

Organisation/ Individual	Response Summary and key issues raised	Officer response	Proposed change to SCI
Natural England	Not able to comment in detail.	Noted.	No change.
'Lets Talk' response	Welcome pre app consultation but would like to see more use of social media and residents association sites being used to publicise pre apps and applications.	The Council currently utilise social media platforms and will continue to do so planning policy documents. In respect of planning applications, the Council do not carry out publicity for pre-applications but the applicants often do which the Council encourage.	No change.
'Lets Talk' response	Make it simple.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way.	No change.
'Lets Talk' response	Planning application and policy process needs to be more open and transparent. There needs to be a lot more information given to residents by the council if the forums are not going to keep us informed, and as someone who works and cares for a disabled relative its impossible to get to meetings during the day, but that's something else that has been noticeable when the council become involved, there is no thought for the workers and no plans to allow them the ability to become involved.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way. The standards and commitments for community engagement and consultation are clearly set out in sections 2 and 3 for planning policy documents and planning applications.	No change.

'Lets Talk' response	Document is too detailed.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way.	No change.
'Lets Talk' response	Not detailed and does little to inspire confidence. Communications on planning should be proactive by contacting residents' associations.	We have drafted the SCI to strike a balance between containing enough detail as to be meaningful and being presented in a straightforward clear way, and we are seeking to improve our systems form a user perspective. In relation to planning policy matters, residents associations can request to be included on the consultation database so that they receive notification of any policy consultations (such as the Local Plan for example).	No change.
'Lets Talk' response	Looks ok.	Noted.	No change.
'Lets Talk' response	No commitment to update the planning platform.	System provision is beyond the scope of the SCI, and we are seeking to improve our systems form a user perspective.	No change.

'Lets Talk' response	The draft SCI contains a great deal of good intent; the extent to which that it is followed will determine its success. Observations include: more to be done to understand cumulative effects of multiple schemes in one area, greater transparency of s106 agreements and how and when implemented.	We published our Infrastructure Funding Statement (IFS) in December 2020 and we will commit to review and update the IFS and our Monitoring Report on an annual basis as per the statutory requirements to ensure there is a comprehensive and transparent approach to how developer contributions are being used.	No change.
'Lets Talk' response	More needs to be done to stimulate genuine community involvement at the early stages of planning and encourage formation of Parish Councils, neighbourhood forums and plans.	Para's 2.15-2.28 inclusive as drafted in the SCI detail the approach to neighbourhood planning together with the Councils website: www.coventry.gov.uk/info/111/planning_policy/3600/coventry_local_plan_2011-2031/5	No change.
Highways England	No comment.	Noted.	No change.
The British Horse Society	No comment other than to say we would welcome inclusion of future consultation.	The representor will be notified as requested and added to the planning policy consultation database.	No change to the SCI but will be added to the planning

			policy database.
Individual respondent	<p>Suspects the 2021 version is intended to remove community involvement unless required by law and wants to retain the 2012 version. Method of notification of planning applications needs to be improved to include 21st century communication i.e. email and SMS. Plus if any aspect fails e.g. planning portal is down or not updated then the notification has to be extended by the amount of time any systems were down or not available. Currently, notification is not required if a road separates you from the planned site even if you are opposite the development, I propose notification is within a radius of so many metres of the development so covering in front, to the side and behind. The distance depending on the scale of the development. Suggestions, extension to a house 25m, new single house 50m, development under 10 houses or flats 100m and over 10 houses or flats 250m.</p>	<p>The 2021 SCI has been revised to take account of changes to Government legislation and guidance since the existing SCI was adopted and to bring it up-to-date with wider Council priorities, processes and strategies. It has been written to be flexible to be able to respond to the changing needs of communities over time to ensure inclusive engagement in planning policy issues.</p> <p>In respect of planning applications, the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the consultation method and there is no way of knowing email addresses for adjoining neighbours. Officers can ask for wider consultation if necessary/desirable based on the type of application or where any extension /building is located on a site. The minimum standards are set out within legislation and this minimum will be exceeded in most instances as officers undertake further consultation dependant on the nature and scale of the development.</p>	No change.

