

APPENDIX G:
Summary of the main issues and the councils response (under Regulation 27)

Main issues raised on the consultation draft SCI (July 2005)

Respondent	Summary of Main Issues	Response/Changes Made
English Heritage	Strongly endorse the value of wider community involvement in the planning process. The council should consult with heritage sector organisations as soon as possible in the plan-making process.	Agree. The heritage sector organisations (list provided by English Heritage) have been added to the community engagement database for the LDF. These groups are categorised under the general heading of Conservation and Heritage Societies in Appendix D of the SCI and are included in the list of standard DC consultees in Appendix E, except for the National Trust who do not have any land holdings in the Borough.
	The principles set out in 'Planning and Development in the Historic Environment – A charter for English Heritage Advisory Services (second edition, April 2005)' should inform the council's consultation approach to significant planning applications.	Noted. We will consult with specialist consultees as advised by guidance.
Mr Peter Burns Peak & Northern Footpath Society	The SCI needs to make clear that public involvement will be carried out well in advance of document preparation.	Agree. This is addressed in Section 6 under stage 1 - Pre-production and stage 2a - Examining issues and options. Section 6 has been amended to make this more clear.
	Involvement should not be confined to local groups as proposals may affect people from a wider area.	Agree. The sub title in the Appendix, now Appendix D is amended accordingly. Involvement will not be confined to local groups where a document is of interest to, or may affect, people from a wider area.
Environment Agency	The contents of the document should comply with Checklist 7a, page 71 of ODPM guidance 'Creating Local Development Frameworks – A Companion guide to PPS12'.	The checklist provided in 'Creating Local Development Frameworks' is a suggested content and the draft SCI wholly reflects the suggested content.
	The opportunity to be involved at the pre-production stage is welcomed, through the supply of environmental information and to ensure that issues can be raised as early as possible.	As a statutory consultee, the Environment Agency will be involved at the earliest stages of plan preparation: the pre-production stage.

	The agency encourages pre-application discussions.	Agree. Paragraph 8.10 (formerly 8.8) has been amended in general terms accordingly.
	Where site constraints are identified relevant to the Environment Agency, the applicant should be encouraged to contact the Agency at an early stage.	Noted. The Environment Agency have been invited to attend the service user forums regularly to guide developers and applicants.
	Request a decision notice on applications where they have made comments. The Agency support feedback on applications.	Noted. Paragraph 8.27 (formerly 8.22) is amended.
Mr G Seaward Orrell	Dates for the consultation and participation stages could be more direct e.g. 1 st May to 31 st July.	This is not a practical suggestion. The time periods for public participation are specified in government regulations. The SCI commits the Council to 6 weeks for all public participation periods in line with regulations.
	There is too much to read and the SCI needs to refer to maps and wards in Wigan	The SCI is a procedural document and as such, a series of maps would not serve a useful purpose. However, a map showing the Ward and Township boundaries has been included in Appendix G.
	Townships should be more involved	The Township Forums are identified in section 4 of the SCI as a key group under the Wigan Borough Partnership. The Township Forums will be consulted at the early stages of plan preparation for the Core Strategy and Area Action Plans where the proposals affect their Township and on SPDs where appropriate. The Township Managers are also sent a copy of the weekly list of planning applications.
Mr G. Wilcock Standish Forum	Appendix C should become page 8.	No Change. Appendix C is a list of specific Development Control consultees and as such is best placed as an Appendix in line with government advice.
	Section 4 on 'who will be involved?' could include youth clubs and community centres.	Agree. The bullet points under paragraph 4.22 are amended.
	The DPD & SPD process is unclear (Section 6).	Agree. Section 6 is amended to make the processes clearer.

