

## APPENDIX B

### South Lakeland Statement of Community Involvement - Reg. 26 Public Participation. Schedule of Comments and SLDC Responses.

Name	Comment	SLDC Response
<b>Section of Document: Statement of Community Involvement (general comments on whole document)</b>		
The Planning Inspectorate	Supporting  After your consultation period we anticipate you submitting your SCI for independent examination and requesting the appointment of a Planning Inspector to consider its soundness. We assume you will also be publishing the required notice and inviting representations in accordance with Para 3.9 of PPS12. Before submitting your SCI for examination, you may find it useful to consult the Test For Soundness documents which are now available on our website at <a href="http://www.planning-inspectorate.gov.uk/pins/appeals/local_dev/Soundness_of_DPD.htm">www.planning-inspectorate.gov.uk/pins/appeals/local_dev/Soundness_of_DPD.htm</a> .	Noted.
Morecambe Bay Primary Care Trust	Objecting  I have a comment about consultation style, as it very much impacts on involvement. The format for responding to this draft is very formal and runs somewhat counter to the principle of engagement of all parts of the community, including the groups that are more difficult to access. Perhaps a system of "supporting" or "objecting" is relevant for the formal planning process, but not so relevant for consultation generally, where people may just want to be asked to agree or disagree with proposals and provide comments and suggestions.	Noted. A more informal style, using a questionnaire, was used at the early draft stage. A less formal response form may be appropriate at this stage for future documents, but a formal response will be required at the next stage - submission to Secretary of State.
Morecambe Bay Primary Care Trust	Supporting  Overall support.	Support noted - no change

Name	Comment	SLDC Response
Higham & Co.	<p>Supporting</p> <p>It is important that the community does not get consultation fatigue and that where contact is made this is optimised to the benefit of the planning process, as noted in the previous round of consultation. It should also be generally recognised that the majority of members of the public engaging in the consultation process are wary of change and are in opposition to new development.</p>	<p>The new planning system will involve a greater amount of consultation. We will select methods which engage the public most directly when proposals are likely to have a significant impact. It is the aim of the consultation measures in the LDF process to find optimum policy solutions and ease concerns over the impact of new development. No change.</p>
Burton-in-Kendal Parish Council	<p>Supporting</p> <p>Excellent, user-friendly, attractive document written in plain English. Being able to comment online will encourage more feedback and public participation in the whole process.</p>	Noted - no change
Eden District Council	<p>Supporting</p> <p>Eden District Council generally supports the document, the way it is laid out and the information contained within it. We just have a couple of typing errors to flag up:</p> <ul style="list-style-type: none"> <li>- The final paragraph on page 5 refers to Appendix 4, when it should say Appendix D.</li> <li>- The second bullet point on page 9 refers to Appendix E, when the list of consultees is actually in Appendix C.</li> </ul>	Amend text to correct mistakes listed.
Lancashire County Council	<p>Supporting</p> <p>Support - no comment</p>	Noted
Priory Building	<p>Supporting</p> <p>This seems well presented - I can not offer any improvements.</p>	Noted
Government Office for the North West	<p>Supporting</p> <p>Compliance with Regulations (A test of soundness) The Regulations appear to have been complied with thus far.</p>	<p>Amend para 1.2 and Appendix F to note requirement for statement of compliance with Regulation 28 to accompany the submitted version of the SCI.</p>

Name	Comment	SLDC Response
	Please note that a statement of compliance with Regulation 28 should accompany the submitted version of the SCI. (The Inspectorate will supply a template).	
Cumbria Biodiversity Partnership	Supporting  I feel that the revised document is very good and clearly sets out the planned processes for community involvement. There are complex issues to be addressed here and it would be difficult to see how the document could have been made any simpler. It is also good to note how well the comments from the early consultation have been incorporated. The coverage of interest groups appears to be wide-ranging and inclusive. I look forward to seeing the process in action.	Noted - no change
Cumbria Tourist Board	Supporting	Support noted
Duddon Estuary Partnership	Supporting  No comment.	
Federation of Cumbrian Amenity Societies	Supporting  A well written and easy to read document.	Noted - no change
Friends of the Lake District (CPRE)	Supporting	Support noted.
TRAC - South Lakes	Objecting to an omission      Whole document  More equity shared housing required - needed on brownfield sites.  The last Joint Structure Plan included (I think) brownfield sites for more cheaply-required homes for locals of the villages of Leece and approached Roose village.	No change. The SCI relates to establishing consultation procedure. Specific issues such as brownfield land and the allocation of particular sites will be dealt with in later DPDs. Copy response to Barrow Borough Council. Add TRAC South Lakes ('To Raise Aid Concerns') to LDF database.

Name	Comment	SLDC Response
	(The remainder of the submission relates to the merits of a brownfield site just inside Barrow Borough.)	
Kendal Civic Society	<p>Objecting</p> <p>This was one of the most confusing and opaque papers we have ever had to read. The number and frequency of acronyms throughout, SEA, LDF, ODPM, SCI, SA, NWRA all in one paragraph, for example, made it almost impossible to follow the train of thought. If the ordinary public are to be involved, documents will have to be written in plain unambiguous language which is clear and understandable at first reading, or they will give up.</p>	<p>We have sought to set out the elements of the new planning system as simply as possible. However the new terms (and their acronyms) inevitably involve a degree of complexity - No change.</p>
Lake District Peninsulas Tourism Partnership	<p>Supporting</p> <p>Thank you for giving me the opportunity to comment on the SCI. I have no comments at this stage and would like to continue to be part of the consultation process.</p>	Noted
National Playing Fields Association	<p>Supporting</p> <ol style="list-style-type: none"> <li>1. The National Playing Fields Association (NPFA) is the only national organisation with specific responsibility for acquiring, protecting and improving playing fields, playgrounds and play space where they are most needed and for those who need them most, particularly children of all ages and people with disabilities. The Association leads the campaign to have adequate outdoor recreation space available for everyone within easy reach of their home.</li> <li>2. The NPFA is recognised by the Government as having an important role to play in the preparation of development plans. In Planning Policy Statement (PPS) 11: Regional Spatial Strategies, the NPFA is listed as an organisation to be consulted on "issues relating to open space and recreation". In PPS 12: Local Development Frameworks, the NPFA is included on a list of organisations that local planning authorities should consider consulting, "where appropriate", in the preparation of local development documents.</li> <li>3. The NPFA is not a Government-funded body, but a charity with limited resources available to carry out its work. Realistically, the NPFA cannot respond to every draft development document that is</li> </ol>	<p>The NPFA's generic response to SCI documents is noted, and it will be consulted accordingly on documents at the stages requested.</p>

Name	Comment	SLDC Response
	<p>produced, or at every stage in its process towards adoption. This paper has been prepared to help local authorities to know what to include in their statements of community involvement and how the NPFA would be like to be consulted.</p> <p>4. The NPFA would also like to be involved in the preparation of Local Development Documents (i.e. the core strategy and generic development control policies). It is intended to prepare a set of model policies and to circulate these to every local planning authority. This will provide the essence of the NPFA's representations at the "preferred options" stage. At the "submission" stage, the NPFA will check the contents of the document and comment as it sees fit. The NPFA considers it "appropriate", in the context of PPS12, for local authorities to undertake a consultation on The Core Strategy and Generic Development Cont</p>	
The British Wind Energy Association	<p>Supporting</p> <p>BWEA is commenting on South Lakeland District Council's Statement of Community Involvement, and provides this submission on behalf of the UK wind energy industry.</p> <p>BWEA was established in 1978 and is the representative body for companies active in the UK wind energy market. Its membership has grown rapidly over recent years and now stands at over 325 companies, representing 98.8% of all grid-connected wind energy now installed.</p>	Noted - no change
Lakeland Radio	<p>Supporting</p> <p>Lakeland Radio supports the document and would be pleased to assist in future local consultation.</p>	Offer of assistance welcome.
The Countryside Agency, North West Region	<p>Supporting</p> <p>As you will appreciate, because the Agency is consulted on a great number and range of documents, we are unable to comment in detail on all of them.</p> <p>In commenting on Statements of Community Involvement, in accordance with</p>	Generic response noted.

Name	Comment	SLDC Response
Environment Agency	<p>our current priorities, we only offer comments on the Agency's general position.</p> <p>We do, of course, support and encourage effective community involvement within the planning system, including in the preparation of the LDF. It is one of the Agency's key principles that community involvement is considered essential to the achievement of our landscape, access and recreation interests in the new planning system.</p> <p>The Agency therefore strongly supports community planning initiatives, which we consider an essential part of good planning. We therefore support, for example, Town Design Statements and Concept Statements, and are interested in ways of incorporating these where possible in the new planning system. The Agency's publications, 'Town Design Statements' and 'Concept Statements' can, of course, be downloaded from our website <a href="http://www.countryside.gov.uk">www.countryside.gov.uk</a>.</p> <p>I am sorry that we cannot offer specific comment at this time, but we look forward to consultation at the various stages in the preparation of the LDF.</p>	Overall support noted.

