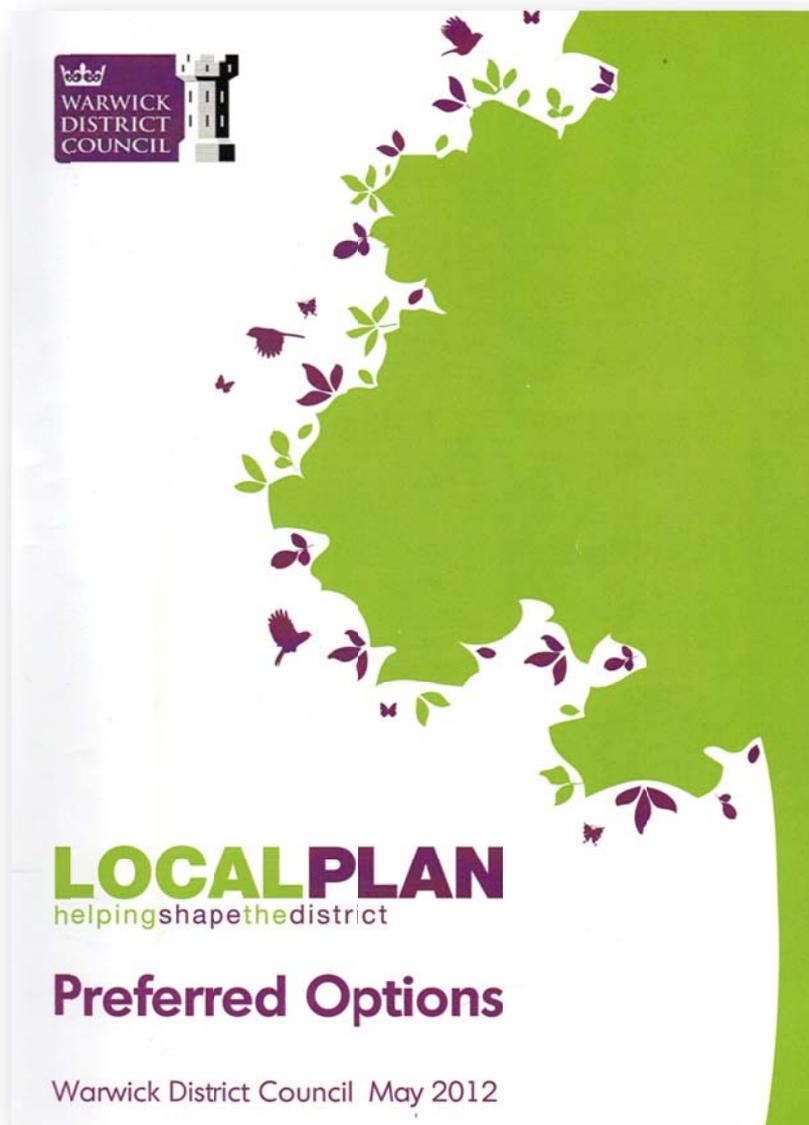


Warwick District Council
Local Plan Preferred Options Document
Consultation Process Review
April 2013: FINAL



