

**Oldham Metropolitan Borough Council**

**Local Development Framework**

**Public Schedule of Representations  
and Responses Report  
for the Pre-Submission Public Participation  
Draft Statement of Community Involvement**

**September 2006**

Schedule of comments received on the Oldham Metropolitan Borough Council Pre-Submission Draft Statement of Community Involvement (Regulation 26 version) and the Council's responses.

Where a Representor has made more than one comment on the Draft Statement of Community Involvement these have been recorded separately.

The following abbreviations are used in this document:

LDF – Local Development Framework

LDS – Local Development Scheme

LDD – Local Development Document

DPD – Development Plan Document

SPD – Supplementary Planning Document

SCI – Statement of Community Involvement

RSS – Regional Spatial Strategy

PPS12 – Planning Policy Statement 12 “Local Development Frameworks”

EqIA – Equalities Impact Assessment

**Countryside Agency**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	<p>The SCI is unlikely to affect any of the Agency's Landscape, Access or Recreation interests and therefore we have no specific comments to make. However, we do, of course, support and encourage effective community involvement within the planning system, including 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. Local planning authorities are therefore encouraged to look at how they can successfully engage communities on these issues, and reflect this in the SCI. The Agency strongly supports community-planning initiatives, which we consider an essential part of good planning. We therefore support, for example, Village Design Statements and Concept Statements and are interested in incorporating these where possible in the new planning system. The Agency's publications 'Village Design Statements', 'Town Design Statements' and 'Concept Statements' may be of assistance to you in enabling community planning initiatives.</p>	Noted.

**Environment Agency**

<b>Nature of</b>	<b>Summary of representation</b>	<b>Council's response</b>
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<b>representation</b>		
Supporting	Environment Agency is pleased to be listed under the “specific consultation bodies”.	Noted.
Other	Environment Agency is keen to be involved in early consultation on both the DPDs and SPDs, starting in the pre-production stage.	Noted.
Other	Environment Agency encourages pre-application discussions so that any applications can be dealt with more efficiently and specific requirements met. Where site constraints are identified which are relevant to the Agency, particularly with regard to flood risk (when a flood risk assessment may be required) or environmental permits or consents may be required, the applicant should be encouraged to contact the Agency at an early stage. The Agency would welcome the opportunity to participate in any relevant pre-application meetings or discussions.	Paragraph 6.4 already encourages developers to discuss their proposals with “specific consultation bodies”, where appropriate.
Other	The Agency supports feedback on planning applications. Where the Agency have made comments on a planning application, a decision notice will be required to monitor the inclusion of objections and conditions.	Noted.
Other	Section 6 – Consultation on planning applications highlights the methods of community involvement and particular attention is drawn to pre-application discussions on significant planning applications. The Agency would be pleased to attend any focus groups and consultation panels meetings where there are issues on a large scale and also in the	Noted.

	stakeholder group which is mentioned in paragraph 4.35.	
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### Highways Agency

Nature of representation	Summary of representation	Council's response
Supporting	Confirms that the Highways Agency is satisfied with the content of the SCI as currently set out.	Noted.

### Derbyshire County Council

Nature of representation	Summary of representation	Council's response
Other	No specific comments to make at this stage, but would like the opportunity to comment on subsequent LDF documents as and when they are produced.	Noted.

### Northwest Regional Development Agency (NWDA)

Nature of representation	Summary of representation	Council's response
Other	Appendix 2 of the Draft SCI lists the specific consultation bodies that will be consulted during the preparation of LDDs which includes a generic reference to Regional Development Agencies which reflects the wording of PPS12. For clarity, we suggest that this generic reference is replaced with a more specific reference to the relevant RDAs, which for Oldham are the NWDA and Yorkshire Forward.	It is not considered appropriate to amend Appendix 2 as requested. The wording for the "specific consultees" in Appendix 2 of the Draft SCI is based on the wording in PPS12. The requirement is to consult with "a Regional Development Agency whose area is in or adjoins the Borough", which in Oldham's case includes not just the NWDA and Yorkshire Forward as referred to by the NWDA, but it also includes the East Midlands Development

		Agency. The LDF mailing list already contains the details of the three relevant Regional Development Agencies.
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### Yorkshire Forward

Nature of representation	Summary of representation	Council's response
Other	No specific comments to make on the SCI, but are pleased that Appendix 2 recognises "Regional Development Agencies whose area adjoins the Borough" as specific consultation bodies. Wish to be notified of the final adoption of the SCI.	Noted.

### National Grid

Other	Having reviewed the document the National Grid have no specific comments to make but would like to take the opportunity to emphasise the role of National Grid and to highlight areas and issues where we feel consultation with national Grid would be appropriate in future Development Plan Documents.	Noted.
Other	National Grid believes that as an important stakeholder we should be involved in the preparation, alteration and review of relevant Development Plan Documents which may affect our assets including policies and plans.	National Grid is already on the LDF mailing list of consultees and will be notified about future public consultations at the appropriate times.
Other	National Grid also want to be consulted on significant planning applications which may affect our assets.	Noted.

Other	Requests that National Grid is kept informed on the production of the Local Development Framework.	National Grid is already on the LDF mailing list of consultees and will be notified about future public consultations at the appropriate times.
Other	Please consult National Grid on any Development Plan Document or site-specific proposals that could affect our assets.	National Grid is already on the LDF mailing list of consultees and will be notified about future public consultations at the appropriate times.
Other	Please add our details to the internal database.	National Grid is already on the LDF mailing list of consultees.

### **Oldham Primary Care Trust (PCT)**

Please Note: The PCT provided a response based on the questions that were asked in the Draft SCI comments form. However, some of the PCT replies were confusing. Further clarification was sought but has not been forthcoming. The summaries below are therefore a summary only of some of the points raised by the PCT.

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	Para 3.28 refers to Local Strategic Partnership – and elsewhere to the Oldham Partnership? Its not clear	The Local Strategic Partnership for Oldham Metropolitan Borough is called the “Oldham Partnership”. This is explained in para 3.9.
Supporting	The role of the thematic partnerships in engagement/involvement is crucial, as is the Community Network. The link to the Community Engagement Framework is also essential. Presented a complex network of relationships with clarity and explained accountabilities therein.	Noted.
Other	The SCI doesn't seem to indicate that the PCT needs to be consulted. Is this correct?	Appendix 2 lists the statutory consultees that will be consulted about the LDF and is based on PPS12. The PCT is not listed as a statutory consultee in

		PPS12. However, the PCT is included on the LDF mailing list and will be notified of future consultations on LDDs, where relevant.
Other	Shouldn't the review (of the SCI) go through to the Oldham Partnership?	The SCI is the responsibility of Oldham MBC, not the Oldham Partnership. Therefore, it is not appropriate for any future reviews of the SCI to be approved by the Oldham Partnership, although the Partnership as a consultee will have the opportunity to comment on any future review.

#### **Government Office for the North West (GONW)**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	All GONW comments made at the Regulation 25 stage have been satisfactorily addressed.	Noted.
Other	The issue to draw attention to is that the references to ODPM on pages 35 and 42 will need to be updated to refer to the Department for Communities and Local Government.	Noted. The references will be updated to reflect the new Government departmental name.