<p>Historic England</p>	<p>Support the approach to the draft SCI and would welcome notification of proposed neighbourhood planning areas and draft plans.</p>	<p>We can confirm the representor will be notified as requested.</p>	<p>No change.</p>
<p>Individual respondent</p>	<p>Access to public venues: not all areas of the city have a library within walking distance and would be too far for residents to walk especially if they are elderly or disabled. This is discrimination as a result of cuts made to local services (which were precipitated by the fall in local authority funding from central Government). How does Coventry City Council (CCC) ensure that residents in Longford have the same opportunity as others in the City to view planning applications and consultation documents? Does CCC identify alternative locations where documents can be viewed in areas such as this? Where can Longford residents go to use computers to search the planning register online or respond to consultations and surveys with support but without incurring travel costs? Where will notices be displayed so that residents are aware of public consultations? Ideally, Longford should have access to its own library service. However, under current circumstances alternative measures should be put in place. Could a reinstated mobile library service provide suitable facilities? For example, the weekly list of planning applications and notices about consultations could be put on display and reference copies of the local newspaper, where CCC advertisements are published, could also be made available. Should a list of suitable venues and their contacts be maintained so that public consultation sessions/events can be arranged when needed? Could more use be made of the community noticeboards?</p>	<p>All planning policy consultation documents are available to view online and the Council will continue to help all users of the planning service to help themselves through appropriate means. Facilities are available at both Holbrooks and Bell Green libraries in addition to other libraries across the city to enable the viewing of planning documents. The planning team will notify users when planning policy document consultations are live. The Council's planning team have previously carried out extensive drop-in sessions during consultation events visiting local neighbourhoods and communities and as part of the SCI, this approach will continue to be part of the toolkit when consulting in respect of planning policy documents as specified in para 2.4. Notices for planning policy document consultations are provided through press releases and posts on social media platforms and the website together with notification by email and/or letter, where appropriate.</p>	<p>Additional point made in para 2.1 regarding utilising best practice engagement techniques.</p>

<p>Individual respondent</p>		<p>Notices for planning applications are provided through neighbour letters and site and press notices depending on what is set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>However, we note the comments and will continue to explore options to increase awareness of, and participation in, planning matters. An amendment to the SCI will be made to support this ongoing commitment.</p> <p>The questions relating to access and the provision of library services would be more appropriately directed to the Councils library services team in the first instance as it is beyond the scope of the SCI to address this issue. The planning team do liaise with library services when planning consultation events and drop-in services to ensure users have access to all information they may need.</p>	
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Individual respondent	<p>Local newspapers: it would be useful to state where CCC advertisements can be found (i.e., which newspaper) in supporting documentation about planning. In addition, local libraries should ensure that reference copies of newspapers are available so that residents have free access to information.</p>	<p>In terms of planning policy, advertisements are made on the policy web pages and via the Councils social media platforms together with press releases, usually in the Coventry Telegraph. To the best of our knowledge, local libraries do have reference copies of newspapers available to view for users.</p> <p>In terms of planning applications, again, the Coventry Telegraph is used, where appropriate.</p>	No change.
	<p>Online Portal: Difficult to download from the portal on accession.</p>	<p>System provision is beyond the scope of the SCI but we are continually seeking to improve the service as a result of feedback.</p>	No change.
	<p>Acknowledgement of representations: how do residents know whether an email or letter has been received and that it has been forwarded to the correct planning officer? How do they know whether their document can be read if it has been attached to an email? What happens if a resident raises concerns about issues such as flood risk, evidence of contamination or the presence of a protected species on a site? Are these types of concern ever investigated further? Are the planning application committee members given the option to read comments in their original format? Summarising residents' concerns as a generalised bullet point list may not convey the significance of the issues raised or provide enough context.</p>	<p>In terms of planning policy, representations would be acknowledged as a matter of course as and when received. Issues relating to flood risk, evidence of contamination or the presence of a protected species on a site are all matters that would be considered by policy as part of the consideration of constraints during plan making and are always considered when raised by residents. If such matters need to be considered further there will be ongoing discussions with</p>	No change.

<p>Individual respondent</p>		<p>the organisations concerned as part of the Duty to Cooperate to find solutions and agreement, where necessary.</p> <p>In terms of planning applications, customers will not know the response has been forwarded to the correct officer, but the planning applications admin team undertake quality control to ensure the representations are sent to the correct officer. Emails sent to the team email address receive an automatic confirmation of receipt.</p> <p>The case officer can raise the issues raised such as flood risk, contamination and protected species with an appropriate consultee such as ecology if the case officer has not already been made aware of the issues. Planning Committee Members could request a redacted copy of neighbour representations. Copying, what can be extensive pages of neighbour representations in a report is not considered necessary or helpful. The case officer aims to identify and highlight the relevant material considerations.</p>	
	<p>Statutory duty to co-operate and cross-boundary issues: In areas on the administrative boundary, such as Longford, the local authorities have not worked together effectively and this has led to an impact on the scoping of</p>	<p>Comments noted but it is considered they fall outside the scope of the SCI's aims and objectives and would be</p>	<p>No change.</p>