	Add ecology and 'green' groups to the list of consultees.	Ecology and 'green' groups are already included in the list of consultees set out in Appendix D (formerly B), under the broad heading of Environment Groups. Also Appendix E (formerly C) shows specific ecology and 'green' groups.
	Add PPG, RPG and UDP to Appendix F.	Agree. Appendix B (formerly D) revised accordingly.
Mr Edgar Ernstbrunner Ramblers' Association	Appendix C fails to mention the Ramblers' Association and the Open Spaces Society as consultees	Appendix E (formerly C) has been amended to include Rights of Way groups. This general heading incorporates the Ramblers' Association and the Open Spaces Society along with other relevant groups.
	Table 2 does not clearly define 'Focus groups' and 'Local Forums' and does not define a positive role. Local and user group forums should be involved at every stage.	Table 1 defines the role of both focus groups, local forums and user group forums. Table 2 has been amended in line with Table 1. It would be very resource intensive if we committed to consulting local and user group forums at every stage for every document and would be likely to result in consultation fatigue. However, we will consult with groups and forums when a DPD is of interest or could affect such a group or forum.
Wigan & Leigh College	Although generally supportive of the draft SCI, Mr Crewdson comments that it is a complex document and given that the majority of people who will read it are unused to such documents, this could be a problem.	We appreciate that the system is complex and perhaps difficult to understand by many people, however, we have made every effort to ensure the document has been written in plain English as far as possible given the requirements of the new system. We have received compliments from GMPTE, West Lancashire District Council and others for its clear explanation.
Edna Booth Leigh, Atherton, Astley & Tyldesley Bridleways Group	Remove any acronyms until the public are familiar with the new terminology (section 1 and 2).	All acronyms are stated in full at the first reference and Appendix B (formerly D) explains the terminology.

Remove words such as 'integrated strategy' and 'clear vision', 'innovative techniques' 'proactive and co-ordinated'. Need to move away from plain English (Sections 2 and 3).	We have made every effort to ensure the document has been written in plain English as far as possible. The Council is committed to using plain English because it is clear, concise and uses the right tone of voice. A number of changes have been made to the revised document with this in mind.
Make reference to Rights of Way Groups in section 4.	Section 4 sets out the main groups and is not intended to be specific in content; it would not be appropriate to consider individual groups. Rights of way groups come under the broad heading of 'other groups and organisations' and have been added to the list of consultees in Appendix D (formerly B).
The free papers and Borough Life are not delivered to everyone in the Borough.	Newspaper notices will be placed in the Wigan Observer, (a paid-for paper) and/or the Leigh Journal. We are advised that the Leigh Journal is the best option for the east of the Borough. Everyone living in the Borough should receive a copy of the Borough Life magazine and the Council has sought to improve circulation.
Concerned that they have not been informed in the past by letter concerning major planning applications such as Bickershaw Colliery and Leigh Sports Village.	The bridleways group would normally be notified of major developments affecting a bridleway. There has been no major planning application for Bickershaw Colliery. Leigh Sports Village was extensively publicised. Rights of way groups are included in the list of standard DC consultees in Appendix E (formerly C).
The use of a comments form is not suitable: it doesn't give the opportunity for genuine response.	The comments form is an option to assist those who wish to comment, and there are benefits. Paragraph 7.1 has been amended accordingly.
Local and user group forums have limited influence.	There will be greater opportunity for local and user group forums to get involved, as set out in the SCI.
Plain English is difficult to understand for the fully literate.	Plain English is written with the reader in mind and is intended to be clear and concise and able to understand by all readers. A number of changes have been made to the revised document with this in mind.

	More explanation is needed for Community engagement facilitators	Agree. Table 1 amended. Community engagement facilitators will be suitably briefed.
	Paragraph 6.8 does not make clear which representations will be considered at examination.	Paragraph 6.9 (formerly 6.8) is clear that only representations received at the submission stage will be considered at examination, but the potential for confusion arose from paragraph 6.7, which is revised.
	The council should take account of people's views rather than ignoring them.	Paragraphs 7.2 and 8.23 (formerly 8.19) address this.
	Section 8 should make it plain that the Government's aim is to eliminate public inquiries.	It is not the Government's aim.
	Show some real commitment to community interests to ensure involvement of the community.	The standards set out in the SCI for community involvement provide the opportunity for this. We will have to comply to the standards once the SCI is adopted.
	Include local horse riding groups in Appendix B and C (Peak & Northern Footpath Society is included!)	Horse riding groups have been categorised as Public Rights of Way groups in Appendix D (formerly B). Appendix E (formerly C) has been amended to include Rights of Way groups. This general heading incorporates the local horse riding groups along with other relevant groups.
Mrs P. Wheal Wigan	Generally supportive of the SCI. The LDF seems fragmented in comparison with the UDP. It will be more difficult to read/study it as a unified whole.	The LDF is fragmented in comparison with the UDP but it is more flexible in terms of how it can be updated and hopefully, it will emerge as a unified plan. That is one of the challenges for the council.
North West Regional Assembly (NWRA)	Amend diagram 2 to better reflect the structure of the new planning system.	Figure 2 is amended.
	Briefly highlight the regional planning consultation/participation process in section 2.	The SCI outlines Wigan's standards for community involvement. No change.

