

**INSPECTOR'S REPORT  
CITY OF YORK COUNCIL  
STATEMENT OF COMMUNITY INVOLVEMENT**

Inspector: Wendy Burden BA DipTP MRTPI

Date: 20<sup>th</sup> August 2007

## **City of York Council's Statement of Community Involvement (February 2007)**

### **INSPECTOR'S REPORT**

#### **Introduction**

- 1.1 An independent examination of the City of York Council's Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (the Act), as applied by s18(4) of the Act.
- 1.2 Section 20(5) indicates the two purposes of the independent examination in parts (a) and (b). With regard to part (a) I am satisfied that the SCI satisfies the requirements of the relevant sections of the Act, in particular that its preparation has accorded with the Local Development Scheme as required by s19(1) of the Act.
- 1.3 Part (b) is whether the SCI is sound. Following Paragraph 3.10 of Planning Policy Statement 12: Local Development Frameworks, the examination has been based on the 9 tests set out (see Appendix A). The starting point for the assessment is that the SCI is sound. Accordingly changes are made in this binding report only where there is clear need in the light of tests in PPS12.
- 1.4 A total of 67 representations were received, all of which have been considered. The Council proposed a number of amendments to the SCI in response to representations received and these have been taken into account in the preparation of this report.

#### **Test 1**

- 2.1 The Council has undertaken the consultation required under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 2.2 This test is met.

#### **Test 2**

- 3.1 Although Paragraph 12.4 states that the Council will make every effort to link consultation on Local Development Documents (LDDs) with other community engagement strategies, the links between the Local Development Framework (LDF), the SCI and the Community Strategy are not as explicit as they should be. I therefore have the following recommendation to make.

**(R1)** Add the following to the end of Paragraph 12.4:

"By working closely with the Local Strategic Partnership, 'Without Walls' and any other groups flowing from the Community Strategy,

the Council will ensure that the Local Development Framework is closely integrated with the Community Strategy.”

3.2 I am, as a result of this amendment, satisfied that the SCI recognises the links between the strategies, the LDDs and the associated consultation exercises.

3.3 Subject to the recommendation above, this test is met.

### **Test 3**

4.1 The Council has set out in Annex 1 of the SCI those groups which will be consulted. This list includes the statutory bodies from PPS12 Annex E with one exception that is noted below. It is stated at Paragraph 5.15 of the SCI that the Council holds a database of consultee details and that this will be updated as necessary. Details of how to be added to this database are also provided.

4.2 A number of representors request the inclusion of their organisation in the lists contained at Annex 1 of the SCI. As the Council has confirmed that these organisations are either listed in its database, or will be added to the database, I am content that they do not need to be listed specifically in the SCI.

4.3 The re-organisation of certain consultation bodies, such as the Strategic Rail Authority, should be acknowledged in the SCI and I recommend an additional sentence be added to this effect.

**(R2)** Insert the following to Annex 1 immediately prior to the list of Specific Consultation Bodies:

“Please note, this list is not exhaustive and also relates to successor bodies where re-organisations occur.”

Additionally add The Historic Buildings and Monuments Commission for England to the list of Specific Consultation Bodies.

Also amend the fourth bullet point of the Specific Consultation Bodies in Annex 1 to read:

“Parish Councils (both within and adjoining the area).”

Finally, as the organisation no longer exists, remove the reference to the Traveller Law Reform Coalition from the General Consultation Bodies list in Annex 1 and replace with Friends, Families and Travellers.

4.4 Subject to the recommendation above, this test is met.

#### **Test 4**

5.1 Section 7 and especially Figure 2 and Table 2 of the SCI show that the Council will involve and inform people from the early stages of LDD preparation and Table 1 sets out the range of methods the Council will employ to do this. The Council clarifies in Table 2 and Figure 2 the stages at which consultation will take place and who will be consulted at those stages. It shows that consultation will take place with the key stakeholders during the issues and options stage of Development Plan Document (DPD) production in accordance with Regulation 25.

5.2 However, the SCI makes no mention of a key stage in the DPD process that could occur if a document is concerned with allocations of land (under Regulation 32). In order that this stage in the DPD process is taken into account I have the following recommendations to make.