#### **Manchester Airport plc**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	Although Sections 1 and 2 do not make it clear how the community can become involved in the planning process, the sections do however clearly encourage community involvement and outline the new planning framework clearly and concisely.	Noted.
Supporting	Supports the Vision.	Noted.



Objecting	Paragraphs 3.8-3.30 – The fact that the Council has three documents all with the aim of engaging the local community in the decision making process is confusing and not user friendly. Consultation arrangements and information on community engagement should be contained in one document which is easy to understand and is easily accessible.	The SCI is a planning-related document indicating how the Council will engage the community in the LDF and planning applications, which the Council is legally obliged to prepare under the Planning and Compulsory Purchase Act 2004. The Community Strategy is an Oldham Partnership document, not an Oldham MBC document. The production of this Strategy is a legislative requirement of the Local Government Act 2000 and assesses the environmental, economic and social challenges and opportunities facing the Borough. Each of the plans/initiatives serves a different purpose and there are separate legal requirements under which the SCI and Community Strategy are prepared which means that they cannot be combined into a single document. The Area Plans and Action Plans are prepared by Oldham MBC Area Committees and cover more than just land-use matters, although there may be elements of complementarity with the Community Strategy. These plans have no statutory requirement and no formal planning status. The Community Engagement Framework, which is now being transformed into a Community Engagement Strategy, is an Oldham Partnership document.
Objection	The SCI clearly explains the new system, however too much emphasis is given to the technical processes prior to the adoption of the documents (such as Sustainability Appraisal and Strategic Environmental Assessment).	One of the roles of the SCI is to explain how the community will be engaged in the new planning system, including its various processes. It is therefore necessary and appropriate to make reference to the role of Sustainability Appraisal and

		Strategic Environmental Assessment, and the level of content in the Draft SCI is considered appropriate.
Other	Paragraphs 4.25-4.29 – The SCI could make it more clear that the groups listed (in paragraphs 4.25-4.29 and Appendix 2) are those which the Council has identified within the community and the Council welcomes views and comments from all members of the community.	The groups identified in the Draft SCI are either specified in PPS12 or identified by the Council through its Consultation Strategy. This is not a prescriptive list of individuals or organisations that can comment on the LDF; Oldham MBC welcomes comments on the LDF from all sections of the community.
Other	Paragraph 4.34 - Strongly supports the inclusion of minimum consultation methods to be used for all LDDs. This enables the community to clearly see how and where information is available on emerging planning policy. Table 2 on the other hand does little to add certainty to the consultation methods of each of the LDDs and therefore raises the question of whether it is a necessary component in the SCI.	Para 4.34 outlines the minimum consultation methods that will be used for all LDDs, which in themselves exceed the minimum standards set out in the Town and Country Planning (Local Development) (England) Regulations 2004. Table 2 also identifies those other methods that may be used as part of the consultation process for the various LDDs. These are included as possible options for future consultations. The consultation methods used, over and above the minimum, will be dependent upon the type of LDD and its subject content, and will also be dependent upon the resources – staff and financial – available at the time. It is not appropriate to be too prescriptive at this time, although it is appropriate to include these methods within the Table so that they may be available for use in the future if resources permit.
Other	Table 3, by displaying all possible consultation methods does not provide the community and other bodies with the certainty necessary to encourage	Table 3 expands on the contents of Table 2 and therefore is appropriate to include for the same reasons stated above.

	participation.	
Objecting	The SCI does not explain enough about how the views of the community will be used, not just in the preparation of the SCI but across the whole planning framework.	Section 5 details the reporting back procedures for consultation exercises undertaken on the LDF.
Objecting	The SCI also fails to state why community involvement is important and what benefits consultation can bring to a community – this will provide enthusiasm for people to get involved.	An new paragraph (2.3) has been added to indicate why the community involvement is important to the planning process.
Objecting	Table 4 could be adopted to show more clearly the consultation methods to be used for each type of planning application – not just for major applications as currently indicated. Much of Section 6 is very “wordy”, so a table which can quickly and clearly show how and where information will be displayed would help simplify things.	Noted – the table is intended to relate to significant/major applications only.
Other	The SCI does not provide much detail as to where additional resources will come from (particularly financial resources). However, this will not be a major concern for the majority (more of an issue for the Council) provided there are community involvement procedures and facilities in place.	It is not appropriate for the Draft SCI to deal with financial matters relating to the LDF. It is important to note however that the Council has a budget for preparing the LDF which includes an element for undertaking consultations. Also it is important to recognise that as the LDF will be the “spatial expression” of the Community Strategy then there will also be opportunities to dovetail community involvement procedures to maximise response rates and to avoid consultation fatigue.
Objecting	The SCI goes some way to explain why and how monitoring will take place, but more information on the likely timescales involved would also be a useful	Section 9 outlines the approach to monitoring. It explains that the AMR, which is published annually, will provide details of the consultations undertaken

	addition.	and will evaluate these in terms of resources used, response rates and expected outcomes. The AMR has to be published by December of each year and relates to the previous financial year.
Objecting	Feels that the important role the airport plays as safeguarding authority (under Circular 1/2003) is not sufficiently recognised within the SCI. Would prefer for Manchester Airport plc should be specifically mentioned rather than being cast under the “Airport Operators” umbrella or that of the Civil Aviation Authority, as the airport is a specific consultation body.	The term “Airport Operator” is taken from PPS12. Manchester Airport plc is not defined as a “specific consultation body”. It is appropriate to include the generic term rather than specifically refer to Manchester Airport plc as there may well be occasions when it is both necessary and appropriate to consult with other airports in the region besides Manchester Airport plc. Manchester Airport plc is already included on the LDF mailing list of consultees and will be notified about future public consultations at the appropriate times
Objecting	Feel that a list of consultees for the Local Development Framework process would be useful, in addition to the list of consultees for planning applications provided in Appendix 2. Also requests that Manchester Airport plc be added to the new list as a specific consultation body.	Appendix 2 is a list of the consultees on the LDF. The Appendix has been expanded to include a list of consultees on planning applications.
Objecting	Wants some amendments regarding pre-application consultations to further enhance the SCI. At present there is no information detailing how pre-application consultation will work in practice. As a statutory consultee for aerodrome safeguarding, the airport is happy to offer its expertise and advice for pre-application consultations. The Draft SCI provides a vague and inconclusive description of the process of	The section relates to pre-application discussions, and encourages developers to discuss proposals with consultees before submitting planning applications. It does not specify what should take place. Para 6.4 has been revised to refer to the benefits of early discussion.