Envision
delivering local planning solutions

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1.0 Executive Summary

- 1.1 This report undertakes a review of the process used by Warwick District Council to analyse the responses to the Warwick Local Plan Preferred Options Document. It considers whether the process: complies with the relevant planning regulations and statutes, and the Council's own Statement of Community Involvement; and provides a reasonable, comprehensive and balanced overview of the representations received.
- 1.2 The consultation on the Warwick Local Plan Preferred Options Document took place during an 8 week period in June and July 2012, and the Council received over 4,300 representations, from approximately 1,510 respondents. The review uses a random 10% sample of the total respondents and covers some 427 individual representations.
- 1.3 Representations can be submitted in a number of different ways: online; email; letter; completed pro-forma etc. The Council's consultation software enables the capture of all representations, against the relevant 'element' of the Preferred Options document. Lengthy representation such as letters and emails are summarised on the system and all respondents receive a confirmation that they have submitted a representation and the final version of the representation if it was summarised.
- 1.4 Envision analysed the representation summaries against the original submissions and considered both omissions and allocation against the correct element. Approximately 75% were considered 'satisfactory'; a further 15% had minor comments; and the remaining 10% of the sample contained either an omissions or could have been placed against an additional element.
- 1.5 Envision noted the large number of elements used by the Council for the document (over 200) and suggests that this number is reduced for future consultation. Despite evidence of a small number of representations which could have been placed against other elements it is concluded that these are minor and do not affect the overall effectiveness of the consultation process.
- 1.6 Only 8% of the sample contained an omission i.e. comments made in the original submission but not included in the final summary. In the majority of cases these are relatively minor and the issues raised are in general covered elsewhere in other representations. In addition, the Council's policy is to respond to each respondent confirming their representations and where required including the final summary used. This provides an opportunity for the respondent to comment if they are not happy with the summary used.
- 1.7 The Council is in the process of producing meta-summaries against each of the key elements of the document, including the 18 options and the main locations, particularly those proposed for housing growth. Using the 7 elements which generated the most representations Envision have checked the sample responses against the draft meta-summaries to ensure that all points raised are taken forward. It is recommended that further work is carried out on the meta-summaries as in their current form using bullet points they are over-simplified. A number of minor omissions were found and these should be taken into account in the updated meta-summaries.
- 1.8 In relation to consultation requirements there are no specific current Regulations covering consultation at the Preferred Options Stage of Local Plan making. The key legal test at this stage is to meet any requirements set out in the Council's adopted SCI. Subject to the production of a further report summarising all views (to the

Council's Executive) and the production of a table of the results of the consultation (including the Council's response) the current process is compliant.

- 1.9 This report highlights a number of recommendations for the Council going forward and it is hoped that these should be relatively simple to introduce both now for the current Preferred Options consultation and in the future, and should improve the effectiveness of the process and reduce the number of minor errors and omissions.
- 1.10 In summary the current process is adequate to cope with the current level of response. It is comprehensive and provides a balanced overview of the numerous representations received. However, through a number of minor changes the process could be further improved, reducing the number of minor errors and omissions and ensuring a more effective reporting system.

2.0 Introduction

2.1 Envision were commissioned by Warwick District Council to undertake a review of the Consultation Process undertaken on the Warwick Local Plan Preferred Options Document which took place during an 8 week period in June and July 2012.

Study Objective

2.2 The objective of the study was:

To review the effectiveness of the process used to analyse the responses to the Warwick Local Plan Preferred Options Document and consider whether it:

- a) complies with the relevant planning regulations and statutes, and the Council's Statement of Community Involvement; and
- b) provides a reasonable, comprehensive and balanced overview of the representations received

3.0 Methodology

- 3.1 Envision set out a clear methodology in their tender covering 5 stages which were agreed with the Council as follows:

Stage 1: Inception

Inception meeting and initial analysis of the Local Plan Preferred Options Document and consultation process.

Stage 2: Review of Responses - Part 1:

Undertake a review of 151 respondents (a 10% random sample from the 1,510 total respondents, as at 12th February 2013). Review to include:

- a) Reading of the full submission text;
- b) Consideration of whether the representation has been allocated to the correct section(s) of the preferred options (described as “elements” on the JDI e-consult system);
- c) Consideration, where applicable, of whether the officer summary is a satisfactory and reasonable summary of the full submission;
- d) Noting any significant inaccuracies or omissions;
- e) Establishment of a database to enable analysis;
- f) Consideration of sample responses as to whether there are any recurring omissions from any of the elements of the Preferred Options, thereby affecting the overall report of consultation.

Stage 2: Review of Responses - Part 2:

Review the Council’s early draft “Consultation Report” in relation to the Preferred Options by:

- a) Looking at the 7 sections that were subject to the highest number of responses;
- b) Considering whether the draft consultation report for each of the elements is a fair reflection of the content of the representations made taken from the agreed sample;
- c) Considering whether there are any relevant points that have been omitted from the consultation report.

