

Representations to the Statement of Community Involvement (SCI) April 2016

Introduction

The Council consulted on the Statement of Community Involvement (SCI) between Tuesday 22nd March and Friday 22nd April 2016. The consultation consisted of:

- Sending emails and letters to organisations and individuals held on the planning consultation database.
- Publication of the draft document on the Council website and Data Portal.
- Provision of paper copy of the draft document in Barrow Town Hall, Dalton Town Hall and various libraries in the Borough.

The consultation attracted 34 representations. Each representation has been listed by the Council in this document, along with a response from the Council on how the comment has been taken on board and used to amend the SCI. Comments and proposed amendments to wording have been taken on board, where appropriate, and the Council welcomes the continues input and engagement from everyone as the Barrow Borough Local Plan progresses through to adoption.

Consultation Details

Should you wish to be added to our Planning Policy Consultation Database, or would like to update your details, please contact us at:

developmentplans@barrowbc.gov.uk

Planning Policy
Barrow Borough Council
Town Hall
Barrow in Furness
Cumbria
LA14 2LD

Representations to the Statement of Community Involvement (SCI) April 2016

ID Number:	Comment
<p>Dennis Barrie – 531 Allan Williams – 565 Ian Barrie – 566 Neil Brown - 567 E A Price – 568 David Barker – 569 Brian Parkes – 570 J Bleackley – 571 Catherine Williams – 572 J McNeice – 573 Linda and Allan Wright – 574 J Dickinson – 575 Matt Barton – 576 C and S Head – 577 N Leake – 578 J Duncanson – 579 Daniel Scanlon – 580 Mr S Quirk – 581 D Coward – 582 Helen Watson - 583 Colin Parsons – 584 MA and VJ Wilding – 585 Edward Rockley – 586</p> <p>C Burton – 592 (received after deadline)</p>	<p><i>NB – An identical response, detailed below, was received from the listed consultees.</i></p> <p>I am writing to express my views on the Council’s latest draft statement of community involvement and, in particular, how ineffective public consultation has been in the development of the latest Local Plan. A number of serious points arise:</p> <ol style="list-style-type: none"> 1. The Council has disregarded the need for prior local consultation on fundamental issues, such as the allocation of land for new housing, before finalising the draft Local Plan. A Neighbourhood Action Plan or Community Led Plan initiated by the Dalton and Newton Parish Council should have been the subject of local consultation in Dalton and Newton, prior to drafting of the Borough Local Plan. The aim should have been for local people to inform and influence the Local Plan as clearly intended and stated in your draft SCI. 2. The views of Dalton people on new housing allocation areas and the impacts should have been sought. None of this has taken place and the consultation is therefore back-to-front in the democratic process. Decisions have been taken on the Local Plan without full involvement at local community level. 3. The consultation to-date on the Local Plan has been inadequate. It has assumed all Dalton residents purchase the local Barrow Evening Mail, read the Town Hall announcements of public meetings; or regularly visiting the local Council office to inspect public notices and pick up leaflets, or subscribe to regular e-mailed information from the Council Planning portal. This is an unrealistic expectation as people have very busy lives. 4. <i>Tick the following if in agreement:</i> <ul style="list-style-type: none"> • I am a resident located very close to a proposed major new housing allocation area adjacent to Romney Park. AGREE <input checked="" type="checkbox"/> • I was not aware of the new Local Plan housing designation and the consequences until the brief consultation ended. AGREE <input checked="" type="checkbox"/> • I was not aware of the public meeting held on 6 August 2015 in Dalton organised by the Council and did not attend. AGREE <input checked="" type="checkbox"/> • I had not seen a Council leaflet advertising the meeting. But this is not surprising as the leaflet was not delivered to my address. AGREE <input checked="" type="checkbox"/>

