CHANGES MADE – clarification added as suggested
005	Wokingham Society	Suggest change	Para 6.7	The table refers to 'Medium' developments, a term not used elsewhere. Should this not be 'Major', which is the word used and then defined in Table 5 and Appendix 2?	Agreed. CHANGES MADE – titles changed to 'minor' developments and 'major' developments for consistency of language with elsewhere in the document
005	Wokingham Society	Suggest change	Para 6.7	Since public engagement is a requirement for major and large scale development, we would like to see a statement to the effect that 'failure to engage in such engagement is likely to jeopardise an application when it is considered for determination'.	Agreed. CHANGES MADE – Additional wording added to para 6.7 as follows: 'These methods or similar can be utilised repeatedly at different stages of the development process (pre-application, submission to the Council and during implementation of the scheme). However early community engagement - as summarised in the table below - will benefit both developers and the community by enabling the creation of appropriate, comprehensive development schemes and enabling subsequent applications to have a smoother progression through the planning system. <i>The council's approach will be consistent with the NPPF which states that:</i>

					<i>'Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot'.</i>
005	Wokingham Society	Suggest change	Para 6.12 – 6.14	Section on 'How will we use your comments?' It needs to be made clear that this section refers to comments submitted to the planning authority, and not those made to developers in response to their own public consultations. We suggest that the heading in white text on a red background be amended to read: 'The written comments that are made to the Council on a planning application....'	Agreed. CHANGES MADE – Heading altered as proposed.
006	James Frewin	General comment	Section 1	'There is a significant difference between being told and being involved, There is nothing within this section that gives any confidence that engaging will have any benefit or make any difference. It is simply a statement of the need to have a process.'	Section 1 is the introductory, scene-setting chapter. It explains the planning system and what an SCI is, with the more detailed chapters to follow. It is written in an open and honest way, which acknowledges how people can often be frustrated by becoming involved in planning late in the process. It is therefore a call for early participation before the document goes into more detail in subsequent sections. NO CHANGE IS REQUIRED.
006	James Frewin	General comment	Section 2	'Again there is a significant difference between telling and consultation. There is no indication	Engagement exercises undertaken by the council's planning functions are genuine

				that by being involved that residents will make any difference. There are no measurable outcomes or benefits for getting involved. Given the record of WBC not listening or taking into account any residents feedback - why should residents get involved?	attempts to seek opinion from residents and local businesses. Decisions must however be made within legal requirements and with regard to national planning policy and guidance. This can often conflict with local opinion. The outcomes of engagement can only be reflected in individual schemes / consultations. It is not possible for an SCI to do this. NO CHANGE IS REQUIRED.
006	James Frewin	General comment	Section 2	<p>The language of this section indicates that WBC have to show they have followed a process but there is nothing that shows that by being involved that residents can make a difference. All they get is informed of the outcome.</p> <p>The levels of trust in WBC are at an extremely low level especially related to planning. If WBC are serious about Community Involvement then there has to be some tangible / measurable benefit in it for residents.'</p>	CHANGE MADE – Additional paragraph 2.7 added to read as follows: <u>'WBC will not pretend that planning decisions are a completely free choice. Decisions need to be made within legal requirements, have regard to national planning policy and guidance, and take into account technical evidence. There will also be differences of opinion. WBC wishes however to reach as many interested parties as possible, so that decisions take into account local opinion.'</u>
006	James Frewin	General comment	Section 3	'There is simply no point in local plans if they are not adhered to. The recent history and behaviours of WBC show that they simply bypass these plans after adoption. The Core strategy and Shinfield Neighbourhood plans are examples. Residents are informed that sites are reserve sites for 2026 and others are not yet WBC hold	The Council has been very successful in implementing its development strategy, delivering development in the allocated places and supporting this through infrastructure investment. Where appeals are lodged against the council's decisions on individual planning