Greater Manchester Passenger Transport Executive (GMPTE)	GMPTE supports the SCI but requests that they are added to the list of consultees in Appendices B and C.	No change. GMPTE is on the community engagement database for LDF consultation, fits under the broad heading of Transport operators and Transport groups in Appendix D (formerly B) and is already in the list of standard Development Control consultees in Appendix E (formerly C).
	Requests that for pre-application discussions, the council should advise developers whether they need to undertake discussions with specific infrastructure or service providers like GMPTE. Section 8 should reflect this.	Agree. Paragraph 8.10 (formerly 8.8) has been amended in general terms accordingly.
Viridor Waste Management	Add the words 'and other stakeholders' when referring to the 'community' or 'communities'.	The SCI is a statement of community involvement with the emphasis on community in its broadest sense. Indeed, is never 'closed' to new involvement. It is therefore not necessary to refer to stakeholders separately.
	Reference to 'soundness' in paragraph: 1.5 could cross reference to definition provided in Appendix E.	Agree. Paragraph 1.5 is amended to refer to Appendix C (formerly E).
Manchester Airport	Manchester Airport are supportive of the SCI but would like to be added to list of Consultees in Appendix B.	No change. Manchester Airport is on the community engagement database for LDF consultation and sits under the broad heading of Transport operators and Transport groups in Appendix D (formerly B). Manchester Airport is included in the list of standard Development Control consultees in Appendix E (formerly C).
Elaine Wystawnoha Economic Regeneration Office Wigan Council	Section 3 is too vague and should be linked better to section 5 which shows how this is implemented (section 5 should come after section 3).	No change. Sections 4 and 5 reflect our strategy for community involvement set out in section 3. The chapters are appropriately ordered to outline 'who' we will involve, 'how' they will be involved and 'when' they will be involved.
	Neighbourhood committees should be involved as Townships may not include a representative from the neighbourhood.	Agree. A new paragraph 4.13 is added accordingly. Contact details for the neighbourhood committees have been added to Community Engagement database.

	The SCI should include more methods to involve specifically 'hard to reach groups', including those who can't read and write and those whose first language is not English.	Agree in part. Paragraphs 4.21 and 4.22 (formerly 4.20 and 4.21) are amended to refer to people who cannot read or write. Paragraph 4.22 refers to the Race Relations (Amendment) Act 2000. Appendix F (formerly A) provides detail on how communities can get help with information. As stated in that appendix, we can make documents available in large print, braille and in a number of alternative languages on request. A note to this effect will also be included at the front of the document. Individuals can also contact the council for help and advice.
	Make better use of the experienced community involvement staff as facilitators for engaging the community.	Agree. Paragraphs 9.1 and 9.2 refer.
Max Finney Over 50s Forum	Mainly supportive of the SCI however, it should make reference to the task group report '50/50 vision. NW Forum on ageing – Engaging older people'.	New paragraph 4.22 (formerly 4.21) sets out how we will seek to involve 'hard to reach groups' including elderly people.
	Considers that section 5 does not identify appropriate methods of community Involvement.	Noted. The council is not aware of more appropriate methods.
Jane Fennell Soroptimist International of Wigan	Supportive of the SCI. However, would like to see a reference that community involvement will be positively pro-active in taking comments into account and providing explanations for decisions.	Paragraphs 7.2 and 8.23-27 (formerly 8.19-22) address this.
Mike Barnes Orrell & Billinge Community Network	What are the 'innovative' techniques mentioned in paragraph 3.7?	Paragraph 3.7 has been amended to read 'we will seek to use more effective techniques'. Table 2 refers to these techniques such as making use of the 'Borough Life magazine' and 'workshops, seminars and focus groups' where possible.
	Will the wish list referred to in paragraph 3.8 be adhered to and what conflicts will there be with planning law?	The principles set out under paragraph 3.9 (formerly 3.8) underpin the approach set out in the SCI and are based on the principles for community involvement advocated by government, as stated, and this would be within the context of planning law. This SCI itself is a requirement of planning law.