	<p>Note: The leaflet was apparently only available to collect from the Council offices.</p> <p>5. The designated new housing in Dalton would have a significant increase in the population of the town (>10%), impact local services (health and education) and potentially strain the local infrastructure. A significant area of productive agricultural land (green belt) would be lost, grassland and quarry habitats for numerous protected species including barn owls and bats would be lost. Elliscales Quarry is a listed SSSI. The proposed development allocation for housing would destroy the agricultural use, ecosystem services and natural habitat that the existing land already provides.</p> <p>6. In summary, the draft Local Plan proposals cannot be described as part of a sustainable housing policy. The proposals are not supported by the majority of local people who have not been adequately consulted. The draft SCI on page 12 lays out the consultation steps that should have taken place and this has not yet been undertaken. The Local Plan should only be finalised when full and effective consultation has been completed.</p> <p>7. The effectiveness of existing consultation methods requires review. This is demonstrated by the poor knowledge of the Local Plan expressed by Romney Park residents who would be significantly affected by the proposed land designated for new housing. Leafleting of existing residents next to any proposed major new land use designation should be a minimum requirement. This should provide adequate notice of public meetings. Senior officers and their consultants should attend such meetings and explain the proposals.</p> <p>8. Local Plan report details should be easily readable and printable from published documents, particularly as greater reliance is being made of electronic reporting via the internet. It was noted that the Local Plan housing allocation areas were included in a large A0 size plan that could not be printed by home computer users. It should have been relatively easy to include local maps at A4 scale to show the designated housing areas in relation to the nearest neighbourhoods.</p> <p>9. Leafleting to individual homes of a neighbourhood within 500m of a major new development, or new land use designation in a Local Plan would improve communication.</p>
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	<p>Response</p> <p>Thank you for your response. In relation to points 1 to 3, the Council has undertaken a number of consultations, throughout the development of the new Local Plan, in line with the Regulations set out in The Planning and Compulsory Purchase Act 2004 and the Council's own Statement of Community Involvement (SCI). Methods have included sending out letters and emails, press releases, advertisements, publishing data on the Council's website, public drop in sessions and making the documents available at public locations around the Borough, including in Dalton. This process is ongoing.</p> <p>Dalton with Newton Town Council are a statutory consultee on the Local Plan and are in the process of producing a Community Led Parish Plan, which is hoped to be finalised in 2016. In addition, all Borough Councillors, including those for Dalton are informed of the consultations we undertake and production of the Local Plan.</p> <p>Points 4 to 9 appear to relate to the content of the Draft Local Plan and you have therefore been added to the consultation database and you will be notified of any document production in relation to planning policy. You will be contacted during the next consultation for the Local Plan, which will be summer 2016, where you will have the opportunity to make a representation in relation to the issues raised above. The Council will endeavour to consult as widely as resources and timescales allow and therefore the SCI has been amended to include the possibility of site notices being displayed on proposed development sites.</p>
<p>ID Number:</p> <p>Cumbria GeoConservation Group - 398</p>	<p>Comment</p> <p>With reference to the consultation on Barrow's Statement of Community Involvement 2016, I can confirm that Cumbria GeoConservation Group wishes to remain on the list of consultation bodies, as in Appendix D. We wish to be consulted on any planning applications that may affect the 9 Local Geological Sites in the Barrow area. Full details of these designations are held at the Cumbria Biodiversity Data Centre (CBDC) in Carlisle.</p> <p>Response</p> <p>Thank you for your response, the comments have been noted. Cumbria GeoConservation Group will remain on the Planning Policy Consultation Database.</p>
<p>ID Number:</p> <p>Dean Maddison - 457</p>	<p>Comment</p> <p>You have asked for my comments on "The Statement of community involvement"</p>

	<p>This draft version includes lots of good words like:-</p> <ol style="list-style-type: none"> 1) Early & meaningful engagement 2) Transparency 3) Community involvement 4) Feedback <p>But we feel the communication methods used to inform local people are poor. Very few people if any will see the article placed in the evening mail or other methods presently used. This is true for the proposed housing development local to me. If you want people to comment and feel involved in your plans, then they need to be aware of them in the first place. In areas where a proposed housing development will impact on local people's lives, either short, medium or long term, then they need to be informed at an early stage.</p> <p>If you are really interested in community involvement and feedback then a better way of informing people of a proposed housing development in their local area / street would be :-</p> <ol style="list-style-type: none"> 1) Attach posters / letters on a number of lamp posts local to the proposed development. 2) Post flyers / letters to houses local to the proposed development. <p>The letters/posters would include a brief description of the proposed plan and where/how further information could be obtained. Both of these are relatively cheap and easy to implement.</p> <p>Another comment is to have some of the consultation meetings in an evening when working people are able to attend.</p> <p>Hope these comments are helpful.</p>
	<p>Response</p>
	<p>Thank you for your response. The Council has undertaken a number of consultations throughout the development of the new Local Plan in line with the Regulations set out in the Planning and Compulsory Purchase Act 2004 and the Council's own SCI. Methods included sending out letters and emails, press release advertisements, publishing data on the Council website, public drop in sessions and making the documents available at public locations around the Borough.</p> <p>The Council will endeavour to consult as widely as resources and timescales allow and therefore the SCI has been amended to</p>