Name	Comment	SLDC Response
National Grid Transco	Supporting	Overall support noted.
Mrs Zoe Davison	<p data-bbox="622 316 748 343">Supporting</p> <p data-bbox="622 363 1413 619">My husband and I appreciate being sent a copy of the Revised Statement of Community Involvement. While generally agreeing with it we are concerned at the workload imposed by the ODPM and appreciate there will be staffing problems. However we would caution against the use of Neighbourhood Forums as an extra resource. In our experience the Forums do not allow for adequate public discussion and suggest other methods of dialogue should be sought.</p>	<p data-bbox="1469 316 2152 507">No change - We believe it is important to make full use of existing channels where possible, including Neighbourhood Forums. We consider that the promotion and format of Forum meetings could be designed to allow useful public discussion across the areas which they serve.</p>
Ulverston and Low Furness MTI Partnership	Supporting	Support noted
DPDS Consulting Group	Supporting	Noted
Cumbria County Council (Education)	<p data-bbox="622 975 748 1002">Supporting</p> <p data-bbox="622 1023 1384 1086">Many thanks for an early sight of this document; an impressive response to the requirement for greater community engagement.</p>	Noted.
<p data-bbox="62 1118 383 1145"><b>Section of Document: 1.1</b></p> <p data-bbox="510 1118 1173 1145"><b>Purpose of The Statement of Community Involvement</b></p>		
Cumbria Rural Enterprise Agency	<p data-bbox="622 1198 1039 1225">Objecting to an omission 1.11</p> <p data-bbox="622 1246 1391 1369">Businesses can also receive planning guidance and help through RPFS, available to rural businesses including many farm based activities, delivered by Cumbria Rural Enterprise Agency (01539 726624)</p>	Agree - add proposed text at end of 1.11

**Section of Document: 1.7**

Name	Comment	SLDC Response
Mr Ray Wilson	Objecting to an omission 1.7 These are questions rather than proposed changes: 1. Where does the Cumbria and Lake District Joint Structure Plan fit in this scenario? If nowhere, then why has so much time and expense been committed on its preparation, EiP, etc.? 2. Reference is understandably made to PPSs. Is it not correct to expect that some PPGs will still be relevant during at least early LDFs? If the JSP is relevant, it should be referred to. If PPGs will still be relevant points of reference then they should be referred to.	Agree - amend 1.7 to refer to role of Cumbria and Lake District Joint Structure as sub-regional guidance, and also to the continuing role of extent PPGs, until replaced by PPSs.
<b>Section of Document: 1.9 Resources</b>		
Urswick Parish Council	Objecting 1.9 Could it be possible to expand on what resources are available and also to expand on item 1.11 planning aid.	The resources are largely those of the current Development Plans Team (see Appendix I). While the Team's time is almost wholly required to meet the demands of delivering the Development Plan Documents of the LDF over the next 2 - 3 years, some limited time for general advice is available in the short-term, with possibly more time available in the longer term. Expand 1.9 in line with comments above. No change to 1.11.
Government Office for the North West	Supporting Availability of Resources (A test of soundness) This is reasonably well addressed.	Noted - no change
<b>Section of Document: 1.10 Monitoring and Review</b>		
Government Office for the North West	Supporting Mechanisms For Review (A test of soundness) Paragraph 1.10 succeeds in our view in being both concise and comprehensive.	Noted - no change.
<b>Section of Document: 2. South Lakeland's Approach to Community Engagement (general comments on section 2)</b>		
The British Wind Energy Association	Supporting A key principle underpinning the new planning system is the need for it to be transparent, accessible, and accountable, and to actively promote and strengthen public participation and	Noted - these principles are incorporated in the SCI (para 2.4)

Name	Comment	SLDC Response
The British Wind Energy Association	<p data-bbox="622 124 920 151">stakeholder involvement.</p> <p data-bbox="622 188 1010 215">Objecting to an omission 2.</p> <p data-bbox="622 236 1406 363">BWEA emphasises that the SCI should follow the guidance of Planning Policy Statement 12: Local Development Frameworks, and the recommendations contained in Planning Policy Statement 22: Renewable Energy.</p> <p data-bbox="622 400 1413 523">In particular, PPS12 states that the SCI should be a clear public statement enabling the community to know how and when they will be involved in the preparation of local development documents and how they will be consulted on planning applications.</p> <p data-bbox="622 560 1384 746">It is hugely important for all local planning authorities to adopt an inclusive approach to community involvement, to ensure that different groups have the opportunity to participate and are not disadvantaged in the process. Identifying and understanding the needs of groups who find it difficult to engage with bureaucratic processes such as the planning system is essential.</p> <p data-bbox="622 783 1335 874">As highlighted in draft Planning Policy Statement 1: Creating Sustainable Communities, effective community involvement requires processes for:</p> <ul data-bbox="622 879 1406 1099" style="list-style-type: none"> <li data-bbox="622 879 1323 938">- Notifying and informing communities about policies and proposals in good time.</li> <li data-bbox="622 943 1406 1034">- Enabling communities to put forward their own ideas and participate in developing proposals and options, rather than simply comment once these are fixed.</li> <li data-bbox="622 1038 1066 1066">- Consultation on formal proposals.</li> <li data-bbox="622 1070 797 1099">- Feedback.</li> </ul>	Noted - the SCI has taken account of guidance in Planning Policy Statements (PPS) and the principles listed in PPS1.

**Section of Document: 2.2**

**Commitment**

Mr Ray Wilson

Objecting to an omission 2.2

Agree - amend 2.2 to include culture.

Would it be possible to incorporate an explicit commitment to protecting South Lakeland's culture? It might be argued that this is intended to be included within 'environment', but I submit that that would be too nebulous, a distraction from truly environmental factors in their own right, and a failure to give adequate weight to the distinctive culture within South Lakeland, albeit, substantially

Name	Comment	SLDC Response
	<p>depleted as it now is from its former richness. The absence of attention to the value of distinct local cultures in the past has been partially responsible for its decline. Every effort should be made to reverse this trend and this includes opportunities provided by the SCI and LDF.</p>	
<hr/> <p><b>Section of Document: 2.3                      Benefits</b></p>		
South Lakeland Friends of the Earth	<p>Objecting to an omission                      2.3, 2.4 and 2.5</p> <p>The listed benefits are understanding and participation and increased confidence in the planning process. 2.4 and 2.5 do not state clearly that the SCI will be binding on the Community Strategy and 2.5 states that in the preparation of LDF, SLDC will concentrate on information, consultation and involvement and merely remain open to partnership and empowerment. This denial of the latter two will not encourage the first three. Participants will give up if their contribution is discounted in this way. FoE considers that the SCI should be binding on the Community Strategy.</p>	<p>The SCI applies principally to the District Council in its role as local planning authority. It would be for the Local Strategic Partnership to consider if some or all of the SCI could be applied and used for the Community Strategy. The Council is willing to look at this positively with other LSP partners. Para 2.5 is realistic as well as positive, in describing the majority of engagement on the LDF as 'information', 'consultation' or 'involvement'. The Council will look positively at opportunities for 'partnership' and 'empowerment' - but on the latter, decisions on LDF and development control lie ultimately with the Council and Secretary of State. Disagree that this stance will negate the Council's approach to consultation, or that this amounts to 'discounting' contributions.</p>
<hr/> <p><b>Section of Document: 2.4                      Principles</b></p>		
Higham & Co.	<p>Objecting to an omission                      para 2.4</p> <p>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 i.e. front loading. However, it is important to recognise from a developer perspective that it may not always be possible to identify development proposals at the Issues and Option Stage. Developers may acquire sites whilst the relevant document is being prepared or alternatively, for confidentiality reasons, when urban sites are being assembled it may not always be possible to reveal proposals early on in the process.</p>	<p>A reasonable point, but the new planning system requires an emphasis on "front-loading". New proposals can be brought forward at the 'preferred option' stage, but ideally not after the submission stage. No change. Current advice indicates that proponents of late proposals will have to 'resource' the sustainability appraisal of these, and possibly also public consultation - if deemed necessary by the Inspector.</p>

Name	Comment	SLDC Response
Higham & Co.	Supporting It is encouraging to see that South Lakeland's Community Engagement Principles (section 3, para 2.4) include opportunities for 'on-going' input into the Local Development Framework.	Noted. However, the importance of 'front-loading' must be taken fully into account. No change.
<b>Section of Document: 2.5      A Spectrum of Engagement</b>		
Mrs Zoe Davison	Objecting The wording 'Consultation' can have a variety of goals.....will concentrate on Information, Consultation and Involvement' is confusing. We suggest rewording as 'Engagement can have a variety of goals....'  The wording 'remaining open to opportunities for approaches involving partnerships or empowerment' needs clarification of how you could proceed beyond the one-way process of consultation to two-way dialogue, and how the public could initiate meetings as envisaged in Communication Method 10 of section 3.11.	Agree - replace 'consultation' with 'engagement' at start of 2.5. 'Consultation' and 'Involvement' both involve two-way dialogue.  Local community groups can simply request a meeting if they feel this would assist their response, over and above any other engagement methods already proposed. No change.
<b>Section of Document: 2.6      Understanding South Lakeland's Communities</b>		
Mrs Zoe Davison	Objecting There is no Appendix 4. Do you mean Appendix D?	Yes - amend to read Appendix D
Government Office for the North West	Supporting The community is concisely and relevantly profiled in 2.6.	Noted - no change
Cumbria Biodiversity Partnership	Supporting I believe that line 3 in paragraph 2.6 should read 'Appendix D'not 'Appendix 4'.	Amend 2.6 to read Appendix D instead of Appendix 4.
<b>Section of Document: 2.7      Community Profile</b>		

