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## The Wokingham Society

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6 December 2018

Dear Sir/Madam

### **Consultation on Statement of Community Involvement**

I am responding to the consultation about the revised draft Statement of Community Involvement on behalf of the Executive Committee of the Wokingham Society. Our points are more easily made in this form rather than by completing the online questionnaire.

#### **General:**

1. It is difficult to determine what text relates solely to this consultation and what will comprise the final document when adopted. We will address the whole document in the absence of clarity.
2. The use of the term 'Statement of Community Involvement' for both this policy document and the evidence of consultation that accompanies a planning application is confusing. Since the former is required by law, could another description be found for the latter, eg 'Evidence of Community Involvement (ECI) or Statement of Community Consultation (SCC)?
3. Paragraph 6.6 urges developers not to engage in a 'tick-box' exercise. Since this criticism has been levelled at the Council in respect of its own consultations (and still continues – see the consultation on *Proposed Vision and Priorities* which frequently asked 'Do you...?') we urge that a commitment by the Council to try and avoid such exercises be included in the general text, eg in section 2 'Wokingham's approach to consultation'.

#### **By paragraph:**

1.4 The document not only sets out how the Council consults but also describes what planning applicants need to do to consult the community. We urge that words to this effect be added to this paragraph.

1.5 This describes the Council's purview but not a planning applicant's responsibility. We suggest the paragraph be reworded to say:

In line 2 – 'how we and planning applicants seek to find out what you think.'

In line 4 – 'in the preparation and consideration of planning applications'.

2.1 In line 6 remove the comma after 'engagement' to clarify that it assists choices rather than making decisions difficult.

2.2 In line 5 it should be 'includes' since 'community' in line 4 is singular.

2.3 Since developers/landowners proposing major and large scale developments are 'required' to (6.2 Figure 7: Pre-application stage), or told they 'must' (6.3) consult the local community, the word 'expects' in line 1 understates the need for consultation at that level. We suggest that line 1

should read:

‘WBC looks for its duty to engage the community in planning matters to be matched...’

3.5 Line 2 refers to ‘made’ Neighbourhood Plans. The inverted commas indicate that this is a specialised term and we suggest you define it, eg ‘(adopted)’.

4.2 The first sentence is confusing since it is not clear what ‘however’ refers to. We suggest that this is really two sentences, ie put a full stop after ‘Local Plan’ in line 2 and begin line 3 as a new sentence ‘However...’.

6.2 This paragraph describes the basic expectation in respect of a domestic planning application, but does not state the onus on developers/landowners to consult the local community in respect of major and large scale plans. We suggest a second sentence be added saying: ‘For major and large proposed developments applicants need to consult more widely among the local community’.

Figure 7: The last line of the fourth panel, headed ‘Determination’ uses the word ‘listed’ but does not explain it. We suggest this should read ‘...Applications being ‘listed’ (ie required to be put to the Committee) by local Councillors.’

6.7. The table refers to ‘Medium’ developments, a term not used elsewhere. Should this not be ‘Major’, which is the word used and then defined in Table 5 and Appendix 2?

Since public engagement is a requirement for major and large scale development, we would like to see a statement to the effect that ‘failure to engage in such engagement is likely to jeopardise an application when it is considered for determination’.

6.12-6.14. Section on ‘How will we use your comments?’

It needs to be made clear that this section refers to comments submitted to the planning authority, and not those made to developers in response to their own public consultations. We suggest that the heading in white text on a red background be amended to read: ‘The written comments that are made to the Council on a planning application....’

Yours sincerely

A handwritten signature in black ink that reads "Peter Must". The signature is written in a cursive style with a long horizontal stroke at the end.

Peter Must  
Chairman