	<p>include the possibility of site notices being displayed on proposed development sites. We have held public drop in sessions in the evening and will continue to do so.</p>
<p>ID Number:</p>	<p>Comment</p>
<p>Health and Safety Executive - 56</p>	<p>Thank you for your request to provide a representation on the Statement of Community Involvement consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved.</p> <p>We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard establishments and MAHPs located in the area of your local plan.</p> <p>Planning authorities are advised to use HSE’s Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Please see the advice note below for further information on the Web App including accessing the package.</p> <p>Future Consultation with HSE on Local Plans HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process, and that we may be able to provide advice on development compatibility as your plan progresses. Therefore, we would like to be consulted further on local plan documents where detailed land allocations and use class proposals are made; e.g. site specific allocations of land in development planning documents.</p> <p>Please send any future request for consultation to:</p> <p>The Administrator – Local Plans HID CEM HD5 Health and Safety Executive 2.2 Redgrave Court Merton Road</p>

	<p>Bootle Merseyside L20 7HS</p> <p>or by e-mail to: LOCAL.PLAN.S.CEMDH.5@hse.gsi.gov.uk</p> <p>If you have any questions about the content of this letter, please contact us at the address given.</p>
	<p>Response</p>
	<p>Thank you for your response, the Planning Policy Consultation Database has been amended to include new contact details for the Health and Safety Executive.</p>
<p>ID Number:</p> <p>National Grid - 224</p>	<p>Comment</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice</p> <p>National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p> <p>Robert Deanwood Consultant Town Planner n.grid@amecfw.com</p>

	<p>Amec Foster Wheeler E&I UK Gables House Kenilworth Road Leamington Spa CV32 6JX</p> <p>Ann Holdsworth Development Liaison Officer, National Grid ann.holdsworth@nationalgrid.com</p> <p>National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA</p>
	<p>Response</p>
	<p>Thank you for your response, the Planning Policy Consultation Database has been amended to include new contact details for Amec Foster Wheeler on behalf of the National Grid.</p>
<p>ID Number: National Trust - 131</p>	<p>Comment</p> <p>Thank you for notifying National Trust of the above consultation and inviting our comments.</p> <p>Having reviewed the draft SCI Review we have only a few comments to make as follows:</p> <ul style="list-style-type: none"> Figure 1 – the text immediately before this Figure refers to it being the “the Planning Policy documents we intend to produce for Barrow Borough”; however, it clearly includes existing documents (i.e. the Saved Local Plan policies, the Barrow Port AAP and the Shopfront and Advertisement Design SPD). It appears that the intention is to show both existing documents that are in force as well as those intended to be produced. However, that does then raise the further question of why Figure 1 does not include the other SPG/SPD documents that remain material considerations as set out on page 4 (i.e. Parking Guidelines in Cumbria SPG (1997) and Layout of New Residential Development SPG (1996))?

	<ul style="list-style-type: none"> • Section 2.2 – attention is drawn to the Trust’s concerns regarding the adequacy of the Green Infrastructure work to date in the context of all the GI resources across the Plan area as opposed to just those in and around the settlement of Barrow itself. The Trust’s specific and detailed concerns remain as set out in our letter dated 4th September 2015 and we would welcome an up-date on progress on this matter; if it would assist to discuss these concerns then our offer to do so remains open. • The overall approach to Development Plan consultations as set out in Sections 3.3, 3.4, 3.5 and Figure 2 is welcomed and supported. • Section 4.2 – the Trust has a concern that the approach set out here under ‘who’ in respect of SPDs does have the danger of missing relevant consultees and thereby failing to enable early engagement and collaborative working. Given that most of the consultees on the Council’s database will have provided email addresses there is no significant resource implication in consulting widely at the first stage so that individual organisations listed as ‘specific’, ‘general’ or ‘other’ consultees are made aware of the preparation of a particular SPD. The organisations themselves are best placed to determine if the subject matter is relevant to them and to respond accordingly. From the Trust’s perspective whilst most Councils appreciate our role in terms of both the historic and natural environments, it is not unusual for our role in areas such as tourism or education to be overlooked. • Section 5 – no particular comments to make. <p>The Trust would welcome notification of the Adoption of the Revised SCI in due course.</p>
	<p>Response</p>
	<p>Thank you for your response, your comments have been noted. The text has been amended above Figure 1, to describe the framework of planning policy documents more clearly.</p> <p>The Council takes into account your comments regarding who will be consulted in respect of SPD’s and we will endeavour to consult as widely as resources and timescales allow.</p>