Name	Comment	SLDC Response
Mr Ray Wilson	Objecting to an omission 2.7 Please consider: ..... with a wealth of natural, built and cultural heritage. The region administered by SLDC still has remnants of a former rich and distinct culture. Preservation of that which remains must commence with a recognition of its existence.	Agree - amend para 2.7 to refer to wealth of natural, built and cultural heritage.
Government Office for the North West	Supporting 2.7 Identification of which Bodies will be Consulted (A test of soundness) The community is also concisely and relevantly profiled in 2.7.	Noted - no change
<b>Section of Document: 2.8 Community Strategy</b>		
Government Office for the North West	Objecting to an omission 2.8 The question of common consultation exercises, for example, in tandem with Community Strategy exercises, is not explicitly addressed though it is implicit on 2.8.	Agree - amend para 2.8 to note that a common approach to consultation exercises involving LDF, the Community Strategy and other documents will be sought where possible.
<b>Section of Document: 2.9 Links to Other Strategies and Evidence Sources</b>		
Government Office for the North West	Supporting Links with other Community Involvement Initiatives (A test of soundness) These connections are set out fully.	Noted - no change
Morecambe Bay Primary Care Trust	Objecting to an omission Para 2.9 Please add Morecambe Bay Local Delivery Plans and health service development plans.	Agree - modify 2.9 to include these documents
Cumbria Tourist Board	Objecting to an omission 2.9 Reference to the "Cumbria Destination Management Plan" would be useful in para 2.9	Agree - amend 2.9 to include document

Name	Comment	SLDC Response
Federation of Cumbrian Amenity Societies	Objecting to an omission para 2.9 The list of Other Strategies should include the Regional Spatial Strategy as well as the Regional Economic Strategy.	Agree - amend 2.9 to include Regional Spatial Strategy (although it is also mentioned in para 1.7).
Northwest Regional Development Agency	Objecting to an omission 2.9 Whilst the Draft SCI clearly indicates that this list is selective, we would also anticipate that the Council will have due regard to the Regional Tourism Strategy, the Lake District Economic Futures Study (prepared by Regeneris on behalf of NWDA in June 2004) and the Agency's Lake District Economic Futures Study Policy Statement (March 2005). These are, in our view, important elements of the LDF evidence base.	Noted - amend para 2.9 to include documents suggested.
Northwest Regional Development Agency	Supporting Para 2.9 of the Draft SCI identifies a number of plans, strategies and sources of evidence that the Council will take into account when preparing Local Development Documents. The Agency welcomes the inclusion of the Regional Economic Strategy on this list.	Noted
English Nature	Objecting to an omission 2.9 Include the "Cumbria Biodiversity Action Plan" in the list of relevant documents. The Cumbria Biodiversity Action Plan is an important document which is mentioned in the Community Strategy. It underpins much of what is required to enhance the natural environment of the District and as such the CS states that the LSP will assist in the implementation of the CBAP. Inclusion in the list in section 2.9 of the SCI underlines that commitment.	Agree - include Cumbria Biodiversity Action Plan in para 2.9
<b>Section of Document: 3. South Lakeland Local Development Framework (general comments on section 3)</b>		
English Heritage - North West Region	Objecting to an omission Section 3 As a statutory consultation body at other stages in the preparation of Development Plan Documents, as well as certain planning applications, we welcome the opportunity to make general comments on the SCI.	Noted - no change. But invite SLDC's Conservation Officer and County Council's Archaeologist to participate in Sustainability Appraisal Panel.

Name	Comment	SLDC Response
	<p>In view of our remit, outlined below are a set of general principles which we suggest are reflected in the SCI.</p> <p>- Sustainability Appraisal - Whilst English Heritage is a statutory consultee for SEA, we do not have the capacity to attend SEA/SA workshops. If it is proposed to hold such an event, you should ensure that your Conservation Officer and a representative from the County Council's archaeological service is invited to attend to advise on any issues relating to the historic environment. We will, of course, respond to correspondence relating to SEA at the appropriate stages.</p>	
The British Wind Energy Association	<p>Objecting to an omission 3.</p> <p>In the case of wind energy development, appropriate community involvement at different stages in the planning process can have considerable benefits for all parties involved. It can help to improve understanding of the issues facing developers, local communities, and stakeholders, and therefore help to reduce conflict; it can help provide an opportunity to engage local people actively in the development of schemes; it can help to address concerns about the impacts of potential schemes; and to explain the wider benefits of renewable energy (A Companion Guide to PPS22, 2004).</p>	Noted - no change
The British Wind Energy Association	<p>Objecting to an omission 3.</p> <p>There are many methods of community involvement that may be appropriate at different levels and stages of the planning process i.e. regional, local level. This is discussed in detail in 'A Companion Guide to PPS22', and should be considered by all local planning authorities in preparation for their SCI.</p>	Noted - no change. The information will assist in detailed design of engagement exercises.
<p><b>Section of Document: 3.1 Introduction</b></p>		
Government Office for the North West	<p>Objecting to an omission 3.1</p> <p>Identification of how the Community can be Involved in a Timely and Accessible Manner (A test of soundness)</p> <p>The question of 'front loading' is important and it needs to be stressed that people should get involved in the 'production stage, given that objections to a submitted DPD have to be based on its soundness rather than on matters of detail which should be sorted out earlier.</p>	Modify 3.1 accordingly to stress importance of 'front-loading'.

Name	Comment	SLDC Response
<b>Section of Document: 3.2 Documents</b>		
Government Office for the North West	Objecting to an omission 3.2 It is not clear whether consultations on different DPDs will be linked; also, the point could be made that the Core Strategy will set a framework to which the other DPDs will be subordinate.	Agree - amend 3.2 accordingly to note that (only) the Site Allocations and Proposals Plan DPDs will have linked consultation; and to note that other DPDs will be subordinate to the Core Strategy.
Mr Ray Wilson	Objecting to an omission 3.2 It would be helpful to give some dimension to 'long-term' alongside 'Core Strategy'. Without a timescale dimension 'long-term' is not very meaningful.	Long-term relates to the length of the plan period i.e. 10 years to 2016. Amend 3.2 accordingly.
<b>Section of Document: 3.3</b>		
Mr Ray Wilson	Objecting to an omission 3.3 It would be helpful to provide some additional scope to the meaning of the topics of guidance for SPDs. There is considerable scope for ambiguity and uncertainty with the current brevity.	It is considered no further definition of SPD topic is required in the context of the SCI. It would be more appropriate to provide this when the Local Development Scheme is reviewed.
<b>Section of Document: 3.4</b>		
Ulverston Trades Council	Supporting	Support noted
<b>Section of Document: 3.6 Stages in Document Preparation</b>		
Morecambe Bay Primary Care Trust	Objecting to an omission 3.6 6 week timeframe is a minimum required by legislation. This may not be long enough for meaningful public consultation, especially if it has to go through Board process. Where at all possible, longer timeframes should be set for public consultation - and the statement should reflect this intention.	Para 3.6 refers to statutory minimum requirements. Modify para 3.6 (at end) to note that the periods for consultation may be extended beyond the statutory minimum, where the Council considers that the nature of the proposals, the needs of consultees or other factors, merit a longer response time. However it is also important for the Council to take account of the approved Local Development Scheme.
<b>Section of Document: 3.7</b>		

Name	Comment	SLDC Response
Mr Ray Wilson	<p>Objecting to an omission 3.7</p> <p>Would it not be appropriate to include a commitment to the period that will be provided for consultation/comment on the Annual Monitoring Report?</p> <p>Time periods for responses are, quite correctly, provided elsewhere in the draft SCI and this appear to be a potential oversight. It is difficult to see why a deliberate absence should exist in this instance.</p>	<p>A formal consultation exercise on the Annual Monitoring Report is not proposed, although its publication will be notified as described in para 3.7, and comments will be welcomed. A formal timescale for comment is not considered necessary.</p>
<b>Section of Document: 3.8 Who Will We Consult?</b>		
Federation of Cumbrian Amenity Societies	<p>Objecting to an omission para 3.8</p> <p>Are the references in para 3.8 correct? Bullet point 2 refers to Appendix E.</p>	Agree - amend 3.8 to make correction
Cumbria Biodiversity Partnership	<p>Supporting</p> <p>The second bullet point in Section 3.8 should direct the reader to the list of consultees in Appendix C.</p>	Amend 3.8 to read Appendix C.
Silverdale Parish Council	<p>Supporting</p> <p>Please continue to consult Parish Councils on SLDCs 'border', as a valuable inclusion.</p>	<p>Noted - Parish and Town Councils in and adjoining the South Lakeland LDF area will be consulted on each Development Plan Document at each consultation stage.</p>
Government Office for the North West	<p>Objecting to an omission 3.8</p> <p>In the reference to PPS12 there appears to be a confusion between Annex E of that statement, and Appendix C in the SCI</p>	Agreed - correct 3.8 to read 'Appendix C'.
Government Office for the North West	<p>Supporting</p> <p>Although the absence of a database of consultees is noted, Appendix D appears to be comprehensive and if not, provides a source for potential consultees to check.</p>	<p>Update 3.8 to note that a database has now been created and will shortly be available to the public to enter comments and view comments of others.</p>
Government Office for the North West	<p>Objecting to an omission 3.8</p> <p>It is not strictly necessary to include the consultee list from PPS12 Annex E and the list which is included, with its references to</p>	<p>Noted - while not strictly necessary, propose retention of Appendix C as it helps all concerned to refer to and understand this element of national policy advice within</p>

