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SECTION 1				
Section 1	Highfield Residents' Association 49/SCIdraft/1	Comment This is useful background but more detail on the local development framework would have been helpful.	Some changes are proposed to paragraphs 2 and 3 of the Statement, in accordance with this comment and objection 220/SCIdraft/1. These changes are intended to explain the local development framework process in a little more detail.	2. The new planning system introduced under the Planning & Compulsory Purchase Act 2004 replaces local plans with a Local Development Framework. The documents that comprise the <u>Local Development Framework</u> will contain policies and proposals to guide development within Oxford and will eventually replace those contained in the Oxford Local Plan 2001-2016. 3. Whilst the Local Plan was produced as one large document, the Local Development Framework
Section 1 (page 1, para.3)	CPRE Oxford Branch 220/SCIdraft/1	Object Objects to the word 'was' in line 3 of paragraph 3, as it is not clear whether the Local Plan still exists or not.	The 'was' that the objector refers to relates to the description of the production method used for the Local Plan. It is correct to refer to this in the past tense, as the Plan is soon to be adopted. However, it is agreed that it is not clear from the opening paragraphs that the policies in the Local Plan will still exist as planning policy. Therefore, a change is proposed to paragraph 3 to make this clearer.	<i>will consist of a series of documents produced at different times. Initially, one part of the Local Development Framework will be policies in the Local Plan that are 'saved' until they are superseded by policies in new documents.</i> This change of format means the plans are more flexible and relevant to changes in Oxford as each document can be amended or updated, if necessary, over time.
SECTION 2				
Section 2	Highfield Residents' Association 49/SCIdraft/2	Comment Very laudable aims. Paragraph 9 states: 'we want to inform and involve the community in decision making.' We see nothing in this document that empowers communities in	It is important the planning process is open to all. The Statement is intended to ensure that the community are informed, involved and consulted as appropriate, both as regards planning applications and in the	9. We want to inform and involve the community in the decision making process. Consultation will start at as early a stage as possible to give everyone the opportunity to participate and influence the development of

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		decision making.	<p>development of planning policy documents. By seeking the views of the community at an early stage, their opinions will be taken into account when making decisions on planning applications and when producing policy documents.</p> <p>However, the final decisions made on planning issues can only be made by officers under delegated powers or by members through the committee process. Consultation will help to inform the decisions taken, but although they will have been involved in the decision making process, the community cannot make the final decision. Therefore, a slight change is suggested to paragraph 9 to add clarity.</p>	policies and options for an area. We will also encourage consultation on major applications at an early stage...
SECTION 3				
Section 3	Apsley Road Residents 7/SCIdraft/1	<p>Object Section 3 should be re-headed 'City and County Initiatives', with a clear statement of the relative roles of the City and County Councils. This deserves a new paragraph to itself, clarifying this complex area for the benefit of the community.</p>	<p>Oxford City Council's Statement of Community Involvement relates to consultation on planning, and as such is only one of several documents that the City Council has produced concerning consultation and involvement of the community. It is important that these other strategies are acknowledged in the Statement and that the Statement is not in conflict with them. Section 3 describes these links.</p> <p>To describe the various functions of the City and County Councils would detract from the main purpose of the document, which is to describe the City Council's consultation process for planning matters. It might be misleading, as it could give the impression that it is a Council wide document.</p>	No change is made to the Statement.
Section 3	Highfield Residents'	<p>Comment This section has very lightweight aims- for</p>	The Consultation Strategy is a published document available from the City Council,	No change is made to the Statement

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	Association 49/SCIdraft/3	example to take on board the media and communications strategy you pledge to publish things on the Council website and in the corporate style. Surely the Consultation Strategy should form the core thinking for the SCI. You list the aims but is the Consultation Strategy published?	<p>and to view on line from Oxford City Council's website, at: http://www.oxford.gov.uk/council/consultation-strategy.cfm</p> <p>The Consultation Strategy does not prescribe exact techniques or methodologies to be used, instead it acknowledges that each Business Unit of the Council has its own research questions and audiences of interest.</p> <p>The Statement is informed by a number of other elements, such as: the consultation exercise carried out specifically to gather the community's views on planning consultation; the statutory requirements for planning consultation; the fact that there is already a very strong tradition of consultation within planning, which the Statement can help to build upon and carry forward; and Government guidance on what should be contained within Statements of Community Involvement.</p> <p>Nevertheless, the Consultation Strategy is a very useful base for the Statement, and did help to inform it. The aims of the Consultation Strategy are listed in Appendix 1 of the Statement. In Section 3 of the Statement it is said that all consultation will be carried out in accordance with the Consultation Strategy.</p>	
SECTION 4				
Section 4	Highfield Residents' Association 49/SCIdraft/4	<p>Comment The local development framework appears to be another change in thinking from National Government. It is complex and we</p>	The Local Development Scheme is a three year programme of document production and it explains the new system in more depth, including which policies of the Local	No change is made to the Statement

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		<p>need to understand more about why the change is happening and what it is. This was requested at Area Committee but declined by the Planning Manager as unnecessary (NEAC Minutes). This document could have put the local development framework documents into context with those we have now- ie where do Development Sites fit into the local development framework?</p>	<p>Plan will be replaced. Although it is useful to have some background about the Local Development Framework in the Statement of Community Involvement, it would detract from the main purpose of the document to go into any more detail about this matter, and it is not necessary given that the information is available in the Local Development Scheme. PPS12, in checklist 7a, says that information should be given about the new planning system, but that this should be kept clear and simple.</p> <p>The objector also raised concern about this matter in relation to Section 1 of the Statement. As a result of this comment, some small changes to the Statement have been suggested, which might also help to overcome the concerns the objector raises in relation to Section 4.</p>	
SECTION 5				
Section 5	Highfield Residents' Association 49/SC1draft/5	<p>Comment It is assumed that the stages for each document process are fixed. How will you assess objections and what influence will consultees have at each stage?</p>	<p>The key stages of document production and how consultation fits into these are described in some detail in Section 5 of the Statement. For example, for DPDs, under the 'early public involvement' heading, it is said that we will be sure that we have understood and considered all views expressed before formulating preferred options and proposals. Under the 'consultation on preferred options' report it is said that we will carefully consider all representation made and take these into consideration in revising the document.</p> <p>Section 5 clearly shows the stages of production for the different types of document. It explains that comments will be considered at each stage, and used either to</p>	No change is made to the Statement.