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<p>ID Number:</p> <p>National England - 2</p>	<p>Comment</p> <p>Thank you for your consultation on the above dated 23 March 2016 which was received by Natural England on 23 March 2016. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>However, we have no specific comments to make on this consultation.</p> <p>Response</p> <p>Thank you for your response to this consultation.</p>
<p>ID Number:</p> <p>Network Rail - 6</p>	<p>Comment</p> <p>Thank you for the opportunity to provide feedback to the proposed policy.</p> <p>Network Rail is the public owner and operator of Britain’s railway infrastructure, which includes the tracks, signals, tunnels, bridges, viaducts, level crossings and stations – the largest of which we also manage. All profits made by the company, including from commercial development, are reinvested directly back into the network.</p> <p>Network Rail has the following comments to make.</p> <p>Network Rail would draw the council’s attention to the following (which applies to England only):</p> <p>The Town and Country Planning (Development Management Procedure) (England) Order 2015 Publicity for applications for planning permission within 10 metres of relevant railway land</p> <p>16.—(1) This article applies where the development to which the application relates is situated within 10 metres of relevant railway land.</p>

	<p>(2) The local planning authority must, except where paragraph (3) applies, publicise an application for planning permission by serving requisite notice on any infrastructure manager of relevant railway land.</p> <p>(3) Where an infrastructure manager has instructed the local planning authority in writing that they do not require notification in relation to a particular description of development, type of building operation or in relation to specified sites or geographical areas (“the instruction”), the local planning authority is not required to notify that infrastructure manager.</p> <p>(4) The infrastructure manager may withdraw the instruction at any time by notifying the local planning authority in writing.</p> <p>(5) In paragraph (2) “requisite notice” means a notice in the appropriate form as set out in Schedule 3 or in a form substantially to the same effect.</p> <p>For developments within 10m of the railway boundary Network Rail is now a statutory consultee.</p> <p>We would also draw the council’s attention to the following:</p> <p><i>Town & Country Planning (GPD) England Order 2015 Procedure for applications for prior approval under Part 3</i></p> <p><i>(5) Where the application relates to prior approval as to transport and highways impacts of the development, on receipt of the application, where in the opinion of the local planning authority the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site, the local planning authority must consult—....</i></p> <p><i>(c) the operator of the network which includes or consists of the railway in question, and the Secretary of State for Transport, where the increase or change relates to traffic using a level crossing over a railway.</i></p> <p><u><i>Procedure for applications for prior approval under Class E</i></u></p> <p><i>(5) On receipt of the application, where in the opinion of the local planning authority the development is likely to result in a material increase or a material change in the character of traffic in the vicinity of the site, the local planning authority must consult—</i></p> <p><i>(c) the operator of the network which includes or consists of the railway in question, and the Secretary of State for Transport, where the increase or change relates to traffic using a level crossing over a railway.</i></p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none">(a) By a proposal being directly next to a level crossing(b) By the cumulative effect of developments added over time
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	<p>(c) By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route</p> <p>(d) By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway</p> <p>(e) By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads</p> <p>(f) By proposals that may interfere with pedestrian and vehicle users’ ability to see level crossing warning signs</p> <p>(g) By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing</p> <p>(h) By proposals that change the demographic of users – from say occasional agricultural usage to (but not limited to) increased usage by minors, dog walkers, the elderly, cyclists and mountain bikers, pedestrian using smart-phones, with ear-phones with little or no appreciation of the risks from approaching trains at footpath level crossings.</p> <p>Where proposals may result in a material increase in type and volume of users at a level crossing the local planning authority should contact Network Rail.</p> <p>All notifications of planning applications and policy consultations (including mining, minerals and waste) should be issued to the following address only:</p> <p>Town Planning Team LNW Network Rail Floor 1 Square One 4 Travis Street Manchester, M1 2NY</p> <p>Email: TownPlanningLNW@networkrail.co.uk</p>
	Response
	<p>Thank you for your response. Comments regarding the publicity of and consultation on planning applications related to railway land have been passed to our Validation Team and we note the address provided for consultation.</p>

