ANNEX A: Officers' response to issues raised during the consultation and recommended changes to the Statement of Community Involvement

Summary of Comments	Officer Response and Suggested Amendments to Statement of Community Involvement (shown in Bold)
1.0 General/Format of the Document: 1.1 This is a long and complex document, documents should be produced in formats which are more accessible and which will encourage participation. 1.2 The pictures contribute nothing to the document. 1.3 Provide information in community languages and Easy Read. 1.4 It is unclear which parts of the SCI relate to the LDF and which relate to applications and it is surprising that the section on applications is low in the order of contents. 1.5 The SCI should refer to other Council strategies where appropriate such as the Community Strategy and should accord with any changes made to the Council's constitution.	1.1 Section 4.2 sets out the principle of communicating clearly, we will endeavour to produce all documents in a clear format and minimise jargon. We will produce a glossary, index, and where appropriate a summary, to accompany all documents. Innovative ways of displaying proposals will be encouraged to make them clearer and easier to understand and to facilitate involvement, making use of diagrams and tables as appropriate. Where practicable we will seek input from the Council's marketing and communications team when producing consultation documents. **Include additional principle in paragraph 4.3 to state 'seek to provide information in an interesting, clear and accessible way'** 1.2 **Review illustrations in re-formatting of document.** 1.3 **Make reference to Easy Read and community languages (Table 2, Key Commitment 6).** 1.4 Accept that the current structure makes this unclear. **Break document into 4 parts, making it clear that part one and part four relate to both the LDF and applications, part two discusses the LDF specifically and then part three covers applications.** It is considered more appropriate to cover involvement in policy documents before dealing with applications. 1.5 It is crucial that the SCI takes into account other relevant documents which have been produced or adopted by the Council. The revised Constitution which was agreed on 25 May 2006 has been taken into account in redrafting the SCI. **Add additional guiding principle to para 4.3 referring to working with other departments and other strategies produced by the Council.**
2.0 Benefits of Community Involvement: 2.1 An additional benefit would be better accountability by decision-takers to the community. 2.2 Residents do not need to be persuaded of the benefits of community involvement. 2.3 The right decision is more important than a	2.1 Decision makers are accountable to the community, the SCI seeks to make the decision making process more transparent and a benefit of this is that it will build trust and limit misunderstanding. 2.2 This paragraph is directed at everyone. **Rephrase para 2.1 to indicate that involving the community in the planning process benefits all parties.** 2.3 **Rephrase and amalgamate previous bullet point 1 and 3 under para 2.1 to: Improved and faster decision making, as issues can be resolved at an early**

speedy decision.	**stage.**
2.4 Local knowledge should be better used by officers.	2.4 Recognise that utilising local knowledge is an important benefit to increased community involvement. **Include additional reference in para 2.1 (5) to making use of local knowledge.**
2.5 Involving more people could simply spread the frustration and despair.	2.5 The intentions outlined in the SCI endeavour to improve the process for all.
3.0 The Aim of the SCI 3.1 The SCI should set out what is meant by community involvement and what consultation is. What is the purpose of consultation and what is the expectation (this would be different for different parties)?	3.1 **Reword para 4.1 to fully explain what we consider to be the purpose of community involvement and consultation.** The expectation of consultation is that it will deliver the benefits outlined in section 2 of the SCI.
4.0 Guiding Principles in Consulting the Community: 4.1 The principles should take account of the York Compact. 4.2 Proposals for a 'continuous process' of public involvement are at odds with CYC's cyclical timetable and low frequency of meetings. A working group of Cllrs and staff should meet weekly to consider views received. 4.3 Need to accept that in some cases lack of interest will be impossible to overcome. 4.4 Obstacles should be recognised as too much ineffective consultation rather than 'lack of interest by the community' or 'too much consultation'. 4.5 Involvement has to start at the very beginning of any process with an open mind and clean slate, there should be no preconceptions or inappropriate assumptions and questions should not be leading. *Suggested amendments to the principles:* 4.6 The SCI should also allow for continuous	4.1 The principles take account of the Code of Practice in the York Compact. **Include reference to the York Compact in the Guiding Principles section (para 4.3).** 4.2 A weekly meeting would have significant resource implications, and would be excessive in the case of document production. The results of all LDF consultations are reported back to Members at the LDF Working Group. 4.3 Recognise that a lack of interest is a barrier. By using the principles set out in para 4.3 to guide community involvement, we will seek to address this barrier as far as possible. 4.4 **Remove reference to too much consultation, expand the guiding principles (para 4.3) to give more detail on how we intend to ensure involvement is effective.** 4.5 This is recognised throughout the SCI and in particular in the guiding principles (para 4.3). 4.6 **Rephrase para 4.3 (i) to: Early and continuous communication and opportunities for public involvement.** 4.7 This is recognised in the guiding principles. **Expand guiding principles (para 4.3 (iv) and (vii)) to provide more explanation on ensuring ideas and comments are considered and continuous development and improvement.** 4.8 **Amend para 4.3 (vi) to refer to providing feedback to individuals, groups and the wider community.** 4.9 **Expand para 4.3 (viii) to refer to carrying out consultation inclusively and give some examples of the sorts of factors we will consider.**