**(R3)** Amend Figure 2, Type 1, by the addition of a further text box beneath Stage 3 to read:

“Should alternative representations be received where a document is concerned with allocations of land, these alternative representations will be advertised for a further six week period of consultation.”

Also, so that the Regulation 32 process is clear the Council should add bullet point details of Regulation 32 and 33 to Annex 2.

5.3 As a result of these amendments, I am satisfied that providing these stages are followed, the consultation proposed will be undertaken in a timely and accessible manner.

5.4 Subject to the recommendation above, this test is met.

#### **Test 5**

6.1 Table 1 of the SCI sets out the methods that the Council proposes to use to involve the community and stakeholders. These cover a variety of recognised consultation techniques that will present information via a range of different media. The Council acknowledges the benefits and disadvantages of the different methods in Table 1 and indicates through Table 2 at what stages of LDD preparation the various methods might be employed.

6.2 The SCI acknowledges in Paragraphs 5.10 – 5.11 that the Council may have to provide extra support to facilitate consultation with certain groups or individuals and proposes in Paragraph 5.10 and in Key Commitments 5 and 6 within Table 2 how it might do this. Paragraph 5.12 explains how the Council will make its information accessible to all members of society and sets out how it will meet

requirements of the Race Relations Act 2000 and the Disability Discrimination Act 1995.

6.3 I am satisfied that the methods of consultation proposed in the SCI are suitable for the intended audiences and for the different stages in LDD preparation.

6.4 This test is met.

### **Test 6**

7.1 Section 12 of the SCI explains how the Council will seek to ensure that sufficient resources are put in place to achieve the scale of consultation envisaged. I am satisfied that the Council is alert to the resource implications of the SCI.

7.2 This test is met.

### **Test 7**

8.1 Key Commitment 2, within Table 2, explains how the results of community involvement will be taken into account by the Council and used to inform decisions. The Council also proposes to prepare reports at the end of the consultation periods explaining how views have been considered and documents changed in light of the community involvement. The SCI also states in this section of Table 2 where these will be made publicly available.

8.2 This test is met.

### **Test 8**

9.1 Section 13 of the SCI provides information on monitoring and review and confirms the Council's intent to review the SCI on an annual basis. This section also makes reference to the role of the Annual Monitoring Report in this process.

9.2 I am satisfied that the Council has mechanisms for reviewing the SCI and has identified potential triggers for the review of the SCI.

9.3 This test is met.

### **Test 9**

10.1 Sections 8 – 11 and especially Annex 4 of the SCI describes the Council's policy for consultation on planning applications. Annex 4 meets the minimum requirements and provides information on additional methods of consultation. This distinguishes between procedures appropriate to different types and scale of application and Paragraphs 10.7 – 10.8 include information on how the consultation results will inform decisions.

10.2 The SCI does not address the longer statutory time period for consultation that may be applicable in certain circumstances and I recommend a change to acknowledge this.

**(R4)** Insert the following after the first sentence of footnote C in Annex 4:

“However, bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation.”

Additionally, add the following text after the first sentence in Paragraph 10.5:

“The timescale allowed for making comments is 21 days. However, bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation.”

10.3 Subject to the recommendation above, this test is met.

### **Conclusions**

11.1 The Council has set out in Appendix D of its Regulation 31 Statement a number of proposed changes to the SCI in response to representations received on the submission document. These suggested amendments (given in Appendix B to this report) do not affect the substance of the SCI but they do improve the clarity and transparency of the submission SCI. I therefore agree that they be included.

**(R5)** Implement the changes proposed in Appendix B to this report.

11.2 In order that the SCI is suitable for adoption the Council should ensure that all references to previous stages of the document are removed, such as the text requesting comments on the submission document on Page 1. I recommend accordingly below:

**(R6)** Remove all references to previous stages of the document.

11.3 In the event of any doubt, please note that I am content for such matters as any minor spelling, grammatical or factual matters to be amended by the Council, so long as this does not affect the substance of the SCI.