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<p>ID Number:</p> <p>South Lakeland District Council - 10</p>	<p>Comment</p> <p>Many thanks for inviting us to comment on your consultation draft Statement of Community Involvement 2016.</p> <p>We welcome references to South Lakeland District Council and relevant parishes within our Local Planning Authority Area as organisations that Barrow Borough Council should work with and consult in respect of the Duty to Cooperate and/or wider consultation activities. However, on this occasion, we have no other comments to make.</p> <p>For your awareness, our own revised SCI is being put before Full Council on March 31st.</p> <p>Response</p> <p>Thank you for your comments. The Council has and will continue to work closely with SLDC, other neighbouring authorities and other public bodies throughout the production of planning policy documents.</p>
<p>ID Number</p> <p>British Astronomical Association - 139</p>	<p>Comment</p> <p>Thank you for your letter asking me, on behalf of the British Astronomical Association to respond to your draft consultation SCI. As you will be aware our concern is in the preservation of the night sky and the prevention of damage to it by way of Light Pollution.</p> <p>Current consultation policies seem to be very opaque and feedback to planning responses is more or less absent, apart from obvious changes in final policies.</p> <p>If you are seeking enhanced involvement in the final choices and move forward local planning, interaction needs to improve.</p> <p>In the past, we had some notice of planning applications, which had potential to cause damaging light pollution. These have stopped despite being on your consultation list?</p> <p>We have recently had to enquire about a large lighting installation on which we had no consultation – Furness Academy sports pitch. As it turned out it has used the best available practice, albeit with a less than perfect end result.</p> <p>We raise the Local Plan review which is currently underway. We have responded to the first and second drafts, but have had no feedback on either. Yes changes were made, which included updated policies in draft 2, which were in the old plan, but not the</p>

	<p>first draft.</p> <p>We appreciate that the Planning team have a high workload, a few minor changes may help the process. Looking forward to your response.</p> <p>We are unable to make specific comments, as no copy of the SCI was available in the local library?</p> <p>Response</p> <p>Thank you for your response, your comments have been noted. We are sorry you were unable to view the SCI at the local library. A copy of the draft SCI was sent to six local libraries and was also available to view at Barrow and Dalton Town Hall.</p> <p>Please contact the Planning Policy Section, should you require more information relating to your previous consultations.</p> <p>The Council is aware that you have made previous representations relating to the Issues and Options and Preferred Options draft of the Local Plan. All representations for the Issues and Options draft were categorised by the Council and listed in a document, along with a response from the Council on how the comment has been taken on board and used to amend the Preferred Options draft. This document was made available on the Council website at the time of the Preferred Options draft.</p> <p>Representations for the Preferred Options draft will be documented in the same way in Summer 2016, during the next consultation of the Local Plan.</p>
<p>ID Number:</p> <p>S Baines - 407</p>	<p>Comment</p> <p>Thank you for your letter asking me to respond to your draft consultation SCI.</p> <p>Current consultation policies and practise seem to be very opaque and feedback to responses is more more so, apart from obvious changes in policies after the fact.</p> <p>As an example, the Local Plan drafts include proposals for housing on a greenfield site in my area REC18. This is clearly not thought through and is in conflict with the inclusive new 'Green Strategies' within the new proposed Local Plan. I had no feedback to my response to the initial draft of the Local Plan. How did you....</p> <p>"Ensure the views of the community are taken into account" - ?</p>

	<p>“We hope that local people will feel part of decisions and processes that help shape the future of the area” - ?</p> <p>If you are seeking to truly involve local people in the final choices, not just the process, interaction with the local residents needs to improve. This should include a longer term view of the direction of travel beyond the political 5 year cycle of central government. Building a coherent inclusive vision for Barrow and its districts as a pleasant, welcoming place to live.</p> <p>Fine words which are not followed into practice are hollow and meaningless.</p> <p>I would have added further specific comments on the SCI after reading them but could not find the library copy?</p>
	<p>Response</p>
	<p>Thank you for your response, your comments have been noted. We are sorry you were unable to view the SCI at the local library. A copy of the draft SCI was sent to six local libraries and was also available to view at Barrow and Dalton Town Hall.</p> <p>The Council is aware that you have made previous representations relating to the Issues and Options and Preferred Options draft of the Local Plan. All representations for the Issues and Options draft were categorised by the Council and listed in a document along with a response from the Council on how the comment has been taken on board and used to amend the Preferred Options draft. This document was made available on the Council website at the time of the Preferred Options draft.</p> <p>Representations for the Preferred Options draft will be documented in the same way in Summer 2016, during the next consultation of the Local Plan.</p>