opportunities for public input.	4.10 Section 12 of the SCI sets out how the consultation set out in the SCI will be resourced.
4.7 There should be continuous revision of policies and willingness to change core principles in response to public input. Work to improve public confidence that their contributions will be acted upon.	**4.11 Expand para 4.3 (v) to refer to how we will ensure involvement is meaningful and effective, including being pro-active.**
4.8 State who you intend to provide feedback and information to.	4.12 Covered under para 4.3 (i) and (v) 'early and continuous communication and opportunities for public involvement' and 'ensure involvement is meaningful and effective'.
4.9 Coordinate consultation effectively and inclusively, including consideration of location and timing of meetings and efficiency and effectiveness of leaflet distributions.	4.13 This is generally recognised and reflected in the approaches set out in the SCI to fully involve the community in preparing planning documents and in making decisions on applications. Key to this is early involvement and meaningful and effective engagement (para 4.3 (i) and (v)).
4.10 Ensure consultation processes are adequately resourced to achieve their objectives.	4.14 A key aim of the Statement of Community Involvement is to encourage more people to get involved in the planning process (para 3.2). Table 2 sets out the range of ways we intend to involve the community in the LDF process, including the range of ways they can make comments (Table 2, Key Commitment 7) . Para 10.5 sets out how people can comment on applications.
4.11 Plan to pro-actively reach groups & individuals, not just passively make information available.	
4.12 Consultation must be implemented early enough so that opinions and evidence from consultees can be used to inform all stages of the decision making process.	
4.13 A consultation process that simply asks for opinions on a detailed scheme before implementation should be recognised as flawed, inadequate and inappropriate.	
4.14 Make it as easy as possible for people to give their opinions.	
5.0 Who will be involved:	5.1 Accept that the additional groups and organisations suggested should be included on the LDF database and referred to in the Annex of the SCI as appropriate. One respondent requested that contact details were also included, however, it would not be appropriate to include specific contact details as these may quickly become out of date. **Merge the 'who will be involved', 'community**
5.1 Suggested amendments, updates and additions to the groups and organisations listed in Section 5, Section 7 and Annex 3 of the SCI.	
5.2 Include a sentence on monitoring and keeping	

the database up to date and give details on who people should contact if they wish to include themselves on the database.	**profile' and 'hard-to-reach' sections to give a clearer overall picture about who will be involved. Update Annex 1 to include additional consultees as appropriate.** 5.2 **Expand paragraph 5.15 to include reference to monitoring the database and keeping it up to date and provide a contact if people wish to add/amend/delete their details.**
6.0 Community Profile: 6.1 Suggested amendments regarding villages, urban-rural population split, disabilities and the equality profile.	6.1 **Amend Paragraph 5.2 – 5.8 to include suggested amendments and additions.**
7.0 Hard-to-reach Groups: 7.1 Those with most to gain will participate more whilst those likely to be disadvantaged will continue to be relatively powerless. 7.2 Give more explanation of why each of these groups is considered to be hard to reach. 7.3 The general public are also a hard to reach group and there are others outside these hard-to-reach groups who also find it difficult to get involved. 7.4 Emphasis on consultation with minority groups may mean that the interests of the majority may not be given enough weight. 7.5 Any attempt to be all-inclusive will be wasteful of time and resources, and will fail. A substantial majority should be the target. 7.6 This term is a way of excusing why views of groups aren't heard and instead should be replaced with 'need to reach'.	7.1 A key aim of the SCI is to encourage more people to be involved and make it as easy as possible for them to do so. By clearly setting out the process, the general public are not disadvantaged by a lack of knowledge of the consultation process. 7.2 The groups identified are minority groups which the Council considers are not easily represented and are therefore considered to be 'hard-to-reach'. The membership of the Inclusive York Forum, which was used as a basis for determining hard-to-reach groups, draws on representatives of the various communities of interest in York, namely: race, age, faith, disability, gender and sexuality. 7.3 Accept that a large proportion of the general public could be considered to be 'hard-to-reach' because they are not easily involved in the planning system. As respondents suggest, this could be for reasons such as working full time. **Reword para 5.11 to emphasise that a large proportion of the general public including those identified in this section are 'hard-to-reach' if these are defined as those not easily involved in the planning system.** 7.4 Taking into consideration the needs of specific groups such as these when planning consultations is unlikely to impact negatively on the level of interest from elsewhere, as this targeted consultation would be over and above any wider consultation we intend to undertake. 7.5 It is accepted that we will never achieve a 100% response rate, even if time and resources were unlimited. However the aim of the SCI is to encourage more people to get involved and to get a response which is representative of the York community. An important part of this is to consider the needs of specific groups