<p>Could consultation documents be sent/presented to Township Forums. Township forums should be kept informed of the plans as they are developed.</p>	<p>The Township Forums are identified in section 4 of the SCI as a key group under the Wigan Borough Partnership. They will be consulted at the early stages of plan preparation and at key stages throughout the preparation process for the Core Strategy and Area Action Plans, where the proposals affect the Township, and for SPDs where appropriate. The Township Managers are also sent a copy of the weekly list of planning applications, as noted in paragraph 8.21 (formerly 8.17).</p>
<p>Who can request a public meeting?</p>	<p>Anyone can request or arrange a public meeting and seek the attendance of council officers. The council will 'send' a representative if it is appropriate to do so i.e. it is at an appropriate stage in the process of LDF document preparation, and a relevant officer is available.</p>
<p>Table 2 needs to make clear who will receive letters / e-mails</p>	<p>Agree. Table 2 is amended to show who will be consulted and how. All contacts on the Community Engagement database will receive a letter at key stages in the LDF if the LDF document interests or affects them.</p>
<p>Local Forums should be included at Stage 1.</p>	<p>Local and user group forums will be consulted at the evidence gathering stage if appropriate for the LDF document being produced and dependant on time and resources.</p>
<p>The SCI will probably not ensure people's views are properly considered.</p>	<p>Paragraphs 7.2 and 8.23-27 (formerly 8.19-22) address this.</p>
<p>Section 8 is not clear on the council's approach to planning applications.</p>	<p>Section 8 has been amended.</p>
<p>The most important thing the SCI can do is to apply equal weight to both the law and the wishes of the community.</p>	<p>We have to work within the law.</p>
<p>Higham & Co.</p>	<p>Agree that community involvement should be appropriate to the scale of proposed development.</p> <p>Noted.</p>

	The options for consultation should be agreed between the applicant and the council at the pre-application stage rather than the council simply giving advice on various options (paragraph 8.9).	Agree. Paragraph 8.11 (formerly 8.9) is amended.
	The SCI should ensure there is not undue duplication between the consultation exercise carried out by the developer and the LA.	No change. We must undertake statutory consultation. In addition to this, there are considerable benefits to the developer in undertaking a community involvement exercise as stated in paragraph 8.11 (formerly 8.9).
	It is important to alert Ward Councillors of their involvement at pre-application stage.	Agree. New paragraph 8.14 refers.
	Consistency of approach is needed between authorities.	Other than the minimum statutory requirements there are no agreed national standards. However, best practice is shared between Local Authorities. The SCI is intended to reflect different local circumstances.
	Planning applications and additional documents should be made available on line.	We have embarked upon a programme of making planning applications available on line, to be completed by January 2006. The weekly list of planning applications along with the committee reports and agendas are already available on line. Section 8 refers.
	Front loading is not always possible as sites may only become available during document preparation.	It will be in developers' interests to identify prospective sites early in the process of preparing LDF documents, and they will be given every opportunity to do so.
W Fielding Orrell	What about infrastructure issues - the main cause of complaint	The SCI is a procedural document not a policy document and therefore it is not relevant to refer to infrastructure.

	Will the present structure of planning committee change to include co-opted members.	<p>The council has the powers to has co-opt persons on to the planning committee but has no plans to do so. Under the 1989 Act, a co-opted member would be a non-voting member. They would only be entitlement to speak.</p> <p>However, they would be required to disclose any personal or prejudicial interests they may have in a particular item under consideration. If they disclose a prejudicial interest they would be required to leave the meeting and would not be able to speak on the matter.</p> <p>Therefore, they may find themselves in a position such that they would be unable to speak on items that are of particular concern to them, on which they may be able to speak as a member of public.</p>
Brian Wilson Ashton-in-Makerfield	To meet 'minimum requirements' is not good enough.	To meet minimum requirements is a necessity but the SCI is clear that we will not just meet minimum requirements.
	The newspaper notice should be clear and non-standard so it is not lost amongst other adverts in the local press/newspaper.	A newspaper notice is a statutory requirement and will be complimented by other publicity as appropriate. LDF notices will be large enough to stand out amongst other notices.
	Listed building consent is not a minor development. Requests another category of 'specialist' development, as minor and major is too extreme.	A new sub heading has been added to make this clear.
	Consultation should not be diminished by the desire for the 8 weeks turnaround for planning applications.	The council has a duty to determine planning applications quickly and effectively, and will do so with good consultation procedures as set out in the SCI.
The British Wind Energy Association	PPS1, PPS12 and PPS22 provide guidance that the SCI should follow.	The SCI reflects government guidance and advice.
	The SCI should highlight the level of community involvement that is considered appropriate for different types of 'significant' planning applications.	Agree. Paragraph 8.12 (formerly 8.10) has been amended to identify a range of different types of involvement that we may encourage.