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			help draft the document, or in the review of the document, depending on the stage.	
SECTION 6				
Section 6	Highfield Residents' Association 49/SCIdraft/6	Comment A fair summary list of appropriate groups. What weight are groups given in influencing the outcome? For instance does GOSE input have the same weight as others?	There is no weighting given to comments from the different groups listed. As stated in paragraph 16, section 6: 'anyone with an interest or involvement in the subject should have the opportunity to participate in the preparation and consideration of a document.' All views expressed will be given the same consideration.	No change is made to the Statement
Section 6- Local interest Groups	Lime Walk Gospel Hall Trust 148/SCIdraft/1	Support	Noted	No change is made to the Statement.
Section 6 (page 10)	CPRE Oxford Branch 220/SCIdraft/2	Comment With reference to 'National Interest Groups' on page 10, the CPRE Oxford Branch would like to be consulted, particularly for large-scale developments. In particular, since the setting of Oxford is so important, the CPRE should be consulted on any proposal regarding or threatening the Green Belt.	In the list on page 10, only two groups are mentioned as national interest groups, and it is clear that these are only examples of what a national interest group might be. It would certainly not be practical to list all national interest groups in this list, and there is no need to mention the CPRE specifically. However, the CPRE Oxford Branch's wish to be consulted has been noted, and they are now included on our consultation database for planning policy documents.	No change is made to the Statement.
SECTION 7				
Section 7	Highfield Residents' Association 49/SCIdraft/7	Comment The chart (pages 18, 19, 20) is non-committal, in that you list a number of additional methods of consultation but do not confirm those options you will use. As you recognise the importance of involving communities early in consultation, it would have been expected that DPDs and SPDs must be developed from 'participation in-depth' consultation methods at early public	The third column of the table referred to is headed: 'additional methods of consultation (what we will do)- we will select the most appropriate methods from this list according to the specific subject matter.' For early public involvement for both DPDs and SPDs, sub headings within the table make it clear that we will use at least one additional method of informing and also of consulting. Therefore, there will always be early public	No change is made to the Statement.

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		<p>involvement stage. An example of how this has gone wrong is the case of Warneford Meadow. Local interest groups should have 'participated in-depth' in the early stages of identifying the potential uses for development. Local residents have as much right (or perhaps more) as institutional stakeholders to be involved in the future of their area.</p>	<p>involvement that goes beyond statutory requirements. There are a variety of consultation methods available; the suitability of these methods varies with the exact nature of the document produced.</p> <p>The Statement is designed to last for many years, so a broad indication of the types of consultation that will be used for DPDs and SPDs is more useful than a detailed account of the consultation methods that will be used for each specific document to be produced in the near future.</p>	
Section 7- page 18	Oxford Architectural & Historic Society 116/SCIdraft/1	<p>Object The objector says that there is an omission from the table on page 18, as consultation on planning documents should specifically include reference to consultation on Conservation Area Appraisals.</p>	<p>The table on page 18 refers to Development Plan Documents. Development Plan Documents contain statutory policies and are expected to take about three years to produce. It is hoped that Conservation Area Appraisals can be produced much more quickly than this, and the intention of them is that they will contain further guidance and advice to that already contained in policies of the Local Plan that are to be carried forward as part of the Local Development Framework. Therefore, it is not appropriate to include Conservation Area Appraisals in this part of the table. Furthermore, the table is designed to refer to the consultation methods that will be used in the production of DPDs generally; it does not list all of the DPDs that will be produced.</p> <p>The Conservation Area Appraisals will either be produced as Supplementary Planning Documents or background documents. If they are to be Supplementary Planning Documents the procedure for consultation outlined in the next part of the table, beginning on page 20, will have to be</p>	No change is made to the Statement.

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			followed. Again, it is not necessary to refer specifically to the Conservation Area Appraisals, as this table is a general description of the consultation procedures that will be used for all Supplementary Planning Documents.	
Section 7	GOSE 221/SCIdraft/1	<p>Comment It may be helpful at paragraph 30, or elsewhere, to indicate how an individual or organisation can be added to the list of consultees.</p>	Additional text is suggested for paragraph 30 to explain how groups or individuals can be added to or removed from the database.	30. Further groups will be added to the register of consultees as they are identified. Similarly there will be other groups that disperse, or no longer want to be involved, and they will be removed from the list upon request. The list will be updated on a regular basis. <u>Groups or individuals who would like to be added to or removed from this database should contact the Planning Policy Team, using the details on the front of this document, to inform us of their contact details and the documents they are interested in being consulted on.</u>
SECTION 8				
Section 8	Apsley Road Residents 7/SCIdraft/2	<p>Object Section 8 does not meet the test of soundness: 'it clearly describes the policy for consultation on planning applications.' The Statement should redress the balance so that procedures are not so heavily loaded in favour of the applicant. The following changes are suggested:</p> <ol style="list-style-type: none"> 1. Page 24 should say Area Committee or clarify if this is not meant. (Area Committee should be in upper case throughout the document); 2. The applicant should be required to state on the application form the steps taken to consult adjoining occupants and relevant interest groups (suggested word changes for page 24 included); 	<ol style="list-style-type: none"> 1. The table on page 24 is not meant to refer to a specific committee, but rather to the committee process. A small change is proposed to clarify this. Paragraphs 51 and 52 describe the committee process in more detail. 2. The additional wording suggested for page 24 includes some description of how planning officers will determine an application, which is not directly related to consultation and is also already outlined in the introductory paragraphs to the section (paras 32 & 33). The objector also suggests that wording should be added to require applicants to state on the application form the steps taken to 	<p>1st line of 4th column of table on page 24: Everyone who responds in writing to an application will be informed if the application is to be decided <u>determined by the committee process</u> and the meeting date.</p> <p>49. Applications are assessed <u>against planning policies</u> by planning officers against planning policies, who take and take into account of all comments received. Legislation requires that applications are <u>refused only when approved unless</u> there are good planning reasons for refusal. although In many cases, <u>an otherwise unacceptable</u> the proposal may be <u>acceptable if certain conditions are imposed.</u> by allowing it only with certain conditions. In some cases there are small Sometimes</p>