	<p>social and environmental issues. In particular, the cumulative impact of strategic allocations on traffic levels, air quality, flood risk and flood storage, biodiversity, climate change, access to services (e.g., GP and schools), green space, play areas and sports provision. Effective engagement with local residents would have highlighted these issues at a much earlier stage during the development of the local plans but unfortunately many people were unaware of the existence of these documents let alone the importance of engaging with the consultation process. When the local plans and supplementary planning documents are reviewed, it is essential that these issues are addressed. Statements of Common Ground should include social and environmental issues especially where cumulative impact is likely. Also, it is important that local residents are better informed about the process particularly when there are strategic allocations near to where they live. There also needs to be better communication with residents from other local authorities who live near to the administrative boundary. For example, events should be held to consult residents on their views and documents ought to be made available to view within their libraries or other public venues and this needs to be advertised in their local newspapers.</p>	<p>more appropriately considered through the plan review and/or plan making process. Reference is made and addressed in para 2.3, third bullet point regarding the cooperation on cross boundary issues, and national Planning Practice Guidance sets out clear expectations in terms of preparing Statements of Common Ground. In terms of awareness- raising of planning policy consultations in local communities (including those who live beyond the City Council's boundaries), the SCI contains a range of methods for doing this, including consultation databases, the local press and social media feeds</p>	
<p>Coventry Society</p>	<p>The Planning System is a very complicated and constrained process, which is difficult for a lay person to comprehend. The local planning authority is often blamed by residents for approving planning applications where it had no alternative but to do so because of national policy or other considerations. Council planning officers are the experts about how things work, whilst residents are generally ill informed about such matters. Such power imbalance does not lend itself to effective engagement. For consultation to be effective there is a need to empower residents by educating them about the planning world, so that they can focus on areas where there is a chance of achieving change. What is needed is a programme of training and support for community organisations so that they can become true participants in decision making rather than unhappy observers and complainants.</p>	<p>We support helping people to help themselves and so it is suggested this would be more appropriately considered by the individual(s) themselves independent of the Council. We will investigate putting more information on the policy and/or planning website to help explain in a more detailed way. The Planning Portal also provides helpful guidance to the system and how it works https://www.planningportal.co.uk/info/200127/planning</p>	<p>No change.</p>

	<p>The SCI mostly conceives 'community' to mean geographical communities. But there are many other types of community in the city that have an interest in its development and many of those communities are organised and represented through a host of voluntary and community organisations. Their role should also be recognised.</p>	<p>Noted: community and voluntary groups play an important role in society and it is appreciated that many of these are not geographical in nature and the SCI is worded to encompass all groups and organisations. Any individual or organisation can request at any point to be added to the planning policy consultation database. In terms of planning applications, such groups are not recognised as statutory consultees but again individuals or organisations can submit comments.</p>	<p>No change to the draft SCI but for planning policy matters, any individual or group can be added to the consultation database.</p>
<p>Coventry Society</p>	<p>We would like to see proposals included to consult with 'hard to reach' groups. Such groups might include disadvantaged communities, people whose first language is not English, young people and people with limited access to the Internet.</p>	<p>Contact information is already provided for such requests on the final page of the draft SCI. For planning policy, we work closely with internal and external stakeholders to ensure hard to reach groups are captured as far as possible to ensure engagement with disadvantaged communities and we have worded the SCI to provide flexibility in our consultation methods to ensure that we are inclusive and proactive. It is acknowledged that reference to such groups within the SCI would be helpful and we have added this in.</p>	<p>Insert the words 'including hard to reach groups' throughout section 2, but specifically in para 2.3, point 1, and para 2.4 point 1</p>

Coventry Society	<p>We would like to see the re-establishment of Ward Forums, but if that is not possible then a new online pattern of ward pages, focused around the ward councillors. Details of planning applications within each ward could be showcased there together with the local impact of council policies.</p>	<p>This is not a planning issue as the decision to abolish Ward Forums was a wider corporate Council decision. Notwithstanding, planning officers still attend public meetings as requested by Members, where appropriate.</p>	<p>No change to the SCI but we will feedback the comment to appropriate colleagues within the Council.</p>
	<p>With the Coventry Local Plan being reviewed in 2022, we would like to see early and deep engagement with the people of the city in this updated document. The re-establishment of ward forums should be part of the consultation processes on the development of the Plan.</p>	<p>The commitment to early engagement is covered specifically through para's 2.3-2.4 of the draft SCI.</p> <p>The point regarding Ward Forums is not a planning issue as the decision to abolish Ward Forums was a wider corporate Council decision. Notwithstanding, planning officers still attend public meetings as requested by Members, where appropriate.</p>	<p>No change.</p>
	<p>We would like the SCI to include proposals for the promotion, support and encouragement for people to submit applications for local listing and reporting issues relating to Conservation Areas or other heritage assets. We would specifically like to read of action to engage local communities in the preparation of Conservation Area Assessments and Management Plans.</p>	<p>This already exists through the services of the Councils Urban design and heritage team. Notwithstanding, reference is made in para 3.7 of the draft SCI to the importance and benefit of quality design in the planning process.</p>	<p>No change.</p>