Broadway Malyan Planning on behalf of Westbury Homes.	Appendix B should refer to housebuilders as a specific category.	Agree. Appendix D (formerly B) is amended accordingly.
	Developers should be given a clearer idea of the types of consultation they may be expected to undertake.	Agree. Paragraph 8.12 (formerly 8.10) has been amended to reflect the methods for involvement that we may encourage.
Katy Crowson Wigan CVS	It is far too complicated in parts and is sometimes not very easy to read.	Amendments have been made to the text to make it easier to read. We have made every effort to ensure the document is written in plain English as far as possible given the requirements of the new system.
	Not enough detail on how the strategy will happen: would like to see an example on how the strategy will be implemented.	Section 4 and 5 both reflect our strategy for community involvement as set out in section 3. Table 2 has been amended to set out in more detail how the strategy will be implemented.
	Make use of the CVS community empowerment database.	CVS was represented at the SCI project group meetings and had an input into setting up our community engagement database. Key contacts from the community network groups have been provided. We will continue to make use of this resource.
	Need more detail on level of feedback and level of involvement needed for someone who cannot read or write.	Agree. Paragraphs 4.21 and 4.22 (formerly 4.20 and 4.21) are amended to refer to people who cannot read or write.
Government Office for the North West	It would be helpful to set out a general profile of the area to demonstrate the nature of the community.	Agree. New detail added to paragraph 4.20.
	Illustrate clearly that RSS forms part of the development plan but not part of the council's LDF.	Agree. Figure 2 is amended.
	The SCI should explain how the Council will link consultation on DPDs with consultation on other strategies and programmes where appropriate, and how the Council will seek to link consultation exercises on different DPDs.	Agree. New paragraph 3.8 added.

	Add to table two which general groups will be consulted at the various stages.	Table 2 amended.
	Section 6 should point out that those promoting an alternative site or policy at submission stage will need to indicate how the proposal complies with the test of soundness and how the SA process has been or is to be carried out prior to consideration at the examination.	Agree. Paragraphs 6.5 and 6.9 are amended accordingly.
	Make reference to the fact that each submitted DPD will need to be accompanied by a statement of compliance.	Agree. Paragraph 6.8 is amended.
	Refer to the Annual Monitoring Report, rather than just the 'Monitoring Report'.	Agree. Paragraph 6.17 (formerly 6.14) is amended accordingly.
	It is not enough just to refer to the Council's leaflet on Community Involvement in the Planning Application process, further detail in the SCI is needed. Refer to the different levels of consultation that will be carried out and give an indication of the types of application where the different levels of publicity may be appropriate.	Agree. Section 8 is amended.
	Expand on why pre-application discussions are important and acknowledge a partnership approach for pre-application discussions.	Agree. Paragraphs 8.10 - 8.17 (formerly 8.8 -8.12) are amended.
	Paragraph 10.1 should explain that where new consultation techniques are identified in the light of experience, the SCI will be reviewed to incorporate them.	Agree. Paragraph 10.1 is amended.
	Add other Government Departments to the list of consultees in appendix B.	Agree. Other Government departments are added to Appendix D (formerly Appendix B).
	The SCI is classed as an LDD	Appendices A and B (formerly D and F) have been amended to make this clear.
United Utilities	United Utilities support the draft SCI with just one comment relating to the communications leaflet mentioned in paragraph 8.12: 'that applicants should be made aware in that leaflet that it is their responsibility to check for the	Noted. A decision on the detail of this leaflet (now noted in paragraph 8.17) has not yet been decided. The comments will be considered at the appropriate time.

	presence of underground services’.	
Highways Agency	Need to set out how the council intends to deal with objectors' alternative sites.	Agree. Paragraphs 6.5 and 6.9 are amended to refer.
	Paragraph 7.3 is misleading, need to reflect that objectors can submit alternative sites.	Agree. Paragraph 7.3 is amended.
	Appendix E only relates to the soundness tests for the SCI	Agree. Appendix C (formerly E) is amended to refer to the soundness of DPDs also.
British Waterways	Would like to see more ticks and less question marks in table 2, for widely available publications such as the Borough Life magazine.	Agree. The Borough Life magazine will include LDF updates quarterly, and Table 2 is amended accordingly.
	The Council needs to set aside a substantial budget for community involvement and to employ a dedicated officer to deal with publicity of the LDF.	Noted. Section 9 refers to resource implications.
GL Hearn on behalf of Tesco Stores Ltd.	It would be helpful if a ‘complete planning strategy’ was identified, e.g. new housing, shops, employment etc.	Agree. Paragraph 2.6 is amended.
	The LDS should be kept up to date whilst the LDF emerges and it should be maintained on the council's website and should be available on request.	The LDS has to be kept under review and submitted to Government for approval. Progress against the contents of the LDS will be updated on our website.
	It would be helpful to identify what methods/techniques for consultation are envisaged for Wigan Borough.	Table 2 sets out how we will consult using the appropriate methods for Wigan Borough as identified in Table 1.
	The Community Engagement Database needs to be kept under review. A wide and comprehensive consultation exercise is preferred to one which is selective.	Agree. The Community Engagement database will be kept up to date and properly managed. We will be seeking to refine the database to identify particular interests for consultation. Involvement won't be confined to selective groups where someone has expressed a particular interest to participate. Paragraph 4.16 is amended.
	Preference is by letter/email on each occasion.	Noted. We will be recording preferences and acting accordingly.