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		<ol style="list-style-type: none"> 3. As planning is preoccupied with Government constraints, these should be spelt out at the beginning of Section 8, ie paragraphs 46 and 47 should come before paragraph 32; 4. Paragraph 49, Page 25 needs sharpening up to specify the options available to the planning officer (suggested word changes included); 5. Paragraph 51 requires more precision about when applications are referred to the Area Committee for determination (suggested word changes included); 6. Paragraphs 54-56 cover only appeals by applicants. What about rules by objectors? Rules should be clearly stated. 	<p>consult adjoining occupants. Paragraph 45 of the Statement describes how applicants will be asked to submit a brief statement with the application that outlines any pre-application process that took place. However, although consultation prior to the submission of an application is encouraged, it is not a statutory requirement, and failure to do so cannot result directly in the refusal of a planning application; there must be good planning reasons for refusal.</p> <ol style="list-style-type: none"> 3. Section 8 is about consultation on planning applications. Paragraphs 32 & 33, at the beginning of this section, are a general introduction to the topic. These are important introductory paragraphs as they outline how planning applications will be determined, and thus they set the context in which consultation will take place. The rest of the section is divided into subheadings, starting with the survey questionnaire, then consultations before applications are submitted and then consultations when applications are submitted. Paragraphs 46 and 47 come under this subheading. This is a logical order in which to describe the consultation process on planning applications. The government targets are included in the section about consultation once an application is received, as it is during this time that targets need to 	<p>issues <u>that</u> can be resolved <u>by the applicant submitting</u> amended plans. <u>If there are more significant issues to resolve, which would mean</u> However if the changes proposed would require further consultation <u>was required, namely though of a significant nature,</u> the applications are <u>is</u> determined as originally submitted and. The applicants <u>is</u> are then invited to re-apply with the revised proposals and re-consultation is undertaken. Prior to recommending a decision, the planning officer will make a full site inspection.</p> <p>51. Applications are submitted to the local area committee if: the application falls outside officer delegated powers; city councillors request that the application is dealt with at committee; or the application is submitted on behalf of the City Council or by an officer or city councillor. <u>Currently, the six area committees meet on a monthly basis.</u></p> <p>Para 54....<u>This right of appeal does not extend to a third party (ie, there is no right of appeal to anyone who is not the applicant).</u></p>

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			<p>be considered.</p> <ol style="list-style-type: none"> 4. Changes are suggested to paragraph 49 along the lines of those suggested by the objector. 5. Some changes are suggested to paragraph 51, broadly in line with the objector's suggestions. However, it is considered unnecessarily wordy to mention the reasons a councillor might have for requesting that an application is dealt with at committee. It is necessary for more than one councillor to request that an application is dealt with by the committee process, so paragraph 51 has been changed to refer to councillors in the plural. Where a report is written before the end of the consultation deadline, any relevant objections later received will be reported to committee verbally. 6. The last sentence of paragraph 54 clearly states that there is no third party right of appeal; that is only the objector can appeal, which is likely to happen mainly in the case of refusal of planning permission. To add clarity, a slight word change is suggested to this paragraph. 	
Section 8, page 22, paragraph 45	JA Pye 14/SC1draft/1	<p>Object The Statement does not meet the test of soundness: 'it clearly describes the policy for consultation on planning applications'. It is inappropriate, prior to any technical assessment of a planning application, to require the applicant to state the 'proposed on-site measures or financial contributions</p>	Paragraph 45 is in Section 8 of the Statement, under the subheading: 'Consultations before planning applications are submitted'. The applicant should submit a summary of any pre-application discussion that has taken place. The applicant should consider the impact that the development will have, and should think of ways to	45. As a result of any pre-application consultation exercise, applicants will be asked <u>requested</u> to submit a brief statement as part of the application submission outlining how the results have been taken into account in the final application document. The <u>pre-application discussion</u> might help to highlight the likely impact of