				<p>Executive meetings that change these local plans and there is no consultation or any recourse for residents. Why have local plans if they are simply changed by WBC after consultation?’</p>	<p>applications, the majority of these are dismissed. It is acknowledged however that some decisions made by independent planning inspectors overrule the council’s decision. Without a local plan, a greater proportion of decisions would be allowed on appeal, leading to development occurring in the wrong places and not being supported by infrastructure.</p> <p>The MDD policy SAL03 is clear in setting out a range of situations where reserve sites could be brought forward prior to 2026. A decision was made by the council’s Executive on 27 July 2017 to invite applications on the reserve sites as it was accepted that the 5 year land supply at that specific point in time was not robust and that the release of the reserve sites would help guard against unsustainable, speculative planning applications. The action undertaken by the Council was wholly consistent with criterion 2 of policy SAL03. NO CHANGE IS REQUIRED.</p>
006	James Frewin	General comment	Section 3	<p>‘Again all this section sets out is how WBC are going to inform/tell. This is not engagement !!’</p>	<p>CHANGES MADE – Additional paragraph 3.8 added to the ‘How We Will Use Your Comments?’ section for added clarity, as follows: <i>‘For each stage of consultation undertaken, we will produce a Statement of</i></p>

					<u>Consultation which summarises all the comments received and how these comments have been used to update the consultation document or inform the strategy moving forward. Where comments have been raised that cannot be addressed, this will also be set out in the Statement of Consultation. Where there are comments received which are not directly relevant to the consultation in question, these will be shared with the relevant people within the council.'</u>
006	James Frewin	General comment	Section 4	'There is NO detail of what and why SPD's are ? So much for the principles of simple language and clarity to help residents involvement. This is planning language. What do SPD actually do? Again examples seem to show they are used to change local and strategic plans without consultation. Is this true? Consultation documents will be clear and concise and avoid unnecessary jargon, ???'	CHANGES MADE – Additional clarification added to paragraph 4.1 as follows: 'Supplementary Planning Documents (SPDs) provide additional guidance to support the <u>specific</u> Local Plan <u>policies</u> . They may provide guidance on a topic area (<u>e.g. on design, affordable housing</u>) or provide guidance for a site or sites. <u>SPDs do not set new policy or allocate land, but add further detail to the contents of a Local Plan. So SPDSs are not part of the development plan (see Figure 4) but</u> they are a consideration when deciding planning applications.'
006	James Frewin	General comment	Section 5	'There is no where that indicates that these plans are actually carried out. WBC have set precedent	When made, neighbourhood plans (NPs) form part of the statutory development plan

				that they are bypassed when it suits WBC without any further consultation. What measures are in place to show compliance.?’	<p>alongside the council’s local plan. Together they form the starting point for considering planning applications. The Council has been very successful in implementing its development strategy, delivering development in the allocated places and supporting this through infrastructure investment. Where appeals are lodged against the council’s decisions on individual planning applications, the majority of these are dismissed. It is acknowledged however that some decisions made by independent planning inspectors overrule the council’s decision. Without a development plan, a greater proportion of decisions would be allowed on appeal, leading to development occurring in the wrong places and not being supported by infrastructure.</p> <p>NO CHANGE IS REQUIRED.</p>
006	James Frewin	General comment	Section 6	‘This section states Before submitting a planning application it is recommended applicants consult with immediate neighbours and people who may be affected by proposals. What is the definition of immediate and may be effected? Experience shows that this is inconsistent and is not policed by WBC. What meets the needs of developers and not what is best for residents.’	The document is not prescriptive on the requirements as impacts can vary on a case by case basis. WBC’s consultation practices follow nationally set procedure. NO CHANGE IS REQUIRED.

006	James Frewin	General comment	Section 6	'6.6 The tick box exercise is what the vast majority of residents strongly feel about WBC planning - what initiatives and measures are in place to counter this feeling?'	This is an issue beyond the scope of this particular SCI document. The council is committed to openness and transparency in its consultation exercises. NO CHANGE IS REQUIRED.
006	James Frewin	General comment	General	'This is not a consultation document but is a process communication. What action will be taken on comments and feedback is unclear and why residents should get involved is also unclear - no benefits and measures are shown.'	Engagement exercises undertaken by the Council's planning functions are genuine attempts to seek opinion from residents and local businesses. Decisions must however be made within legal requirements and with regard to national planning policy and guidance. This can often conflict with local opinion. The outcomes of engagement can only be reflected in individual schemes / consultations. It is not possible for an SCI to do this. NO CHANGE IS REQUIRED.
007	Finchampstead Parish Council	Support	N/A	Thank you for providing the opportunity to comment on the above. We fully support the principles of extensive community consultation and have no further comments to make.	Support noted
008	Historic England	Support	Section 1 - 6	'Historic England has no concerns with section 1, 2, 3, 4, 5, 6 of the Draft Statement of Community Involvement 2018.'	Support noted