	who may otherwise be disadvantaged by methods used.
	7.6 'Hard to Reach' is considered to be a recognisable term for referring to groups that are not easily reached by the planning system.
8.0 Methods of Community Involvement (Table 1):	8.1 Newsletters are recognised as a possible method and this is reflected in their inclusion in Table 1.
8.1 Newsletters could be another method of creating local awareness (e.g. Huntington Newsletter).	8.2 Accept that there are other forums and groups which it would be valuable to involve. **Add an additional row to Table 1 covering Community Groups, Organisations and Forums.**
8.2 Public meetings and meetings with community groups and other local forums are a good way to get more of the community involved.	8.3 Table 1 recognises that one weakness of public meetings and area forums is that they may be hijacked by the most vocal groups – having a strong chairman would be one way of addressing this. The purpose of these meetings and forums is to discuss a range of issues and gather views from different members of the public, in most cases it is inappropriate to cast a vote, as it is not simply a matter of 'for and against'.
8.3 The danger of meetings being hijacked by vocal groups can be minimised through a strong chairman and participants at these meetings should conclude with a vote on the key issues.	
8.4 Further explanation required about area forums	8.4 Area forums would be set up where appropriate to discuss a particular issue, site or application where these particularly impact on a certain area. Amongst other things the membership could be drawn from existing Ward Committees and Parish Councils.
8.5 Public meetings should be well advertised by local media.	8.5 The Council will seek to make use of local media to advertise consultations and any public events.
8.6 It should be recognised that the Council has an exhibition unit for pubic exhibitions.	**8.6 Add reference to exhibition venues, including the mobile unit, in Table 1.**
8.7 An additional weakness of Formal Written Consultation / Community Surveys is that these documents can over- simplify.	8.7 Accept that this is a risk when attempting to make information more accessible. **Make reference in Table 1 to the possibility of issues being over-simplified.**
8.8 An additional weakness of focus groups is that they are unaccountable.	8.8 This is the case with most of the different groups involved. Table 1 recognises that these groups may not be fully representative of the community and they would never be used as the sole method of consultation.
8.9 Workshops can be manipulated by a facilitator.	8.9 Recognise that a facilitator can manipulate outcomes and this is reflected in the suggestion that an external facilitator brings about the best results.
8.10 Local Press should be briefed on proposals and the Council should investigate running more interactive and coordinated publicity campaigns through the local media.	8.10 Agree that the local press provides a good way of reaching large numbers of people. Each consultation will be accompanied by a press release and during some consultations we will produce follow-up releases to encourage more interactive coverage (e.g.: follow-up stories with photographs of consultation events). However, it should be noted that whether items are covered by the press
8.11 All documents should be made available on the Council's website and the website should be designed so that documents can be easily	

located.

8.12 Make more use of electronic forms of communication, as this would increase speed and lower costs (for example, when consulting with Parish Councils on applications or to produce a database of email addresses for interested parties.

8.13 Regularly update website information so that key consultation dates are not missed by members of the public.

8.14 The web is an effective way of gaining and sharing information.

8.15 Include notice board in libraries dedicated to Council business.

8.16 Ensure that letters are addressed to the correct individuals.

Which methods of community involvement will be used when?

8.17 SCI should recognise that in most cases an effective consultation will involve employing a wide range of often overlapping measures. There is a lack of clear criteria as to what methods of involvement will be used when – implying that the Council will employ as many or as few as it likes in any given situation.

8.18 Suggest additional focal points for contact and information points: supermarkets, schools/colleges, shops, bus stops, work places and businesses and political party flyers.

8.19 Table 1 should indicate that Planning Aid is provided free of charge to the public.

8.20 Table 1 sets methods against the failings of the public to fit in, it should start with the range

is not within the Council's control. **Make reference to issuing press releases at key stages in Table 2.**

8.11 All consultation documents are made available on our website and during consultations a direct link to the relevant page is placed on the Council's homepage. We will continue to seek advice from our web team on the best way to display information on the website.

8.12 The Council will continually seek new ways to use electronic communication methods. As applications are now available on the website the scope for this has increased. However, as email and internet access is not available to all the best way is still to contact Parish Councils and all neighbours by post.

8.13 **Include an additional bullet point in Table 2, commitment 6: The council will seek to maximise use of the City of York Council Website and ensure it provides up to date information.**

8.14 The Council recognises that the website provides a valuable source of information. **Add the following text to table 1: 'is a simple way of sharing and gaining information'.**

8.15 As libraries have restricted space it is not possible to have a notice board within them dedicated to Council business. For each consultation, we will produce a poster which we will encourage libraries to display to advertise the consultation and the availability of documents within the library.

8.16 Where the information is available letters regarding the LDF are addressed to specific individuals or departments within organisations. At each stage of the consultation when responses are received the LDF contact database is updated to record individuals names rather than simply an organisation.