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		<p>that will be used to mitigate the impact of development...’ Further, at this stage and, indeed, any other prior to the formal determination of the application, it is inappropriate to address ‘potential reasons to refuse an application.’</p> <p>In some instances, the developer, as applicant, will have entered into a contract with a landowner. This contract may require the developer to minimise the costs of development and the implications of planning obligations that may include financial contributions. To require these to be submitted at the application stage, before any meaningful negotiation on the issues raised, may conflict with the provisions of the Option Agreement or conditional contract.</p> <p>For these reasons the second sentence of paragraph 45 should be deleted.</p>	<p>mitigate these impacts so that the application is acceptable. This is in the best interests of the applicant and the City Council.</p> <p>Paragraph 45 of the Statement is designed to show that pre-application discussions could help to draw attention to potential problems with the development, and possible mitigation measures. Where this is the case the statement on pre-application discussions should mention this, as it is requested that the outcomes of any pre-application consultation process are described. Changes to paragraph 45 are suggested as a result of this objection, and also as a result of another objection to Section 8: 225/SC1draft/1. These changes should overcome this objection.</p>	<p><u>the development and some possible means of mitigating these impacts. Where this is the case,</u> information submitted should also include proposed on-site measures or financial contributions to mitigate the impact of development or address potential reasons to refuse an application.</p>
Section 8	Tesco Stores Ltd 225/SC1draft/1	<p>Objection</p> <p>Paragraph 45 of the Statement indicates that, as a result of any pre-application consultation exercise, applicants will be asked to submit a brief statement outlining how the results have been taken into account in the final application document. We recommend that further guidance be provided within the SCI detailing the information that the Council would expect to be included within this statement.</p>	<p>Paragraph 45 explains that a statement should be submitted alongside the application that outlines how the results of the pre-application consultation exercise have been taken into account. It is implicit that this statement should also contain a summary of the consultation exercises that took place and the results of these, but to make this clearer an addition to this paragraph is suggested. As well as the change made as a result of this objection, a change to paragraph 45 is also suggested in response to representation 14/SC1draft/1, and that change might also help to address this objection. Further detail beyond these changes would not be appropriate as the exact nature of the statement will vary depending on the method of consultation</p>	<p>45. As a result of any pre-application consultation exercise, applicants will be requested to submit a brief statement as part of the application submission outlining <u>what pre-application consultation took place, the results of any pre-application consultation and also</u> how the results have been taken into account in the final application document...</p>

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			used, the outcomes of this consultation, and the way issues raised are addressed in the application.	
Section 8	Highfield Residents' Association 49/SCIdraft/8	<p>Comment This theme has the most tangible and direct impact on residents, and the planning process is widely thought of as flawed and a "developers' charter". Many of these concerns could be (and have been) allayed when developers/applicants have involved local residents in their designs. The SCI should encourage this involvement as a pre-application requirement and developers should then show officers that concerns raised have (or not) been addressed when discussing details of design. Once again this is another plea that local 'stakeholders' must be involved in 'participation in depth' at an early stage.</p> <p>All applications should be published in the local newspaper. I have asked on a number of occasions why the paper and web versions of the 'weekly list' are so different. Also, the web version has applications with dates apparently received and registered months previous. Why do these anomalies exist?</p>	<p>The objector suggests that pre-application consultation should be a requirement. However, although consultation prior to the submission of an application is encouraged, it is not a statutory requirement, and failure to do so cannot result directly in the refusal of a planning application; there must be robust planning reasons for refusal. Paragraph 41 of the Statement explains that, whilst there is no legal obligation for consultation to take place, failure to consult properly is likely to lead to objections being made by interested parties.</p> <p>When pre-application consultation has taken place, applicants are requested to submit a statement to show how they have taken any issues raised into account (see paragraph 45 of the Statement).</p> <p>The dates on the newspaper list and on the web are likely to vary, as the web version can be updated frequently and it shows the date the application was put on the web, but it can take nearly two weeks for an application to be advertised in the newspaper. The applications shown on the web list and newspaper list also vary because the web list shows all applications, including, for example, tree applications, whereas the newspaper list only shows applications that have a greater impact. Because of the consultation that takes place anyway, it is not considered necessary for every application to be shown in the newspaper advert.</p>	No change is made to the Statement.

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			<p>On occasion, an application is made invalid and later submitted and validated. Where this occurs, the receipt of the original application is used. This explains why some applications on the list were apparently received and registered several months previously.</p>	
Section 8	Oxford Architectural & Historic Society 116/SCIdraft/2	<p>Object There should be additional text on page 24 that there is a requirement to consult local and national heritage bodies before applications for listed building or conservation area consents are submitted, particularly where demolition or partial demolition of buildings is involved.</p>	<p>As explained in response to the above objection, pre-application consultation cannot be made a requirement, even though it is strongly encouraged. If it does take place, page 24 of the Statement does say that, once an application is submitted, statutory consultees will be consulted and wider consultation of local residents and interest groups will also be carried out if appropriate.</p>	No change is made to the Statement.
Section 8	Town Furze Allotments Association 147/SCIdraft/1	<p>Object The Statement does not meet the test of soundness: 'it clearly describes the policy for consultation on planning applications.' It fails to meet this test of soundness because it does not describe what the City Council will do if the applicant chooses not to consult properly. Also, the methods of consultation do not meet the test of soundness that they are: 'suitable for the intended audience' because the applicant will not consult those likely to object. Neighbours could be completely uninformed about an application until it is too late to make representations.</p> <p>Consultation by the applicant should be mandatory and the City Council has failed to make clear its own role in the planning consultation process.</p> <p>Additions to paragraphs 39, 40 and 41 of the</p>	<p>There are many reasons why pre-application consultation by the applicant is encouraged. It has a different function to consultation after an application is received. As well as being a courtesy, it helps to raise issues that the applicant might not have thought of, and it could help the local community and those likely to be affected by an application get a better understanding of what is involved. It could help to iron out planning issues so that the applicant is more likely to submit an acceptable application. The applicant may also discuss the planning application with the planning authority before submitting it. However, there must be good planning reasons to refuse an application. It cannot be refused because there was no pre-application consultation.</p> <p>The changes to paragraphs 39, 40 and 41 that the objector suggests are not</p>	No change is made to the Statement.