009	Cllr Imogen Shepherd-DuBey	General comment	Para 2.5	<p>‘The data must be fully available to the public and every comment must be addressed.</p> <p>‘Any additional comments, not expected by the consultation must be treated with respect and passed to relevant department.</p> <p>‘All too often, residents respond to consultations, but the feedback is ignored, because it is not relevant to this particular consultation.’</p>	<p>CHANGES MADE –Additional paragraphs added to the ‘How We Will Use Your Comments?’ sections of Chapter 3 and Chapter 4 – see paragraphs 3.8 and 4.5. This is sign posted by additional wording added to 4th bullet point below para 2.5 as follows: ‘Consultation outcomes will be made accessible to the public (<u>see following chapters for how</u>).’</p>
009	Cllr Imogen Shepherd-DuBey	Suggest change	Para 4.3	<p>‘I don't see a reference to any Equality Impact Assessments. In all projects and plans - the needs of the protected groups needs to be considered and accommodated. All plans should include this consideration.</p> <p>‘All of the groups mentioned under the equalities act should be consulted.’</p>	<p>CHANGES MADE – Additional paragraph (2.6) added to chapter 2, the section which sets out the Council’s overarching approach to consultation, as follows: <u>Every effort will be made to consult and accommodate the needs of protected groups. For projects and plans undertaken, an Equality Impact Assessment statement will be prepared in line with Council policy.</u></p>
009	Cllr Imogen Shepherd-DuBey	Suggest change	Table 4	<p>‘This must include protected groups, especially disability groups. We do not want to be submitting applications that are not friendly to disabled users.</p>	<p>Noted – additional wording added elsewhere as paragraph 2.6. This is also covered already at Table7: Engaging Hard to Reach Groups’.</p>

009	Cllr Imogen Shepherd-DuBey	General comment	Table 4	'I would like to see ALL properties built to be accessible to wheelchair users and safe for people with differing abilities.'	The design and accessibility of housing – as well as other specifics of planning - are issues for the local plan, specific SPDs, and applications and cannot be addressed through the SCI. NO CHANGE IS REQUIRED.
009	Cllr Imogen Shepherd-DuBey	Suggest change	Para 6.17	'Sometimes there is more than one councillor and the time slot is not a dedicated one as it has to be shared with the interested parties. There are not three slots, but I would prefer it if there were!'	Agree. CHANGES MADE – Text altered for additional clarity as follows: 'There are three dedicated speaking slots per application for the Borough Councillor, a representative of the <u>Town/Parish Council and the applicant, and one additional slot for any other interested parties (usually residents) who have arranged to address the Committee <u>Town or Parish Council; objectors; and applicants, agents or supporters. All parties wishing to address the Committee must register online their intention to speak in advance of the meeting. Each of the three</u></u> slots is allocated a maximum of three minutes for speakers to make their points; if several residents <u>people (be they residents, councillors, agents)</u> wish to speak, then the combined length has to fit into the specified three minute time limit. It is therefore recommended that if large numbers of people share similar views on an

					application then they should organise a spokesperson to represent them. After each Planning Committee the minutes of the meeting are made available to view on the Council's website.'
009	Cllr Imogen Shepherd-DuBey	General comment	General	'There is not enough support for people with disabilities when it comes to planning applications - there needs to be more attention to this group in the consultation and planning stages.'	People with disabilities, and other hard to reach groups, are covered in the section 'Hard to Reach Groups' of the SCI which sets out ways to include people with disabilities in planning. All projects and plans will need to produce an Equality Impact Assessment in line with Council policy. For planning applications, design and access statements accompanying applications will need to consider the needs of people with disabilities.
010	Canal and Rivers Trust	No comment	N/A	As the Trust neither owns or maintains any waterway in the area we have no comments to make.	Comment noted