8.17 Table 1 sets out the range of methods and paragraph 6.2 states that those used would be dependent on the consultees and the type of document being consulted on. To go into more detail would make the document too prescriptive. The Companion Guide to PPS12 states that SCIs should not be too over-prescriptive as this would have considerable resource implications and would require the statement to be reviewed frequently. However an additional sentence could be added suggesting that consultation involves employing a wide range of measures. Add the following text to Paragraph 6.2: **The Council recognises that in most cases an effective consultation involves employing a wide range of often**

of people who may wish to contribute, followed by a decision on the range of measures needed to most effectively reach these people.	**overlapping measures to reach as many people as possible.** 8.18 During previous consultations we have distributed leaflets and posters widely to venues as suggested here. Accept that further information could be provided in Table 1**. In Table 1, i**nclude additional examples of where we could distribute leaflets and brochures.** 8.19 **Add additional text to Table 1 to indicate that Planning Aid services are free of charge to the public. In addition, refer to Planning Aid in the Glossary and in the section on Resources.** 8.20 Agree that who is being consulted is an important consideration when determining which methods to use in each case. **Revise 6.2 to include: 'The consultation methods used in each case will be specifically tailored according to those to be consulted and what it is they are to be consulted on, to encourage maximum input. Factors such as the accessibility of venues, timings and working hours, care needs and language must be carefully considered in determining the optimum consultation approach in each case'.**
Local Development Documents (LDDs)	
9.0 Consultation on Local Development Documents (LDDs) 9.1 Timescales should be set out in the SCI and these should be updated as changes occur. 9.2 The SCI is resume of what the Council is already doing. It would be helpful to differentiate between the old and new standards and highlight whether we will still be going beyond what is required by the regulations. 9.3 Different terms are used to refer to the same thing throughout the table (eg. 'you' and 'citizens'). 9.4 It mentions that copies of reports will be free to non-profit organisations but isn't clear who will have to pay. 9.5 Stage 1 in the table should state that issues will	9.1 The Local Development Scheme (LDS) sets out the timescales for the production of the LDF and this will be updated at key stages to provide an up-to-date programme. This is available on the Council's website. Reference to the statutory 6 week consultations could be included in the SCI. **Include reference to the statutory 6 week consultation period for Preferred Options and Submission stages in Figure 2.** 9.2 The Council already carries out considerable consultation with regard to applications and planning documents, in many cases going beyond the requirements of the regulations. The SCI provides the opportunity to formally set out these existing practices but also take on board the new standards introduced by the 2004 Planning Act, which encourages a more comprehensive and inclusive approach to community involvement. **Include additional Annex which summarises the minimum requirements for consultation for the LDF.** 9.3 **Amend terms in Table 2 to make them consistent.** 9.4 Accept that the wording makes this unclear. **Reword relevant parts of Table 2 to read 'Copies will be available free to non-profit making organisations.**

be discussed clearly and concisely whilst leaving all options open and providing appropriate background information. 9.6 Amend reference to LSP to refer to using them to reach as many groups as possible who would like support to develop their knowledge of the planning system. 9.7 Advertise widely the offer of a visit by a planning officer to hard to reach groups and others who are interested. 9.8 The Council should state clearly where consensus cannot be reached and what the various points of view are. 9.9 The process of LDDs should have an extra stage 0 – seeking ideas. Otherwise stage 2 is only a consultation on options already owned by the Council.	**Copies for residents and others will be available at an affordable rate.'** 9.5 These points are covered in paragraph 4.3 of the SCI under guiding principles. 9.6 Accept that the suggested change would clarify how we intend to work with the Local Strategic Partnership. **Amend Key Commitment 5 in Table 2 to clarify reference to LSP.** 9.7 This is covered in Table 2, Key Commitment 5. **9.8** As part of the new system planning authorities are required to set out clear reasons for their selection of the preferred options, together with a précis of the alternatives that were considered. At every stage of the LDF process officers will prepare a report setting out how they intend to respond to issues raised. This is set out in Table 2**.** 9.9 A key aim of the new planning system is to involve communities and stakeholders from the earliest stage in the plan preparation process ('frontloading'). Each Development Plan Document will go through an initial 'issues and options' stage, which will include a discussion of possible issues and options, and evidence gathering (pre-production). Stage 1 is therefore part of that trawl for ideas and a stage which will include full community involvement. This is covered under the guiding principles identified in section 4 and under Key Commitment 1 in Table 2.
10.0 Village Design Statements, Parish Plans, Area Action Plans and Supplementary Planning Documents: 10.1 Will Village Design Statements and Conservation Areas be given more weight when considering applications? 10.2 Will Supplementary Planning Documents have 'material' status as SPGs currently do? 10.3 Does an Area Action Plan exist for Huntington, North East York or Haxby/Strensall? There is a need for an agreed area plan to address the cumulative impacts of applications. 10.4 Anything that directly affects a particular town or parish should be highlighted to that area to	10.1 The current aim for design statements is for them to be approved as supplementary planning guidance. The weight attached to the statement depends how closely it reflects national or regional guidance and the level of consultation carried out. This will continue to be the case if they are adopted as SPDs under the LDF. The duty to preserve and enhance the character and appearance of Conservation Areas remains unchanged. 10.2 SPDs will form part of the planning framework for the area and will be included in the LDF. Although not part of the statutory development plan, they must be in conformity with the Core Strategy and the DPD policies which they support and will be subject to rigorous procedures of community involvement. They will therefore be material considerations in the determination of applications. 10.3 There are no Area Action Plans (AAP) proposed for the areas mentioned. AAPs are used to provide the planning framework for areas where significant change or conservation is needed. In the areas mentioned it might be more appropriate to