Stage 3

Undertake a review of the consultation process to assess whether the approach taken is compliant with the relevant Planning Regulations, statutes, and the Council’s adopted Statement of Community Involvement (SCI) and is sufficiently robust to meet the requirements of an Examination in Public.

Stage 4

Prepare a Draft Report of findings and any recommendations for change, for comment by the Council. If required attend a further meeting to discuss the findings.

Stage 5

Issue Final Report.

4.0 Background

- 4.1 The Council produced a detailed 108 page A4 consultation document, Local Plan - Preferred Options, May 2012, with all details available on the Council's website. In addition, two handy summary documents were produced, one at A4 (20 pages) and one at A5 (22 pages) and these were made widely available. The documents set out the Council's 18 Preferred Options covering issues such as housing growth, the economy, town centres, transport and Green Belt.
- 4.2 The Council uses a software system called e-consult, provided by JDI Solutions, to manage consultation responses.
- 4.3 During the 8 week consultation period the public were able to respond in a number of different ways to the proposed preferred options:
- Comments could be submitted online on the Council's dedicated Local Plan pages on its website;
 - A printed response form was available and could be completed and sent to the Council;
 - e-mail and standard letters of objection or support could also be submitted to the Council.

Data Entry

- 4.4 For web-based submissions, entries were made and captured against specific preferred options and sub-elements of the main A4 document. For e-mails, forms and letters, entries were made by officers based on headings that were available or by judgement where no specific subject heading was given. Respondents were asked to indicate the consultation documents they had seen and were commenting on i.e. summary document (A4 or A5), or the full document.

Summaries

- 4.5 The system provides for original representations to be summarised. Both the original representation¹ and summary (where required) are published online as follows:
- Any representation made in any format of 100 words or less are automatically carried to the Summary, usually via copy and paste;
 - Representations longer than 100 words are summarised by officers.
- 4.6 A number of different officers were used to undertake this somewhat time-consuming process. The majority are experienced planners within the planning policy team.

Confirmation

- 4.7 The Council received over 4,300 representations, from approximately 1,510 respondents and all have now been entered into the consultation system. As each representation is entered, it is "published" and an e-mail is sent to the person who has made the representation so that they can check that the summary accurately reflects the comments they made. In some cases one respondent could have made several separate representations and will receive separate emails depending on the contact details given.

¹ If this was by letter or form the original representation can be viewed as an attachment.

- 4.8 Where e-mail addresses are not available and only postal addresses have been provided the Council responds once by letter.
- 4.9 Once all of the representations have been entered, the Council proposes to prepare a 'Report of Public Consultation' capturing the points raised in relation to each of the Preferred Options. This report is still at draft stage (April 2013).

5.0 Process Review: Stage 1

- 5.1 For Stage 1, Envision consultants met with Council representatives on 12th February 2012. They were given a brief overview of the key proposals of the Warwick Local Plan Preferred Options Document and a summary of the consultation process undertaken in June and July 2012.
- 5.2 Copies of all consultation documents were made available and the consultants received an overview of the e-consult system. Each respondent is allocated a unique ID. Each representation is also given a unique representation ID. Across the 18 preferred options the e-consult system allows for comments to be attributed to “elements” within the documents. The system recognises some 200+ elements, for example someone could comment on one of the 18 options e.g. PO2, Community Infrastructure Levy, but could also refer their comments to one specific paragraph or a location such as one of the villages.
- 5.3 The system is both detailed and sophisticated and allows for analysis by the Council but also a clear referral system to ensure the Council is able to respond to all respondents to acknowledge receipt of their response.
- 5.4 Following the meeting the Council provided a spreadsheet of the total representations, indicating the respondent name, representation ID, submission method (i.e. e-mail, paper or online) together with the representation summary and a hyperlink to the Council’s online consultation facility where original documents can be downloaded where necessary.
- 5.5 Using an online random numbers selector (<http://www.randomizer.org/form.htm>) a 10% sample of the total 1,510 respondents was selected (151 respondents). These represented a total of 427 individual representations. The full list of representations used as part of this study is contained in **Appendix 1**.