<p>Coventry Society</p>		<p>Local authorities are not required to provide public consultation for new conservation areas, however if stakeholders request amendments to boundaries of existing Conservation Areas, then we are required to consult the public. Notwithstanding, planning officers have and will continue to proactively engage and consult stakeholders in respect of Conservation Area Appraisal work across the city in line with good practice.</p> <p>The process for how we will deal with planning applications in conservation areas are covered by section 4 of the draft SCI and associated table 1.</p> <p>Further information can be found at: https://historicengland.org.uk/advice/hpg/has/conservation-areas/</p>	
	<p>We would like the SCI to include a list of statutory consultees, local group categories and duty to cooperate bodies, perhaps as an appendix. This would be helpful in demonstrating to the public the types of bodies councils consult as part of the statutory process.</p>	<p>For planning policy matters, such lists can be found using the links below. We have avoided inserting specific lists in the SCI to ensure that the document remains up to date as sometimes such lists of consultees do change and the links would reflect these</p>	<p>Insert a new sentence at the end of para 2.2 to read 'The list of statutory consultees can be found</p>

		<p>www.gov.uk/guidance/plan-making www.legislation.gov.uk/uksi/2012/767/regulation/4/made</p> <p>In respect of planning applications, there is a national list of statutory consultees (depending on the type of application the ones that need to be consulted will be selected from this list). The officers report on the application will provide the detail of this information and the responses received. The responses will also be viewable online under the planning application reference number.</p>	<p>by using the following links’.</p> <p>www.gov.uk/guidance/plan-making www.legislation.gov.uk/uksi/2012/767/regulation/4/made</p>
Coventry Society	Although the draft SCI includes reference to the use of digital consultation, we would like to see a section of the document dedicated to this and being more pro-active and forward looking, rather than just responding to the Covid crisis.	The SCI already commits to digital consultation throughout the entire document (not just in relation to the pandemic) and specifically in sections for both Planning Policy and Development Management.	No change.
	We would like to see a stronger emphasis on pre-application engagement with local communities on significant developments. We would like to see the local authority make it clear to developers that this is a requirement of the process and not just something desirable.	Para’s 3.7-3.10 inclusive of the draft SCI detail the commitments to pre-application engagement. CCC remains committed to the pre-application process and strongly encourages applicants to engage meaningfully with communities prior to submitting applications. However, the NPPF is clear that such pre-application work	No change.

		cannot be made a requirement of submission.	
	<p>The City Council includes a list of all planning applications on its website. However, the information provided is so broad and extensive that it is not easy for a community group (or individual) to see what is happening that is significant or important, amidst a plethora of applications for extensions and lawful development certificates etc. Whilst an extension might be important to a neighbour, it is not generally significant to the wider city. The Coventry Society provides a service of filtering planning applications every week and re-listing the more significant applications in a more accessible format on our website at https://www.coventrysociety.org.uk/planning-applications.html</p> <p>Over recent months we have also highlighted the most interesting applications. We think that the Council should take over this responsibility and provide alternative filtering of applications to make the weekly lists more relevant to people in the city. For example we think that it should be possible, at the click of a link, to see all applications in a Ward; all applications in Conservation Areas, all applications for Listed Building Consent, all Outline applications etc. We think that the SCI should include a commitment to developing such an approach.</p>	<p>The suggestion is welcome and IT improvements will be made to enable the service to be accessed and used more effectively. The new search facility will make it easier to operate, and the weekly list indicates within which Ward the applications have been made.</p>	<p>No change to the SCI but ongoing improvements to the Councils IT service will be made.</p>
Coventry Society	<p>We would like to see community engagement in the process of identifying the necessary amelioration associated with major developments. Currently section 106 contributions are used as a milch cow for the education and health services and local residents who have to put up with the damage to their environment caused by development get no say in how it's spent. We would also like to see community engagement in the development of policy in this area and especially if the council makes the much delayed move toward the use of a Community Infrastructure Levy.</p>	<p>Comments are noted and whilst S106 is governed by strict legal requirements, information is published annually on how this is allocated and spent through the Infrastructure Funding Statement.</p> <p>Section 106 agreements ensure that development contributes to the local communities through a variety of projects including open space and</p>	<p>No change.</p>