Name	Comment	SLDC Response
Mrs Zoe Davison	<p>PPS12 and Appendix C, covers that aspect clearly and adequately.</p> <p>Objecting</p> <p>The list of relevant organisations is not in Appendix E. Do you mean Appendix C?</p>	<p>one document, rather than refer to another document.</p> <p>Amend 3.8 to replace Appendix E with 'C'.</p>
<b>Section of Document: 3.9</b>		
Government Office for the North West	<p>Supporting</p> <p>Identification of which Bodies will be Consulted (A test of soundness)</p> <p>This is addressed comprehensively in 3.9 and Appendix D.</p>	Noted - no change
Mr Ray Wilson	<p>Objecting to an omission      3.9</p> <p>Regarding Interests: How and when are Parish Plan groups made visible to SLDC so as to facilitate involvement?</p> <p>Whilst the SCI correctly makes this reference to Parish Plan groups, it is not known whether a formal mechanism exists, and which is known to exist in the community, which enables SLDC to facilitate their involvement.</p>	<p>It is considered that consultation with Parish and Town Council's would also ensure consultation with Parish Plan Groups. However we are happy to also consult Parish Plan Groups on request. No change.</p>
Mr Ray Wilson	<p>Objecting to an omission      3.9</p> <p>Regarding the Types of Consultees: Does the inclusion of 'landowners' mean all landowners or should the intended group be qualified in some way?</p> <p>In a literal sense there are huge numbers of landowners in SLDC, for example, most house owners are also landowners. If this level of inclusiveness is not intended, the qualifying criteria for inclusion should be provided.</p>	<p>Landowners generally refers to those known to have an interest in proposed sites, or who have made proposals regarding sites in their ownership. It would be for landowners to notify the Council of their wish to be consulted, not vice versa. No change.</p>
Mr Ray Wilson	<p>Objecting to an omission      3.9</p> <p>Regarding Interests: In light of the now published PPS 9, would it not be appropriate to explicitly include geology alongside 'Nature conservation and landscape'?</p> <p>The omission of geology would be unjustified and inconsistent with PPS 9.</p>	<p>Agree - amend 3.9 (and Appendix D) to include reference to geology alongside nature conservation and landscape.</p>

**Section of Document: 3.10**

Name	Comment	SLDC Response
Government Office for the North West	Supporting Suitability of Methods Employed (A test of soundness) The question of the 'hard to reach' is fully addressed although the potential to adopt different methods of engagement for these groups is implied rather than made explicit. (By way of comparison you might wish to look at the 'Good Practice Guide' produced by Tonbridge and Malling BC, the first Council to have their SCI examined, accessible on their website).	Amend 3.10 to note the potential to adopt different methods of engagement for hard to reach groups.
<b>Section of Document: 3.11      How We Will Consult You - Consultation Methods</b>		
Government Office for the North West	Supporting Identification of how the Community can be Involved in a Timely and Accessible Manner This appears to be very fully covered.	Noted - no change
South Lakeland Friends of the Earth	Objecting to an omission      3.11 and 3.12 FoE considers that public speaking should be allowed at planning committee meetings on LDF issues.	Planning committee deals with development control matters. Key LDF reports will be considered at Cabinet and Full Council, both of which provide for public speaking, given advance notice. Amend 3.15 to explain how the Council formally considers LDF issues, and the opportunity for public speaking.
Silverdale Parish Council	Objecting to an omission      Section 4 of Table Town Regeneration Partnership - you do not include Carnforth Area Regeneration Partnership (CARP). Certainly CARP officially includes Arnside/Milnthorpe in its area of influence so it should be included.	Amend to include Carnforth Area Regeneration Partnership in Appendix D and in LDF Consultee database, but not specifically in the tables in paragraphs 3.9 or 3.11.
Mr Ray Wilson	Objecting to an omission      3.11 Item 4: Town and Parish Councils should be required to post related information on their notice boards. It is thought to be a rather hit-and-miss affair at the moment. All or most communities are thought to have a parish council notice board. Where one exists it should be an additional means of communication relevant to the subject programme. Parish Councils should be required to fulfil their role in this regard.	Amend 3.11 to note that Town and Parish Councils will be encouraged to place information on noticeboards. The District Council could not make this a formal requirement.

Name	Comment	SLDC Response
Urswick Parish Council	<p data-bbox="622 156 1099 183">Objecting 3.11/3.12</p> <p data-bbox="622 204 1413 363">Community meetings /involvement - there would seem to be room for more local community input rather than "time/resouces allow", also feel focus groups not necessary reflect community views. With more community involvement stronger communication links/skills will be required to get a good success rate.</p> <p data-bbox="622 395 1413 523">On the whole the draft consultation is quite comprehensive but perhaps SLDC.planning dept. could organise some form of formal education on planning for parish councils in order to get more information on what issues are pertinent to planning decisions.</p>	<p data-bbox="1469 156 2157 411">The range of methods, taken as a whole, is considered adequate to accommodate local community input. While ticks indicate where community meetings will always be held, the question mark indicates that the need for community meetings will be given active consideration. Para 3.10 indicates that we will seek advice and assistance from other bodies in carrying out engagements - No change.</p> <p data-bbox="1469 416 2157 603">The proposal to provide Parish Councils with more information and briefings on the new planning system and how they may best engage with it is a good idea and will be given active consideration. South Lakeland Cumbria Association of Local Councils has already received an introductory briefing on the new planning system.</p>
The British Wind Energy Association	<p data-bbox="622 639 748 667">Supporting</p> <p data-bbox="622 687 1413 778">As identified in paragraph 4.26 of 'A Companion Guide to PPS22', appropriate methods of community involvement will vary depending on the stage in the planning process, but may include:</p> <ul data-bbox="622 783 1413 970" style="list-style-type: none"> <li>- Public exhibitions, displays, roadshows;</li> <li>- Presentations at public meetings;</li> <li>- Dissemination of information via the internet, local press, or leaflet drops;</li> <li>- Consultation with focus groups; consultation with parish and town councils.</li> </ul> <p data-bbox="622 1007 1413 1034">The issues that may need to be addressed could include:</p> <ul data-bbox="622 1038 1413 1262" style="list-style-type: none"> <li>- A lack of awareness about the technology and concerns about noise, visual effects, odour and other perceived hazards;</li> <li>- Juxtaposition between the importance of addressing a long term global impact threat such as climate change, and the specific, immediate local impacts arising from a particular project; and,</li> <li>- Difficulties in making the link between regional policy and local delivery.</li> </ul> <p data-bbox="622 1294 1413 1453">For further guidance on community involvement and wind energy development, BWEA recommends local planning authorities refer to the 'South West Public Engagement Protocol for Wind Energy' (available at <a href="http://www.regensw.co.uk/cotent-download/Report-SWPEPWE-Protocola">www.regensw.co.uk/cotent-download/Report-SWPEPWE-Protocola</a>)</p>	<p data-bbox="1469 639 2157 762">Information and advice noted from this generic reply, but no change considered necessary. The issues and guidance in relation to wind energy will assist in consultation on the Landscape Renewables SPD.</p>

Name	Comment	SLDC Response
	ndGuidance.pdf). The document discusses the various options for community involvement at each stage of the planning process, and offers valuable guidance in terms of how to deliver these options effectively and appropriately. Endorsed by the South West branch of the Local Government Association, the South West branch of the Royal Town Planning Institute, and BWEA; the Protocol could be used by local planning authorities as a basis upon which to develop their own approach to community involvement for wind energy development.	
Cumbria Biodiversity Partnership	Supporting In the PDF of the table I downloaded, the icons for 'Key Stakeholder Groups', 'Exhibitions, leaflets and posters' and 'Meeting with Community' were missing. This may be a download problem, however, rather than an omission in the original document.	The icon problem was corrected early in the consultation process and did not affect the content of the document.
Federation of Cumbrian Amenity Societies	Objecting to an omission para 3.11 How are the key Stakeholder Groups defined?	Amend 3.11 to provide brief generic definition of 'key stakeholder groups'.
English Nature	Supporting para 3.11 English Nature supports the variety of communication methods proposed. We prefer to be consulted by receiving copies of documents either on paper or by email. An email containing a web-link to documents on line such as in this case is also acceptable. Receiving copies as early as possible in the consultation phase enables us to respond within timescales.	Noted - no change
<b>Section of Document: 3.12 Consultation Stages and Methods</b>		
Cumbria County Council (Education)	Objecting to an omission 3.12 The table at 3.11 appropriately includes schools and colleges as a 'method' of communication/consultation. However, the table in 3.12 on the following page then suggests that schools and colleges will not be consulted in relation to the SCI itself. Is this the intended or appropriate situation, especially given the clear recognition that young people can represent a 'hard to reach' group in the community? If I have misunderstood the process, please feel free	Cartmel Priory Church of England, Kirkbie Kendal, Queen Elizabeth, Queen Katherine and Ulverston Victoria High Schools and Kendal College have each been consulted by post, receiving a copy of the draft SCI. We will repeat this at the Submission stage, but do not intend to hold specific consultation meetings with schools. No change.