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		<p>Statement are suggested, outlining the methods of consultation that the Council will use when an application is received. The Statement should say that the Council will inform neighbours (minimum 2 houses on all 4 sides). For medium-sized applications the Council will inform local groups and a minimum of 4 houses on all 4 sides. For large developments the Council will inform a minimum of all residents within 10 houses of the development in all 4 directions plus local interest groups and residents' associations.</p>	<p>appropriate for the section on pre-application consultation, as they are related to what the City Council will do once an application is received. The role of the Local Planning Authority in the consultation process cannot realistically begin until an application is submitted. A part of Section 8 of the Statement, beginning at paragraph 46, is headed: 'consultations when applications are submitted.' What the City Council will do is described clearly in this section.</p> <p>Once an application is submitted, the Local Planning Authority can get involved with the consultation process and, indeed, there are statutory requirements for consultation. People are informed about planning applications by: the weekly list; advertisements and site notices; availability of plans; consultation with statutory consultees; and direct written consultation with occupiers of properties most likely to be affected by a proposal (ie. properties bordering an application site).</p>	
Section 8 omission of text para 41 or 38	Oxfordshire County Council 186/SCldraft/1	<p>Object The test of soundness: 'it clearly describes the policy for consultation on planning applications' has not been met. The draft Statement omits reference to how developers should engage with stakeholders at the pre-application stage with a view to identifying the impacts of their proposals and the requirements for on site measures or financial contributions to mitigate the impacts. The draft Statement advises developers to contact the City Council; this should be expanded to explain that on major applications the City Council will involve, as</p>	<p>The part of section 8 headed 'consultation before planning applications are submitted' is designed to explain the methods developers are encouraged to use to consult with the community prior to submission of their application. Potential applicants may also wish to consult with officers prior to submission. The protocol that the objector refers to relates to pre-application discussions with officers. When appropriate, representatives from the County Council, amongst others, will also be invited to be involved in these discussions.</p>	<p>38. All applicants and their agents are strongly encouraged to discuss development proposals <u>with the City Council</u> before an application is made, <u>and to consult the community</u>. There are significant benefits to early consultation on applications including:</p> <p>42. <u>Applicants, particularly those proposing larger developments, are encouraged to seek advice from the City Council. For major applications, a</u></p>

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		appropriate, the County Council as highway and transport authority, as Structure Plan authority and as service provider in pre-application decisions through the major development teams (as set out in the protocol). This will ensure that the developer provides the information required at the application submission stage as set out in paragraph 45.	The Statement is designed to show how the Council will engage the community in planning and to encourage developers to do so. To go into detail about pre-application discussions that developers can have with planning officers would detract from the main purpose of the Statement. Also it is not necessary as information about this is already freely available from the Council and on the website. However, some changes to paragraphs 38 and 42 are suggested so that there is a clearer distinction between the pre-application consultation with the community that applicants are strongly encouraged to initiate, and pre-application discussions with officers.	<u>development team will be set up to discuss the initial proposals. This team will include officers in other departments of the City Council and may also include outside bodies, such as the County Council and the Environment Agency. However, whilst</u> planning officers will offer applicants advice, any advice given to applicants cannot prejudice the formal consideration of an application.
SECTION 9				
Section 9	Highfield Residents' Association 49/SCIdraft/9	Comment It remains to be seen whether good intentions can be realised.	Comment noted, but it is considered that adequate resources are available.	No change be made to the Statement
SECTION 10				
Section 10	Highfield Residents' Association 49/SCIdraft/10	It is difficult to understand how the Annual Monitoring Report can be an effective review of the Local Development Framework if you do not consult widely. Public input should be included because it is as valid as 'key specific groups'.	Section 10 is referring to the evaluation of the Statement of Community Involvement specifically, rather than the evaluation of the Local Development Framework. Paragraph 61 explains how the effectiveness of consultation exercises will be evaluated. It is agreed that the best way to assess the effectiveness of consultation exercises is to ask those involved, which is why it is said in paragraph 61 that there will be evaluation forms available to all of those involved in each major consultation exercise. Thus it is not the intention that the effectiveness of consultation exercises will be assessed through the AMR process;	61. Evaluation forms will be available after each major consultation exercise undertaken by the City Council to help assess how successful the methods were. The information obtained will be used to evaluate the effectiveness of consultation exercises, and to make improvements where needed. The results will be reported in the Annual Monitoring Report. However as this Statement has been designed to be flexible, it should only be necessary to revise it when significant changes have occurred to the types of groups involved in consultation, or changes to the methods of consultation used.

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			<p>rather it is the intention that the AMR will report the results. To make this clearer, it is suggested that paragraphs 61 and 62 are combined and that minor wording changes are made.</p> <p>It is in Section 4: 'What will we be consulting on' that it is stated that there will not be general public consultation on the AMR. The main purpose of the AMR is to assess whether policies contained in the Local Development Framework are being implemented effectively and having the intended effects. This needs to be done through the collection and analysis of relevant data. Whether particular policies are a good thing or not is more of a subjective matter. Wide public consultation will be carried out to help determine what policies should be contained in planning documents in the first place, which is what the Statement of Community Involvement is all about.</p>	
APPENDICES				
Appendix 2	Tesco Stores Ltd 225/SCIdraft/2	<p>Object Section 6 of the Statement identifies who should be consulted in the production of a Local Development Document. A list specifying a number of organisations that should be consulted is set out in Appendix 2 of the Statement. Tesco is an important business/retailer within the District and we therefore request that the company's details be added to the list and that the appropriate consultation occurs at the key stages of the Plan making process.</p>	<p>Appendix 2 is a list of statutory consultees for Local Development Documents and sustainability appraisals. Tesco is not a statutory consultee, and therefore should not be added to this list. Section 6 is a general list of the types of groups we will consult, and this list includes businesses. Tesco have been added to our consultation database, so they will be consulted during the production of Local Development Documents. However, it is not necessary for Tesco to be specifically listed in the SCI. There are many businesses that will be consulted, and to list all of these is unnecessary.</p>	No change is made to the Statement.