		biodiversity, as well as health, education and many others.	
Coventry Society	We are aware that engagement with the public is a scary thing for some officers. We would like to see a training and support programme put into place to assist officers engaging with the public. We believe that done properly engagement can be a fulfilling experience for officers.	Noted. All officers within planning are entitled to, and receive training as part of the corporate approach to staff development and as a part of the continuing professional development seminars and events which do focus on engagement.	No change.
	With the Government giving much greater emphasis than previously to the quality of new design, especially in housing, we would like the SCI to include proposals about how that will be achieved in Coventry. It is clear to us that local communities need to be involved in the development of design guides and statements.	It is agreed there is much more emphasis upon design form Government. Para 3.7 of the draft SCI addresses and makes specific reference to the importance of design quality and the proceeding para's detail the approach to community involvement in this regard.	No change.
Coventry Society	We acknowledge that engagement requires resources and that the City Council is limited in the resources available to them. However, we feel that as a minimum the Council should appoint a Planning Engagement Officer to promote, support and develop the engagement process in the city.	We work closely with our internal and external stakeholders in respect of engagement as we need to utilise the Councils limited resources effectively, but are continually considering ways in which things can be improved and this includes training and development opportunities for officers. Any decisions regarding new job roles is more appropriately considered through the Councils planning management team however the comments are	No change.

		noted and this feedback will be relayed.	
Individual respondent	It would be useful to know what has, and has not, been taken into account when assessing the individual Planning Applications. Where there are several developments being assessed for a local area it appears that each is considered on its own merits and the complete picture may not be fully taken into account. A statement within the planning documents would make this clear.	Each application is assessed on its own merit having regard to other material considerations. The officer report will contain the reasoning for any recommendation.	No change.
Individual respondent	The SCI proposal to include ' <i>Plain English non-technical summaries where evidence is of a complex and technical nature</i> '. This would be especially of interest where Traffic Assessments are being consulted as they are by nature very technical and quite detailed. The full implication of a proposal may not be readily inferred by a non-specialist from the reports that are made available.	Noted and agreed – the draft SCI provides such a commitment in para 2.1. for evidence base documents.	No change.
Individual respondent	There are a significant number of comments throughout the document that refer to 'consultation at an early stage with affected local communities'. This is a fundamental part of the Planning process as far as I am concerned, and many of the issues that arise at the approval stages could well be mitigated had early consultation have taken place, and not just lip service to community consultation. This would result in better developments with far greater buy-in from the affected communities than currently seems to be the case.	Agreed. The SCI provides a commitment to undertake consultation at an early stage in the planning process as specified in paras 3.7-3.10 and paras 2.3 – 2.4.	No change.
	There was no mention of working closely with neighbouring councils to align Local Plans, or to propose any way to resolve issues that may arise from the different focus the differing councils may have. This is definitely an issue in the area in which I live and should be addressed.	It is considered this point is best addressed through the existing Duty to Cooperate process, but in any event, this is specifically addressed in para 2.3 bullet 3 of the draft SCI.	No change.

	<p>Section 106 agreements are appended to a development in a cursory manner, giving brief details regarding the amounts of monies and to whom it should go to. There is usually little or no detail of how the money was calculated or is to be used, nor importantly the timing of that spend. There are quite often mismatches between the money to be spent and the provision of the public resource that is proposed, eg schools or health facilities to be extended or built to provide spaces for new residents. This ought to be clarified at the time the agreement is committed to.</p>	<p>Where details of s106 contributions are required these can be found in the responses to the planning application consultations which are published online and summarised in the officers report.</p>	<p>No change to the draft SCI</p>
<p>Individual respondent</p>	<p>I am greatly concerned that this anticipated policy revision will become a 'lame duck' before it hits the water! As an organisation, we have been subject to frustration over many years as to the 'Principle to Practice' gap, there having been a consistently abject failure to properly engage with local groups such as ours. My fear is that this will prove to be yet another mere token gesture serving only to fulfil a 'legal requirement'. In our experience, the so-called 'Consultation Process' has never properly engaged the community. The publicity within the neighbourhood, more often than not, has neither been timely nor thorough, usually offered by the would-be developer rather than the Authority itself. This minimalist approach has not been appreciated, indicating a 'hands off' rather than a 'hands on' strategy of responsibility avoidance. Any initiatives in relation to the sharing of ideas with regard to intended developments have been almost entirely on our part.</p> <p>This presumptuous lack of co-operation by the Council has resulted in a woefully dispirited sense of 'official' neglect when essential 'local knowledge' factors have not been taken into account, especially in planning matters involving infrastructure and the environment. There is, or should be, a reason why 'Communities and Housing', for example, have been linked as a Director's post. The S.C.I. should reflect a practical determination on behalf of the Council to involve citizens in decision-making which will not only promote good relations between the elected and the electorate, but also prevent</p>	<p>We believe the 2021 draft SCI is a balanced approach to community involvement, engagement and consultation going forward taking account of current guidance and examples of good practice.</p>	<p>No change.</p>