11.4 Subject to the implementation of the recommendations set out in this Report, the City of York Council’s SCI (February 2007) is sound.

Wendy Burden BA DipTP MRTPI

*Wendy Burden*

Inspector

**APPENDIX A**  
**TESTS OF SOUNDNESS**





### **Examination of the soundness of the statement of community involvement**

3.10 The purpose of the examination is to consider the soundness of the statement of community involvement. The presumption will be that the statement of community involvement is sound unless it is shown to be otherwise as a result of evidence considered at the examination. A hearing will only be necessary where one or more of those making representations wish to be heard (see Annex D). In assessing whether the statement of community involvement is sound, the inspector will determine whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in Regulations;<sup>1</sup>
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- vi. resources are available to manage community involvement effectively;
- vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- viii. authority has mechanisms for reviewing the statement of community involvement; and
- ix. statement clearly describes the planning authority's policy for consultation on planning applications.

*From:* Planning Policy Statement 12: Local Development Frameworks

<sup>1</sup> The Town and Country Planning (Local Development) (England) Regulations, 2004.



**INSPECTOR'S REPORT**  
**CITY OF YORK COUNCIL**  
**APPENDIX B – PROPOSED CHANGES**

## Appendix D: Summary of Representations Received and Council's Response

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
<b>General</b>			
Natural England (4/1274)	Comment	Highlight a range of community planning tools which should be linked to the SCI to make it more robust i.e. Quality of Life Assessment and Concept Statement.	As the LDF progresses, we will consider whether either of these planning tools could be used to assist in the production and/or implementation of the LDF. <b>No recommended change to SCI.</b>
The Highways Agency (6/1277)	Comment	<ol style="list-style-type: none"> <li>1) Recommend that timescales for preparation of documents are included within the SCI.</li> <li>2) Agency would like to be consulted at the earliest possible stages in the preparation of the LDF and associated DPDs and SPDs.</li> </ol>	<ol style="list-style-type: none"> <li>1) The timescales are set out in the Local Development Scheme which will be reviewed on an annual basis. To include the timescales within the SCI may require the SCI to be frequently reviewed simply to reflect timescales rather than as a result of monitoring and review of involvement procedures.</li> <li>2) The Highways Agency will be involved at all stages as a specific consultee. Where appropriate they will be involved in documents prior to issues and options as part of the development of the evidence base.</li> </ol> <b>No recommended change to SCI.</b>
Huntington Parish Council (75/1301)	Comment	Parish and City Councillors on behalf of Huntington face three different systems to promote community involvement i.e. the LDF process, the Ward Committee process of creating Ward Plans and the promotion of a Parish Plan.	Recognise that there are a variety of ways in which the community can get involved in making decisions about issues which affect their local area, both directly connected to and outside the planning system. Paragraph 4.3 (i) of the SCI recognises the need to take into account the consultations carried out with other departments within the Council and other relevant documents that the Council produces. In addition, the Council has approved a number of Village Design Statements and the SCI (Table 1) recognises the production of these as a key strength in involving Parish Councils and encourages applicants to consider these in drawing up their proposals (paragraph 9.6). <b>No recommended change to SCI.</b>
Wigginton Parish Council (88/1302)	Comment	<ol style="list-style-type: none"> <li>1) The aim of the exercise is not clear.</li> <li>2) the book is impressive but hard work and difficult to follow.</li> <li>3) Needs to be a swing of emphasis from Ward to Parish Council level on planning issues.</li> </ol>	<ol style="list-style-type: none"> <li>1) The aim of the SCI is set out in Section 3 of the SCI. The aim of consultation at the Submission stage of the SCI is to provide the opportunity for consultees to make formal representations to the Planning Inspectorate on the soundness of the document. The letter sent out to consultees at the start of the consultation outlined this opportunity to make representations and explained the submission and examination process, as well as highlighting the earlier stages of consultation which the SCI had been through.</li> <li>2) We consider that the SCI is divided into four clear parts. The first part introduces the SCI, setting out the aim and guiding principles, and then outlining who we want to involve and the key methods for involving these groups. Part two specifically outlines how we intend to involve the community in the preparation of the LDF and part three covers how the community will be involved in planning applications. The final part explains how the approaches set out in parts two and three will be resourced and monitored. However, in the interests of improving the clarity further it would be beneficial to include the title for each of these four parts on the contents page.</li> </ol> <b>Recommendation: Amend the Contents page to include the title of each of the four parts:</b> <b>Part One – Introduction</b> <b>Part Two – Consultation on the Local Development Framework</b> <b>Part Three – Consultation on Planning Applications</b>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