	<p>pre-application consultation, and it is difficult to determine what would be required from both developers and consultees. Detailed guidelines for the process of pre-application consultation should be provided in the SCI and contain guidelines for developers and agents. The guidelines should include what will be required of all parties and how responses should be presented in order to add structure and clarity to the process. The SCI could do more in setting out the benefits of pre-application consultations in terms of speeding up the planning process and producing better planning decisions.</p>	
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**Centre for Hydrology and Ecology**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	<p>As the Centre for Hydrology and Ecology has few links with the area may I request that our details be removed from your mailing list in the interests of natural resources conservation.</p>	<p>The Centre for Hydrology and Ecology is listed as an "other consultee" under PPS12 that local planning authorities should consult where appropriate, and hence is included within Appendix 2 of the Draft SCI. It is noted that the Centre for Hydrology and Ecology wish not to be consulted on any further documents relating to the LDF, however where considered appropriate the Council maintains that an organisation with expertise in specialised areas such as the Centre for Hydrology and Ecology may be a useful consultee. The Council therefore wishes to retain the possibility of consulting on relevant issues where appropriate and proposes to retain the Centre</p>

		for Hydrology and Ecology on the LDF mailing list.
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### Equal Opportunities Commission

Nature of representation	Summary of representation	Council's response
Other	The Equal Opportunities Commission was set up under the Sex Discrimination Act 1975 to work towards the elimination of sex discrimination and to promote equality of opportunity between men and women. It will not be necessary for the Equal Opportunities Commission to see further documents relating to the LDF.	The Equal Opportunities Commission is listed as an "other consultee" under PPS12 that local planning authorities should consult where appropriate, and hence is included within Appendix 2 of the Draft SCI. It is noted that the Equal Opportunities Commission wish not to be consulted on any further documents relating to the LDF, however where considered appropriate the Council maintains that an organisation with expertise in specialised areas such as the Equal Opportunities Commission may be a useful consultee. The Council therefore wishes to retain the possibility of consulting on relevant issues where appropriate and proposes to retain the Equal Opportunities Commission on the LDF mailing list.

### Health and Safety Executive

Nature of representation	Summary of representation	Council's response
Other	The SCI has been forwarded to the Health and Safety Executive Manchester office for reply.	Noted. No further response received.

### National Trust

Nature of representation	Summary of representation	Council's response

Other	<p>Paragraph 4.26 - As with other SCIs assessed by the National Trust there is uncertainty as to how the words “where appropriate” will be interpreted in practice. What the Council may deem to be appropriate might not accord with the views of potential consultees. Indeed unless the Council has perfect knowledge of the expertise and interests (including ownership) of the myriad consultees listed it is highly likely that consultation will not match expectation. This can be overcome by either sending a short questionnaire to all those on the Council’s database asking which LDS documents they wish to be notified about; or ensuring that all those on the database are sent a consultation letter at the outset of the production of each new document.</p>	<p>The Council has already undertaken the task that the National Trust suggests. As part of the preparation for the LDF, the Council wrote to all individuals and organisations, apart from statutory consultees identified in PPS12, on both the UDP mailing list and the UDP Database (of people who had commented on the UDP review) asking whether they wished to be informed about the LDF process and, if so, which types of documents and which parts of the Borough that they wish to be notified of. This process formed the basis for creating the LDF mailing list.</p> <p>The Council also included a flyer within the Spring 2006 edition of the Voluntary Action Oldham newsletter which is sent to approximately 800 voluntary, community and faith groups informing them about the LDF and how they could be added to the LDF mailing list if they wanted to.</p>
Other	<p>Section 6 – Although the National Trust has property interests in the Council’s area these are largely land, rather than building, based. It is unclear how they will receive notification of relevant applications, and Site Notices are unlikely to be picked up by Trust staff within the necessary time limits. The Trust can provide information about the extent of its ownerships in plan form if this would assist, and potentially this could be provided in the form of a GIS layer.</p>	<p>Notification of planning applications is undertaken in accordance with advice in Circular 15/92: Publicity for Planning Applications, and includes a range of publicity measures such as individual letters, site notices and advertisements in the press. It is not possible to maintain an up to date record of land ownership, nor is it appropriate to make exceptions, for specific landowners, to the general approach.</p>

### Greater Manchester Police (GMP)

Nature of representation	Summary of representation	Council's response
Supporting	Architectural Liaison Unit wishes to continue to receive consultation documents particularly related to planning applications. Please note that GMP does not employ crime prevention design advisors.	Noted.

### Greater Manchester Passenger Transport Executive (GMPTE)

Nature of representation	Summary of representation	Council's response
Other	It is unfortunate that the GMPTE is not included in the list of "specific consultation bodies" listed in Appendix 2. It is assumed that the Council was guided by the Planning and Compulsory Purchase Act 2004, and that therefore it cannot be included. Please can you clarify whether this is the case?	The "specific consultation bodies" listed in Appendix 2 of the Draft SCI are taken from the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004.
Supporting	Although it is disappointing that Passenger Transport Executives are not statutory consultees, it is welcomed that they are included in the list of "other consultees" in Appendix 2. It is recognised that Oldham MBC has a good track record of consulting GMPTE on planning issues and it is anticipated that this will continue.	Noted.
Other	Paragraph 4.30 – It is assumed that the LDF mailing list referred to in this paragraph includes all organisations listed in Appendix 2. It would be useful to cross-refer to Appendix 2 in paragraph	All the bodies listed in Appendix 2 are on the LDF mailing list. A cross reference has been added as requested.



	4.30.	
Supporting	Paragraph 6.13 - GMPTE welcomes the web based/electronic initiatives such as the online planning applications resource.	Noted.
Other	Paragraph 6.4 – The section about pre-application discussions is welcomed. It is important for GMPTE to be involved at the pre-application stage on major applications as this provides the opportunity to advise a developer of the need for public transport improvements and to secure changes to the layout or developer contributions to public transport infrastructure or services. It is suggested that paragraph 6.4 is amended to the effect that pre-application discussions may need to take place with specific infrastructure or service provides such as GMPTE.	There are many consultees and it is inappropriate to refer to individual ones.

**Post Office Property Holdings (Agent: Sanderson Weatherall)**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Supporting	Welcome the guidance provided in the SCI relating to community involvement in the development control process. In particular support paragraph 6.7 which informs developers on how they should inform the LPA as to how they involved the community during their application.	Noted.
Other	Please note that "Royal Mail Group plc" are the umbrella group for "Post Office Property Holdings" and although the latter are listed as a consultee in	Noted. Appendix 2 of the SCI and the LDF mailing list will be updated accordingly.

	Appendix 2 would wish for the “Royal Mail Group plc” to be listed in Appendix 2.	
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### Home Builders Federation

Nature of representation	Summary of representation	Council’s response
Supporting	Supports the Vision.	Noted.
Supporting	Welcomes the Home Builders Federation in Appendix 2 as an organisation to be consulted (please be advised that the House Builders Federation is now trading as the Home Builders Federation).	The change of name is noted. Appendix 2 of the SCI and the LDF mailing list will be updated accordingly.
Other	We would also welcome the addition of agents, landowners and house builders within Appendix 2.	It is not appropriate to include agents, landowners and house builders in Appendix 2 as these are not listed as statutory consultees in PPS12. However, individual agents, landowners and house builders can be added to the LDF mailing at any time upon request.
Supporting	Home Builders Federation would like to emphasise the importance of traditional consultation techniques, namely formal letter and email notification of the availability of documents and the holding of events. Making documents available on the Council’s website, for example, is only of benefit if stakeholders are in the practice of regularly checking the Council’s website on the off-chance that something new has been announced. It is highly unlikely that most stakeholders will be in a position to do this. However, using emails or standards	Noted.

	letters to inform stakeholders that documents are available or events are to be held is a vitally important aspect of the overall consultation and participation process.	
Objecting	The Home Builders Federation believe that the expectation that planning applications for major developments will undertake pre-submission community involvement is too onerous, and we consider the SCI could be more flexible, recognising that some proposals would not necessarily need to undertake extensive consultation exercises.	Para 6.6 encourages prospective developers to engage the local community where the Council considers a proposal <i>“to be of a scale and/or nature likely to generate significant levels of public interest”</i> . This provides the flexibility required.