	wastage of time, effort and money on ill-informed projects. We ask for 'works' not 'words'.		
Individual respondent	<p><u>1 – Introduction</u> [to the SCI] Community involvement = legal requirement – how often? Surely more frequently than every 9 years. Timing – Why now? There is a MHCLG consultation and pilot which envisages much more community involvement (more than CCC/planning dept would probably like!). Will this (consultation) document be amended if the MHCLG consultation and pilot meet with general approval and legislation is enacted and this document doesn't adequately reflect the new requirements? <i>'It has to be kept up to date'</i> – 9 years since 2012! Not exactly keeping up to date (especially given NPPF was revised in Feb 2019). What about SPG? Presumably no legal requirement seeing as CCC's most recent one for design requirements dates back to 1991! 2012 → review after 18 months. Was it reviewed? Even if it was, it has probably largely ignored in the intervening 6-7 years. Having regular review dates built in is absolute basics for any self-respecting organisation! Presumably, this document/process will be subject to the same external scrutiny detailed in the 2012 document which gives a timeline for 2005/2006 (p10). Why wasn't it approved until 2012? Just how long has CCC been inept? Why is this document 24 pages (and the 2012 document 52 pages)? It appears to be a very skimpy version - no appendices? Attempt to minimise community engagement rather than broaden? If MHCLG envisages more community involvement there should be more detail as to how you intend to achieve this.</p>	<p>The SCI has been revised now to take account of the changes to national legislation and guidance and to bring the existing 2012 SCI up-to-date. We believe the 2021 draft SCI is a balanced approach to community involvement, engagement and consultation going forward which takes account of current guidance and examples of good practice. We have made it shorter to ensure it is more concise and accessible (we have had comments about documents being too long) and have included links (eg to lists of statutory consultees, or to specific guidance or legislation) so that the SCI does not quickly become out of date if this information changes. Rather than minimising engagement we seek to ensure we are flexible and adaptable to respond to the changing needs of communities over time.</p> <p>We believe the section on resilience is robust and capable of responding to changes. However, if Government legislation changes in respect of planning, consideration will be given to</p>	No change.

		decide whether the SCI needs to be reviewed at the appropriate time.	
Individual respondent	<p><u>2 - Planning Policy:</u> [Chapter of the SCI] Para 2.1 [of SCI] – ‘where consultation is undertaken’ - when won’t/wouldn’t consultation be undertaken? ‘Ensure that documents are publicised and made available as required by the relevant legislation’ - including hard copies.</p> <p><u>Local Plan (+AAP):</u> Para 2.3/2.4 [of the SCI] — needs to be advertised much more widely (with timescale) > household leaflet, if you are genuine in your desire for community involvement otherwise it ends up as ‘them and us’ as appears to be the case at present (particularly green belt development). I was ignorant of the 2016 consultation despite living in Coventry. Too much re-AAP (city centre) passes under the radar. I suspect a lot more would be objected to if only we knew.</p> <p>Section on Local Plan focuses heavily on statutory procedure – and consultees (and doesn’t really concentrate on the general public) > see RTPi proposals.</p> <p><u>SPD:</u> Para 2.13/2.14 of the SCI – SPD/SPG affects every household and should be debated/discussed/voted on by full Council. Why has the SPG on design guidance for residential development not been updated since 1991?! Document is woefully inadequate in some areas.</p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward, to encourage a range of views from all sections of the community.</p> <p>Para 2.1 of the draft SCI sets out that documents will be made available upon request as required by relevant legislation.</p> <p>Para 2.2-2.4 of the draft SCI state that full use of press releases will be made together with notifications on the Councils social media platforms.</p> <p>Extant and long standing SPDs are currently being reviewed separately from the SCI and the Councils Local Development Scheme (LDS) will bring forward detailed timetables for this work.</p>	No change.
Individual respondent	<p><u>Neighbourhood Plans/Neighbourhood Development Order/Community Right to Build:</u> [2.15-2.28 of the SCI] Para 2.15 of the SCI – These should be actively promoted rather than the current policy/attitude which appears to be ‘we’d rather nobody finds out about these!’</p>	The Council have a duty to support and help facilitate the neighbourhood planning process. The Council remain committed to do so as specified in para’s 2.15-2.28 inclusive.	No change.