Name	Comment	SLDC Response
	to ignore the above; it is only a minor point in what is overall an impressive approach.	
Federation of Cumbrian Amenity Societies	<p>Objecting to an omission para 3.12</p> <p>The key is wrong. Yes should be v and No X.</p> <p>The use of a ? in some boxes implies that some consultations will only occur if time and resources allow, however, these need to be made available where it is relevant to consult a particular Key Stakeholder group.</p>	Amend key to 3.12 relating to ticks and crosses. The 'question mark' does not reduce the potential relevance or need to consult particular key stakeholder groups. No change.
Cumbria Biodiversity Partnership	<p>Supporting</p> <p>The key at the top of the table refers to 'Yes' and 'No' but the table itself uses ticks and crosses rather than words. Also, in the version I downloaded, there are no icons at the top of column 7.</p>	Amend table 3.12 to correct the key reference to ticks and crosses. The icon problem was corrected early in the consultation period and did not affect the content of the document.
South Lakeland Friends of the Earth	<p>Objecting to an omission 3.12</p> <p>FoE considers it should be made clear how county level functions integrate with County Departments.</p> <p>This appears to be missing from the document.</p>	Agree - explain role of Cumbria Joint Structure Plan at para 1.7 (in context of national and regional policy).
Government Office for the North West	<p>Supporting</p> <p>Identification of how the Community can be Involved in a Timely and Accessible Manner</p> <p>This appears to be very fully covered.</p>	Noted - no change
Government Office for the North West	<p>Objecting to an omission 3.12</p> <p>Availability of Resources (A test of soundness)</p> <p>There should be an assessment of the resource implications of the more pro-active methods of involvement, and whether or how that might influence their adoption.</p>	Agree - add short section to para 3.11 (or 3.12) to highlight the most resource-intensive methods (7, 9, 11 and 12) and to note that these will be reserved for document consultation stages where most benefits will be gained - noting also that Planning Delivery Grant will be used to provide additional resources, when required and if available.

**Section of Document: 3.13**



Name	Comment	SLDC Response
Cumbria Rural Enterprise Agency	<p>Objecting to an omission 4.</p> <p>Businesses should be included as forming part of the community; without them jobs would not exist and economic activity take place. A case should be made for Economic Development Agencies to be formally consulted on business based development control applications. This will inform decision making as well as providing better balance to views from specific interest groups/ statutory consultees which are often environmentally focused.</p>	<p>In terms of development control (section 4), para 4.6 notes that anyone can notify the Council if they wish to be consulted on a generic issue. This is also open to Economic Development Agencies. For the LDFs (section 3), business interests are recognised in para 3.9, and representative agencies listed in Appendix D - No change.</p>
Higham & Co.	<p>Objecting to an omission section 4</p> <p>It would be of assistance to the development industry generally if there was some consistency in approach between Local Authorities.</p>	<p>Each local authority must undertake consultation to minimum statutory requirements, but beyond this, each local authority can develop varying approaches depending on the nature of proposals and resources available. No change.</p> <p>This point may be of interest to Government Office North West and ODPM.</p>
Cumbria Constabulary	<p>Supporting</p> <p>Support</p>	<p>Overall support noted.</p>
Cumbria Constabulary	<p>Objecting to an omission 4.</p> <p>As Police Crime Prevention/Architectural Liaison Officer, would wish to be consulted as a matter of course regarding planning/development issues which impact upon South Lakeland in order to 'design out crime' wherever possible.</p>	<p>Para 4.6 indicates that anyone wishing to become a regular consultee on generic issues can notify the Council. Propose requesting Police Crime Prevention/Architectural Liaison Officer to indicate and request the type of applications where he should be routinely consulted.</p>
Kendal Civic Society	<p>Objecting</p> <p>We expect to be involved as we have been with the present system, receiving lists of applications and being able to comment, object or support.</p> <p>We would like to be sure that, if we comment on or object to a planning application, we will be listened to. By we, I mean all those involved or affected by a scheme, and the Planning Committee. We abhor the fact that a decision taken locally by the Local Planning Committee in accordance with its own local plan,</p>	<p>Para 4.6 notes that any amenity society can request to be a regular consultee on generic issues. All responses will be taken into account by officers and Planning Committee and weighed before reaching a decision - No change.</p>

Name	Comment	SLDC Response
	<p>can be overturned by the Planning Inspectorate, as happened recently within the Conservation Area. If this is to happen, there is no point in local involvement.</p>	
The British Wind Energy Association	<p>Objecting to an omission 4. Community Involvement in Significant Planning Applications</p> <p>Local planning authorities will have the power to identify the level of community involvement they consider appropriate for different types of 'significant' planning application, including renewable energy generating schemes. BWEA emphasises the importance of local planning authorities highlighting in their SCI what level of community involvement they consider appropriate.</p>	<p>No change - para 4.7 indicates the types of community involvement which the Council considers appropriate, in response to significant applications. (see also response to Aggregate Industries UK Ltd)</p>
English Heritage - North West Region	<p>Objecting to an omission Section 4</p> <p>As a statutory consultation body at other stages in the preparation of Development Plan Documents, as well as certain planning applications, we welcome the opportunity to make general comments on the SCI.</p> <p>In view of our remit, outlined below are a set of general principles which we suggest are reflected in the SCI.</p> <p>- Planning and Development in the Historic Environment - A Charter for English Heritage Advisory Services (second edition, April 2005): This document sets out English Heritage's advisory services for planning and development. It details the circumstances where we must be consulted upon planning applications affecting the historic environment, and the type of information required for consultations with English Heritage on proposals affecting nationally important heritage assets. It also underlines the value and importance of pre-application discussions with us on proposals with the potential for major change or damage to nationally important heritage assets. The principles set out in this charter should inform the Council's consultation approach to significant planning applications. See also a copy of Applications Requiring Notification to English Heritage for your information.</p>	<p>Agree - Amend 4.3 (penultimate para) to confirm that English Heritage will be consulted on nationally important heritage assets. Also amend 4.7 (last para) to note that the Council encourages pre-application negotiations with statutory consultees including English Heritage.</p>

Name	Comment	SLDC Response
English Nature	<p>Objecting to an omission 4.</p> <p>Development Control This is a comment for information not an objection. English Nature would like to be directly consulted on all planning applications affecting Statutory designated sites (Sites of Special Scientific Interest/Special Areas of Conservation/RAMSAR/Special Protection Areas)and applications affecting European Protected Species (listed in the Habitats etc Regulations 1994)</p>	<p>Amend 4.13 to explain that 'Technical Consultations' in table include consultations with all statutory consultees - eg. English Nature, English Heritage, Highways Agency, Environment Agency.</p>
Highways Agency	<p>Objecting to an omission 4.</p> <p>The document provides an effective overview of the LDF structure and process. I am pleased to see the involvement of the Highways Agency in Appendix C-Consultees. The chapter 4 Development Control on decision making is well laid out and easy to follow however I would have liked to have seen a section encouraging developers to carry out pre-application consultations and a mention of the Highways Agency where development effects the Trunk Road Network.</p> <p>The Highways Agency are keen to work in partnership with South Lakeland and would be grateful if you would ensure we remain on the councils database in relation to the LDF processes. I hope the above has been of benefit to you. If you have any queries please do not hesitate to contact me.</p>	<p>Amend 4.7 (last para) to also refer to encouraging pre-application consultation with the Highways Agency, where development affects the Trunk Road network.</p>
<p><b>Section of Document: 4.2 Key publication commitments for all applications</b></p>		
Natland Parish Council	<p>Objecting to an omission 4.2</p> <p>We were concerned by what appeared to be an omission in the planning application routine. We could see no reference to the plans being circulated, (as at present) to Parish Councils. We consider this checking of development locally to be one of our most important functions.</p>	<p>Agree - amend para 4.2 to include reference to sending of planning applications to Parish Councils.</p>
Higham & Co.	<p>Supporting</p> <p>We agree that community involvement should be appropriate to the scale of the proposed development (Section 4, paragraph 4.2). For example, we do not consider that the change of use of individual buildings or householder proposals should be subject to the same</p>	<p>Noted. No change.</p>