ensure awareness. 10.5 The SCI should make reference to Parish Plans. 10.6 Are Area Action Plans the same as development briefs?	consider producing design guides or statements. 10.4 Paragraph 7.5 of the SCI recognises that some topics will be of localised concern or will only affect certain areas. Consultation on certain documents, such as AAPs and SPDs needs to reflect this. The focus of consultation on these documents will be tailored to the likely level and type of interest. In terms of applications, these are advertised in the local area through site notices, neighbour notification and consultation with the relevant Parish Council or planning panel. 10.5 Community Plans such as Parish Plans and Village Design Statements provide an important method for involving the community in the planning system. **Provide these as examples in Table 1.** 10.6 Unlike development briefs which were previously Supplementary Planning Guidance, Area Action Plans will benefit from having development plan status.
11.0 How will comments be brought into the process and what weight will they have? 11.1 SCI should give clear indication of how the comments received will be brought into the process and what weight will be attached to them. There is the perception that comments will not be taken into account and that decisions have already been made. 11.2 SCI should set out how it intends to ensure that any consultation is open, fair, transparent and democratic. 11.3 The results of consultation should be used to inform the decisions makers. All appropriate committee reports on issues likely to have significant impact on local communities will include details of what consultations have taken place and if none, why not. 11.4 Provide a reasoned explanation where decisions are contrary to the views expressed by the majority of those consulted, in many cases people would be more interested in consultation	11.1 All comments will be registered and at every stage of the LDF process officers will prepare a report setting out how they intend to respond to issues raised. With planning applications, the officer draws together all the issues and comments made on a planning application into a written report and makes a recommendation whether to approve or refuse the application, as set out in paragraph 10.6 of the SCI. The comments and reports will be available for the public to view. We believe that all comments are valued, but views often differ and therefore we cannot commit to making all changes requested. **Expand guiding principle iv to explain what happens to comments received and amend Key Commitment 2 in Table 2 to refer to responding to issues raised.** 11.2 Through seeking to increase involvement and clearly setting out how and when members of the public can be involved in the planning process, the SCI seeks to ensure that any consultation is carried out in a way which is open, fair, transparent and democratic. A key part of this is early and continuous involvement and the commitment to providing feedback on comments and decisions. 11.3 Consultations on the LDF and applications will be reported back to Members in the relevant committee reports. For the LDF this is a standard process, for applications this would only be the case for larger/significant applications. 11.4 As set out above the response to the issues raised/reasons for a decision will be set out by Officers. Public views, even if expressed by a majority of respondents still have to be considered alongside planning guidance and a

if the majority view prevailed.	balanced decision reached.
12.0 Access to Information: 12.1 Accounts of meetings with council staff should be available for inspection by the public. 12.2 Make it possible for *anyone* to gain information. 12.3 The SCI should set out the opportunities for comment and complaint on development projects.	12.1 Under the Freedom of Information Act certain officer notes will be available to be viewed by the public. However there will be exemptions where matters are confidential. 12.2 **Include additional Key Commitment to Table 2 which refers to information being made available to everyone.** 12.3 The SCI as a whole sets out the opportunities available for public comment and involvement. However, it would be good to include contact details for the main teams involved. **Include an Annex which sets out contact details for key departments.**
13.0 Resources and Training: 13.1 The resource implications (time and financial) have been underestimated. 13.2 The SCI should state as a matter of principle that the process will be properly resourced throughout. 13.3 Invest in training for staff and Members and try to initiate training local people how to use new IT.	13.1 Expand **section 12 to set out the resources which will be used to undertake the level of involvement set out in the SCI.** 13.2 The processes and methods set out in the SCI take into account the level of resources available. The need to adequately resource the process is recognised in section 12**.** 13.3 The Council will seek to make use of opportunities to provide Members and staff with appropriate training. There are many facilities which provide IT training for people, including Learning for Life and Learndirect. Where possible the Council will seek to make people aware of the opportunities.
Planning Applications	
14.0 General Comments: 14.1 As well as 'transparency of decision making' include 'leading to a better understanding of the reasons for a decision'. 14.2 Make clear that anyone can comment on a planning application. 14.3 How can we obtain copies of the Council's 'Good Practice Guide to Development Control'? 14.4 All applications should include aerial and plan views of all surrounding properties as well as the proposed property. The planning office should ensure that all plans are accurate or reject the proposal.	**14.1** **Add to para 8.2: 'The Council wishes to make the process of dealing with an application, and the reasons for deciding whether to approve or refuse it, open and accessible to everyone.'** **14.2** **Add to para 10.5: 'Anyone can make a comment on a planning application.'** **14.3** This is not available yet. Development Control are currently working on a Code of Practice to give more detail on the Development Control process. **Remove reference to Good Practice Guide.** **14.4** We are unable to insist on aerial views, especially for smaller schemes, but these are encouraged for larger ones. A minimum standard of plans is required, together with supporting reports to enable clear understanding of the proposals**.** Plans have to meet standard or they will not be registered. **14.5** Agree consensus and negotiation should be undertaken wherever possible,

