

## Representations for Statement of Community Involvement (SCI) December 2014

### Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
<b>LDF/00537</b>	<b>74</b>	<b>St Ippolyts Parish Council</b>	

**Document Section:** Statement of Community Involvement (SCI) December 2014

Representation: *Support*

St Ippolyts Parish Council agree to support the statement of Community Involvement.

**Council Response:**

Comments noted.

<b>LDF/01867</b>	<b>12</b>	<b>Parkin</b>
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**Document Section:** Statement of Community Involvement (SCI) December 2014

Representation: *Comment*

I wish to add my voice to that of Jonty Wild. The lack of involvement with the local community has been dreadful especially as it was known by the Council that our village has been working hard to gather local opinions and prepare a Neighbourhood plan. There is great enthusiasm in the village to develop a sustainable, thriving community. I hope you will realise this and tap this resource.

I wish to make the following comments on the document and its amendments:

The document fails to acknowledge or reflect the Government's stated aim for the Localism Act (2011), i.e. The Government thinks that the local community should have a greater say in shaping the way their local area develops".

The document acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan.

The document fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process.

The document fails to detail how adopted neighbourhood plans will be used and reflected.

The document fails to acknowledge NHDC's legal obligation to pro-actively support the Neighbourhood Plan process<sup>1</sup> and to consult in advance of the general public consultation, i.e.

"Duty to Support

Once the neighbourhood area is approved, the local planning authority is legally required to provide support and advice to those bodies producing a Neighbourhood Plan in its area. This could include things like:

- arranging meetings, as appropriate, with the qualifying body;
- making available data for the evidence base, such as housing needs data, development viability considerations, environment designations, and flood risk assessments;
- setting out local strategic policies in the Local Plan;
- setting out national policies which will need to be considered;
- providing advice on the legal requirements for Neighbourhood Planning under the Localism Act;
- providing advice on general planning matters;

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			sharing information on key contacts and stakeholders; making available venues and helping to arrange community engagement activities, to avoid consultation overload and maximise efficiencies of resources; checking the plan prior to formal submission; participation in meetings of the qualifying body or its working groups; providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations); providing technical support, such as assistance in laying out and illustrating a plan; providing members for neighbourhood forums or more informal steering/working groups; identifying any need for and undertaking environmental assessment or Habitat Regulations assessment.

The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance."

Under the list "Who will we consult" (ref: 3.1), the formal groups who are preparing Neighbourhood Plans are missing, this is a serious and unacceptable omission.

"Methods of Consultation" (Ref: 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans.

"Community Involvement in Determining Planning Application" (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.

The document fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission.

The document purports to be a statement of community involvement, yet in fact it is a little more than a statement of how the NHDC will conduct written consultations. The National Planning Policy Framework (NPPF) refers to "working in collaboration with" the community. I do not see this reflected in the document.

Paragraph 2.6 concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans.

I object to the deletion of reference to category B sites at (ref: 6.5). These sites are just as important in rural communities as category A sites are in urban areas.

The title of this document and content should be changed to fully reflect the requirement under Localism Act (2011) to consult, not just involve, communities to enable them to have a greater say in shaping the way their local area develops.

Key

<sup>1</sup> = Neighbourhood Plans Roadmap Guide [www.locality.org.uk](http://www.locality.org.uk)

**Council Response:**

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The representation raises a number of issues, these are responded to in order:

1. The SCI fails to acknowledge or reflect the Government's stated aim for the Localism Act, 2011, "that the local community should have a greater say in shaping the way in which their local area develops".

NHDC response: It is acknowledged that one of the aims of the Localism Act, 2011 is to enable communities to have a greater say in shaping local areas. However, a Statement of Community Involvement simply sets out how, when and where the District Council will consult statutory consultees, stakeholders and the local community when developing planning policies and determining planning applications.

No change proposed to the SCI.

2. The SCI "acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications - it is not a document which sets out how evidence is taken into account in the preparation of local planning documents or neighbourhood plans.

No change proposed to the SCI.

3. The SCI "fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process".

NHDC response: The SCI sets out an illustrative list of organisations which are consulted during the preparation of planning policies and neighbourhood planning steering groups could be added to this.

Proposed change to the SCI - neighbourhood planning steering groups will be added to this illustrative list.

4. The SCI "fails to detail how adopted neighbourhood plans will be used and reflected".

NHDC response: The SCI sets out which planning policy documents must be considered when determining planning applications. Currently, these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.

Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

5. The SCI "fails to acknowledge NHDC's legal obligation to pro-actively support the neighbourhood planning process and to consult in advance of the general public consultation".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications. The SCI is not a document which should be used to set out how the District Council will support communities engaged in neighbourhood planning as the way in which the District Council supports local communities in preparing neighbourhood plans will vary significantly from one to another.

No change proposed to the SCI.

6. "Methods of Consultation" (Ref 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans".

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NHDC response: The table set out under paragraph 4.1 sets out the methods which the District Council may use when consulting on the preparation of the local plan. The methods of consultation which are described in the SCI are ones which the District Council considers are effective and practical for the purposes of preparing the local plan - the table does not distinguish between which consultation method should be used for a particular type of consultee.