Name	Comment	SLDC Response
	level of consultation as a large scale residential or commercial development proposal.	
South Lakeland Friends of the Earth	Objecting 4.2 FoE consider that the consultation period for the public should be extended to 4 weeks.	No change. The Council's 21 day consultation period already exceeds the statutory requirement of 14 days. To extend this to 28 days would negatively impact on achieving the Council's 8 week performance target for deciding applications (set by Government).
South Lakeland Friends of the Earth	Objecting to an omission 4.2 Bullet point 2 There is no mention of standard community response forms, which would encourage a response. FoE considers these should be promoted.	No change. The provision of site notices and individual letters to notify neighbours is considered adequate.
<b>Section of Document: 4.4 Planning commitments to engagement and community access</b>		
South Lakeland Friends of the Earth	Objecting to an omission 4.4 4.4 does not state whether all the information on the Planning File will be available to everyone. FoE considers that this should be the case and that the document should make this clear. (I made this point in my previous comment, but did not finish the sentence)	Agree - Amend 4.4 to clarify that all information in planning files is available for public inspection, with the exception of commercially-sensitive pre-application data.
South Lakeland Friends of the Earth	Objecting to an omission 4.4 4.4 does not state whether all the information on the planning file. It also does not state whether information on proposed Section 106 agreements are published. Foe considers both these should be included	See response to related comment on 4.4. Regarding S106 agreement, anyone can comment on matters relevant to S106 agreements as part of consultation on planning applications. Completed S106 agreements are available for inspection on planning files. No change.
South Lakeland Friends of the Earth	Objecting to an omission 4.4 SL FoE considers that free copies of the environmental statement should be available. This appears to be omitted.	No change. The Environmental Statement is available for public inspection with planning files. However copies of the document (and planning application) cannot be made available free of charge, as this would contravene copyright.
<b>Section of Document: 4.7</b>		
South Lakeland Friends of the Earth	Objecting to an omission 4.7 Although applicants are encouraged to hold public meetings and pre application negotiations with the council are on offer, there is no	No change. The Council encourages appropriate community engagement and will take account of the results, but it is not able to offer a mediation role between different interests and views.

Name	Comment	SLDC Response
	mention of effective mediation. FoE consider this should be available.	
Aggregate Industries UK Ltd	<p>Objecting 4.7</p> <p>Section 4.7 refers to applicants being encouraged to hold a public meeting. Public meetings are not the only or most effective way for applicants to consult with stakeholders. I suggest that applicants discuss and agree with planning officers a community engagement action plan.</p>	<p>Agree - Amend para 4.7 to note that applicants will be expected to demonstrate appropriate community engagement (for the types of applications listed), also noting that the Council can advise on appropriate forms of engagement.</p>
Higham & Co.	<p>Objecting to an omission para 4.7</p> <p>It is considered that the options for consultation should be agreed between the applicant and the Local Authority at the pre-application stage. This would relate to, for example, the need for a pre-application presentation as highlighted in Section 4, paragraph 4.7. The Council needs to give such negotiations priority as part of the planning process and allocate resources accordingly.</p>	<p>Need of resources for negotiations noted, but no change needed. Para 4.7 specifies the type of application where public consultation will be encouraged. (see also response to Aggregate Industries UK Ltd, above)</p>
Higham & Co.	<p>Objecting to an omission para 4.7</p> <p>Ward Councillors need to be alerted to the importance of their involvement in the process prior to planning applications being made.</p>	<p>No change. Current procedure does not require the involvement of ward members in community consultation by applicants, although it is recognised ward members may become involved, particularly in larger schemes.</p>
Kirkby Lonsdale & District Civic Society	<p>Objecting to an omission 4.7</p> <p>In the definition of "Locally Significant" on page 16, Planning Committee for a decision.</p> <p>Wish to add "or set a damaging precedent" to the end of the first sentence. The reason is self-evident.</p> <p>Also we would like to remove the word "Members" so that the last sentence becomes "Such applications need to be referred to the Planning Committee for a decision". This is to ensure that such decisions are made in committee not informally with members of the committee in private.</p>	<p>Agree - modify 4.7 (section headed 'Locally Significant') to take account of proposed changes.</p>

Section of Document: 4.9

Decision Making

Name	Comment	SLDC Response
Mr Ray Wilson	<p>Objecting to an omission 4.9</p> <p>I believe reference should be included in this section to the possibility of a site visit being decided by members of the Planning Committee as a necessary part of the decision making process. In this regard, it is appropriate that I register here, views which have already been made known to SLDC Officers, that there are currently significant deficiencies in the procedures of SLDC governing site visits as an element in the decision making process. The validity of my views on this matter remain both undiminished and unattended to by SLDC.</p> <p>The observation made and the knowledge gained during a site visit are unequivocal considerations in the decision process.</p>	<p>Amend 4.9 to include current procedure regarding site visits by Planning Committee.</p> <p>Approved procedure is for members of Planning Committee to undertake site visits without applicants, objectors or other interested parties being present. All have opportunity to make representations through the normal processes, including verbal presentations at Committee meetings. Decisions can not be made at site visits, as they do not form duly constituted committee meetings.</p>
<hr/> <p><b>Section of Document: 4.10 Post Decision</b></p>		
South Lakeland Friends of the Earth	<p>Objecting to an omission 4.10</p> <p>The document does not mention whether information on complaining to the Ombudsman etc is available. FoE considers that this should be available and referred to.</p>	<p>Agree - Amend 4.10 to note that the public may refer concerns about potential maladministration to the local Government Ombudsman.</p>
South Lakeland Friends of the Earth	<p>Objecting to an omission 4.10</p> <p>There is no reference to information on judicial review and the Environmental Law Foundation. This should be provided and reference made to it here.</p>	<p>Agreed - amend para. 4.10 to note availability of judicial review and role of the Environmental Law Foundation.</p>
<hr/> <p><b>Section of Document: 4.13 Summary of Consultation</b></p>		
Higham & Co.	<p>Supporting</p> <p>It will be helpful when plans and drawings submitted with planning applications are made available to view on the Council website (Autumn 2005). The ability to view Planning Committee Agendas and Reports online is also supported.</p>	<p>Noted - no change.</p>
Government Office for the North West	<p>Objecting to an omission 4.13</p> <p>Repeated typographical error 'separate' spelt incorrectly.</p>	<p>Amend table 4.13 to spell 'separate' correctly.</p>

Name	Comment	SLDC Response
Mr Ray Wilson	<p>Objecting to an omission 4.13</p> <p>I do not understand why 'Parish/Town Councils' and 'Adjacent neighbour letter' are excluded in the table of engagement activity for Agricultural Notices of Intention. In the absence of a clearer understanding of this exclusion, I submit that both should be considered for inclusion.</p> <p>Apparent correction is necessary.</p>	<p>The table correctly reflects current Council procedure - No change.</p>
<b>Section of Document: 5. Conservation Areas (general comments on section 5)</b>		
Kendal Civic Society	<p>Objecting to an omission 5.</p> <p>We would wish to be more involved with the Conservation Area issues in Kendal. Since it was the Civic Society which instigated the original Article 4 Direction and the Conservation Area, we have been disappointed to have been practically ignored recently</p>	<p>The SCI sets out how the Council will engage with the public and interest groups on LDF documents, including forthcoming Supplementary Planning Documents, including Conservation Area management plans. The implementation of SPD in Kendal also offer the possibility of partnership working with the Civic Society and other interests. Each Conservation Area review involves meeting with Civic Societies, inviting their participation in the process. This opportunity is available to Kendal Civic Society.</p> <p>Add new section 5.4 entitled 'Implementation', noting that the Council will adopt a positive approach to working in partnership with Civic Societies, amenity groups and local residents in implementing Supplementary Planning Documents and Conservation Area Management Plans.</p>
<b>Section of Document: 5.1 Introduction</b>		
Federation of Cumbrian Amenity Societies	<p>Objecting to an omission para 5.1</p> <p>The North West Association of Civic Trust Societies is encouraging all its members in the region to pro-actively assist in the preparation of Conservation Area Appraisals. This should be noted.</p>	<p>Noted - amend 5.1 to include this information.</p>
<b>Section of Document: 6.1</b>		
Broughton Business Association	<p>Supporting</p> <p>Broughton in Furness and District Business Association stresses the urgent need for two recommendations in our Parish Plan to be acted upon:</p>	<p>These issues are noted. It will be appropriate to consider these issues in later LDF documents. The SCI deals only with consultation procedure.</p>