<p>Individual respondent</p>	<p><u>3 - Development Management</u> [section of the SCI]</p> <p>‘Advice can be requested’ – this is too lax and should be tightened – e.g. too many HMO are being approved on the nod and some areas are becoming HMO ghettos. CCC needs to get a grip of this. HMOs dilute community cohesion and are often linked to crime hotspots.</p> <p>Para 3.2 of the SCI – why does the Council allow the Planning dept to ignore (not adhere to) Local Plan site allocations which have been adopted by full council i.e elected officials? Why, in some instances, are officers allowed to ignore/disregard the Local Plan so flagrantly?</p> <p>Para 3.3 of the SCI – environmental assessment – surely this should apply to most (in not all) in line with climate change/net-zero priorities (read RTP1 response and how important they rank this).</p> <p><u>Pre-app consultation</u> (Para 3.7-3.10 of the SCI) – appears to be inconsistent and not monitored sufficiently by LPA; effective engagement! Insufficient follow-up with regard to ‘working collaboratively ... understand + seek to resolve issues’. Officers should be required to engage more (rather than seeing the public as a nuisance). Mitigation/planning condition ... public not consulted on these – need for more transparency.</p> <p><u>How planning applications are decided</u> (Para 3.11-3.19 of the SCI)</p> <p>Para 3.11 of the SCI – According to MHCLG - <i>legally</i>, a hard copy should be available for consultation, if requested.</p> <p>Para 3.16 of the SCI – why do material considerations seem to vary from one LPA to the next? Surely there should be a nationally recognised list/register!</p> <p>Para 3.17 of the SCI – delegation: a thorny issue - officers are not accountable to the electorate and can’t be voted out! Delegating ‘reserved matters’ from planning committee seems a slippery slope and detrimental as developers are very skilled at exerting pressure/making threats (if officers don’t cede to their demands).</p>	<p>Each application is determined in accordance with the Development Plan unless material considerations indicate otherwise. In terms of the Environmental Assessment, national regulations guide which applications require an Environmental Statement.</p> <p>Material considerations do not vary between Local Planning Authorities and it is not possible to provide a list.</p> <p>Delegation of authority to determine planning applications is essential to ensure decisions are made in a timely manner for less controversial applications.</p>	<p>No change.</p>
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<p>Individual respondent</p>	<p><u>4 – Resilience (pp21-22 of the SCI)</u></p> <p>Covid-19/compliance – why send out notification letters (spring 2020) saying documents could be consulted in libraries/ Broadgate when they couldn't. Sloppy - does nobody proof-read letters?</p> <p>Para 4.1 of the SCI - What reassurances that in practice this will only deviate from SCI where Westminster legislation allows and will not be used as an excuse to obstruct/abuse due democratic process?</p> <p>Para 4.2 of the SCI – Physical documents – nothing to stop these being printed and posted (as subsequently implied). People without reasonable broadband (usually pensioners/the most deprived) are discriminated against – even more than is usually the case. 'Different formats can still be provided upon request' – such as? The LPA has a statutory requirement to make a hard (paper) copy available.</p> <p>Para 4.3 of the SCI Social media should only ever complement normal means of communication - people who shun social media (FB) should not be precluded or discriminated against in any way. Social media should NOT replace traditional means of communication. It must not be seen as the new normal.</p> <p>Para 4.4 of the SCI (Planning Applications)</p> <p>Para 4.5 of the SCI – It is NEVER acceptable to abdicate your statutory duty to send out neighbour notifications (or site notices/newspaper adverts). Failure to do so would be irresponsible (and illegal). It is inconceivable that there would be a situation where the postal service is suspended. Social media is never acceptable as an alternative because some people refuse to have FB accounts because of their privacy/data policies and government/local government should never capitulate to social media as the primary means of communication. 'Any such steps should ... likely to have an interest ...' is too vague and is not prescriptive enough. Any property which is required by law to be notified must be notified. There must be no loopholes. Any attempt to adopt a minimalist approach to public consultation would be detrimental and</p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward.</p> <p>Re paras 4.1 and 4.2: Section 4 clearly states such practices will be used where there are exceptional circumstances directly informed by national legislation. It is only right and proper the SCI provides a commitment to provide the necessary means to ensure community consultation is carried out in all circumstances and situations.</p> <p>Para 2.1 point 7 of the draft SCI commits to ensuring documents are made available as appropriate.</p> <p>Re Para 4.3: Social media platforms and other electronic methods complement other forms of consultation but section 4 of the draft SCI is focusing on being resilient during the COVID-19 pandemic and potential future such situations, and it is only right and proper the SCI provide appropriate commitments to operate during such situations whilst adhering to national legislation.</p> <p>Re: Points relating to paras 4.4 – 4.6 of the SCI - all statutory required</p>	<p>No change</p>
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<p>Individual respondent</p>	<p>alienate/antagonise the public even more because the evidence already points to the planning dept. favouring developers over the public.</p> <p>Para 4.6 of the SCI – ‘Open and transparent’ – if that is the case, why are some applicants allowed to have their name etc redacted?! No reasonable justification.</p>	<p>notification is carried out for submitted planning applications and all applicant's names are now redacted apart from a select few types of application in accordance with GDPR. If people are genuinely needing assistance, planning officers will do their best to help. Prior to the pandemic, officers have knocked the neighbours door to explain the planning proposals where they are elderly or disabled.</p> <p>The current standards and commitments provided by the draft SCI adequately address the points raised.</p>	
<p>Individual respondent</p>	<p>I'm puzzled at the timing of this consultation given the government (MHCLG) consultation (#2) and pilot which follows on from Teresa May and others kicking up a stink last autumn. Just in case you don't follow them on linkedin (or elsewhere) here's what I got in my 'feed' from MHCLG a couple of months ago. Hopefully, you will note the clear emphasis on communities and let's hope (for the sake of Coventry) this is enacted because the system, at the moment, seems heavily skewed in favour of developers and residents are viewed as a nuisance.</p> <p>Press release: All new developments must meet local standards of beauty, quality and design under new rules. Local communities will be at the heart of plans to make sure that new developments in their area are beautiful and well designed. Ministry of Housing, Communities and Local Government: Videos LinkedIn (most recent) All new developments must meet local standards of beauty, quality and design under new rules - GOV.UK (www.gov.uk)</p>	<p>We believe the 2021 draft is a balanced approach to community involvement, engagement and consultation going forward. The SCI has been revised now to take account of the changes to national legislation and guidance and to bring the existing 2012 SCI up-to-date.</p> <p>All officers within planning are entitled to, and receive training as part of the corporate approach to staff development and as a part of the continuing professional development seminars and events which do focus on engagement.</p>	<p>No change.</p>