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Appendix 4	Lime Walk Gospel Hall Trust 148/SCIdraft/2	Support	Noted	No change is made to the Statement.
Appendix 6	Apsley Road Residents 7/SCIdraft/3	Object The section on 'statutory consultees' in Appendix 6 should be tabulated and should state which categories of application are appropriate to each. Contact details should be given so that members of the community may consult with these bodies directly.	As contact details are expected to change frequently, to give these details in the document would mean that the document dated easily, and it would not be particularly helpful. The City Council will keep a database of contact details and this can be updated whenever necessary. The appropriate consultees change with the nature of each application. The rules about who is consulted are complicated, and to put this information into the Statement would over-complicate it.	No change is made to the Statement.
Appendix 6 (page 36)	David Coates, JA Pye 14/SCIdraft/2	Object There should be additional text in Appendix 6 to detail the 'duty to respond' to consultation so that applicants are aware of when responses are due. Guidance on this may be found in ODPM Circular 08/2005 paragraphs 34 and 35, to which reference should be made.	A new reference in Appendix 6 to statutory consultees' duty to respond is suggested.	Appendix 6- List of statutory consultees for planning applications. <u>Statutory consultees are required to respond to consultation within 21 days under the provisions in section 54 and article 11A of the GDPO.</u>
GENERAL				
General	Gosford and Water Eaton PC 3/SCIdraft/1	Comment So far the Parish Council has had copies of similar documents from South Oxfordshire District Council and Cherwell District Council. The Parish Council finds that each gives similar information, but in different layouts, formats and messages, and presenting different lists of consultees. Bearing in mind that the planning process should be a Countrywide acceptable prototype, why is this not a standard produced document for covering all authorities? A copy of the Parish Council's response to	It is a statutory requirement that each Local Planning Authority produces its own Statement of Community Involvement. As well as this it is considered to be an important and beneficial exercise. Producing the document initiates careful thinking about consultation on planning matters. Although Government Guidance is one basis for the document, there are many other considerations, which will vary between Councils. These might be the types of consultations that have worked previously in a particular area, the needs of different groups within an area, resources available and other documents produced by each	No change is made to the Statement

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		Cherwell District Council is enclosed, and the City Council will find many of the comments made will be applicable to their document.	Council. The Parish Council's comments relating to Cherwell District Council's Statement of Community Involvement are noted, but they do not apply directly to Oxford City Council's Statement.	
General	Kidlington Parish Council 217/SCIdraft/1	Comment The Parish Council would like to be consulted only on planning issues that affect the Kidlington/Oxford boundary.	The comment is not directly related to the contents of the SCI. Adjoining Parish Councils are statutory consultees for new planning documents under the new planning regulations, and as such are listed in Appendix 2 of the Statement.	No change is made to the Statement.
General	South Hinksey Parish Council 223/SCIdraft/1	Comment The Parish Council only wish to be consulted on any application on the Parish/City boundary, or one that has a direct effect on the Parish.	The comment is not directly related to the contents of the SCI. Adjoining Parish Councils are statutory consultees for new planning documents under the new planning regulations, and as such are listed in Appendix 2 of the Statement.	No change is made to the Statement.
General	British Waterways 29/SCIdraft/1	Comment It is important that Oxford City Council consults British Waterways throughout the preparation process where it is felt necessary or appropriate to do so. British Waterways has extensive experience of designing successful waterside schemes that would be beneficial in the preparation of planning policy, as well as in the assessment of planning applications. British Waterways are concerned that the City Council should maximise the benefits of being located on the waterway network. Where the Council is in doubt over the involvement of British Waterways in consultation on specific documents, we	The British Waterways Board is listed as a Statutory Consultee for planning applications in Appendix 6. They also responded to our previous questionnaire, specifying the planning policy documents that they are interested in being consulted about. This information is in our database. Therefore, we will be contacting British Waterways about the things that concern them.	No change be made to the Statement

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		<p>advise the Council should consult British Waterways anyway.</p> <p>It should also be recognised in the SCI that British Waterways comments on planning applications. As a statutory consultee, they should be consulted on those applications that have the potential to affect the safety and integrity of any waterway, reservoir, canal feeder channel, watercourse, let off or culvert owned or managed by British Waterways.</p>		
General	Higham and Co 179/SCIdraft/1	<p>Comment</p> <ul style="list-style-type: none"> ● It is considered that the options for consultation should be agreed between the applicant and the Local Authority at the pre-application stage. ● In respect of consultation on Local Development Documents, we note the intention of the Government to seek community/developer involvement at the beginning of the process, ie front loading. However, it is important to recognise BMW's perspective that it may not always be possible to identify development proposals at the early stage of the process of formulating these documents. ● It would be appreciated if we could be registered as a consultee both in the further preparation of your SCI and the local development framework. 	<p>Developers seeking guidance on methods and range of consultation in pre-application discussions would be welcomed, but the advice given by officers would be based on what is contained in the Statement of Community Involvement anyway. At the pre-application stage, only advice can be given, and this will always be on the understanding that it will not affect the consideration of the submitted application. Also, part 7.7.2 of the companion guide to PPS12 says that : 'Authorities cannot refuse to accept valid applications because they disagree with the way in which an applicant has consulted the community.' Therefore, it would not be appropriate to enter into an agreement between the potential applicant and the City Council about how this is done.</p> <p>The idea behind the new planning system is that documents can be updated more frequently if there is a change in circumstances,. Therefore, the problem from BMW's perspective that they might not be able to identify development proposals at the early stage of the process of formulating documents is likely to be less of a problem</p>	No change be made to the Statement