#### **Northern Counties Housing Association**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council’s response</b>
Other	Sections 1 and 2 simply say the SCI will identify how the community will be involved. You have to get to Section 4 and 6 to understand the methods and mechanisms that will be used.	Noted.
Other	Paragraph 3.5 – Enable, empower and encourage are motivational words that set an enthusiastic tone for the Vision. They are also terms that will generate high expectations amongst those being involved about the level of influence that they can enjoy if they take up the opportunities offered. Need therefore to be clear about the things to which this Vision applies – note paragraph 3.6 bullet point 1 – what are the things that the outputs from consultation can influence decision making?	The consultations undertaken on the various LDDs will inform the plan-making process.

Objecting	Paragraphs 3.8-3.30 – It would be more accessible if the SCI and other initiatives could be collapsed into an over-arching strategy. Also not sure this amount of detail is necessary	The SCI is a planning-related document indicating how the Council will engage the community in the LDF and planning applications, which the Council is legally obliged to prepare under the Planning and Compulsory Purchase Act 2004. The Community Strategy is an Oldham Partnership document, not an Oldham MBC document. The production of this Strategy is a legislative requirement of the Local Government Act 2000 and assesses the environmental, economic and social challenges and opportunities facing the Borough. Each of the plans/initiatives serves a different purpose and there are separate legal requirements under which the SCI and Community Strategy are prepared which means that they cannot be combined into a single document. The Area Plans and Action Plans are prepared by Oldham MBC, Area Committees and cover more than just land-use matters, although there may be elements of complementarity with the Community Strategy. These plans have no statutory requirement and no formal planning status. The Community Engagement Framework, which is now being transformed into a Community Engagement Strategy, is an Oldham Partnership document.
Other	Paragraphs 4.1-4.20 – Not doubting the accuracy of the text, but it does make for very dense and technical reading. The flow charts are much easier to digest.	Noted.

Other	Paragraphs 4.33-4.36 and Tables 1 and 2 – Many of the `consultation` mechanisms seem to lend themselves more to provision of information. The face to face consultative techniques are all flagged as `possible`. Whilst more difficult and expensive to do, it is these methods that are more likely to `enable and empower`. The less participative methods will `encourage` involvement though.	Noted.
Objecting	Section 6 – How does the Council decide if a proposal is of a `scale/nature likely to generate significant levels of public interest`? Is this explained in paragraph 6.17?	Para 6.17 defines what are major planning applications. The Council will make a judgement on the implications of the scale and/or nature of a development in each case.
Other	Section 8 – It reads as though there are insufficient resources available and as such makes the reader question the capacity to actually deliver the SCI.	The Council has a budget for preparing the LDF, which includes an element for undertaking consultations.

#### **Inland Waterway Association – Manchester Branch**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Support	Found paragraphs 1 and 2 particularly useful as graphics highlight the interconnection of the various "folders".	Noted.
Other	Suggests an alternative form of wording for paragraph 3.5 "to enable, empower and encourage all Oldhamers to actively participate in the planning to improve their Borough".	The Vision for the SCI has been amended slightly to take account of other comments received on the Draft SCI.
Other	Queries why "Area Plans and Action Plans" are not on Figure 1 as a help to clear up any confusion as indicated in paragraph 3.26.	Figure 1 shows those elements that form part of the new LDF system. However, it does not show the Area Plans and Action Plans as these are not part of

		the statutory land-use planning system, they are Oldham MBC documents that cover more than just land-use matters.
Other	Paragraph 6.6 – Who will inform developers of other specific consultation bodies?	These are listed in Appendix 2.
Other	Paragraph 6.16 – Would it be possible for site notices to have a précis on the Council website?	The website contains full application details.

#### **Disabled Persons Transport Advisory Committee (DPTAC)**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	DPTAC no longer has a specific built environment remit and therefore could you remove DPTAC from the list of statutory consultees. It is understood that the Commission for Architecture and the Built Environment (CABE) are included as organisations to be consulted and the former work of DPTAC's Built Environment Group has been transferred to them under the formation of a new group called the Inclusive Environment Group (address provided).	Noted. Inclusive Environment Group added to the LDF mailing list for future consultations, where appropriate.

#### **Sustrans**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	It is not possible for Sustrans to become too involved in the new planning processes. Sustrans interest lies in working with local authorities to encourage more walking and cycling on short, local journeys. Sustrans are happy to comment on: land	Noted.

	use policies and planning briefs; large scale planning applications; relevant planning applications for sites adjacent to the proposed National Cycle Network routes in Oldham; and Travel Plans required through planning.	
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### Country Land and Business Association (CLA)

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	Request that the CLA is recognised as a relevant group for consultation on any relevant policy documents produced as part of the LDS.	The CLA are already on the LDF mailing list and will be notified about future public consultations at the appropriate times.
Other	CLA would welcome information as to how the results of involvement of landowners and managers will be used in preparing the LDF documents and combined with other responses about your Council's policies for the rural economy, the rural environment and rural social matters and how the LPA will try to achieve consensus on emerging issues in the LDF.	Section 5 of the Draft SCI details that where individuals and organisations are requesting changes be made to LDDs that the Council will prepare a Public Schedule report that will outline whether and how the LDD will be changed to take account of comments received during the public consultation stages.
Other	CLA is very keen that the SCI is linked to the Community Strategy and that rural areas have been referred to with reference to economic, social and environmental enhancement. It is hoped that the SCI can acknowledge that this can only be achieved with the help of land managers. We would like to see provision in the SCI to foster a positive approach to achieve this objective.	The LDF, of which the SCI is an important part, will be the "spatial expression" of the Community Strategy and as such there will be important linkages between the two processes. The SCI acknowledges that all sections of the community can make a positive contribution to the plan-making process.
Other	CLA would also like to see provision for the SCI to require relevant landowners and managers to be	The CLA are already on the LDF mailing list and will be notified about future public consultations at the