6.0 Process Review Stage 2: Part 1

- 6.1 For Stage 2 – part 1, each of the 427 representations was analysed and put into a database to ease further analysis. Firstly the representation summaries were considered against the original submission both in terms of accuracy, omissions and allocation against the correct element. It should be noted that respondents using the online system or completing forms were asked to enter the part of the document (and which document) they were commenting on.
- 6.2 From the initial analysis 6 main categories were established: Satisfactory Summary and Element; Summary Omission; Element Missed; Note; Further Response and Superseded. Table 6.1 below provides a summary position indicating the number of representations against each category and the percentage of the total sample (NB six representations were in 2 categories).

Table 6.1

CATEGORY	EXPLANATION	NUMBER	%
Satisfactory Summary and Element	The summary provided was considered to fully reflect the points made in the original representation and is linked to the correct element of the Preferred Options. (109 were identical, 211 required a summary)	320	74.94%
Summary Omission	Part of the original submission is not included in the summary	32	7.49%
Element Missed	The representation has been placed against one element but could also be allocated against another element	9	2.11%
Note	Includes: duplicate responses; key element assumptions; lengthy web-based submissions with different details entered by respondent	53	12.41%
Summary Omission and Note	Explanation as above	1	0.23%
Summary Omission and Element Missed	Explanation as above	1	0.23%
Note and Element Missed	Explanation as above	2	0.47%
Further Response	For example the respondent asked for further clarification or requested a further meeting	6	1.41%
Superseded	Superseded by another representation ID	3	0.70%
TOTAL		427	100%

- 6.3 In addition to the above analysis there were 103 advisory comments, mainly typographical errors (*NOTE: some of the errors could be from the original submissions by the public if they were simply copied and pasted in full into the summary box*). It is

recommended that in future the system is thoroughly checked for typographical errors before e-mails and letters are sent out confirming the representation summary.

Recommendation 1:

Using the e-consult system, all current summaries should be checked for typographical errors before they are sent back to the original respondent.

- 6.4 Template responses were received, particularly in relation to Blackdown and land North of Milverton. These quite lengthy submissions required a summary and represented approx 10% of the total sample. Envision noted that a range of different summaries were included in the system for essentially the same representation. This was due to a number of different Council officers responding quickly as representations were received but not recognising that the representations were identical. In hindsight it is advised that some time elapses before the summaries are undertaken such that this type of template representation can be summarised consistently (once only) and avoid additional staff time.

Recommendation 2:

Template style responses are quite typical in local plan consultations. Before undertaking the “summarising process” the e-consult database should be checked for duplicate responses and duly noted. One “template” summary should be produced and used accordingly.

General Findings

- 6.5 From the sample, approximately 75% were considered “satisfactory” and for a further 15% minor comments are made for information to the Council in the form of a ‘Note’, ‘Further Response’ and ‘Superseded’. In the remaining 10% of the sample some omissions were found relating to both the element and within the summary itself, and these are analysed in more detail below.

Analysis of Elements

- 6.6 From the sample of 427 representations the consultants noted 12 (2.8%) where an additional element could be linked to the original representation. It should be noted that for online and proforma responses, respondents are able to place their representation against an element in the documents, so in some cases they may have omitted to include a further element. The majority of element comments relate to the two sites (land North of Milverton and Blackdown) under PO4, A - Allocated sites, which were also subject to the most template responses, with one site linked to the representation and not the other. A summary of the “element” comments is contained in **Appendix 2**.
- 6.7 From information supplied by the Council on the total number of representations received against the 200+ element titles the consultants do not consider that a particular objection or support for an element has been missed. However, the large level of objection to the two sites: land North of Milverton and Blackdown, could be checked to ensure objections are shown against both.

Recommendation 3:

The e-consult system is checked to ensure that objections to both sites: land North of Milverton and Blackdown, are shown against both elements and not just one.