14.5 Much greater emphasis should be given to the concept of compromise and reaching a consensus.	and this is carried out where tangible benefits are possible.
	14.6 Amend statements in Part 3 to make it more positive about what is achieved.
14.6 The applications section should be more positive about current practices and what the SCI seeks to achieve within the resources available.	**14.7** Accept that this may be unclear because it is set out in another section of the document. **Include page reference number for Table 1.**
14.7 It is unclear where table 1 is within the SCI.	**14.8** Accept **Add short section about planning enforcement.**
14.8 It is important from a planning point of view to get it right first time. Enforcement costs time and money.	**14.9 Amend paragraph 10.1 to reflect suggested changes and correct inaccuracies.**
14.9 Some of the explanations in paragraph 12.3 are inaccurate or seem arbitrary.	**14.10** Involvement of the community at an early stage and throughout the development of proposals provides opportunities for negotiation and discussion between all parties. One benefit of this is that the public will have greater awareness of the process as a whole including S106 agreements.
14.10 The SCI should encourage public recognition of the benefits of development derived through Section 106 agreements.	
15.0 Consultation on Applications:	15.1 **Amend paragraph 10.1 (viii) to refer to consulting, where appropriate, the specific bodies listed in Annex 1, which includes adjoining authorities.** Consider that adjoining parishes are better consulted by their District.
15.1 Include a commitment to consult neighbouring District and Parish Councils.	
15.2 Neighbours should be defined and should always be consulted by some method to ensure they are aware of proposals.	15.2 Existing practice gives the 'net' for notification by letter, this is usually adjoining properties and then wider coverage for large scale applications and extra letters are often sent out following case officers site visit**.**
15.3 For larger developments the Council should consult with its own various partnership boards.	15.3 Briefing the Local Strategic Partnership Boards will be considered with regard to larger applications as appropriate.
15.4 The whole application should be available at the nearest library/Post Office.	15.4 Applications are now available on line and can therefore be accessed in all libraries. Making them available in Post Offices would have significant resource issues.
15.5 For all developments there should be observation "windows" so that the public can view the development.	15.5 For major sites, encourage by negotiation with the developer.
15.6 The Council should contact property owners to inform them of applications and not just rely on notifying tenants and advertisements in newspapers.	15.6 This would have significant resource implications and would not be possible to guarantee in all cases, leading to inconsistency.
	15.7 The Council acknowledge all comments on planning applications.
	15.8 This is not done as routine on applications but is considered on merits of each case.

15.7 Does the Council acknowledge all comments on planning applications? 15.8 Are Resident Groups and Ward Committees consulted as routine? 15.9 Where CYC have a vested interest in an application, residents should be given a bigger role. 15.10 Site notices should always be displayed. 15.11 Site notices should be redesigned to make them more visible (large print, community languages- this is also the case for newspaper adverts) and the siting of notices should be considered to make them more accessible to disabled people and less vulnerable to vandalism.	15.9 An aim of the SCI is that the public should be involved fully in all applications, related to the size/ implications of the proposal. 15.10 National legislation defines when we are required to display notices. There would be resource implications if they were displayed in every case. Neighbour letters give good coverage. 15.11 We are currently looking at the design and location of site notices.
16.0 Reporting Consultation to Members: 16.1 Consultation carried out by a developer and earlier negotiations should be taken into account by committee and this should be viewed as a positive factor when deciding applications.	16.1 A full report on consultation should be included as part of the committee report. **Outline in para 9.8 how the consultation undertaken by developers will be fed into the decision-making process.**
17.0 Delegated Decisions: 17.1 When a decision is delegated, copies of the delegated report are available on request. 17.2 It is not clear on what basis a planning decision may be delegated rather than taken to a planning committee. 17.3 What action can an objector take if they wish to ensure an application is taken to a planning committee rather than being delegated. 17.4 Under "Delegated Authority" Members may overlook significant applications.	**17.1 Refer to delegated decision reports being available in paragraph 10.8.** 17.2 The majority of applications are dealt with through delegated authority, it would be complicated to set out in the SCI the circumstances where they are not. This information will be available from the DC Officer in each case. 17.3 As stated in para 10.7, Members can request that an application is considered at Committee, therefore objectors can make a request to their Councillor and they can decide whether they feel it is appropriate. **17.4** The delegated decisions process is needed practically and brings benefits to residents, for example by enabling householder applications to have a speedier decision. Approximately 87% of applications do not go to committee, which enables the Council to devote more time to larger scale or controversial applications.