	involved whenever particular issues affecting rural policies arise as part of the planning process. We would urge that the CLA and its Members should be consulted on any planning policy document involving the rural areas of your District, especially those involving the diversification of the rural economy, rural housing, environmental protection and community development.	appropriate times. Other landowners and managers can be added to the LDF mailing at any time upon notifying the Strategic Planning and Information section.
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**John Dillon (OMBC Councillor)**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Objecting	Paragraph 1.3 – Insert “Borough” after “Oldham”	Accepted.
Objecting	Paragraph 1.6 – Insert “Metropolitan Borough” after “Oldham”	Accepted.
Objecting	Does not support the Vision. Oldhamers live in the old County Borough of Oldham. The word “Oldhamers” should be replaced by “residents of Oldham Metropolitan Borough”.	The Vision has been slightly amended to take account of other comments made. The Vision now refers to “residents and other stakeholders of Oldham Metropolitan Borough”.
Objecting	Paragraph 3.1 – Insert “Metropolitan Borough” between “Oldham” and “Council”	Accepted.
Objecting	Paragraph 3.20 – Insert “Metropolitan Borough” after “Oldham” and delete possessive of Oldham	Accepted.
Objecting	Paragraph 3.27 – Insert “Metropolitan Borough” after “Oldham” and delete possessive of Oldham	Accepted.
Objecting	Paragraph 4.27 – Replace “Oldhamers” with “residents of Oldham Metropolitan Borough”.	Oldhamers replaced with “residents and other stakeholders of Oldham Metropolitan Borough”
Objecting	How do you contact members of the general public? An item in the Oldham Chronicle is not good	The SCI outlines the various consultation methods that will be used to engage the community on the



	enough. The wording is too small. If I was an ordinary member of the public, I would not have known about the Replacement UDP.	LDF. Section 4 outlines the minimum standards that will be used. A Public Notice in the local press is only one of the methods that will be used. The community will also be notified of the LDF through the Council's website, public libraries, Council buildings including the Civic Centre, the Oldham Partnership and individuals and organisations on the LDF mailing list. If timings permit, the Council's "Oldhamer" newspaper will also be used.
Objecting	Paragraphs 4.33-4.36 and Tables 1 and 2 – There should be a mailing to each household, ideally separately, may be with polling cards or Council Tax demand.	The LDF will be a portfolio of different documents each prepared to different timetables with key consultation stages being staggered that will not always coincide with the issuing of polling cards or Council Tax notices. It is therefore not appropriate to use these methods which are undertaken on an annual basis.
Objecting	Paragraphs 4.37-4.39 and Table 3 – Only leaflets to every household will alert the general public.	The use of leaflets is identified as a possible consultation for engaging the community about the LDF, which will be used where appropriate and resources permitting. It is not appropriate however to be prescriptive in stating that leaflets will be used at all public consultation stages for all LDDs.
Objecting	Section 5 – The Public Schedule of Representations Report has to be clear. Perhaps the Schedule should be produced in area order, e.g. Shaw, Saddleworth, Failsworth etc.	Noted. That option of reporting the comments received may be explored for the other LDDs.

### Saddleworth Archaeological Trust

Nature of	Summary of representation	Council's response
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<b>representation</b>		
Other	<p>We had no objection to the plans for involvement of the different sections of our community, but we do take issue with some aspects in the Draft. These are:</p> <p>The acceptance of the Regional Spatial Strategy prepared by the North West Regional Assembly. The NW Regional Assembly is a body that some of us in the North West do not agree with, having no members directly elected by communities in the North West. A Regional Plan issued two or so years ago was badly drafted and had no reference whatsoever to Archaeology or Scheduled Monuments. Both the Saddleworth Archaeological Trust and the Greater Manchester Archaeological Unit, together with a number of other groups, registered strong objections.</p>	<p>Under the Planning and Compulsory Purchase Act 2004, the Regional Spatial Strategy (RSS) is now formally part of the Borough's statutory development plan. The Council is therefore obliged to have full regard to the provisions of RSS when preparing the LDF, otherwise any documents prepared will run the risk of failing the test of "soundness" at the public examination. The North West Regional Assembly prepares the RSS and a revised draft is currently under preparation, which will be subject to public examination during the autumn/winter 2006.</p>
Other	<p>The Draft Statement notes that Area Committees are to be an important part of the consultative arrangements. Our understanding is that current thinking in Oldham is that Area Committees are to be downgraded. The Trust considers that Area Committees are an important element in the consultative process as they allow representatives of all groups. Area Committees will also be able to be used for the input from the wider number of consultees.</p>	<p>The Council is currently consulting with local people about how it can increase the opportunity for local people to inform and influence how a range of Council services can be delivered in a way that better meets the different geographic circumstances across the Borough. The Council also wishes to encourage greater debate amongst local people about local issues of concern by providing public meetings that focus on a smaller geographic areas than the current 6 Area Committee meetings.</p> <p>This approach supports the Council's belief that</p>

		<p>local people have the right to receive high quality services and that they also have responsibilities to play their role as good citizens.</p> <p>This consultation is part of a wider debate within the Oldham Partnership, about how all public services such as those provided by the Primary Care Trust, Police, Connexions, First Choice Homes, Housing Associations, the voluntary sector and the Council might be improved by working together in a more co-ordinated way at a neighbourhood level.</p>
Other	Paragraph 6.41 reads “ <i>90% of all planning applications are determined under delegated powers by the Head of Planning Services</i> ”. How this better involves the community in the planning system is difficult to follow.	Determination of planning applications under delegated powers does not reduce community involvement in the process. All comments received are taken into account in reaching a decision. Furthermore, Councillors can refer applications to the Planning Committee.
Other	Paragraph 6.12 reads “ <i>where councillors wish a planning application to be determined by the Planning Committee they must submit a letter stating the reasons for referral...within 21 days of the relevant list of planning applications...</i> ” This seems to be a method of speeding up the processing of planning applications that the Government is pushing for, but it appears to us as being completely the opposite of engaging more of the community in the planning system.	This allows applications which would normally be delegated to officers to be determined by the Planning Committee.
Other	It may be necessary, in the list of “new” consultees	An Equalities Impact Assessment (EqIA) was

	in the Hard to Reach Groups, in paragraph 4.27 to consider carefully how these groups are to be involved.	<p>undertaken on the Draft SCI to establish whether the hard to reach groups and the consultation methods identified are appropriate. The results of the EqIA are reflected in the SCI.</p> <p>The Council included a flyer within the Spring 2006 edition of the Voluntary Action Oldham newsletter which is sent to approximately 800 voluntary, community and faith groups informing them about the LDF and how they could be added to the LDF mailing list if they wanted to.</p>
Objecting	It would be most important to include in Appendix 2, the Greater Manchester Archaeological Unit and the Assistant County Archaeologist for Greater Manchester. They already monitor all planning applications in Greater Manchester, and their careful watch is essential to continue to safeguard the preservation of archaeological remains and Listed Buildings.	<p>The Greater Manchester Archaeological Unit is not defined as a statutory consultee in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Development) (England) Regulations 2004, on which Appendix 2 is based. However, the Greater Manchester Archaeological Unit is already included on the LDF mailing list and will be sent notification of the preparation of relevant LDDs, where appropriate.</p> <p>The Assistant County Archaeologist for Greater Manchester is listed at the same address as the GMAU who are already on the LDF mailing list.</p>

### Saddleworth White Rose Society

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Objecting	Objects to the use of the word "Oldhamers" in the	The Vision for the SCI has been amended slightly to

	Draft SCI Vision. The unitary authority is made up of seven towns and districts each with their own identity. The people of Saddleworth, Chadderton, Failsworth, Crompton & Shaw, Royton and Lees are not Oldhamers. They have their own identities, of which they are rightly proud and no attempt should be made to rob them of these. On the contrary, in the interest of community cohesion their identities should be recognised as equal to that of Oldham, which of course they are.	take account of other comments received on the Draft SCI. The Vision now refers to “residents and other stakeholders of Oldham Metropolitan Borough”.
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#### **Huddersfield Canal Society**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council’s response</b>
Other	No comments to make on the proposals for the LDF or SCI, but wish to be retained on the list of formal consultees, particularly in relation to proposed developments in the Huddersfield Narrow Canal corridor.	Noted.