- 6.8 Furthermore, the large number of elements available on the system against the 18 Preferred Options has created some confusion in terms of knowing which element to put the response against. A simpler list of “elements” would have eased analysis and would not have unduly affected the process.

Recommendation 4:

Given the number of Preferred Options (18) the number of “elements” on the system could have been reduced from the current 200+, to assist those making representations and simplify further analysis of the responses. It is recommended that future consultations should have a smaller number of elements.

Analysis of Omissions

- 6.9 A key part of Stage 2 is to note any significant inaccuracies or omissions in the summaries on the system. The consultants found a total of 34 representations with specific omissions (8%); **Appendix 3** contains the consultants’ comments highlighting the omissions and shows in detail: the respondent’s name and ID number; representation reference; summary and hyperlink to the Council’s website. More than half of the omissions found relate to representations against specific locations such as the proposed housing sites (principally land North of Milverton, Blackdown, Loes Farm and Woodside Farm). The majority of the omissions are relatively minor, and from the consultants check on the meta-summaries (Stage 2-Part 2 below) for the top 7 “elements” the majority of the main points are picked up elsewhere.
- 6.10 The Council’s policy is to respond to each representation reproducing the summary that has been produced and placed on the system and therefore offering the respondent a further opportunity to say that something has been missed. It is understood from discussions with the Council that very few further comments or suggested amendments have been received. The summary is also available on the Council’s website and original documents are also downloadable on the same screen.
- 6.11 The above policy and procedure is helpful and avoids misrepresentation of views. The low level of omissions, the majority of which are relatively minor is well within an acceptable level given the large number of responses received and processed. Care needs to be taken to ensure that all of the points raised are included in the summary, even if only in bullet point format. In general terms the majority of omissions relate to quite lengthy e-mail and paper submissions.

Recommendation 5:

For lengthy submissions care needs to be taken during the summarising process to ensure that all points are covered against each element. Where possible an additional cross check should be made by another officer.

- 6.12 One unavoidable result in the use of summaries is that detail and context can sometimes be lost particularly from longer representations which cannot be broken down into different elements. This could lead some to consider that issues and

emphasis have been missed or inadequately considered. Officers are able to exceed the suggested 100 word limit when summarising responses on the e-consult system, and this should continue to be exercised.

- 6.13 Responses submitted “Online” cannot exceed 100 words. Envision noted a number of ‘original responses’ which were different to the final ‘online version’. This was due to respondents being advised that they had exceeded the 100 word limit and they re-entered the data. In some cases detail is missing between the originally entered information and the final summary/changes to plan. These are picked up as a “note” for information and all are contained in **Appendix 4**.

Further Observations

- 6.14 From the sample of 427 representations the consultants noted 6 where a ‘further response’ was requested. As part of the consultation process and as part of the process of responding to the original respondent to confirm receipt of their representations and to include a summary, it is anticipated that the Council officers will follow up these additional requests where practicable.

Recommendation 6:

Requests for further information should be noted on the e-consult system as a prompt to provide additional information, where practicable.

- 6.15 A further 56 representations (13%) have been “noted” by the consultants and include: duplicate responses; key element assumptions; and lengthy web-based submissions with different details entered by respondent. These are listed in full in **Appendix 4**. In addition a further 3 representations are noted as superseded.

7.0 Process Review Stage 2: Part 2

7.1 For the second part of Stage 2, Envision analysed the “meta-summaries” which the Council had prepared for key elements, namely the 18 Preferred Options and a number of sites, in particular the proposed sites for housing under PO4. The Council provided a list of the key elements which received the most number of comments (top 7). The “meta-summaries” for each cover all of the points raised throughout the consultations. They do not attempt to measure weight of response at this stage and are in a bullet-point format. The list provides a range of both PO’s and locations as follows:

- PO1: Level of Growth
- PO3: Broad location of Growth
- PO14: Transport
- Milverton Gardens (North of Milverton) Leamington
- Blackdown
- Woodside Farm, Tachbrook Road
- Loes Farm, Warwick

7.2 The number of representations from the sample database covered by the 7 meta-summaries is shown in Table 7.1 below and represents approximately half of the sample. This compares favourably with the percentage of total representations against the relevant PO’s and sites and confirms that the sample is a fair and reasonable reflection of the total comments made.