Name	Comment	SLDC Response
Mrs Zoe Davison	<p>1. New Duddon Crossing between Askam and Millom In the event of an emergency at Sellafield the rapid response unit in Barrow in Furness cannot reach the site because the road network round Furness Peninsula and across the present Duddon Bridge is unadequate. Sections of it are single track and one block creates a logjam.</p> <p>The fringe of the Lake District is dominated by through traffic making its way to West Cumbria. This traffic affects Greenodd, Penny Bridge, Craik Valley, Spark Bridge, Lowick, Gawthwaite, Grizebeck, Foxfield, Broughton in Furness and Ulpha Valley in the South Lakes district.</p> <p>2. Carpark in Broughton in Furness Broughton depends on visitors to make shops and trades viable but we lose many of them because they cannot park here. We have offered sites and suggested ways of operating a carpark.</p> <p>Duddon Mosses by Foxfield are being opened up by English Nature for visitors. There is nowhere to park on the main road and trains dont run on Sundays. This jeopardises the success of the project.</p> <p>Broughton Business Association has pressed for these two changes and wishes to continue to be involved with the new Local Development Framework in order to keep up the pressure. The environment, health and safety, education, economy and business are all at stake here. We cannot afford to let these issues be sidelined any more.</p>	Agree - add 'some' at start of para 6.1
<b>Section of Document: 6.3</b>		
Urswick Parish Council	<p>Objecting</p> <p>6.3</p> <p>Where it says you may possibly prepare a community plans supplementary planning document etc., is this not only an</p>	Agree - para 6.3 indicates the possibility of the Council preparing an SPD covering relevant parts of Parish Plans (once the DPDs are complete), subject to the requirements listed in para 6.4. The Council will undertake

Name	Comment	SLDC Response
	<p>opportunity to show parish plans will be taken into account when preparing the L.D.F. but also to show some evidence that parish councils/ parish plans/quality parishes have some status by including any relevant findings from these sources in a S.P.D.</p>	<p>this exercise where land use planning issues have been raised by Parish Plans and they cannot be adequately addressed in the main Development Plan Documents. No change.</p> <p>See also responses to representations on para 6.4 below.</p>
<b>Section of Document: 6.4</b>		
Urswick Parish Council	<p>Objecting 6.4</p> <p>If these requirements are to be met by any parish council in order to obtain a S.P.D. it would seem to be a very daunting task as these requirements are vague and not easy to interpret.</p>	<p>Agree that requirements are demanding, but they are statutory requirements of the new planning system. It is recognised that the resource implications would be challenging both for Parish Councils and the District Council. This is why para 6.3 sets out the alternatives of the Council possibly preparing a single SPD for Parish Plans, or preferably, for all Parish Plans to be endorsed as part of the South Lakeland Community Strategy. This way all community issues can be addressed rather than solely land use planning matters.</p> <p>No change (See also response at para 6.3 and to Mr Ray Wilson at para 6.4)</p>
Mr Ray Wilson	<p>Objecting to an omission 6.4</p> <p>The preparation of a Parish Plan requires considerable effort and a significantly desired outcome from that effort is to ultimately achieve Supplementary Planning Document status. Whilst the bullets in this SCI may be acceptable, they should additionally be related to both a more detailed SLDC document on the topic, and associated with an appreciably stronger commitment to further advice and help than currently appears in this section. SLDC's commitment to Parish Plans and to supporting those involved in their preparation, appears weak and inadequate.</p>	<p>Para 6.3 refers to the possibility of an SPD relating to Community/Parish Plans being prepared by the Council (once the main DPDs are complete) as resources are limited for advising on the preparation of individual Parish Plans as SPDs. Para 6.3 also recommends the preferred alternative of Parish Plans being endorsed as part of the South Lakeland Community Strategy. This way all community issues can be addressed rather than solely land use planning matters.</p> <p>SLDC has a protocol outlining a network of officer advice and information available to assist with the preparation of Parish Plans. This is to be reviewed shortly in consultation with CALC and VAC.</p> <p>No change.</p>

**Section of Document: Appendix B A Spectrum of Community Engagement**

Name	Comment	SLDC Response
South Lakeland Friends of the Earth	Objecting to an omission Appendix B ('Inform') No mention is made of accessible education material on the planning process itself. FoE considers that this should be available.	We will research education material available, and add relevant information sources to para 1.11 ('Planning Aid and Further Help').
Government Office for the North West	Objecting to an omission Appendix B This is a commendable and excellently clear statement of commitment and deserves more prominence, for example by being displayed as a text box near the front of the main document. It is not clear, however, how the Council can place 'final decision making' in the hands of the public - surely the Council itself is the 'final' decision making body?	While Appendix B sets out the potential range of 'goals' of consultation, para 2.5 explains where the Council's emphasis will lie i.e. 'information' 'involvement' and 'consultation'. The table in Appendix B will be included in Section 2, if practicalities of report presentation and implications for re-numbering of appendices permit.
<b>Section of Document: Appendix C Consultees</b>		
Kirkby Lonsdale & District Civic Society	Objecting Does SLDC really have the resources to consult with such an enormous range of interests? If it does, how will it reconcile differences of opinion?	Para 3.8 notes that relevant representative groups will be selected when designing consultation exercises. This will not necessarily involve all of those listed in Appendix D in each case. The issues of resources relates more to the method of consultation than number of consultees. Sending proposals to all relevant groups is within the Council's resources. Differences of opinion are inevitable and recommendations will be made when all view points have been taken into account, in the light of current policy and the sustainability appraisal. No change.
Aggregate Industries UK Ltd	Objecting to an omission Appendix C It is vital that the Council consults properly with all business rate payers. The Quarry Products Association should also be consulted.	Appendix C is a list reproduced from PPS12. Amend Appendix D and LDF database to include Quarry Products Association. Business rate payers will be consulted through representative bodies (listed in 3.9 and Appendix D) and also as part of the wider public. It is considered impracticable to consult all business rate payers individually.
Mr Ray Wilson	Objecting to an omission Appendix C As a subsection of 'Environmental groups at national, regional and local level including:' it is relevant to include Cumbria RIGS Group. (Regionally Important Geological and Geomorphological Sites).	Agree - include RIGS in Appendix C

Name	Comment	SLDC Response
	<p>PPS 9 acknowledges the role of RIGS.</p> <p>1 Cumbria RIGS Group are already recognised by Cumbria County Council in the designation process for the county's geological assets.</p> <p>2 It would be inconsistent with PPS 9 not to include this group.</p>	
Federation of Cumbrian Amenity Societies	<p>Objecting to an omission Appendix C</p> <p>Local public transport user groups e.g. Lakes Line Rail User Group should be added to the list, or are they only needed in Appendix D.</p>	Appendix C is a copy of PPS12 Appendix E. It is listed appropriately in Appendix D. No change.
Cumbria Constabulary	<p>Objecting to an omission Appendix C</p> <p>Would wish to see Cumbria Constabulary highlighted and included as an organisation for consultation.</p>	Agree - amend Appendix C to refer to Cumbria Police, Cumbria Fire Service and Cumbria Ambulance Service - specifically rather than generically as 'rescue' services. Also amend Appendix D to list Cumbria Police in relation to 'Community Safety Organisations'.
Cumbria Tourist Board	<p>Objecting to an omission Appendix C</p> <p>Listing of Cumbria Tourist Board as a consultee in Appendix C</p>	Appendix C is a copy of PPS12 Appendix E. Cumbria Tourist Board is listed in Appendix D - no change.
Northwest Regional Development Agency	<p>Supporting</p> <p>We welcome the Agency's inclusion in the list of 'Specific Consultation Bodies' at Appendix C of the Draft Statement of Community Involvement (SCI). This accords with the Town and Country Planning (Local Development)(England) Regulations 2004 and Annex E to PPS12.</p>	Noted
English Nature	<p>Supporting Appendix C</p> <p>English Nature is pleased to be listed as a relevant organisation to the South Lakeland LDF, and we support the inclusion of the other environmental groups as also being relevant.</p>	Noted - no change
The Theatres Trust	<p>Objecting to an omission Appendix D</p> <p>The Threatres Trust is a Non Departmental Advisory Abody and a statutory consultee on planning applications that affect land on which there is a theatre and was established by The Theatres Trust Act 1976 'to promote the better protection of theatres'.</p>	Agree - Theatres Trust to Appendix D and LDF Consultee database (as noted earlier in response to English Heritage).