			<p><b>Part Four – Resources and Monitoring</b></p> <p><b>3)</b> As set out in paragraph 10.1 (d) of the SCI, Parish Councils are consulted on all planning applications within their area, together with planning panels within the main urban area. Therefore, for planning applications, the emphasis for consultation is with the Parish Councils and Planning Panels. However, in addition, the SCI encourages applicants to carry out pre-application consultation on major or locally sensitive applications (paragraph 9.3) and suggested methods do include involving Ward Committees (Table 1).</p>
Learning Difficulties Forum (251/1338)	Comment	<p>Respondent does not think that any of their comments made in earlier consultation have been acted on. In summary the respondent previously raised the following issues:</p> <ol style="list-style-type: none"> <li>1) The reference to 'better decisions' is worth including on the summary sheet under benefits of community involvement. It has been included on the main statement.</li> <li>2) The SCI should refer separately to people with learning difficulties rather than only referring to people with disabilities.</li> <li>3) For people with learning difficulties to be fully involved, there should be a commitment to producing accessible documents (simple language, backed by images).</li> <li>4) Suggests additional consultees: York People First and various Carers groups.</li> </ol>	<p>The Council considers that the issues raised by this respondent have been addressed in the summary of the SCI Regulation 26 consultation and where appropriate addressed in the submission version of the SCI.</p> <ol style="list-style-type: none"> <li>1) The summary sheet was produced at the Regulation 26 consultation stage to try and encourage groups, organisations and individuals who might not otherwise comment to get involved. The summary sheet is not part of the formal SCI and has therefore not been redrafted for the Submission consultation. The primary reason for not producing a summary sheet at this stage was because this consultation is part of the formal examination into the document, therefore we require comments to be made specifically on the content and wording of the statement.</li> <li>2) Paragraph 5.11 of the SCI was amended at the submission stage to refer separately to people with learning difficulties.</li> <li>3) Table 2 in the SCI includes a commitment to making information available through a variety of methods. This commitment includes making all information available on request in Braille, large print, audio format or Easy Read. Easy Read is used by people with learning difficulties. It is a form of communication which uses pictures to support the words.</li> <li>4) Annex 1 of the SCI provides an overview of the types of groups we intend to involve in the LDF and major planning applications. However, it not intended to be a comprehensive list of every group we will involve, therefore the additional groups suggested by this respondent have been added to the LDF database and will therefore be contacted to inform them of future LDF consultations.</li> </ol> <p><b>No recommended change to SCI.</b></p>
R Firm (460/1328)	Comment	<p>Respondent is not convinced that the draft adequately addresses all of the issues they raised previously. In summary the respondent previously raised the following issues:</p> <ol style="list-style-type: none"> <li>1) involving more people could simply spread the frustration and despair;</li> <li>2) the SCI should set out what is meant by community involvement and what the purpose and expectation is of consultation;</li> <li>3) lack of public confidence that comments will be listened to;</li> <li>4) consultation must be implemented early enough so</li> </ol>	<p>The Council consider that all of these issues have been responded to in the summary of the SCI Regulation 26 consultation and where appropriate addressed in the submission version of the SCI. The Council's responses to these issues, taken from the summary of the Regulation 26 consultation, are provided below.</p> <ol style="list-style-type: none"> <li>1) The intentions outlined in the SCI endeavour to improve the process for all (paragraphs 3.1 and 3.2).</li> <li>2) Para 4.1 of the SCI was reworded at the submission stage 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.</li> <li>3) The guiding principles (paragraph 4.3 (d)) were expanded at the submission stage to provide more explanation on how we will ensure that ideas and comments are</li> </ol>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