<p>Individual respondent</p>	<p>Communities to be at the heart of plans for well-designed neighbourhoods, to help us Build Back Better. Every council to create their own local design code so new developments can reflect what local communities truly want New 'Office for Place' to be set up, to help communities turn these designs into a local standard for all new developments. More funding to help communities nominate local historic buildings for listing. Proposals mean local communities will have the power to decide what buildings in their areas should look like, to help the country Build Back Better. The RTPi proposals for planning reform (= feedback to MHCLG?) also makes for interesting reading (inc. these key excerpts relevant to SCI): <i>Perhaps the most egregious issue for local communities is schemes being permitted that the local plan says should be refused. (Very simple solution - instruct the unelected Planning dept officers to adhere to it rigidly when applications relate to sites allocated in the Local Plan otherwise how can we have any confidence in the process. After all, Cllr Welsh claims 'the Local Plan means a lot to a lot of people.'! There is a high risk that communities will be disenfranchised from engaging in the planning system unless much greater involvement in local plans can be brought about. + A culture shift to front-loaded engagement. Therefore, we need a targeted public awareness campaign to raise awareness of the purpose and benefits of good planning and improve clarity on how, when and why people should engage.</i> <u>'Planning with and for people': Community Planners</u> Centrally funded positions of Community Planners in local authorities are needed to ensure a dedicated focus on hearing the views of communities and providing training on the technical and soft skills needed for participatory engagement particularly with hard to reach groups, including those without access to digital technology. They can also help facilitate community involvement in monitoring the local plan between reviews. <u>Popup Planning Shops</u> One way for us to ensure that digital engagement works for everyone, is to provide hands-on help for it. Many local planning authorities are accustomed to taking over empty shops or village halls for the duration of local plan consultation exercises. An extension of this would be for</p>	<p>The planning policy service is also committed to fully utilising consultation technology alongside other methods in line with latest good practice to ensure all sections of the community have the ability to put their views forward in an easy and effective way possible and ensuring digital inclusion through the introduction of a bespoke consultation management system later in 2021. This will help facilitate improved levels of community engagement and consultation at the earliest stages of plan preparation and throughout the entire journey of securing a revised Local Plan that will deliver the growth needs of Coventry.</p>	
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	<p>“shops” where experts help people use the consultation technology , including helping people log their comments. This is a model which works well for retail (e.g. the Apple store). We think it would ensure digital inclusion.</p>		
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