Section./ paragraph /page/heading	Objector/Ref No.	Summary of representation	Officer response	Officer recommendation
			<p>than the previous situation, wherein if they identified development proposals part way through a Local Plan period it would not be possible to change anything.</p> <p>Higham and Co are registered as a consultee for the next stage in production of the Statement of Community Involvement and for the Local Development Framework.</p>	
General	Summertown Riverside Group 198/SCIdraft/1	<p>Comment It would appear from the thrust of your draft statement that local and structure plans are moving from covering fixed periods to becoming rolling concepts which are always subject to change. It is obvious that this must be a godsend to developers as they will be able to apply constant pressure on, eg Oxford's Green Belt, until they get their way. If there is no plan period, what is the position of safeguarded land- there is no security of knowing land is protected from development for the Plan period. The Statement does not clearly show whether the Local Plan still exists. If it does not, what is the status of safeguarded land?</p>	<p>Policy NE.3 of the Oxford Local Plan 2001-2016 concerns safeguarded land. Several areas of the City, notably a large area in the north around the river Cherwell, are safeguarded. The aim of the policy is to safeguard the land from development that would prejudice longer-term development needs. These areas are intended to enable Oxford's Green belt boundary to remain stable beyond the Plan period. The open character of these areas of land is to be preserved.</p> <p>Policies in the Local Plan can be saved until they are replaced by policies in documents developed under the new planning regulations. Changes are suggested to paragraphs 2 and 3 of the Statement to clarify that the Local Plan policies will still be used (see objection 220/SCIdraft/1 at the beginning of this table).</p>	No change be made to the Statement

Section./ paragraph /page/heading	Objector/Ref No.	Summary of representation	Officer response	Officer recommendation
			<p>The Local Development Framework will consist of several different documents. Updating will be easier than updating local plans, as it might be necessary to update only one document, or to introduce a new document concerning a relevant topic to the Local Development Framework, rather than reviewing a whole local plan.</p> <p>However, this is not to say that individual documents within the Local Development Framework will be continually subject to change. One of the documents of the Local Development Framework, which the City Council is due to begin producing in 2006, will be the Core Strategy. Guidance in paragraph 2.14 of PPS12 says: 'The local planning authority should ensure that policies and proposals in the core strategy provide certainty for the future. The time horizon of the core strategy should be for a period of at least 10 years from the date of adoption....'</p> <p>Green Belt is designated at the strategic planning level. Its existence is not reliant on protection from the Local Plan. The strategic planning authorities are responsible for review of the Green Belt. The County Council has previously been the strategic planning authority with responsibility for this, but this function will now be the responsibility of the Regional Planning Body.</p>	
General	GOSE 221/SCIdraft/2	<p>Comment We have some detailed but informal comments:</p> <ol style="list-style-type: none"> For those for whom English is not their first language, or who have 	<ol style="list-style-type: none"> Adding text to explain how those with optical or literacy difficulties or those who would like the document in a different language can obtain these copies will be considered for 	<ol style="list-style-type: none"> Sustainability Appraisals – whilst this is a separate exercise, sustainability appraisals will be produced by the City Council alongside Development Plan Documents

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		<p>optical or literacy difficulties, you may wish to add text on the front or back cover of the document that informs why people should want to read the document and the means by which they can do so;</p> <p>2. You may wish to consider how the SCI may more fully highlight the importance of SA/SEA and the ability of public and others to be involved in their production and assessment. You should also include an explanation of SEA in your glossary for completeness;</p> <p>3. You may wish to consider whether the local development framework documents should be branded and presented so that they are recognisable as an integrated set in themselves to aid community and stakeholder involvement and ownership, as well as being part of the wider branding of the Council per se;</p> <p>4. You may wish to reconsider putting a time limit on forms. Case law indicates that even something a couple of days out, when an inquiry would not be for months, could be taken into account. With E Government there is also a question of where in the world representations are coming from, and it could be a different time zone. It would be simpler just to say a date.</p>	<p>the submission document.</p> <p>2. Although it is anticipated that consultation on Sustainability Appraisals will be integrated with the general consultation exercises, to make this clearer it is agreed that it might be useful to add information to the Statement. Changes to paragraph 12, 13, 14 are suggested, as well as an update to Appendix 2 and an addition to the glossary.</p> <p>3. The documents of the LDF will all be in the same City Council style, using the same fonts and so on.</p> <p>4. The time was stated on the form as an aid to objectors, as in the past some had assumed that the offices closed at 5pm on Fridays and had been disappointed to find that they had not been able to deliver representations by hand after 4.30. The arguments about time zones and late representations apply equally when there is a specific date on the form as when there is a specific time, as the date can be different in different locations also. Of course discretion is used in accepting late applications.</p>	<p>and Supplementary Planning Documents to examine the impact of the policies and proposals on economic, social and environmental factors (including natural resources). <u>Initial consultation will take place on the scope of the sustainability appraisal, alongside early public involvement in development of each Development Plan Document and Supplementary Planning Document. Following this, the sustainability appraisal report into the likely significant effects of all of the options will be available for consultation, running alongside consultation on each draft Development Plan Document and Supplementary Planning Document. Responses to the sustainability appraisal report will be considered as well as responses to the draft Development Plan Document or Supplementary Planning Document.</u></p> <p>13. Early Public Involvement – ...The type and level of community involvement will vary depending on the document involved. For example, when preparing the Core Strategy, the involvement will be much broader than when focusing in more detail on a specific geographical area to produce an Area Action Plan. <u>At this stage we will also consult on the scope of the sustainability appraisal for a minimum of 5 weeks.</u> This is a key stage as it enables people to put forward their own ideas and to participate in developing proposals and options. Once we are sure that we have understood and considered all views expressed, we will start to formulate preferred options and proposals including</p>