	Add Tesco Scores Ltd to the database.	Tesco Stores Ltd have been added to the Community Engagement database.
	Would like the statutory periods for consultation to be identified as time bound and the consequences of late representations in statutory/non-statutory circumstances identified.	Agree. New paragraph 6.6 refers.
	The SCI should make clear how the 'soundness' test will be applied in respect of other LDF documents.	Agree. Appendix C (formerly E) refers.
	It should be made clear that it is not necessary to make representations using a standard form / comment sheet.	Paragraph 7.1 is suitably amended.
	Considers that the definition of Major/Minor applications should be undertaken on a case-by-case basis, rather than adhering strictly to fixed thresholds.	No change. The definitions for major and minor developments are statutory definitions.
	The SCI should clarify the Council's approach on consultation with elected members, both before and during submission of a planning application.	Agree. New paragraph 8.14 refers.
Ian Baseley Associates on behalf of The Showmen's Guild of Great Britain.	Requests early and direct consultation with the local section of The Showmen's Guild of Great Britain. Requests the local contact be put on the community engagement database.	Agree. The Lancashire, Cheshire and North Wales section of the Showmen's Guild of Great Britain contact has been added to the community engagement database and will be consulted with at the early stages of document preparation where interested or affected by proposals.
Northern Planning on behalf of Peel Investments.	It is important that the views of developers and landowners are taken into account during preparation of DPDs and SPDs. The SCI should commit the Council to working with developers and landowners to minimise potential objections and to ensure policies and proposals are practicable.	Agree. The SCI by means of section 4 and Appendix D (formerly B) ensures this.
	The SCI should commit the Council to discussions with objectors to discuss their representations after formal consultation stages.	No change. We will seek to discuss representations with objectors where appropriate.

	The SCI should commit the Council to a full 6 week consultation period on SPDs.	This is stated in paragraph 6.13 and was formerly stated in paragraph 6.8. Figure 4 has been amended to reflect this.
	The SCI should specify the type of pre-application community involvement the Council may be seeking on major development. It should not be left to be explained in a leaflet, which has no weight in the planning process.	It is up to the developer. The Council can only advise. However, paragraphs 8.11 and 8.12 are revised.
Peter Sargeant	Colour and design should be used with greater care on the cover.	The large 'Draft' at an angle across the cover will not be used in future draft documents.
	Some of the titles in the 'contents' page are inconsistent with the section titles in the document.	Agree. Contents page titles are amended accordingly.
	The date on the page footers would be more appropriate alongside the page headers.	Agree. Headers and footers are changed and updated.
	The LDF should start with DC in order to grab attention to what people are most familiar with / concerned about.	Disagree. The SCI is part of the LDF and, therefore, logically concerned foremost with the preparation of LDDs. The purpose is to promote LDD preparation as the way to influence development.
	There are many instances where the language and the presentation could be much clearer and more consistent.	Noted. Numerous changes have been made to the text and presentation of the SCI for the purposes of clarity and consistency.
	When referring to other documents, the date of the document concerned should be noted or, alternatively, words such as 'or any subsequent replacement of it' should be included.	Agree in part. It would not be practical to refer to the dates of documents that may be subject to change and be republished. However, the additional wording would address this and references are amended accordingly.
	A map of Wards and Townships is needed.	A map is included in Appendix G.
	The nine guiding principles in section 3 are woolly and ridden with ridiculous political jargon such as 'frontloading' and 'fit for purpose', but do provide key tests for the SCI itself.	As stated in the SCI, these are based on the Government's principles for community involvement in the planning system. 'Frontloading' is jargonistic but is critical to the new approach and is explained in the related text. The meaning of 'fit for purpose' is dependent on the context within which it is used. If something is not fit for its purpose then it is clearly deficient.