18.0 Speaking at Planning Committee:
18.1 The dates and frequency of committee meetings should be made easily available.
18.2 Speakers should be allowed to respond to other comments and make factual corrections to things said by other speakers.
18.3 Object to only allowing one speaker and limiting speakers to 3 minutes:
    - insufficient when an application is opposed on a variety of grounds or it involves complex issues. The number of speakers could be determined by the size of the application?
    - potentially discriminatory against hard to reach groups.
    - inconsistent with the provisions of the human rights Act 1998.
18.4 Where a Parish Council wishes to speak will they be in addition to or displace others who wish to speak against?
18.5 Local resident objectors should have precedence over remote body objectors.
18.6 Only members that undertake site visits should be able to vote. No new material should be able to be presented at Planning Meetings.
18.7 Usually the deadline to register to speak is 10am of the day before not 5pm.
18.8 Parish Councils should be given a vote on planning committee, the number of vote's dependant on the size of the parish.
	18.1 This information is available on the Council's website.
	18.2 It is necessary to have measures in place to manage the length of meetings. If the right to respond was allowed all speakers could claim the opportunity. Chair can invite further comment.
	18.3 As above, it is necessary to have some framework to manage the meetings, however, the overall aim should be to get the best balance of views, commensurate with good decision making and meetings of practical duration. In cases dealing with very large applications or complex issues then multiple speakers may be allowed to register for different issues.
	18.4 The practice is to allow one person to speak on a first come first served basis in addition to the Parish Council.
	18.5 Parish Councils are always allowed to speak therefore local residents can always have a voice through their Parish Council.
	18.6 For practical purposes in Committees, this could mean the decision is taken by smaller number of members and would actually be less representative. This remains at the discretion of each member. The introduction of new material at meetings is at the discretion of the chair.
	18.7 The deadline for registering to speak at a planning committee is 5pm on the day before the meeting**.**
	18.8 This is not possible within the existing constitutions for decision making. Parish Councils do not cover the whole of the authority area so this would lead to some inconsistency in decision making and other groups could also claim the right to have a vote.

19.0 Feedback and communication: 19.1 Letters of acknowledgment should be	19.1 Due to the number of letters sent out this would have considerable resource implications.

personalised to lead to better relations. 19.2 Better feedback should be provided to respondents on the outcome of an application. Respondents should be informed of Officers' recommendations on an application and what they can do if they wish to object further. 19.3 Comments can also be made on-line or by fax.	19.2 When an application is considered by Committee, feedback is given to respondents. In the case of delegated decisions, direct feedback is not given due to the resource implications however, the progress of any application can be followed on the internet or by telephoning the planning officer. 19.3 Amend para 10.5 to include on-line and fax responses.
20.0 Major Planning Applications: 20.1 Seek clarity with regard to use of the terms 'major' and 'significant'.	20.1 Agree that the use of the terms 'major' and 'significant' was in cases unclear. For clarity the threshold for what are considered to be major applications should be the same as the statutory definition of 'major'. **Amend para 9.3 to clarify what we consider to be 'major' applications.**
21.0 Requirements from developers on applications: 21.1 The SCI should clarify that it is not obligatory that developers carry out consultation on applications. 21.2 Developers should be required to involve the community. The SCI should be more prescriptive about what is expected from developers and set out how the LPA will work with applicants. Applications which do not state what involvement has been undertaken should be invalidated. 21.3 There should be a leaflet for developers setting out what is expected of them.	21.1 Include reference to consultation not being obligatory in para 9.8. 21.2 Planning guidance states that it is not obligatory that developers carry out community consultation. We therefore cannot require developers to carry out consultation, we can only encourage them to by outlining the benefits. The SCI should not be too prescriptive about what would be expected from developers allowing for flexibility and innovation depending on the type and location of the proposals. **In para 9.4 refer to developers speaking to officers prior to submitting an application to discuss the opportunities for community involvement and provide some further guidance on the type of consultation which will be expected.** 21.3 A leaflet could be helpful when resources permit to help applicants and the public to understand and be involved in the process.
22.0 Parish Councils/amendments to applications: 22.1 The cumulative impact of applications needs to be assessed with input from the community via local forums such as the Parish Council at the pre-application stage. 22.2 Parish Councils / Planning Panels should be informed of any amendments to applications,	22.1 Part of considering applications is to assess the precedent that could be created and cumulative effects. Parish Councils are consulted on all applications and on major applications, section 9 encourages pre-application discussions, however, this would not be practical for all applications. 22.2 Consultation takes place upon 'significant' amendments. In many cases amendments are minor and in keeping with policy, and re-consultation in all cases would have resource implications. Discretion by the case officer helps to reduce unnecessary delays and avoid consultations that would not yield real benefits.

