

## Consultation Responses – Further Information

We have received some enquiries about the representations made to our last consultation in 2021, Preferred Options, and how representations to the current Publication Plan will be dealt with.

### Preferred Options – Regulation 18

We received around 2500 comments initially to the Preferred Options across all sectors - residents, agents, site promoters and statutory bodies. However, we knew there were duplicate responses (email plus letter) and a number of standard proformas created by action groups.

If someone made a representation themselves, and then also completed a proforma, all the points made from those multiple submissions were amalgamated into one single response from that individual, not recorded as separate objections. As we have advised previously, it is not the volume of responses that is important, but the points raised.

Therefore, once we had read and analysed the responses, the final numbers changed. Overall, there were 1690 individual people and organisations who responded, and their comments have been recorded against various issues against the 12 questions we posed in the Preferred Options. The summaries of these responses are available to the public here: [South Staffordshire - Preferred Options November 2021 \(oc2.uk\)](https://www.oc2.uk/SouthStaffordshire-PreferredOptionsNovember2021)

There is no requirement to respond direct to comments made, or to publish them, under Regulation 18 consultation, but to produce a [Consultation Statement](#), which we have done. The consultation statement contains a breakdown of the comments received against each of the questions in the Preferred Options consultation, for example site specific comments or the issue of making a contribution to unmet need.

To be clear, the full responses were taken into account as we prepared the Publication Plan, and as you are aware, as a result of comments made and updated evidence, we made a number of changes between Preferred Options and Publication.

### Publication Plan – Regulation 19

Consultation under Regulation 19 (pre-submission) is very different as it relates to the soundness and legal compliance tests. This is a more complex consultation, set out under Planning Regulations, and we know that residents particularly may find this more daunting. There is a [response form](#) published online, which shows how responses should be framed (word version available on request) plus a [guidance note](#).

The easiest way to make comments is by using the [consultation portal](#). Each paragraph and policy of the plan has a comments box next to it that will pop up for comments to be made directly, and the system automatically guides you through the soundness questions. We have also produced a [Step-by-Step User Guide](#) to help people make their representations.

If residents choose to respond by email or letter and do not specify an area of soundness or legal compliance, when we analyse the representations, we will note it as a general response and make a professional judgement as to which test it sits under.

Once the consultation is complete, we will produce a table for the Inspector (included in our submission documents) which outlines the issues raised and the council's response to them.

## Examination

When the Inspector is appointed, they will examine the version of the plan which we have sent in for examination. They will only consider the representations made on that version of the plan, ie the Regulation 19 plan. The Inspector will not consider any earlier draft versions of the plan which the LPA may have consulted on.

Therefore, the representations made to Preferred Options will not be sent on because they relate to an earlier version of the plan (which we have already taken into account), and they were not concerned with soundness and legal compliance. However, we will need to submit the following:

'A statement setting out:

- who was invited to make representations on the plan at Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised, and how the representations were taken into account; and
- the number of representations made under Regulation 20 (in response to consultation at Regulation 19 stage) and a summary of the main issues raised;
- Copies of all representations made under Regulation 20 (in response to consultation at Regulation 19 stage)'

*(Extract from para 1.17 of the Procedure Guide for Local plans, see below)*

More information about the Examination process can be found here:

[Procedure Guide for Local Plan Examinations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/procedure-guide-for-local-plan-examinations)

[Local plans: taking part in examinations - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/local-plans-taking-part-in-examinations)