#### **Saddleworth Civic Trust**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council’s response</b>
Objecting	Section 6 – The section regarding the planning process/applications still gives cause for concern in that Development Control, who are working to a “quota” system imposed by the Government, seems to be given too much power to pass applications. Initial proposals by developers should ideally involve	Early involvement is encouraged. The Planning Committee determines most of the larger, more complex or controversial applications. The basis for the level of determination is established in the Council’s Scheme of Delegation. Councillors can refer applications to the Planning Committee as

	a wider range of people and organisations and at an earlier stage. After this it would also be advantageous if more calling in was done so that Planning Committee were more closely involved in more planning applications than at present.	appropriate.
Objecting	Section 6 – It would also be useful to illustrate the document with hypothetical examples to clarify further what are Major Developments / Tier 1 or 2 etc and what time periods are involved. This might give a “real life” aspect to it that the general public could relate to.	Noted – Table 4 revised.

#### **Moorside East Residents Association**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council’s response</b>
Objecting	It is totally unacceptable for the Council to expect lay people to trawl through 46 pages of complicated text to extract the right answers to your questionnaire.	A two-page summary of the Draft SCI, with an explanation of each section, was available. It is intended this will be repeated for the Submission SCI.

#### **Greenfield and Grasscroft Residents Association**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council’s response</b>
Objecting	Sections 1 and 2 – They may show how the community can be involved in helping to contribute to OMBC’s Development Plans, but they do not state clearly how Oldham residents can be involved in planning matters.	Noted. Sections 1 and 2 provide an outline of the new planning system and context for the SCI and community involvement that is further expanded upon in the other sections of the SCI.
Objecting	Paragraph 3.5 - The Vision is appropriate, but the	Noted. Section 6 outlines the Council’s approach to

	SCI does not show how this can be achieved in practice, specifically with regard to planning applications.	consultation on planning applications.
Objecting	Paragraphs 3.22-3.26 – Given Oldham MBC’s stated intention to scrap Area Committees, the statements in paragraphs 3.22-3.26 only serve to confuse. The Association are in favour of Area Committees and have already made our views clear to the Leader of the Council on this matter.	<p>The Council is currently consulting with local people about how it can increase the opportunity for local people to inform and influence how a range of Council services can be delivered in a way that better meets the different geographic circumstances across the Borough. The Council also wishes to encourage greater debate amongst local people about local issues of concern by providing public meetings that focus on a smaller geographic areas than the current 6 Area Committee meetings.</p> <p>This approach supports the Council’s belief that local people have the right to receive high quality services and that they also have responsibilities to play their role as good citizens.</p> <p>This consultation is part of a wider debate within the Oldham Partnership, about how all public services such as those provided by the Primary Care Trust, Police, Connexions, First Choice Homes, Housing Associations, the voluntary sector and the Council might be improved by working together in a more co-ordinated way at a neighbourhood level.</p>
Objecting	Paragraphs 4.1-4.20 – Section 4 fails to inspire public participation and paragraph 4.18 fails to	As stated in Planning Policy Statement 1 “Delivering Sustainable Development” para 3, “ <i>sustainable</i>

	<p>convince us that the community will be consulted on `sustainability` issues. "May" should be replaced by "will" in the last sentence.</p>	<p><i>development is the core principle underpinning planning</i>". The community will be consulted on all LDF documents.</p> <p>Paragraph 4.18 makes specific reference to the first stage of the Sustainability Appraisal Report (called the scoping report stage), which is just an initial exercise in gathering baseline information from relevant stakeholders and agencies in order to take forward the full Sustainability Appraisal. The findings of this stage will be reported in the Sustainability Appraisal Report that the community will have an opportunity to comment upon alongside the DPD/SPD that it assesses as part of the formal consultation period.</p> <p>The last sentence of paragraph 4.18 does not contain the word "may", so no change can be made as suggested.</p>
<p>Objecting</p>	<p>Paragraphs 4.25-4.29 and Appendix 2 - Community and Residents Associations should also be included in the list – "from all areas of the Borough". The list should be inclusive.</p>	<p>Paragraphs 4.25-4.29 refer to the types of consultees identified in both Government guidance and through the Council's Consultation Strategy. Appendix 2 provides further details on these consultees.</p> <p>As part of the preparation for the LDF, the Council wrote to all individuals and organisations, apart from statutory consultees identified in PPS12, on both the UDP mailing list and the UDP Database (of people who had commented on the UDP review) asking whether they wished to be informed about the LDF process and, if so, which types of documents and</p>



		<p>which parts of the Borough that they wish to be notified of. This included community and residents associations.</p> <p>Additionally, the Council also included a flyer within the Spring 2006 edition of the Voluntary Action Oldham newsletter which is sent to approximately 800 voluntary, community and faith groups informing them about the LDF and how they could be added to the LDF mailing list if they wanted to.</p> <p>Any community or resident group can be added to the LDF mailing list upon their own request.</p>
Objecting	Paragraph 4.34 – The Local Development Statement should be submitted to all groups who have requested that such documentation be sent to them.	<p>The LDF mailing list has been created and will be used to notify individuals and organisations of the consultations on the LDDs. It is not appropriate to send the LDD to all individuals and organisations on the LDF mailing list due to the cost implications for the Council. However, all LDDs will be available on the Council’s website, at public libraries and at certain Council buildings including the Civic Centre for individuals and organisations to view.</p>
Objecting	Paragraphs 4.37-4.39 and Table 3 – The SCI does not state “how” community groups could be involved in practice.	<p>The consultation methods used, over and above the minimum, will be dependent upon the type of LDD and its subject content, and will also be dependent upon the resources – staff and financial – available at the time. It is not appropriate to be too prescriptive at this time, although it is appropriate to include these methods within the Table so that they may be available for use in the future if resources permit.</p>