No change proposed to the SCI.

7. Section 6 of the SCI, "Community Involvement in Determining Planning Applications". Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.

NHDC response: As stated above, the SCI sets out which planning policy documents must be considered when determining planning applications. Currently these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.

Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

8. The SCI "fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission."

NHDC response: the way in which consultation is undertaken for neighbourhood plans is the responsibility of the individual neighbourhood planning steering groups - not the District Council. It would be inappropriate for the District Council to set out how the consultation should take place for neighbourhood plans.

No change proposed to the SCI.

9. Paragraph 2.6 of the SCI, ...."concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans".

NHDC response: paragraph 2.6 has been deleted from the SCI as it referred to interim guidance prepared by the District Council on the preparation of the neighbourhood plans. This interim guidance was prepared to help guide local communities considering neighbourhood planning but was prepared in advance of the publication of the Neighbourhood Planning (General) Regulations 2012, which set out how neighbourhood plans should be prepared. Subsequently, separate comprehensive guidance on how to prepare neighbourhood plans has been prepared by Locality and Planning Aid England and the Council considers that drafting more guidance would simply be a duplication. Proposed change to the SCI - a reference to the neighbourhood planning guidance published by Locality and Planning Aid England will be added into the SCI.

10. Paragraph 6.5 - object to "...the deletion in paragraph 6.5 of the reference to category B sites. These sites are just as important in rural communities as category A sites are in urban areas.

NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.

No change proposed to the SCI.

<b>LDF/01911</b>	<b>8</b>	<b>Keen</b>	
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014		

Representation: *Object*

Fortunately an acquaintance recently ascertained that there is a consultation about the subject document buried on a NHDC website titled 'Local Plan Preferred Options' and I now wish to submit the following observations about the consultative document;

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Category B Sites. I wish to object to the deletion of reference to Category B sites at paragraph 6.5. They are as important to rural communities as Category A sites are to urban ones.

'Localism'. The document as a whole does not adequately recognise national policy as determined by the Localism Act (2011). Indeed it could be construed as it stands to be simply how the NHDC will conduct consultations.

'Hard to Reach Groups'.

The document acknowledges 'Hard to Reach Groups' at paragraph 3.3 and has a marvellously politically correct list there. However, a category that is variously described as the elderly, OAPs, etc is not included unless age is deemed to be a disability. That group includes me and to avoid offending anyone, I shall refer to it as 'US'.

The draft's response to the challenge is at paragraph 3.4 and is 'The Council's Policy and Community Services Development team has established links with these "hard to reach groups"'. Too often such links end up being via self-appointed 'community leaders'. This is not something independently minded people such as many of US are going to be happy to accept.

NHDC mentions social media at paragraph 1.3 and records a large array of methods for consultation. However, not all have access to these media especially in rural villages without libraries, free papers, etc and some may be uncomfortable using electro-magnetically based capabilities having not been educated in their use.

I believe that draft document is unacceptable unless it shows how NHDC will engage with all of US. I appreciate this will not be easy but I am sure you must rise to the challenge.

**Council Response:**

The SCI sets out the types of organisations which will be consulted when preparing local planning policies and also identifies which groups have been identified as being "hard to reach", in terms of responses to consultation documents.

It is considered that the elderly or OAPs as described in the representation have not been a particularly difficult group of the population to engage in consultation on the local plan. The groups listed in the SCI as "hard to reach" are those which the Council has identified as being those where different consultation techniques may be required.

No change proposed to the SCI.

<b>LDf/01952</b>	<b>4</b>	<b>Wild</b>	
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014		

Representation:	<i>Comment</i>
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I have only just understood that there is a consultation on this document as the NHDC website does not make it clear because it is lost under the heading 'Local Plan Preferred Options'.

I wish to make the following comments on the document and its amendments:

The document fails to acknowledge or reflect the Government's stated aim for the Localism Act (2011), i.e. The Government thinks that the local community should have a greater say in shaping the way their local area develops".

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			The document acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan.
			The document fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process.
			The document fails to detail how adopted neighbourhood plans will be used and reflected.
			The document fails to acknowledge NHDC's legal obligation to pro-actively support the Neighbourhood Plan process <sup>1</sup> and to consult in advance of the general public consultation, i.e.
			"Duty to Support Once the neighbourhood area is approved, the local planning authority is legally required to provide support and advice to those bodies producing a Neighbourhood Plan in its area. This could include things like:
			<ul style="list-style-type: none"> <li>arranging meetings, as appropriate, with the qualifying body;</li> <li>making available data for the evidence base, such as housing needs data, development viability considerations, environment designations, and flood risk assessments;</li> <li>setting out local strategic policies in the Local Plan;</li> <li>setting out national policies which will need to be considered;</li> <li>providing advice on the legal requirements for Neighbourhood Planning under the Localism Act;</li> <li>providing advice on general planning matters;</li> <li>sharing information on key contacts and stakeholders;</li> <li>making available venues and helping to arrange community engagement activities, to avoid consultation overload and maximise efficiencies of resources;</li> <li>checking the plan prior to formal submission;</li> <li>participation in meetings of the qualifying body or its working groups;</li> <li>providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations);</li> <li>providing technical support, such as assistance in laying out and illustrating a plan;</li> <li>providing members for neighbourhood forums or more informal steering/working groups;</li> <li>identifying any need for and undertaking environmental assessment or Habitat Regulations assessment.</li> </ul>
			The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance."
			Under the list "Who will we consult" (ref: 3.1), the formal groups who are preparing Neighbourhood Plans are missing, this is a serious and unacceptable omission.
			"Methods of Consultation" (Ref: 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans.
			"Community Involvement in Determining Planning Application" (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.
			The document fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission.