Table 7.1

Preferred Option/Location	No.	% of sample
PO1: Level of Growth	16	7.31%
PO3: Broad location of Growth	40	18.26%
PO14: Transport	25	11.42%
Milverton Gardens (North of Milverton) Leamington	61	27.85%
Blackdown	44	20.09%
Woodside Farm, Tachbrook Road	7	3.20%
Loes Farm, Warwick	26	11.87%
TOTAL	219	50.71%

7.3 The 219 representations referred to in table 7.1 above were extracted from the database into separate spreadsheets and in each case Envision’s comments made in Stage 2 part 1 are included.

7.4 Envision analysed each of the 7 draft meta-summaries produced by the Council to check that all relevant planning issues raised in the sample representations had been included. Omissions are highlighted in **BOLD** on the composite spreadsheet contained in **Appendix 5**. In total, omissions were noted against 39 representations (18% of the representations against the selected 7 meta-summaries), 10 of which relate to the summary omissions noted by Envision at Stage 2 part 1.

- 7.5 The current format of the draft meta-summaries uses bullet points for each of the key issues raised in the representations. As indicated in Para 7.1 at this stage no weight is given in terms of the number of times the comments has been made. It is therefore assumed that if a comment is only made once i.e. in one representation, it should be reflected in the meta-summary. Envision consider that the current format provides an over-simplified review and further work should be undertaken to provide more structure against each of the key elements, focussing on common themes and issues.

Recommendation 7:

The current draft meta-summaries should be restructured to provide a more comprehensive analysis of the representations received. The current bullet point format is over simplified.

Analysis of Omissions

- 7.6 A summary of all omissions are shown as bullet points in **Appendix 6**. Further analysis shows that there is at least one omission against each of the 7 meta-summaries. There is a wide range of comments and all should be included in the meta-summaries. PO3: Broad Locations of Growth has the most omissions and in particular there is no reference in the meta-summary to comments about the windfall allowance or the proposed buffer of approximately 1,400 new homes.

Recommendation 8:

Before the draft meta-summaries are finalised, additional time should be taken to carry out a further check to ensure all points raised in representations have been adequately reported.

8.0 Process Review: Stage 3

- 8.1 Envision have reviewed the consultation exercise and considered its compliance with relevant statutory requirements. The current key statutory requirements and an assessment of compliance for undertaking consultation on Local Plans are set out in Table 8.1 below.
- 8.2 In summary, there are no specific current Regulations covering consultation at the Preferred Options Stage of Local Plan making, and the key legal test at this stage is to meet any requirements set out in the Council's adopted Statement of Community Involvement (SCI). In this context, the Council's adopted SCI gives a commitment to:
1. Undertake consultation at the Preferred Options Stage (which has been done);
 2. Undertakes to report a summary of views to the Council's Executive (currently being drafted); and
 3. Undertakes to produce a table of the results of consultation at each stage with the council's response so that those sending in representations can see how their concerns have been addressed.
- 8.3 Provided the Council complete 2, and 3 fully they will comply with the minimum legal requirements.