		<p>that opinions and evidence from consultees can be used to inform all stages of the decision making process;</p> <p>5) a consultation process that simply asks for opinions on a detailed scheme before implementation should be recognised as flawed, inadequate and inappropriate;</p> <p>6) make it as easy as possible for people to give their opinions;</p> <p>7) suggested methods – involve schools and make more use of the website as an effective way of gaining and sharing information;</p> <p>8) the process of LDDs should have an extra stage prior to Issues and Options called ‘seeking ideas’. Otherwise stage 2 is only a consultation on options already owned by the Council;</p> <p>9) the results of consultation should be used to inform the decision makers. All appropriate committee reports on issues likely to have significant impact on local communities should include details of what consultations have been taken place and if none, why not;</p> <p>10) 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 the consultation if the majority view prevailed;</p> <p>11) make it possible for anyone to gain information they want;</p> <p>12) much greater emphasis should be given to the concept of compromise and reaching a consensus;</p> <p>13) where CYC has a vested interest in an application, residents should be given a bigger role; and</p> <p>14) evaluate the success of major consultation processes and use this to inform and improve future exercises to ensure resources are spent wisely.</p>	<p>considered.</p> <p>4) Consider that this issue is covered in the SCI in paragraph 4.3 (a) ‘early and continuous communication and opportunities for public involvement’ and (e) ‘ensure involvement is meaningful and effective’.</p> <p>5) 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 (SCI, paragraph 4.3 (a) and (e)).</p> <p>6) A key aim of the SCI is to encourage more people to get involved in the planning process (paragraph 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). Paragraph 10.5 sets out how people can comment on applications.</p> <p>7) The Council recognises that the website provides a valuable source of information. Table 1 was amended at the submission stage to include reference to the website being a simple way of sharing and gaining information. During previous consultations the Council distributed leaflets and information to a number of venues including schools. At the submission stage, Table 1 was amended to include reference to schools as an example of where we could distribute leaflets and brochures.</p> <p>8) 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 DPD 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.</p> <p>9) 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 be the case for applications which are considered by committee.</p> <p>10) The responses to the issues raised and reasons for a decision will be set out in the Officer’s report for both applications and the LDF. Public views, even if expressed by a majority of respondents still have to be considered alongside planning guidance and a balanced decision reached (paragraph 10.7).</p> <p>11) An additional Key Commitment was added to Table 2 at the submission stage to refer to information being made available to everyone.</p> <p>12) Agree that consensus and negotiation should be undertaken wherever possible, and this is carried out where tangible benefits are possible.</p> <p>13) An aim of the SCI is that the public should be involved fully in all applications, related to the size and implications of the proposal (paragraph 8.1).</p> <p>14) Section 13 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 (paragraph</p>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
			13.1). <b>No recommended change to SCI.</b>
York People First (480/1330)	Comment	Not able to read the consultation letter because it wasn't accessible. Making information accessible is what helps those with learning difficulties to be involved and included. Tell us more about the SCI so that we can pass information on to our members.	There is a statement in the SCI outlining that it can be made available in accessible formats if requested (for example in 'Easy Read' format for those with learning difficulties), however the letters which were sent to consultees were not made available in an accessible format because it was considered more appropriate to provide telephone and email contacts so that people could contact a planning officer directly if they wanted more information on the consultation. On receipt of comments from this respondent we contacted them by phone to discuss their comments in more detail. As part of the discussion, they outlined that they would like further information on the SCI process and they suggested that we sent an email in large print which explained the SCI process in simpler terms. In addition they requested information on how the Council as a whole is meeting the requirements of the Disability Equality Duty. We followed up this discussion with an email providing more information on the SCI as requested and the Council's Equalities Officer contacted them directly with regard to the Equality Duty. Once the SCI is adopted we intend to publish it in a range of accessible formats. <b>No recommended change to SCI.</b>
Timothy Kirkhope MEP (360/1323), Equal Opportunities Commission (381/1324)	Acknowledgement	Acknowledgement	N/A
Government Office of Yorkshire and the Humber (1/1270), Yorkshire and Humber Assembly (2/1271), Environment Agency (5/1275), Ryedale District Council (13/1278), English Heritage (242/1320), Disability Rights Commission (384/1325)	No Comments	No comments	N/A
Natural England (4/1272), Highways Agency (6/1276), Acaster Malbis Parish Council (60/1295), The Theatres Trust (324/1322), The Woodland Trust	Support	Support	N/A



Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
(569/1334), Home Builders Federation (165/1317)			
Osbalwick Parish Council (43/1294)	Support	<p>Questions for clarification: –</p> <ol style="list-style-type: none"> <li>1) Wish to be fully involved in consultation process, please ensure included in all distribution of paperwork.</li> <li>2) Can we be assured that more notice will be taken regarding planning applications after LDF has been completed?</li> <li>3) Under new LDF arrangements can a member of the Planning Department attend a Parish Council meeting when there is a major development being proposed with which we may disagree?</li> <li>4) When plans are amended can the amended plans be circulated?</li> <li>5) What recourse do we have if we do not agree with a planning decision?</li> <li>6) Are we entitled to contact Yorkshire Planning Aid direct if necessary?</li> </ol>	<ol style="list-style-type: none"> <li>1) Parish Councils are specific consultees and will therefore be contacted at all stages in the LDF consultation process (Table 2) and consulted on all applications within their area (paragraph 10.1 (d)).</li> <li>2) The SCI sets out how the Council will involve the community in the LDF, including how they will be involved in planning applications. The SCI seeks to build on and improve existing practice. Parish Council comments are currently taken into account as a material consideration in determining planning applications, this will continue under the LDF.</li> <li>3) Paragraph 10.3 of the SCI explains that where appropriate, planning officers will attend meetings such as Parish Council meetings to understand views being expressed or to provide factual information to help inform discussions at the meeting. However, for comments to be formally considered they must be submitted in writing by one of the methods set out in paragraph 10.5 of the SCI.</li> <li>4) Paragraph 10.6 of the SCI explains that the Council will re-consult all respondents if amendments are significant or if they would directly affect a neighbour.</li> <li>5) Under national planning legislation, only applicants currently have the right to appeal against decisions. However, there are other opportunities to challenge a decision for example, through judicial review or a complaint can be made to the Local Government Ombudsman on the grounds of maladministration.</li> <li>6) Planning Aid is a service for members of the public and they can be contacted directly via the contact details set out in Annex 3 of the SCI. However, as set out in paragraph 12.5 of the SCI, the Council will also consider working with Planning Aid, where appropriate, to help communities participate in the LDF process and major planning applications.</li> </ol> <p><b>No recommended change to SCI.</b></p>
<b>Chapter 1: Introduction</b>			
R Firm (460/1327)	Comment	Open Planning Forum is near to being wound up telling us there is a real problem feeling that City of York Council has little desire to listen.	<p>The Open Planning Forum is a community-led forum which arranges public meetings in order to discuss particular planning issues as they arise. The Council considers that it provides an important forum for discussing planning matters with members of the community and it is listed as a consultation body in Annex 1 of the SCI.</p> <p>The chair of the Open Planning Forum has informed the Council that it has been temporarily suspended. At the moment there is no intention that the Forum will finish completely and it is hoped that it will be possible to link it into another group. No final decision has been made as to the future of the group.</p> <p><b>No recommended change to SCI.</b></p>
<b>Chapter 4: Guiding Principles in Consulting the Community (Para 4.3)</b>			
P Crowe (580/1313)	Objection - Soundness Test 9	<ol style="list-style-type: none"> <li>1) Mechanisms for pre application discussions not satisfactory (see also objections 580/1306, 580/1307 &amp; 580/1309 under Chapter 8).</li> <li>2) The Council will decide to ask for comments at its discretion – community involvement will not occur if the</li> </ol>	<ol style="list-style-type: none"> <li>1) Whilst Government guidance (Companion Guide to PPS12) states that authorities cannot prescribe that developers carry out pre-application consultation, the SCI (paragraph 9.1) seeks to strongly encourage pre-application consultation by outlining the benefits it can bring for applicants. The SCI (paragraph 9.3 &amp; 9.4) provides guidance on the types of application which the Council considers require</li> </ol>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