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			Paragraph 2.6 concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans.
			I object to the deletion of reference to category B sites at (ref: 6.5). These sites are just as important in rural communities as category A sites are in urban areas.
			The title of this document and content should be changed to fully reflect the requirement under Localism Act (2011) to consult, not just involve, communities to enable them to have a greater say in shaping the way their local area develops.
			Key
			<sup>1</sup> = Neighbourhood Plans Roadmap Guide <a href="http://www.locality.org.uk">www.locality.org.uk</a>

**Council Response:**

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The representation raises a number of issues, these are responded to in order:

1. The SCI fails to acknowledge or reflect the Government's stated aim for the Localism Act, 2011, "that the local community should have a greater say in shaping the way in which their local area develops".

NHDC response: It is acknowledged that one of the aims of the Localism Act, 2011 is to enable communities to have a greater say in shaping local areas. However, a Statement of Community Involvement simply sets out how, when and where the District Council will consult statutory consultees, stakeholders and the local community when developing planning policies and determining planning applications.

No change proposed to the SCI.

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No change proposed to the SCI.

3. The SCI "fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process".

NHDC response: The SCI sets out an illustrative list of organisations which are consulted during the preparation of planning policies and neighbourhood planning steering groups could be added to this.

Proposed change to the SCI - neighbourhood planning steering groups will be added to this illustrative list.

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Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

5. The SCI "fails to acknowledge NHDC's legal obligation to pro-actively support the neighbourhood planning process and to consult in advance of the general public consultation".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications. The SCI is not a document which should be used to set out how the District Council will support communities engaged in neighbourhood planning as the way in which the District Council supports local communities in preparing neighbourhood plans will vary significantly from one to another.

No change proposed to the SCI.

6. "Methods of Consultation" (Ref 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans".



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<p>NHDC response: The table set out under paragraph 4.1 sets out the methods which the District Council may use when consulting on the preparation of the local plan. The methods of consultation which are described in the SCI are ones which the District Council considers are effective and practical for the purposes of preparing the local plan - the table does not distinguish between which consultation method should be used for a particular type of consultee.</p> <p>No change proposed to the SCI.</p>			

7. Section 6 of the SCI, "Community Involvement in Determining Planning Applications". Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.

NHDC response: As stated above, the SCI sets out which planning policy documents must be considered when determining planning applications. Currently these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.

Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

8. The SCI "fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission."

NHDC response: the way in which consultation is undertaken for neighbourhood plans is the responsibility of the individual neighbourhood planning steering groups - not the District Council. It would be inappropriate for the District Council to set out how the consultation should take place for neighbourhood plans.

No change proposed to the SCI.

9. Paragraph 2.6 of the SCI, "...concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans".

NHDC response: paragraph 2.6 has been deleted from the SCI as it referred to interim guidance prepared by the District Council on the preparation of the neighbourhood plans. This interim guidance was prepared to help guide local communities considering neighbourhood planning but was prepared in advance of the publication of the Neighbourhood Planning (General) Regulations 2012, which set out how neighbourhood plans should be prepared. Subsequently, separate comprehensive guidance on how to prepare neighbourhood plans has been prepared by Locality and Planning Aid England and the Council considers that drafting more guidance would simply be a duplication. Proposed change to the SCI - a reference to the neighbourhood planning guidance published by Locality and Planning Aid England will be added into the SCI.

10. Paragraph 6.5 - object to "...the deletion in paragraph 6.5 of the reference to category B sites. These sites are just as important in rural communities as category A sites are in urban areas.

NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.

No change proposed to the SCI.

<b>LDF/02152</b>	<b>3</b>	<b>Burleigh</b>	
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014		

Representation:	<i>Comment</i>
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The following are my comments on the proposed amendments to the Statement of Community Involvement:

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			I welcome the attempt to modernise the Statement with reference to greater use of technology for communications. The Council should be wary though, of placing too much emphasis on the use of electronic media as there are still significant numbers of individuals and groups who have no access to electronic media.
			That said, this is supposed to be a statement of community involvement. In fact, it is very much a statement of how the NHDC will conduct written consultations. There is very little attempt, save for reference to the NHDC's own social media sites, to "involvement". The National Planning Policy Framework (NPPF) refers to "working in collaboration with" the community. There is little attempt to reflect the guidance of the NPPF in this revised statement.
			I object to the deletion of para 2.6 concerning guidance on the development of Neighbourhood Plans. I assume this reference is being put forward for deletion because the NHDC has no guidance, a position that places itself in breach of its statutory duties under the Localism Act 2011. I would much prefer to see the retention of this statement, and for the NHDC to prepare appropriate guidance.
			I do not agree with the replacement of the word "some" with the word "exceptional" in para 4.1 when referring to the occasions in which the NHDC may seek community involvement by "exhibition". Whilst I appreciate that the NHDC may find "some" too wide and lacking in specificity, "exceptional" is also undefined. I would argue that a new Local Plan that allocates very large numbers for housing development, knowing such allocations will prove to be contentious, and one that replaces a Local Plan now nearly 20 years old, would form an "exception". If this circumstance is not exceptional, it is difficult to envisage what would be. It is therefore likely that the use of "exhibitions" will either never take place, or be used in as arbitrary a fashion as the current "some" may allow.
			Para 4.3 seems entirely sensible.
			Para 4.4 is sensible in curtailing the use that the NHDC can be expected to pro-actively glean and provenance from external social media sites. However, I see no difficulty in the NHDC accepting comment on consultations via their own social media sites.
			4.5; surely it is the role of our elected Local Councillors to act upon communication from their constituents? This must include passing on a constituent's view as expressed by a constituent and forwarded with that constituent consent. I therefore object to the amendment at para 4.5.
			I do not understand what the NHDC means by "immediate" vicinity in para 6.7; there should be no change until this is clearer.
			I object to the deletion of reference to category B sites at para 6.5. Such sites are important to local communities with whom the NHDC has an obligation to act collaboratively.
			I object to the change proposed in para 6.15. Many people do not have access to electronic media, particularly the elderly and the not so well off. So it should remain that where the NHDC is contacted by letter regarding a consultation, the reply should also be by letter. The same comment applies to the proposed changes to para 6.16.
			In conclusion, the title of the document does not fully reflect the NHDC's views of "Community Involvement" which appear to be limited to formal consultation documents available primarily on the Council's website for comment by e/mail. This hardly constitutes "Community involvement" let alone the emphasis on "collaboration" which is so clearly highlighted in the NPPF. The Statement should be amended to accord more fully with the spirit of collaboration and proper community involvement than appears to be the case as indicated by the changes to which I refer above.

**Council Response:**

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The representation raises a number of issues, these are responded to in order:

1. Para 4.1 - do not agree with the replacement of the word "some" with the word "exceptional" when referring to the occasions in which NHDC may seek community involvement by "exhibition".

NHDC response: This amendment to the SCI was made to try and make it clear that the Council will not normally undertake exhibitions for all local planning consultations. However, in considering this representation, the suggested amendment, "exceptional" does not make the SCI any clearer in determining when exhibitions will be held. In the past, decisions to hold exhibitions have been made to reflect the content of a particular consultation document and this flexibility needs to be retained. However, as stated in the SCI, the Council cannot make a commitment to stage exhibitions at all stages of consultation for the local plan because of the resources involved. Proposed change to the SCI - retain the word "some" rather than replace it with "exceptional" in Table 3, "Exhibitions".

2. Para 4.4 - is sensible in curtailing the use that NHDC can be expected to pro-actively glean and provenance from external social media sites. However, ...."there is no difficulty in the NHDC accepting comment on consultations via their own social media sites".

NHDC response: Comments made on social media websites, including the NHDC Facebook page and the Twitter feed cannot be taken as formal representations in local planning consultations as the representations can be made anonymously. It is important that if people want to be involved in the local plan process they are kept informed and have the opportunity to take part in the examination. Without the correct contact details this is not possible to achieve. No change proposed to the SCI.

3. Para 4.5 - surely it is the role of the "elected Local Councillors to act upon communication from their constituents? This must include passing on a constituent's view as expressed by a constituent and forwarded with that constituent consent."

NHDC response: The amendment to the SCI was made to make it clear that representations made to individual councillors cannot be taken into account unless they are forwarded to the Planning Policy team. To avoid all doubt, it is only comments received by the Planning Policy team which are logged as formal comments to a local plan consultation. This is made clear in all consultation documentation. No change proposed to the SCI.

<b>LDF/02448</b>	<b>3</b>	<b>Tackley</b>
<b>Document Section:</b>		Statement of Community Involvement (SCI) December 2014

Representation: *Comment*

I have only just understood that there is a consultation on this document as the NHDC website does not make it clear because it is lost under the heading 'Local Plan Preferred Options'.

I wish to make the following comments on the document and its amendments:

The document fails to acknowledge or reflect the Government's stated aim for the Localism Act (2011), i.e. The Government thinks that the local community should have a greater say in shaping the way their local area develops".

The document acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan.

The document fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process.