<p>There are significant constitutional problems that weigh against Township Forums as representative bodies, including their oligarchical nature and lack of openness.</p>	<p>The Township Programme was set up by the Council in April 2003 to help develop community involvement. Ten Township Forums bring together representatives from local groups and businesses in each area with councillors and with officers from all the agencies that deliver services in the area (they act as advisors). There are 331 places on the ten Forums, held by representatives from 166 community groups. Forums are part of the Wigan Borough Partnership and contribute to the Community Plan. They are not part of the democratic process, nor do they pretend to be. They are consultative bodies only. They are there to:</p> <ul style="list-style-type: none"> ▪ Promote local action via a local plan; ▪ Help people and agencies to work together better; ▪ Provide a voice for local people and issues.
<p>Page 13 - standard comment sheets should be regarded as guides. They can unduly constrain responses.</p>	<p>As noted in the SCI, the use of comment sheets for people to respond to draft documents makes our task of analysing those comments easier. As such, council resources can be used more effectively and efficiently and it is easier to assess whether a change can be made to satisfy the concerns raised.</p>
<p>The Council Tax mailing is a serious omission from Tables 1 and 2.</p>	<p>No change. The Council Tax mailing is only once a year and the primary purpose is to 'request' payment and advise on how the money is spent. It has to be light in order to keep the cost of postage to a minimum. The annual LDF programme could be publicised but would not necessarily be a priority given the breadth of work that the Council is engaged in. Neither would it be likely to generate a lot of interest.</p>
<p>The SCI should go a stage further and indicate precisely what will be done for each LDD through an LDF page or insert in each edition of Borough Life.</p>	<p>Agree in part. Borough Life will be used to update on the latest position on LDD production, with an emphasis on forthcoming opportunities to participate. Table 2 is amended accordingly.</p>

<p>Paragraph 6.5 indicates a period of 6 weeks for representations on SPDs but Figure 4 says it may be reduced to 4 weeks. This cannot be acceptable at any time of year.</p>	<p>The Town and Country Planning (Local Development) (England) Regulations 2004, Regulation 18 (3) states that the period for any person to make representations on a SPD "must be a period of not less than 4 weeks or more than 6 weeks". Figure 4 reflected this with paragraph 6.5 making a commitment to allow the maximum permissible time on each occasion. Nevertheless, Figure 4 is changed.</p>
<p>In the unnumbered paragraph below paragraph 6.14, it is inappropriate to reserve the right to determine mechanisms for public involvement on the joint waste development plan document for Greater Manchester outside the SCI; plus as part of the LDF it is inappropriately described as a related document.</p>	<p>The arrangements for preparing and consulting on the joint waste plan are still subject to agreement between the Greater Manchester authorities. Therefore, we cannot be definitive about how public participation will be arranged. However, as a DPD we will ensure that we meet the definite commitments set out in Table 2, with the exception of the Readers Panel because it will be prepared by a joint team on Wigan Council's behalf. The former unnumbered paragraph is deleted accordingly and appropriate reference is made in the key to Table 2 instead.</p>
<p>In paragraph 8.5 it should be made clear that 'exceptional development' is a local concept.</p>	<p>Agree. The reference is amended.</p>
<p>The Council should guard against the assumption that all interested parties can easily access the website or would necessarily wish to view reports in hard copy.</p>	<p>We do not publicise or provide any information exclusively on the website. It is, however, an increasingly important medium and we are increasingly ensuring that information is accessible on it for those that want, and are able, to access it there.</p>
<p>Paragraph 9.7 is all but predicated on the possibility that the Council might seek to evade minimum statutory requirements. It certainly cannot have a get-out clause like this.</p>	<p>Paragraph 9.7 stated that we will "always meet the statutory requirements". However, it is deleted as paragraph 9.5 serves the purpose intended.</p>