Objecting	It is not clear at all how the responses from community groups will materially change the SCI before it is finally submitted	Paragraph 5.2 explains that where changes to an LDD, which includes the SCI, are being sought a report will be made available to indicate whether the Council accepts that the LDD should be changed along the lines being suggested. This document is that report for the Draft SCI.
Other	The Council's policy does not encourage participation. Is this a Statement of Less Community Involvement?	The SCI is the method of formalising how the community will be engaged in the planning processes. Although the Council can put in place the mechanisms to facilitate and encourage participation by the community upon the planning process, it cannot require the community to comment.
Other	Paragraph 8.4 Development Control Officers have a vested interest to keep the consultation process to a minimum. These procedures should be scrutinised by a Community Liaison Officer.	Section 6 outlines the approach to consultation on planning applications.
Objection	OMBC's commitment to monitor and review SCI's, needs to be confirmed by specific dated requirements e.g. annually, biannually or every 5 years.	Section 9 indicates that the Council will monitor the SCI through the Annual Monitoring Report that has to be finalised every December. Part of that monitoring process will identify whether any amendments are needed to be made to the SCI, in which case a revised SCI will have to be prepared that will be subject to the same procedures as this first SCI.
Objecting	Section 6 – Residents are not convinced that the public can be effectively and fully engaged in the planning process as described in the SCI, given that 90% of planning applications are to be dealt with by	The public are in no way disadvantaged by the delegation of decisions on planning applications to officers. Furthermore, Councillors can refer applications to the Planning Committee as

	Development Control Officers outside the scrutiny of OMBC's Planning Committee. Within the tight time constraints involved, we are concerned that government targets to speed up planning will put pressure on planning officers to cut corners with the consultation process. A better way to reach government targets would surely be to hold more Planning Committee Meetings rather than allow more to be taken behind closed doors. The systems advocated in Section 6 are not only an attack on democracy but double perceived as being open to abuse, fostering distrust and suspicion amongst Oldham citizens.	appropriate. The publicity given to applications generally exceeds that required.  The Council determines over 1800 planning applications each year and the system outlined in Section 6 represents an efficient and effective means of dealing with them, balancing the need for community involvement with timely determination.
Objecting	Given the Council's commitment to publicise all planning applications, the Association have noted that there is often a delay in publication of these details on OMBC's website. Every effort should be made to put knowledge of all planning proposals in the public domain.	All planning applications are already in the public domain. Information on the Council's website is in addition to the statutory publicity requirements, occasional delays resulting from scanning requirements.
Objecting	The Association is also concerned that criteria determining the Tier Level 1-3 for Major Planning Applications should be stated clearly. There is nothing in paras. 6.30-6.34 stating on what basis the Levels would be chosen, appropriate to different applications.	Noted – Table 4 revised.
Objecting	It is also noted that the SCI Response form published on OMBC's website does not allow respondees to type in their comments, a significant discouragement to people who might otherwise	The SCI comments form was available on the Council's website in PDF format. The Council is currently investigating options for using a consultation database that will allow comments to be

	email their views to the Council.	submitted directly online. Until such time as that system is installed, then for all future consultations the comments form will be made available in both PDF and Word formats. The Council has a dedicated email address for LDF consultations at <a href="mailto:spi@oldham.gov.uk">spi@oldham.gov.uk</a> .
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### Cowlishaw Action Group

Nature of representation	Summary of representation	Council's response
Objection	Section 1 and 2 contain no actual details of `how the community can be involved` beyond the general statement in paragraph 1.3 "...the Council will engage the community in the preparation and revision of LDF documents and in determining planning applications".	Sections 1 and 2 provide an outline of the new planning system and context for the SCI and community involvement that is further expanded upon in the other sections of the SCI.
Supporting	Supports the Vision.	Noted.
Objecting	Needs a chart to depict the other elements of the Community Strategy besides `planning for sustainable communities`. Also, the jargon is completely bewildering - `community strategy`, `community engagement framework`, `community cohesion partnership`, `community network protocols` etc. Whatever is the meaning of paragraph 3.18?	The Community Strategy is available as a separate document and it is not appropriate to duplicate its content within the SCI other than where directly relevant to the planning process.  Paragraph 3.1.8 states: ' <i>The thematic partnerships within the Partnership may in some instances provide an appropriate means of securing multi agency engagement about specific aspects of the Local Development Documents</i> '. The thematic partnerships represented on the Oldham Partnership are made up of a range of stakeholders from the

		private, public and voluntary, community and faith sectors. Each partnership is ‘themed’ based, e.g. crime, health, children and young people and are used as forums for consulting and seeking views. As such, the thematic partnerships provide an excellent forum for consulting on specific aspects of the Local Development Documents.
Objecting	Paragraph 4.4- after “consultation” insert “see Table 1”.	Accepted.
Objecting	Suggest including the Greater Manchester Ecology Unit in the list of consultees in Appendix 2 of the SCI.	Appendix 2 lists the “specific”, “general” and “other” consultees identified in PPS12. The GMEU is not identified in PPS12. However, the GMEU are already on the LDF mailing list and will be notified of future consultations, where appropriate.
Objecting	The “specific consultation bodies” includes “A water undertaker”, while the “Other Consultees” list includes “water companies”. Aren’t these the same?	The list of consultees in Appendix 2 is taken from Planning Policy Statement 12 which refers to both “a water undertaker” and “water companies”. It is therefore appropriate to include both references within the listing of consultees.
Objecting	Section 5 only outlines how representations on Local Development Documents are dealt with, but the SCI is a NON Development Plan Document.	The SCI is a Local Development Document, which is the generic name for all types of documents prepared under the new planning system. Section 5 therefore applies to the SCI as it does to the other LDDs.
Objecting	Table 4 needs an explanation of “Enquiry by Design / Planning for Real”.	These are both means of involving the community in the development of proposals for their area. The phrases have been amended in the “Submission SCI” to state “ <i>design exercises</i> ”.
Objecting	Paragraph 6.45 – Do not agree that	Councillors are the elected representatives of their

	objector/supporters (of planning applications) are limited to three minutes (speaking) while Councillors have no time restriction.	communities, hence the difference. Public speaking at Committee is not a statutory requirement, but has been introduced to allow objectors and supporters to address the Committee directly. A time limit is necessary because of the large number of speakers and applications for consideration at Planning Committee meetings.
Objecting	Is not convinced that one announcement in the Public Notices section of the Oldham Chronicle will make `all Oldhamers` aware of the new planning system and therefore accomplish the Council's Vision.	The Town and Country Planning (Local Development) (England) Regulations 2004 set out the formal requirements for publicising the consultations on the various LDDS, which including requirements for local press advertisements. Additionally as well as placing a Public Notice in the local press, the Council will also advertise the consultations on its website, at public libraries and certain Council buildings including the Civic Centre as well as notifying those individuals and organisations on the LDF mailing list. All of these methods of informing individuals and organisations about the consultation are considered appropriate.
Objecting	It is ironic that the SCI contains so much jargon and planning speak as to make it difficult for the public to understand. The number of strategies, frameworks, partnerships and protocols is very confusing. A shift towards plain English is crucial if the public are to be encouraged to be involved. It is recommended that the SCI be vetted by the Plain English Campaign.	The SCI has sought to explain the different processes in a way that is accessible. A two-page summary outlining the content of each section of the SCI was made available. It is not intended to get the Plain English Campaign to vet the SCI.

**Campaign for Real Ale – Rochdale, Oldham and Bury (CAMRA)**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Supporting	Supports the Vision and the rest of the SCI.	Noted.