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				<p>input as appropriate by City Council committees and full Council. We will also undertake initial consultation to assist in the preparation of a sustainability appraisal.</p> <p>Consultation on preferred options report ...After the close of this consultation period, we will carefully consider all representations made <u>on the preferred options report and the sustainability appraisal</u> and take these into consideration in revising the document. Comments made at this stage will <u>not be</u> carried forward to examination. The revised document and outcome of consultation will be reported to appropriate City Council committees and full Council.</p> <p>14. Early Public Involvement – ...Like Development Plan Documents, the main purpose of this stage of involvement will be information gathering and the consideration of issues and options. <u>There will also be a consultation period of a minimum of 5 weeks, during which comments will be invited on the scoping report of the sustainability appraisal.</u> A draft document will then be prepared including input as appropriate by City Council committees and full Council.</p> <p>Glossary Add definition of Strategic Environmental Assessment to glossary as follows: Internationally used term to describe environmental assessment as applied to policies, plans and programmes. The European 'SEA Directive' (2001/42/EC) requires a formal 'environmental</p>

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				assessment of certain plans and programmes, including those in the field of planning and land use'
General	Highways Agency 222/SCIdraft/1	<p>Comment</p> <ul style="list-style-type: none"> You should be aware that it is a formal statutory requirement, under the General Development Procedure Order 1995, to consult the Highways Agency on planning applications, and therefore, please can you add the Highways Agency to the list in Appendix 6. We would expect to be consulted on any Local Development Documents that may impact on the motorway and all-purpose trunk road network. In particular, we would expect to be consulted on all Development Plan Documents. Where a meeting is considered appropriate on issues relating to the trunk road network, we would prefer a one to one meeting. 	<p>The statutory consultees for planning applications are listed in Article 10 of the General Development Procedure Order 1995. This lists DETR as a statutory consultee for applications affecting a trunk road. The DETR no longer exists, having been replaced by the Department for Transport. Responsibility for trunk roads lies with the Highways Agency. They should, therefore, have been included in Appendix 6.</p> <p>The Highways Agency are a statutory consultee for Local Development Documents, and as such they are listed in Appendix 2. As a statutory consultee, they must be consulted about all planning policy documents considered relevant to them, which is likely to be all of them. However, as they have expressed a definite desire to be consulted on all development plan documents, this has been noted on our database.</p>	The Highways Agency should be added to the list of statutory consultees for planning applications in Appendix 6.
General	Berkshire, Buckinghamshire and Oxfordshire Wildlife Trusts 18/SCIdraft/1	<p>Comment</p> <p>Please notify when the document is submitted to the Secretary of State.</p>	Noted	No change is made to the Statement.
General	Bellway Homes 20/SCIdraft/1	<p>Comment</p> <p>Bellway Homes would like to be notified of all future consultations relating to the local development framework. Bellway would also like to be notified that the Statement has been submitted to the Secretary of State and that the Statement has been adopted.</p>	Bellway are already in our database to be consulted on all local development framework documents. Their other comments are noted.	No change is made to the Statement.

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General	The Theatres Trust 86/SCIdraft/1	Comment We are pleased to see that you have included the Theatres Trust as a consultee in Appendix 6. We are also pleased to note that at paragraph 30 your SCI explains about your 'free-standing' register, and how you intend to keep it up to date.	Noted	No change is made to the Statement
General	National Playing Fields Association 134/SCIdraft/1	Comment The National Playing Fields Association would like to be involved in the preparation of relevant Local Development Documents.	The National Playing Fields Association are in our database to be consulted about the documents that they have previously expressed an interest in, namely the Core Strategy, Planning Obligations DPD and any future documents containing generic development control policies or provision for outdoor sport/children's play.	No change is made to the Statement.
General	Outdoor advertising association/ British Sign and graphics association 136/SCIdraft/1	Comment We wish to continue to be consulted	Noted	No change is made to the Statement.
General	Hives Planning 180/SCIdraft/1	Comment Please could you incorporate the Diocese of Oxford as a consultee on appropriate documents being prepared for you Local Development Framework. Please could you also add Hives Planning to your mailing list of consultees.	Hives Planning are already in our database of consultees, and the Diocese of Oxford have been added as requested.	No change is made to the Statement.
General	SEERA 224/SCIdraft/1	Comment The Assembly's available resources and focus mean that we are unable to comment in detail at this stage. However, we would take this opportunity to remind you that your Local Development Documents should be in general conformity with the current Regional Spatial Strategy and take account of the emerging Draft South East Plan.	Noted	No change is made to the Statement.
General	WM Morrison	Support SCI	Noted	No change is made to the Statement.

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	Supermarkets Plc 88/SCIdraft/1			
General	Oxford Greenbelt Network 133/SCIdraft/1	Support SCI	Noted	No change is made to the Statement.
General	St. John Street Residents' Association 155/SCIdraft/1	Support SCI. General comment- reconcile SCI to the 100 metre rule in licensing applications, beyond which residents cannot make representations.	The support is noted. The Statement of Community Involvement is intended only to refer to consultation processes relating to planning matters. It would be misleading to refer to consultation methods relevant to other parts of the City Council, as the Statement cannot influence these, and it is not designed to encompass all areas of City Council consultation. Oxford City Council Licensing Authority need to be able to establish whether representations regarding changes to premises licences are relevant. For the Licensing Authority to lawfully accept them, representations must be specific to individual premises. They use the 100m definition of the vicinity of a premises as a guide, rather than as a rule. They do this because, beyond 100m, noise emanating from the building itself is extremely unlikely to directly affect anyone. A letter has been sent to the Residents' Association explaining the position.	No change is made to the Statement.
General	Oxford Preservation Trust, Marston Area 191/SCIdraft/1	Support SCI	Noted	No change is made to the Statement.
General	SEEDA 202/SCIdraft/1	Support SCI	Noted	No change is made to the Statement.