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			<p>The document fails to detail how adopted neighbourhood plans will be used and reflected.</p>
			<p>The document fails to acknowledge NHDC's legal obligation to pro-actively support the Neighbourhood Plan process and to consult in advance of the general public consultation, i.e.</p>
			<p>"Duty to Support Once the neighbourhood area is approved, the local planning authority is legally required to provide support and advice to those bodies producing a Neighbourhood Plan in its area. This could include things like:</p> <ul style="list-style-type: none"> <li>arranging meetings, as appropriate, with the qualifying body;</li> <li>making available data for the evidence base, such as housing needs data, development viability considerations, environment designations, and flood risk assessments;</li> <li>setting out local strategic policies in the Local Plan;</li> <li>setting out national policies which will need to be considered;</li> <li>providing advice on the legal requirements for Neighbourhood Planning under the Localism Act;</li> <li>providing advice on general planning matters;</li> <li>sharing information on key contacts and stakeholders;</li> <li>making available venues and helping to arrange community engagement activities, to avoid consultation overload and maximise efficiencies of resources;</li> <li>checking the plan prior to formal submission;</li> <li>participation in meetings of the qualifying body or its working groups;</li> <li>providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations);</li> <li>providing technical support, such as assistance in laying out and illustrating a plan;</li> <li>providing members for neighbourhood forums or more informal steering/working groups;</li> <li>identifying any need for and undertaking environmental assessment or Habitat Regulations assessment.</li> </ul> <p>The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance."</p> <p>Under the list "Who will we consult" (ref: 3.1), the formal groups who are preparing Neighbourhood Plans are missing, this is a serious and unacceptable omission.</p> <p>"Methods of Consultation" (Ref: 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans.</p> <p>"Community Involvement in Determining Planning Application" (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.</p> <p>The document fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission.</p> <p>The document purports to be a statement of community involvement, yet in fact it is a little more than a statement of how the NHDC will conduct written consultations. The National Planning Policy Framework (NPPF) refers to "working in collaboration with" the community. I do not see this reflected in the document.</p>

## Representations for Statement of Community Involvement (SCI) December 2014

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
		Paragraph 2.6 concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans.	

I object to the deletion of reference to category B sites at (ref: 6.5). These sites are just as important in rural communities as category A sites are in urban areas.

The title of this document and content should be changed to fully reflect the requirement under Localism Act (2011) to consult, not just involve, communities to enable them to have a greater say in shaping the way their local area develops.

Key

<sup>1</sup> = Neighbourhood Plans Roadmap Guide [www.locality.org.uk](http://www.locality.org.uk)

**Council Response:**

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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The representation raises a number of issues, these are responded to in order:

1. The SCI fails to acknowledge or reflect the Government's stated aim for the Localism Act, 2011, "that the local community should have a greater say in shaping the way in which their local area develops".

NHDC response: It is acknowledged that one of the aims of the Localism Act, 2011 is to enable communities to have a greater say in shaping local areas. However, a Statement of Community Involvement simply sets out how, when and where the District Council will consult statutory consultees, stakeholders and the local community when developing planning policies and determining planning applications.

No change proposed to the SCI.

2. The SCI "acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications - it is not a document which sets out how evidence is taken into account in the preparation of local planning documents or neighbourhood plans.

No change proposed to the SCI.

3. The SCI "fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process".

NHDC response: The SCI sets out an illustrative list of organisations which are consulted during the preparation of planning policies and neighbourhood planning steering groups could be added to this.

Proposed change to the SCI - neighbourhood planning steering groups will be added to this illustrative list.

4. The SCI "fails to detail how adopted neighbourhood plans will be used and reflected".

NHDC response: The SCI sets out which planning policy documents must be considered when determining planning applications. Currently, these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.

Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

5. The SCI "fails to acknowledge NHDC's legal obligation to pro-actively support the neighbourhood planning process and to consult in advance of the general public consultation".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications. The SCI is not a document which should be used to set out how the District Council will support communities engaged in neighbourhood planning as the way in which the District Council supports local communities in preparing neighbourhood plans will vary significantly from one to another.

No change proposed to the SCI.

6. "Methods of Consultation" (Ref 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans".

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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NHDC response: The table set out under paragraph 4.1 sets out the methods which the District Council may use when consulting on the preparation of the local plan. The methods of consultation which are described in the SCI are ones which the District Council considers are effective and practical for the purposes of preparing the local plan - the table does not distinguish between which consultation method should be used for a particular type of consultee.

No change proposed to the SCI.

7. Section 6 of the SCI, "Community Involvement in Determining Planning Applications". Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.

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NHDC response: the way in which consultation is undertaken for neighbourhood plans is the responsibility of the individual neighbourhood planning steering groups - not the District Council. It would be inappropriate for the District Council to set out how the consultation should take place for neighbourhood plans.

No change proposed to the SCI.

9. Paragraph 2.6 of the SCI, ...."concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans".

NHDC response: paragraph 2.6 has been deleted from the SCI as it referred to interim guidance prepared by the District Council on the preparation of the neighbourhood plans. This interim guidance was prepared to help guide local communities considering neighbourhood planning but was prepared in advance of the publication of the Neighbourhood Planning (General) Regulations 2012, which set out how neighbourhood plans should be prepared. Subsequently, separate comprehensive guidance on how to prepare neighbourhood plans has been prepared by Locality and Planning Aid England and the Council considers that drafting more guidance would simply be a duplication. Proposed change to the SCI - a reference to the neighbourhood planning guidance published by Locality and Planning Aid England will be added into the SCI.