<p>Appendix A is silent about charging the public for copies. A precondition of effective participation is that copies of basic documents should be free, or charged at a modest rate.</p>	<p>The Council has to order an appropriate number of documents to ensure, as far as possible, that it does not run out of the them while it is still 'current' but that it is not left with lots of unwanted copies when it is no longer 'current'. This would be a waste of resources. A modest charge is imposed to ensure that those people that want a copy can get one. This is in addition to the fact that free copies are sent to local groups and that copies are available for inspection in all libraries, at certain council offices and on the website. Appendix F (formerly A) is amended to refer to the fact that a modest charge is made.</p>
<p>Appendix B is very generalised. Appendix C is more specific. However, both a short on relevant detail such as the identities of neighbouring Parish Councils.</p>	<p>Appendix D (formerly B) is generalised in line with the advice in Annex E of PPS12 and Checklist 7a of the companion guide to PPS12 'Creating Local Development Frameworks'. Appendix E (formerly C) is an established list used by Development Control. There is no need to identify individual Parish Councils in the SCI - these details are held in the community engagement database.</p>
<p>Appendix E should be made relevant to all aspects of the LDF.</p>	<p>Agree. Appendix C (formerly E) is revised accordingly.</p>
<p>Appendix F is not complete. It should include 'UDP'; the derivation of RSS from RPG should be explained and there is overlap with Appendix D with scope for rationalisation.</p>	<p>Agree in part. Appendix B (formerly F) is revised accordingly but, while there are similarities between it and Appendix A (formerly D), there are key differences, not least with the references to UDP, RPG and PPG added. One is a glossary of terms, the other an explanation of the new system. It is simpler to keep them apart.</p>
<p>Legal authority referred to should be provided, perhaps by discrete footnote.</p>	<p>Source documents are referred to when it is appropriate to do so.</p>
<p>There should be a clear outline of what the minimum legal requirements are, in suitably referenced appendices, dealing with (a) involvement in development plans, (b) involvement in development control and (c) rights of access to meetings, reports and documents, including background documents.</p>	<p>The minimum legal requirements for involvement in development plans are shown briefly in Tables 1 and 2. Otherwise, the minimum requirements in the Borough will be as set out in the SCI. Paragraph 8.19 (formerly 8.16) has been substantially revised to set out the publicity arrangements for DC.</p>

<p>Does the SCI cover all the circumstances that might be anticipated in the Wigan Borough area? Does a 'pick and mix' formula give the necessary assurance required? With the LDS it ought to be possible to identify in advance precisely when, and by what methods, each DPD and SPD will be subject to consultation with the public at various stages. If the LDS is up to scratch there is no room for any uncertainty at all.</p>	<p>A pick and mix approach is appropriate to ensure that the SCI is sufficiently flexible to deal with circumstances that might arise. With experience of the new planning system, the council may be able to be more definitive about when, and by what methods, consultation will take place. However, we are yet to adopt an SPD or commence work on a DPD, and we are only half way through the first year of the first LDS, which will be reviewed in the light of our experiences.</p>
<p>The SCI is silent about the handling of significant cross-boundary applications, such as those subject to EIA, both as regards proper publicity and the evaluation of local views.</p>	<p>For applications requiring an EIA, publicity will be undertaken by the council dealing with the application in accordance with the EIA regulations. For all other applications publicity will be undertaken by the council dealing with the application in accordance with their own code of publicity. All such publicity would be unaffected by the presence or otherwise of a district boundary.</p>
<p>The SCI should make it clear what kinds of notices will appear in which newspapers.</p>	<p>Agree in part. Table 1 is amended accordingly for the SCI. Paragraph 8.19 (formerly 8.16) has been substantially revised to set out the publicity arrangements for DC.</p>
<p>The Council should protect itself against the charge of sharp practice and recognise that proper public involvement is not served by undertaking publicity at, or just before, certain periods in the calendar. Christmas, Easter and mid-July - August should be avoided. Requiring responses by 5pm on Friday, especially one before the Bank Holiday Monday, rather than the Monday after the weekend makes the Council look foolishly bureaucratic.</p>	<p>The new planning system sets out detailed schedules for the preparation of DPDs and other LDDs. The formal public participation stages come at set points in these schedules. As well as having to programme our overall workload at different stages of different documents, we have to avoid deposit over Christmas and key decisions / deposit over the period before Council elections in early May. We simply cannot afford to avoid Easter and summer as well. Furthermore, with 6 weeks and adequate publicity, everybody should have the opportunity to participate.</p>
<p>Inconsistencies in deadlines between neighbour consultations and public notices results in two threats that representations may not be taken into account, one of which is plainly of no effect.</p>	<p>With planning applications the council has no choice as to when to publicise. It depends entirely on when the application or any amended plans / details are submitted. The council can only advise.</p>

The SCI says nothing about remedies when the Council fails to adhere to its own undertakings.	Agree. A new paragraph 7.5 has been added to section 7.
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