**Mr Glyn Swallow**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Other	Whilst found that the SCI itself was a comprehensive document, suggests a non-legally binding two-page summary would have been helpful.	A two-page summary was prepared as part of the Draft SCI outlining what each section related to. A similar summary will be prepared for the next stage of the SCI when it is submitted for Examination and a further period of public consultation.
Other	It is appreciated that any consultation will have to operate within the confines of financial limitation, staff availability and externally imposed constraints, however it is difficult to see a major improvement over the existing planning and UDP structure in which many people feel that their views and comments are not adequately reflected.	The purpose of the SCI and its Vision is to facilitate community involvement on the planning processes. The UDP generated a large number of respondents, whose views were fully taken into consideration by the Planning Inspector at the Public Local Inquiry. The principal LDF documents, including the SCI and DPDs, will be subject to independent examination by a planning Inspector who will test the "soundness" of the document.

**Mrs J I Kay**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Objection	Agree with alternative formats such as large print and electronically, but not community languages.	The Council has an internal translation service. Council policy is not to translate documents in full

	There are numerous languages in our multicultural society which would make it economically unsound to translate all such documents.	<p>from the outset, but to provide an introductory summary in three languages – Bangla, Urdu and Gujarati. The Council does provide translations of documents upon request, which therefore minimises cost implications.</p> <p>Furthermore, the Council aims to provide a cost-effective service to all its customers. Therefore, in the event that information is requested and it is not deemed cost effective to provide such a service e.g. one customer requires 100 pages of a document to be translated, then this service may be declined and an alternative service provided.</p>
Other	It is to be hoped that the work of the Strategic Planning and Information section does not inhibit the public consultation process, especially if it is to be under pressure to fulfil 60% of major planning applications within 13 weeks, for example.	It is the Council's Development Control section, with responsibility for processing planning applications, which is guided by the Government's targets for determining planning applications within specified periods. The Strategic Planning and Information section is responsible for preparing the LDF and leading on public consultations which will form an integral part of the plan-making process.

### Terence Talbot

Nature of representation	Summary of representation	Council's response
Support	Sections 1 & 2 Well presented outline	Noted.
Support	Para. 4.1 –4.20. Appreciated the diagrammatic presentation	Noted.
Support	Para. 4.33 – 4.36. Very thorough	Noted.



Objection	Paragraph 6.6 – Change from “prospective developers <u>will be encouraged to</u> engage the local community and undertake wide consultation” to “... <u>will be expected to</u> ...”.	‘Encouragement’ is a more appropriate description of the process.
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### Co-op

Nature of representation	Summary of representation	Council’s response
Other	Paragraphs 4.25-4.29 and Appendix 2 - The Council may also like to consider the homeless, carers, those on low incomes or those in remote/rural areas in the list of local community groups and other bodies that will be consulted.	The “hard to reach” groups were identified by the SCI project team and take account of Government advice and the Council’s Consultation Strategy. The Draft SCI was subject to an Equalities Impact Assessment that informed the groups identified as “hard to reach”. It is not considered appropriate to amend the identified list in para 4.27 to specifically mention those groups suggested by the Co-op, however the LDF mailing list contains a range of organisations some of which will represent the interests of the groups mentioned.
Other	Paragraphs 4.33-4.36 and Tables 1 and 2 – It is hoped that any documents, which are out for consultation, will be available through the Council’s website. These should be capable of being downloaded as a single file. Consideration should be given to the design of the website, to ensure that documents can be quickly and easily located.	All LDDs will be published on the Council’s website, as this is a legal requirement.
Other	Section 6 – To facilitate the inspection of applications, a register, which includes any additional plans and documents, should be made	The use of the website is additional to the statutory publicity requirements, and all application documents are available to view.

	available online.	
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### Higham & Co

Nature of representation	Summary of representation	Council's response
Other	Community Involvement should be appropriate to the scale of the proposed development. For example, we agree that the change of use of individual buildings or householder proposals should be subject to the same level of consultation as a large scale residential or commercial development proposal.	Noted.
Other	It is considered that the options for consultation should be agreed between the applicant and the Council at the pre-application stage. It is therefore important that such negotiations can take place without delay and that the Council gives then priority as part of the planning process and resources are allocated accordingly.	Noted.
Other	Councillors need to be alerted to the importance of their involvement in the process prior to planning applications being made.	Noted.
Other	It is important that there is not undue duplication between the consultation exercise carried out by the developer and the Council. This is where there is a risk of consultation fatigue. In the majority of cases the Council's procedures adequately advise the community of a development proposal.	Developer consultation exercises can lead to modification of proposals before they are formally submitted, taking into account views expressed by local communities.
Other	It would be of assistance to the development	Noted.

	industry generally if there was some consistency in approach between Local Planning Authorities.	
Other	It is helpful that plans and drawings submitted with planning applications, Planning Committee agendas and reports are made available to view online.	Noted.
Other	In respect of 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 Options 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.	Developers are encouraged to involve the local community as early as possible in the process.

### **Vividor Waste Management**

<b>Nature of representation</b>	<b>Summary of representation</b>	<b>Council's response</b>
Objecting	Sections 1 and 2 need to deal with minerals development. Where is this covered? Will this involve joint working with the Greater Manchester Geological Unit?	Sections 1 and 2 provide an outline of the new planning system, including details about the different types of documents that will be prepared as part of the LDF, and sets the context for the SCI. It is not appropriate to go into specific details on the range of documents that will be prepared as part of the LDF within the SCI; these details are provided in the project plan called a Local Development Scheme

		<p>which is available on the Council's website.</p> <p>The minerals policies in the UDP are now "saved" until 2009.</p> <p>A new paragraph (7.4) has been added to the Submission SCI to indicate that it is the intention of the Greater Manchester local authorities that a joint plan will be prepared for minerals. However, as yet no formal agreement has been reached on the production of this document, therefore work on the plan cannot commence till this is in place.</p>
Objecting	Paragraph 6.7 – In the first line of the sentence suggests the word "expected" be replaced with the word "encouraged".	'Expected' is the appropriate term – following community consultation it is important that developers outline what has been done and how the scheme has taken this into account.
Objecting	Paragraph 6.10 – The sentence is full of jargon and will not mean much to the general public.	The sentence is factual and explanatory.
Objecting	Paragraph 6.30 – Seeks an explanation of what is meant by the consultation method "Enquiry by Design and/or Planning for Real".	These are both means of involving the community in the development of proposals for their area. In the Submission SCI the phrase has been changed to "design exercises".
Objection	If an amendment is minor – do we really need to re-consult and go through a formal notification procedure? It is unnecessary and will lead to time delays. Why can't matters be dealt with by exchange of letter?	Para 6.38 explains when re-notification is necessary – this is not always the case for minor changes. Recent case law has removed the ability to seek minor amendments to schemes following the granting of planning permission.
Objecting	Paragraphs 7.1-7.3 – The SCI makes clear the approach towards waste management. But what	The minerals policies in the UDP are now "saved" until 2009.

	<p>about minerals development/proposals and policies? Where is policy/development plan guidance provided on minerals and by whom/when?</p>	<p>A new paragraph (7.4) has been added to the Submission SCI to indicate that it is the intention of the Greater Manchester local authorities that a joint plan will be prepared for minerals. However, as yet no formal agreement has been reached on the production of this document, therefore work on the plan cannot commence till this is in place.</p>
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