10. Paragraph 6.5 - object to "...the deletion in paragraph 6.5 of the reference to category B sites. These sites are just as important in rural communities as category A sites are in urban areas.

NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.

No change proposed to the SCI.

<b>LDF/02450</b>	<b>4</b>	<b>Tackley</b>	
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014		

Representation: *Object*

The document fails to acknowledge or reflect the Government's stated aim for the Localism Act (2011) i.e. 'The Government thinks that the local community should have a greater say in shaping the way their local area develops'.

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
			<p>The document acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan.</p> <p>The document fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process.</p> <p>The document fails to detail how adopted neighbourhood plans will be used and reflected.</p> <p>The document fails to acknowledge NHDC's legal obligation to pro-actively support the Neighbourhood Plan process<sup>1</sup> and to consult in advance of the general public consultation, i.e.</p> <p>'Duty to Support Once the neighbourhood area is approved, the local planning authority is legally required to provide support and advice to those bodies producing a Neighbourhood Plan in its area. This could include things like:</p> <ul style="list-style-type: none"> <li>arranging meetings, as appropriate, with the qualifying body;</li> <li>making available data for the evidence base, such as housing need data, development viability considerations, environmental designations, and flood risk assessments;</li> <li>setting out local strategic policies in the Local Plan;</li> <li>setting out national policies which will need to be considered;</li> <li>providing advice on the legal requirements for Neighbourhood Planning under the Localism Act;</li> <li>providing advice on general planning matters;</li> <li>sharing information on key contacts and stakeholders;</li> <li>making available venues and helping to arrange community engagement activities, to avoid consultation overload and maximise efficiencies of resources;</li> <li>checking the plan prior to formal submission;</li> <li>participation on meetings of the qualifying body or its working groups;</li> <li>providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations);</li> <li>providing technical support, such as assistance in laying out and illustrating a plan;</li> <li>providing members for neighbourhood forums or more informal steering/working groups; identifying any need for and undertaking environmental assessment or Habitat Regulations assessment.</li> </ul> <p>The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance.'</p> <p>Under the list 'Who we will consult' (ref: 3.1), the formal groups who are preparing Neighbourhood Plans are missing, this is a serious and unacceptable omission.</p> <p>'Methods of Consultation' (Ref: 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans.</p> <p>'Community Involvement in Determining Planning Application' (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases no more. The document fails to acknowledge this.</p> <p>The document fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, this is a formal process with binding, planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission.</p>



## Representations for Statement of Community Involvement (SCI) December 2014

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<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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Key

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**Council Response:**

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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No change proposed to the SCI.

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## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
<p>NHDC response: The table set out under paragraph 4.1 sets out the methods which the District Council may use when consulting on the preparation of the local plan. The methods of consultation which are described in the SCI are ones which the District Council considers are effective and practical for the purposes of preparing the local plan - the table does not distinguish between which consultation method should be used for a particular type of consultee.</p> <p>No change proposed to the SCI.</p>			

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NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.

No change proposed to the SCI.

<b>LDF/02991</b>	<b>4</b>	<b>Ransom</b>
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014	

Representation:	<i>Comment</i>
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I have only just understood that there is a consultation on this document as the NHDC website does not make it clear because it is lost under the heading 'Local Plan Preferred Options'.

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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I wish to make the following comments on the document and its amendments:

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The document acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan.

The document fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process.

The document fails to detail how adopted neighbourhood plans will be used and reflected.

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"Duty to Support

Once the neighbourhood area is approved, the local planning authority is legally required to provide support and advice to those bodies producing a Neighbourhood Plan in its area. This could include things like:

- arranging meetings, as appropriate, with the qualifying body;
- making available data for the evidence base, such as housing needs data, development viability considerations, environment designations, and flood risk assessments;
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The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance."

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## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
			-"Community Involvement in Determining Planning Application" (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.
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**Council Response:**

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.

No change proposed to the SCI.

<b>LDF/03057</b>	<b>2</b>	<b>Ransom</b>
<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014	

Representation: *Comment*

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## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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- providing advice on who needs to be consulted, especially in order to help the draft proposals meet the basic conditions (such as compatibility with EU obligations);
- providing technical support, such as assistance in laying out and illustrating a plan;
- providing members for neighbourhood forums or more informal steering/working groups;
- identifying any need for and undertaking environmental assessment or Habitat Regulations assessment.

The Duty to Support does not require the giving of financial assistance to parish councils or designated neighbourhood forums, this should not stop those local planning authorities that wish to do so from offering such assistance."

-Under the list "Who will we consult" (ref: 3.1), the formal groups who are preparing Neighbourhood Plans are missing, this is a serious and unacceptable omission.

-"Methods of Consultation" (Ref: 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans.



## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
			-"Community Involvement in Determining Planning Application" (ref: section 6). Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.
			-The document fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission.
			-The document purports to be a statement of community involvement, yet in fact it is a little more than a statement of how the NHDC will conduct written consultations. The National Planning Policy Framework (NPPF) refers to "working in collaboration with" the community. I do not see this reflected in the document.
			-Paragraph 2.6 concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans.
			-I object to the deletion of reference to category B sites at (ref: 6.5). These sites are just as important in rural communities as category A sites are in urban areas.
			-The title of this document and content should be changed to fully reflect the requirement under Localism Act (2011) to consult, not just involve, communities to enable them to have a greater say in shaping the way their local area develops.

**Council Response:**

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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The representation raises a number of issues, these are responded to in order:

1. The SCI fails to acknowledge or reflect the Government's stated aim for the Localism Act, 2011, "that the local community should have a greater say in shaping the way in which their local area develops".

NHDC response: It is acknowledged that one of the aims of the Localism Act, 2011 is to enable communities to have a greater say in shaping local areas. However, a Statement of Community Involvement simply sets out how, when and where the District Council will consult statutory consultees, stakeholders and the local community when developing planning policies and determining planning applications.

No change proposed to the SCI.

2. The SCI "acknowledges the use of social media yet fails to address the need to take into account emerging evidence during the development of a Neighbourhood Plan".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications - it is not a document which sets out how evidence is taken into account in the preparation of local planning documents or neighbourhood plans.

No change proposed to the SCI.

3. The SCI "fails to acknowledge the need to consult with those official bodies who are developing Neighbourhood Plans during that process".

NHDC response: The SCI sets out an illustrative list of organisations which are consulted during the preparation of planning policies and neighbourhood planning steering groups could be added to this.

Proposed change to the SCI - neighbourhood planning steering groups will be added to this illustrative list.

4. The SCI "fails to detail how adopted neighbourhood plans will be used and reflected".

NHDC response: The SCI sets out which planning policy documents must be considered when determining planning applications. Currently, these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.

Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

5. The SCI "fails to acknowledge NHDC's legal obligation to pro-actively support the neighbourhood planning process and to consult in advance of the general public consultation".

NHDC response: As stated above, the SCI simply sets out how, when and where the District Council will consult during the preparation of local planning policies and in determining planning applications. The SCI is not a document which should be used to set out how the District Council will support communities engaged in neighbourhood planning as the way in which the District Council supports local communities in preparing neighbourhood plans will vary significantly from one to another.

No change proposed to the SCI.

6. "Methods of Consultation" (Ref 4.1) fails to detail how this will be done with formal groups developing Neighbourhood Plans".

## Representations for Statement of Community Involvement (SCI) December 2014

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NHDC response: The table set out under paragraph 4.1 sets out the methods which the District Council may use when consulting on the preparation of the local plan. The methods of consultation which are described in the SCI are ones which the District Council considers are effective and practical for the purposes of preparing the local plan - the table does not distinguish between which consultation method should be used for a particular type of consultee.  
No change proposed to the SCI.

7. Section 6 of the SCI, "Community Involvement in Determining Planning Applications". Actually the greatest influence the community can have is by the acceptance of a Neighbourhood Plan, the policies of which are as legally binding as the Local Plan, in some cases more so. The document fails to acknowledge this.

NHDC response: As stated above, the SCI sets out which planning policy documents must be considered when determining planning applications. Currently these are the National Planning Policy Framework and the Saved Local Plan 2007. Once neighbourhood plans and a new local plan have been prepared and adopted, they would also need to be taken into account when determining planning applications.  
Proposed change to the SCI - it is suggested that the SCI should be amended to make this clear as work on several neighbourhood plans has started and work on the Local Plan 2011 - 2031 continues.

8. The SCI "fails to acknowledge in sufficient detail, the existence of the Neighbourhood Development Plan process and, as this is a formal process with binding planning and legal obligations for the consultation process and a formal means of community involvement, this is a serious and unacceptable omission."

NHDC response: the way in which consultation is undertaken for neighbourhood plans is the responsibility of the individual neighbourhood planning steering groups - not the District Council. It would be inappropriate for the District Council to set out how the consultation should take place for neighbourhood plans.  
No change proposed to the SCI.

9. Paragraph 2.6 of the SCI, "...concerning guidance on the development of Neighbourhood Plans should not be deleted without replacing it with an adequate statement dealing with neighbourhood plans".

NHDC response: paragraph 2.6 has been deleted from the SCI as it referred to interim guidance prepared by the District Council on the preparation of the neighbourhood plans. This interim guidance was prepared to help guide local communities considering neighbourhood planning but was prepared in advance of the publication of the Neighbourhood Planning (General) Regulations 2012, which set out how neighbourhood plans should be prepared. Subsequently, separate comprehensive guidance on how to prepare neighbourhood plans has been prepared by Locality and Planning Aid England and the Council considers that drafting more guidance would simply be a duplication.  
Proposed change to the SCI - a reference to the neighbourhood planning guidance published by Locality and Planning Aid England will be added into the SCI.

10. Paragraph 6.5 - object to "...the deletion in paragraph 6.5 of the reference to category B sites. These sites are just as important in rural communities as category A sites are in urban areas.