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TABLE 8.1	Detail	Comments	Compliance
1) Planning and Compulsory Purchase Act 2004			
Statutory basis for “new” planning system. Provides for Regulations to be made to prescribe the process for preparation of the local plans			
The Act (para 19(3) refers) requires local planning authorities to comply with their statement of community involvement.		See 3 below	Yes see 3 below
2) The Town and Country Planning (Local Planning) (England) Regulations 2012			
The 2012 regulations require two key stages of consultation: 1) Regulation 18: Preparation of the Plan At commencement of the preparation of a local plan, local planning authorities are under Reg 18 to notify (inter alia) “such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations” .of the subject of a local plan which the local planning authority propose to prepare, and invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain. In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).		Not applicable to Preferred Option Document	N/A
2) Regulation 20: Consultation on Proposed Submission Local Plan Document Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.		Not applicable to Preferred Option Document	N/A
3) Regulation 22: Submission of documents and information to the Secretary of State When submitting a Local Plan to the Secretary of State for Examination under Regulation 22, local planning authorities are required to submit: A statement setting out— (i) which bodies and persons the local planning authority invited to make representations under regulation 18, (ii) how those bodies and persons were invited to make representations under regulation 18 (iii) a summary of the main issues raised by the representations made pursuant to regulation 18, (iv) how any representations made pursuant to regulation 18 have been taken into account; (v) If representations were made pursuant to regulation 20, the number of			

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TABLE 8.1	Detail	Comments	Compliance
	<p>representations made and a summary of the main issues raised in those representations; and</p> <p>(vi) if no representations were made in regulation 20, that no such representations were made.</p> <p>copies of any representations made in accordance with regulation 20; and such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.</p>		
	<p>The 2012 Regulations explain in Explanatory Note that the main steps in the local plan procedure are-</p> <p>(a) publication of the proposals for a local plan, consultation on it and consideration of representations (regulations 18 to 20);</p> <p>(b) submission to the Secretary of State, independent examination of the local plan and publication of the recommendations of the person appointed to examine the local plan (regulations 22 to 25); and</p> <p>(c) adoption of the local plan by the local planning authority (regulation 26).</p>	<p>With the revocation of PPS12 the procedures for preparing a Local Plan are not set out in great detail in the Act or regulations or NPPF. In addition at the time of writing the PAS Online Guide to Plan Making was in the course of being updated.</p> <p>It is our opinion that only one stage of consultation on the actual proposals of a Local Plan is now required under the 2012 Regulations (Reg 20). There are no specific regulatory requirements for consultation on Preferred Options Stage. However, undertakings set out in the Council's SCI would have to be met (see 3 below).</p> <p>Notwithstanding the lack of a specific Regulatory requirement for the Preferred Options Stage it is good practice to present the findings of each consultation stage in a Consultation Statement to be submitted with the Final Local Plan for Examination.</p>	Yes
<p>3) Warwick DC Statement of Community Involvement –Adopted - July 2007: <i>Relevant Text set out below:</i></p>			
	<p>Table 2: Quick Guide To Community Involvement in Development Plan Document (DPD) Production</p> <p>A set of preferred options will be published giving everyone the chance to give their views. This stage will be advertised in the local press and will be published on the Council's website with hard copies made available at deposit points*. A letter will be sent to all those consulted at the Pre-Production stage informing them of the availability of documents. Once collated, the representations will inform any changes to the options suggested.</p>	<p>In this table the Council explains the key stages when it will consult on the preparation of a DPD and includes the Preferred Option Stage</p>	<p>Yes, the Council has undertaken consultation at the Preferred Options stage as set out in the adopted SCI</p>

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TABLE 8.1	Detail	Comments	Compliance
	<p><i>How and when the community can become involved in planning matters</i> 7.1 Tables 2 and 3 in section 1 show the stages that DPD's and SPD's will go through and the stages at which you can become involved. The initial development of a DPD will have a consultation period attached to it, the draft document will then be statutorily consulted upon and finally, another period of statutory consultation will begin when the document is submitted to the Secretary of State for consideration. The Council will provide a structure for your response by way of a questionnaire for each document.</p>		Yes, proforma provided
	<p><i>How community and stakeholder views will inform later stages of documents</i> 7.3 The views expressed by those participating in the consultation process will be carefully considered. Wherever possible we will incorporate your ideas and your views will help us to shape not only the current documents, but also the ways in which we involve you in the future. A summary of views will be reported to the Council's Executive. All such Council reports are public and published on our website www.warwickdc.gov.uk and made available in hard copy at The Council Offices.</p>	The SCI undertakes only to present a summary of views to the Council's Executive	Yes
	<p><i>How we will inform you of what action we have taken as a result of such involvement</i> 7.4 The Government expects feedback to be an integral part of the process of involvement. It is essential that this is built in to ensure that the results of community input are known. It will also be necessary to provide reasons why it may not have been practical to introduce a particular idea so that contributors gain a better understanding of the system and its limitations. It may be for example, that an issue is raised where planning legislation has no control over and cannot therefore influence. The results of consultation will inform the production of DPD's and SPD's, which we will publish on the website. In terms of policy documents, a table of the results of consultation will be produced at each stage with the council's response so that those sending in representations can see how their concerns have been addressed.</p>		Provided the Council publish on their website a table of the results of consultation for the Preferred Options Stage, including the Council's response and indicating how their concerns have been addressed then this will comply with the SCI requirements.