even when not considered significant. 22.3 The Council should inform interested parties about the outcome of appeals from the Inspectorate.	22.3 The Inspectorate advise anyone who asks for a copy of the decision and this is explained in the initial appeal notification letter. **Include a brief section about appeals (para 11.2 and 11.3).**
23.0 Other considerations for applications: 23.1 There is a grey area between Planning, Building regulations and Listed building consent. This often impacts on access issues and general DDA considerations. 23.2 The SCI should be informed by guidance from English Heritage. 23.3 The publicity requirements for applications should also consider the Listed Building and Conservation Area Act and the Planning (Listed Building and Conservation Area) regulations 1990. 23.4 There is no explicit mention of archaeology in the SCI. Consultation on archaeological issues should be considered both at an early stage and throughout the development process. Information on investigations should be made available to the public (perhaps in the form of an open day).	23.1 Consideration of Listed Building Consent is determined nationally, regarding issues that can be taken into account. From 10 August 2006, applicants are required to submit a Design and Access Statement with their application, which will consider the sorts of issues raised by this respondent and this is outlined in para 9.8. 23.2 The Council will continue to consult and involve English Heritage on appropriate applications. This commitment to contacting appropriate specific consultees is set out in para 10.1 (viii). 23.3 **Refer to 1990 Act in para 8.3.** 23.4 Accept that there are often wider issues considered as part of development. Applications are often accompanied by further detailed documents and information, for example on archaeology. All of this information is available on the application file and is available for the public to view. **Include sentence in para 10.4 to outline that additional information is often provided as part of applications and this is available to the public as part of the application file – giving example of archaeology.**
24.0 Developer and Community Consultation: 24.1 Closer involvement between developers and the community should start at a very early stage. This early involvement is essential to minimise development/design costs. 24.2 Technical input should be provided by the developer or an independent facilitator to enable full understanding of technical issues. 24.3 All answers or responses provided by developers to the public should be recorded	24.1 SCI seeks to encourage involvement at an early stage. 24.2 Encourage developer to have technical team at public meetings to answer questions. Meetings may be chaired by an independent facilitator. The community can retain their own experts. In terms of the Council, reports to Planning Committee will involve technical expertise on relevant issues. 24.3 A record of public meetings is important, however the Council cannot ensure this if they are not involved in the meeting.

and logged to help ensure honest and accountable exchanges.	
25.0 Monitoring: 25.1 Monitor distribution of documents and where documents are viewed, particularly at the libraries. 25.2 Set participation levels to measure impact and validity of the process. 25.3 Evaluate the success of major consultation processes and use this to inform and improve future exercises to ensure resources are spent wisely. 25.4 Set out how monitoring and review will be undertaken and indicate if the intention is to involve partners in monitoring compliance with the SCI. 25.5 Would it be appropriate to include commitment to feedback under the monitoring and review section?	25.1 Section 10 of the SCI sets out our commitment to reviewing our consultation process to assess the impact of methods, a key part of this will be to include a question on comment forms asking where the respondent heard about the consultation and seeking views on the consultation process itself. As part of the monitoring and review of consultations the Council will seek to improve the information that is provided to Library staff. 25.2 Seeking to achieve a target level of involvement for each consultation would be resource intensive and would not necessarily yield a more representative response. 25.3 As set out above there will be a continual review of the success of consultation approaches. 25.4 The mechanism used to review the SCI process, through the Annual Monitoring Report, could be made clearer. **Reword paragraph 13.1 to provide more detail on how the AMR will monitor SCI outcomes.** At this stage there is no intention of involving partners in monitoring compliance with the SCI. 25.5 The Council's commitment to feedback is one of the guiding principles set out in para 4.3 (vi). Information on feedback is also outlined under Key Commitment 2 in table 2.
26.0 Annex 1, SCI Process: 26.1 Unsure of what scoping means.	26.1 Scoping refers to the initial stage at which we gather evidence to inform the scope or coverage of the document. **Annex 1 previously set out the process for preparing the SCI, it is not appropriate to have this in the final version of the SCI. Delete Annex 1.**
27.0 Annex 2, Test of Soundness: 27.1 Annex 2 should include some explanation of the application of the Test of Soundness.	**27.1** The purpose of the examination is to consider the soundness of the SCI. The presumption is that the SCI is sound unless it is shown to be otherwise as a result of evidence considered at the examination. This Annex sets out part of the process of preparing the SCI, it is therefore not appropriate that it appears in the final version. Delete Annex 2.
28.0 Annex 5, City Development: 28.1 It would be useful to know the job descriptions or responsibilities of officers/departments so that the applicant can be sure that that	**28.1 Delete diagram in Annex 5 and replace with a list of key contacts and how to contact them (Annex 3: Development Control, City Development, Design and Conservation, Enforcement)**

information has reached all departments concerned, this would also give a more transparent view of Council procedure.	
29.0 Glossary: 29.1 Should the last glossary term read 'sustainable' instead of supplementary? 29.2 It would be helpful to give examples of the different Development Plan Documents. 29.3 The Development Control Policies section in the glossary is not clear. Consider rewording: 'suite' and 'spatial'. 29.4 Could 'neighbours' be added to the Glossary? 29.5 Could Planning Aid be added to the Glossary?	**29.1 Amend reference to Sustainability Appraisal (SA).** 29.2 Examples of Development Plan Documents are set out in the Glossary. 29.3 Accept that the Development Control Policies section of the Glossary could be simplified **Replace 'suite' with 'range' and remove references to 'spatial'.** 29.4 The 'net' for notification by letter is in most cases to adjoining properties and then wider coverage for large-scale applications. In many cases extra letters are also sent out following the Case Officers site visit. It is therefore difficult to define who would be contacted through neighbour notification. 29.5 Accept **Add section on Planning Aid to the Glossary.**