NHDC response: the reference to category B sites has been deleted to reflect the Member protocol states.  
No change proposed to the SCI.

**LDF/03117                      25                      Natural England - East of England Region**  
**Document Section:**                      Statement of Community Involvement (SCI) December 2014

**Representation:**                      *Comment*

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.

## Representations for Statement of Community Involvement (SCI) December 2014

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We are supportive of the principle of meaningful and early management of the general community-by the public, community and other organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.

We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at <http://www.naturalengland.or.uk/ourwork/planningdevelopment/default.aspx>.

We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: [consultations@naturalengland.or.uk](mailto:consultations@naturalengland.or.uk). This system enables us to deliver the most efficient and effective service to our customers.

**Council Response:**

Comments noted.

<b>LDF/13250</b>	<b>1</b>	<b>Pirton Neighbourhood Plan Steering Group</b>
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<b>Document Section:</b>	Statement of Community Involvement (SCI) December 2014
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<b>Representation:</b>	<i>Comment</i>
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I write as Chair of the Pirton Neighbourhood Plan Steering Group (PNPSG), established with the enthusiasm of the Pirton parish community and with the support of the Pirton Parish Council. The following are comments by the Steering Group on the proposed amendments to the Statement of Community Involvement:

The document is about community involvement. In fact, it is very much a statement of how the NHDC will conduct written consultations. There is very little attempt, save for reference to the NHDC's own social media sites, to "involvement". The National Planning Policy Framework (NPPF) refers to "working in collaboration with" the community. There is little attempt to reflect the guidance of the NPPF in this revised statement.

We object to the deletion of para. 2.6 concerning guidance on the development of Neighbourhood Plans. We assume this reference is being put forward for deletion because the NHDC has no guidance, a position that places itself in breach of its statutory duties under the Localism Act 2011. We would much prefer to see the retention of this statement, and for the NHDC to prepare appropriate guidance.

The PNPSG is very disappointed by the NHDC's almost total lack of enthusiasm for the development of the Neighbourhood Plans, and its almost total lack of involvement in or support for communities seeking to develop such plans. Given the thrust of the Localism Act 2011 and the National Planning Policy Framework, it is more than disappointing to see no separate reference in the Statement of Community Involvement to reflect the obligations placed on the NHDC to develop an open and supportive process for involving communities who choose to go down the Neighbourhood Plan route. We see this as a serious omission to the Statement of Community Involvement.

We object to the deletion of reference to category B sites at para 6.5. Such sites are important to local communities with whom the NHDC has an obligation to act collaboratively, particularly where such communities are developing a neighbourhood plan.

In conclusion, the title of this document does not fully reflect the NHDC's views of "Community Involvement" which appear to be limited to formal consultation documents available primarily on the Council's website for comment by e/mail. This hardly constitutes "Community involvement" let alone the emphasis on "collaboration" which is so clearly highlighted in the NPPF. This is even more so the case in relation to communities seeking to develop Neighbourhood Plans. The Statement should be amended to accord more fully with spirit of collaboration and proper community involvement than appears to be the case as indicated by the changes referred to above.

**Council Response:**

## Representations for Statement of Community Involvement (SCI) December 2014

<u>Ref.</u>	<u>Rep No.</u>	<u>Applicant</u>	<u>Agent</u>
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The representation raises a number of issues, which are responded to in order:

1. That the SCI is a statement of how NHDC will conduct written consultations and does not reflect the NPPF reference to "working in collaboration with" the community.

NHDC response: the SCI is a statement of how the District Council will undertake consultations for the Local Plan and in determining planning applications. The SCI sets out methods by which the local community maybe involved in the plan making process but the SCI needs to retain some flexibility about how that consultation takes place.

2. That the text in paragraph 2.6 was proposed to be deleted.

NHDC response: paragraph 2.6 has been deleted from the SCI as it referred to interim guidance prepared by the District Council on the preparation of the neighbourhood plans. This interim guidance was prepared to help guide local communities considering neighbourhood planning but was prepared in advance of the publication of the Neighbourhood Planning (General) Regulations 2012, which set out how neighbourhood plans should be prepared. Subsequently, separate comprehensive guidance on how to prepare neighbourhood plans has been prepared by Locality and Planning Aid England and the Council considers that drafting more guidance would simply be a duplication. Proposed change to the SCI - a reference to the neighbourhood planning guidance published by Locality and Planning Aid England will be added into the SCI.

3. The omission from the SCI that there is no reference to reflect the obligations placed on NHDC to develop an open and supportive process for involving communities who choose to undertake neighbourhood plans.

NHDC response: the SCI is a statement of how the District Council will undertake consultations for the Local Plan and in determining planning applications. It is considered that the SCI is not the right document to set out how the District Council will work with the community in developing neighbourhood plans as this will vary from one community to another.

No change proposed to the SCI.

4. That the reference to category B sites has been deleted from paragraph 6.5

NHDC response: the reference to category B sites has been deleted to reflect what the Member protocol states.

No change proposed to the SCI.