9.0 Conclusions and Recommendations

- 9.1 The objective of the study was to review the effectiveness of the process used to analyse the responses to the Warwick Local Plan Preferred Options Document and consider whether it: a) complies with the relevant planning regulations and statutes, and the Council's Statement of Community Involvement; and b) provides a reasonable, comprehensive and balanced overview of the representations received.
- 9.2 In relation to requirements there are no specific current Regulations covering consultation at the Preferred Options Stage of Local Plan making. The key legal test at this stage is to meet any requirements set out in the Council's adopted SCI. Subject to the production of a further report summarising all views (to the Council's Executive) and the production of a table of the results of the consultation (including the Council's response) the current process is compliant.
- 9.3 The audit process has highlighted a number of issues in relation to the way in which representations are recorded on the Council's system, e-consult. This report highlights a number of recommendations for the Council going forward and it is hoped that these should be relatively simple to introduce both now for the current Preferred Options consultation and in the future, and should improve the effectiveness of the process and reduce the number of minor errors and omissions.
- 9.4 Although a small number of omissions were found in the representation summaries within the sample (approximately 8%), the Council's process includes sending the final summary to the original respondent as confirmation. Envision believe that this process is reasonable and appropriate particularly given the large number of responses received and the level of detail contained in a significant proportion of the total.
- 9.5 Recommendations 1-6 (below) relate to the summarising and element allocation process where lengthy representations are summarised and placed against an array of different "elements". The consultants suggest that in the future the number of elements is reduced.

Recommendation 1:

Using the e-consult system, all current summaries should be checked for typographical errors before they are sent back to the original respondent.

Recommendation 2:

Template style responses are quite typical in local plan consultations. Before undertaking the "summarising process" the e-consult database should be checked for duplicate responses and duly noted. One "template" summary should be produced and used accordingly.

Recommendation 3:

The e-consult system is checked to ensure that objections to both sites: land North of Milverton and Blackdown, are shown against both elements and not just one.

Recommendation 4:

Given the number of Preferred Options (18) the number of “elements” on the system could have been reduced from the current 200+, to assist those making representations and simplify further analysis of the responses. It is recommended that future consultations should have a smaller number of elements.

Recommendation 5:

For lengthy submissions care needs to be taken during the summarising process to ensure that all points are covered against each element. Where possible an additional cross check should be made by another officer.

Recommendation 6:

Requests for further information should be noted on the e-consult system as a prompt to provide additional information, where practicable.

- 9.6 Recommendations 7 and 8 (below) relate to the current process of producing the meta-summaries, where further improvements could be made. These will assist the Council in compliance with its adopted SCI which requires publication of the results of consultation including the Council’s response and indicating how the concerns raised have been addressed.

Recommendation 7:

The draft meta-summaries should be restructured to provide a more comprehensive analysis of the representations received. The current bullet point format is over simplified.

Recommendation 8:

Before the draft meta-summaries are finalised, additional time should be taken to carry out a further check to ensure all points raised in representations have been adequately reported.

- 9.7 In summary the current process is adequate to cope with the current level of response. It is comprehensive and provides a balanced overview of the numerous representations received. However, through a number of minor changes the process could be further improved, reducing the number of minor errors and omissions and ensuring a more effective reporting system.