Name	Comment	SLDC Response
	<p>We note your list of consultees in Appendix C and D and are disappointed the The Theatres Trust is not listed. We appreciate that SCI's should be concise, and not overly prescriptive, and that you should not be producing a long list of names (as these would change too quickly). Nevertheless, as we are not included in Appendix D, the SCI should explain about your 'free-standing' register, and how you intend to keep it up to date, and that The Theatres Trust is included.</p>	

**Section of Document: Appendix D South Lakeland's Community Interests**

English Heritage - North West Region	<p>Objecting to an omission      Appendix D</p> <p>As a statutory consultation body at other stages in the preparation of Development Plan Documents, as well as certain planning applications, we welcome the opportunity to make general comments on the SCI.</p> <p>In view of our remit, outlined below are a set of general principles which we suggest are reflected in the SCI.</p> <p>- Environmental Quality in Spatial Planning: Incorporating the natural, built and historic environment and rural issues in plans and strategies: Guidance to help in preparation of Regional Spatial Strategies and Local Development Frameworks was published in June 2005 jointly by the Environment Agency, Countryside Agency, English Nature, and English Heritage. The guidance also strongly endorses the value of wider community engagement in the planning process. With regard to this wider engagement, the statutory and non governmental organisations within the heritage sector that the agencies recommend are included in the planning process are: CABE, Ancient Monuments Society, Council for British Archaeology, Society for the Protection of Ancient Buildings, The Georgian Group, The Victorian Society, The Twentieth Century Society, Garden History Society, The National Trust, Local Civic/Amenity Society, Local Building Preservation Trust, Local Archaeological and Antiquarian Societies, and local history societies. We encourage the close involvement of your own conservation staff (including the county archaeologist) in the consultation process and in the preparation of Development Plan Documents, as well as your Heritage and Design Champions.</p>	<p>Amend Appendix D (and LDF consultee database) to include list of organisations proposed, including local authority consultees - including SLDCs Heritage and Design Champion.</p>
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Name	Comment	SLDC Response
Cumbria Joint Agency Gypsy and Traveller Strategic Planning Group	<p data-bbox="987 156 1128 183">Appendix D</p> <p data-bbox="622 204 1417 296">1. Should the document include a reference to the need to consider the needs of migrant or incoming worker who are often of ethnic origin?</p> <p data-bbox="622 333 1395 426">The hotel and restaurant business would be in dire straits if it was not for the Eastern European workers this season. The health service are recruiting abroad...to name but two.</p> <p data-bbox="622 462 1395 715">Should there be a reference of the need to cater for Gypsies and Travellers who visit South Lakes. It is not really ok to say that this is a small problem for only a small part of the year. The unauthorised encampments are evidence of need and by ignoring the issue we are also ignoring the often negative interact between Gypsies and Travellers and the local community and thus SLDC would be failing under the Race Relations act to promote good relationships between people of different race.</p> <p data-bbox="622 751 1406 1069">2.The table only says for Black and minority ethnic minorities....as defined by the census. The census does not separate out Gypsies and travellers who are one of the most significant minority ethnic groups in Cumbria. Should they appear separately? Hard to reach is now a generally unacceptable term. There is nothing hard about reaching people...you just have to visit them..the difficulty is within the organisation. The census is now very out of date and unreliable? What about ethnic minority visitors and migrant workers? The Audit Commission BME Area Profiles project might help.</p> <p data-bbox="622 1106 1384 1262">3. Audit Commision BME Area Profiles project might help. What about the Multi-cultural Forum at Barrow?..they support BME county wide and not just in Barrow. What about AWAZ...a Newly formed group run by BME for BME. See their web site <a href="http://www.AWAZ.info">www.AWAZ.info</a></p> <p data-bbox="622 1299 1375 1453">4. How are you going to contact Gypsies and travellers in South Lakes.You could try through Joint Agency Group that Mark Richardson (SLDC)is involved with. Within MME communties we know there are special issues with elderly people women.</p>	<p data-bbox="1469 156 2069 217">Amend Appendix D to include reference to migrant workers, gypsies and travellers.</p> <p data-bbox="1469 221 2141 282">Retain the term 'hard-to-reach' since it is used in national planning guidance.</p> <p data-bbox="1469 287 2069 347">Include BME Area Profile information and Cumbria Attitudes survey in para 2.9.</p> <p data-bbox="1469 352 2107 413">Include AWAZ and Joint Agency Group in Appendix D and LDF database.</p>

Name	Comment	SLDC Response
Furness Greenways Partnership	<p data-bbox="622 156 1429 247">5. What about using the Cumbria Attitudes survey...see County Council web site, and the results of the BME research project just available</p> <p data-bbox="622 284 1429 746">Objecting to an omission      Appendix D - Communities of interest should include reference to sustainability in all aspects of development, for energy conservation, energy generation, use of environmentally friendly materials, green transport and waste minimization. Relevant points of contact would be South Lakeland Friends of the Earth, Cumbria Greenbuild and Ulverston Eco-housing Support group. This would be in addition to the contribution to design by in-house specialists, external consultants and regional government initiatives. I believe that sustainability should be central to all developments and not seen as a minority interest. There has to be a rethink of patterns of development, the style of buildings and the materials used. The current document contains no reference to this increasingly relevant theme.</p> <p data-bbox="622 783 1429 906">With my Greenways chairman's hat on, clearly the provision of non-motorized routes for travel-to-work/school and leisure should be the subject of local consultation and central planning, not a retrospective add-on.</p>	<p data-bbox="1469 284 2141 539">Amend Appendix D to include category for local organisations with an interest in aspects of sustainable development, listing those organisations suggested and adding to LDF database. The issue of sustainability will be at the heart of subsequent LDF documents. The SCI, as a procedural document sets out how Sustainability Appraisal will form part of the public consultation process (para 3.4).</p>
Mr Ray Wilson	<p data-bbox="622 943 1413 975">Objecting to an omission      Appendix D</p> <p data-bbox="622 991 1413 1118">Cumbria RIGS Group are relevant as a South Lakeland community group for inclusion in Appendix D, perhaps in subsection 'Biodiversity and Nature Conservation Organisations'. Argument as presented for Appendix C.</p>	<p data-bbox="1469 943 2085 1007">Agree - Amend Appendix D to include RIGS under Biodiversity and Nature Conservation Organisations.</p>
South Lakeland Leisure	<p data-bbox="622 1155 1402 1187">Supporting      Appendix D</p> <p data-bbox="622 1203 1402 1390">I would just ask that consideration be given to the involvement of South Lakeland Leisure (SLL) or impact contribution SLL may be able to make and Families with reference to Young Adults 18-24, Rural Young People and Adults, Young Children a Families with Young Children, People with disability, Health Services and Organisations promoting Health and Well Being, Arts `and Culture</p>	<p data-bbox="1469 1155 2114 1246">Agree - amend Appendix D to include South Lakeland Leisure in relation to categories of community interests listed.</p>

Name	Comment	SLDC Response
South Lakeland District Council (Lyth Valley)	<p>Objecting to an omission      Appendix D</p> <p>Under Annex 'D' I think we should also consult with the RFU and FA as both run youth programs linking clubs and schools and for the self employed The Chamber of Trade for each area Kendal Ulverston etc.</p>	<p>Agree - amend Appendix D to include RFU and FA in relation to young people and repeat references to the various Chambers of Trade in relation to the self-employed.</p>
Stagecoach-in-Cumbria	<p>Supporting</p> <p>Support - no comment</p>	<p>Support noted.</p>
South Lakeland Friends of the Earth	<p>Supporting</p> <p>SL FoE are pleased that SLDC are making efforts to communicate with hard to reach groups, especially with young people and young adults and we hope they will persist and have success with these groups.</p>	<p>Noted.</p>
Cumbria Rural Enterprise Agency	<p>Objecting to an omission      Appendix D</p> <p>CREA should be included as representing interests of businesses of all sizes (P29). Small to medium sized businesses and agricultural businesses are described as hard to reach. Whilst we concede they do not have a clear single representative body, CREA works with hundreds of rural businesses annually as well as having contact with over 1500 farming businesses through its farm advisory programme, and can therefore respond authoritively on their behalf.App. D Cont. Additionally, no account has been taken of businesses which employ fewer than 5, often the “self employed”. Microbusiness support is a particular feature of our programmes thereby having a knowledge and understanding of their needs.</p>	<p>Agree - amend Appendix C to list Cumbria Rural Enterprise Agency as a body representing enterprises with less than 5 employees; the self-employed; and enterprises with less than 20 employees and those with more than 20 employees.</p> <p>Page 28 includes a category for enterprises with less than 5 employees.</p>
Morecambe Bay Primary Care Trust	<p>Objecting to an omission      Page 29</p> <p>Please omit Morecambe Bay Health Promotion - this is covered by the Morecambe Bay Primary Care Trust</p>	<p>Omit Morecambe Bay Health Promotion from page 28.</p>

Name	Comment	SLDC Response
Government Office for the North West	<p>Objecting to an omission      Appendix D</p> <p>Would be more easily navigable if its 'communities of interest' could be more clearly organised, for example in thematic sections.</p>	<p>Noted but propose no change as table was originally developed on basis of identifying as many relevant interests as possible, avoiding prescriptive themes.</p>
Eden District Council	<p>Supporting</p> <p>Whilst this Appendix is very useful, it may be a little too prescriptive in its present form to be part of the document (as the groups listed within it may be subject to change).</p> <p>Either some acknowledgement that this is not a definitive list (and may change over time) or possibly including it as a separate attachment that you can update when required might help lengthen the life of the SCI.</p>	<p>Agree - amend both para 3.8 and Appendix D to note that the list is not definitive and may change over time.</p>
<b>Section of Document: Appendix F Summary of Statutory Requirements for Consultation on LDF Documents</b>		
South Lakeland Friends of the Earth	<p>Objecting</p> <p>FoE considers that paper copies should be available free of charge. Even a modest charge could discourage people, especially those from hard to reach groups, from responding.</p> <p>It is also discriminatory to charge for information which is available for free on the www.</p>	<p>No change - statute permits Councils to charge for paper documents and the Council has done so for current planning documents for a number of years, with no apparent problems for those who have inquired. Providing paper copies of plans can add significant costs to the Council, while web-based information does not (after initial set-up).</p>