		<p>Council decide it is not appropriate.</p> <p>3) Why would it not be possible to engage with all departments within the Council? Which departments would resist this and why?</p>	<p>pre-application consultations and what is expected from applicants.</p> <p>2) This objection refers to one of the SCI's guiding principles which are set out in paragraph 4.3. A guiding principle of the SCI (paragraph 4.3 (e)) is to ensure that involvement is meaningful and effective and the SCI outlines that one way of ensuring this is to only ask for comments when there is an opportunity to shape or amend the content of a document or proposal. There may be circumstances where parts of a document or proposal are determined by other factors such as government legislation, the intention is that any consultation methods should make this clear and should focus on what can be shaped or amended.</p> <p>3) This objection refers to paragraph 4.3 (i) of the SCI, which refers to co-ordinating with all departments within the Council. The phrase 'where possible' in this paragraph is intended to recognise that it may not always be practicable or appropriate to link up with the consultations and strategies of other departments, for reasons such as differing timescales for production and the topics covered, rather than in principle not engaging with certain departments.</p> <p><b>No recommend change to SCI.</b></p>
Chapter 5: Who will be involved? (Para 5.3)			
Landmatch Ltd (534/1332)	Comment	Third sentence of 5.3 should be amended with addition of <i>"whose precise boundaries will be scrutinised and assessed through the emerging LDF process."</i>	<p>Agree that it would be appropriate to provide more information to clarify the position on the green belt.</p> <p><b>Recommendation: Add the following wording to the end of the third sentence in paragraph 5.3: 'whose precise boundaries will be determined through the Local Development Framework.'</b></p>
Chapter 5: Who will be involved? (Map 1)			
Landmatch Ltd (534/1333)	Comment	Map includes the term "defined settlement limit", but this has not yet been subjected to public scrutiny. Key to map 1 should be amended to read – <i>"Draft Green Belt" (subject to LDF amendments)</i> <i>"Existing defined Settlement Limits" (subject to LDF amendments)</i>	<p>Agree that it would be appropriate to explain that the settlement limit and green belt boundaries will be formally determined through the LDF.</p> <p><b>Recommendation: Amend the key to Map 1 to read: 'Draft Greenbelt (precise boundaries to be determined through the LDF) Draft Defined Settlement Limit (precise boundaries to be determined through the LDF)'</b></p>
Chapter 6: Methods of Community Involvement (Para 6.2)			
P Crowe (580/1314)	Objection Soundness Test 9	The local press average circulation is around 35,000 there are 80,000 households. The free sheet "Star" has a weekly circulation of 54,000 but does not take notices. Table 1 over estimates the impact of press releases and public notices.	<p>The publication of public notices in a local newspaper to publicise consultation on the LDF is a statutory requirement of the Town and Country Planning (Local Development) Regulations 2004. In terms of planning applications public notices are published as required by the Town and Country Planning (General Development Procedure) Order 1995 and Planning (Listed Building and Conservation Areas) Regulations 1990. Press releases are sent out to 30 media contacts including all local press, television and radio (Table 1 and Table 2). However whether items are covered by the press is not within the Council's control. The SCI recognises that no one method of publicity will reach everyone and therefore a number of methods are proposed for each consultation (paragraph 6.2).</p> <p><b>No recommended change to SCI.</b></p>
3Ps: People Promoting Participation	Objection Soundness Test 5	Do not regard the methods suggested for community involvement as being the only ones suitable for hard to reach groups, or necessarily the best ones. More creative	<p>Many of the key principles of Participatory Appraisal, which are making use of local knowledge and encouraging local people to get involved in carrying out consultation, are recognised in the SCI. Paragraph 2.1 (e) acknowledges that local knowledge is a</p>

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(527/1331)		ways of engaging with people need to be examined such as Participatory Appraisal and using INVOLVE which is a government backed organisation that can help find more creative ways of engaging with communities.	key benefit of community involvement and this is seen as a key strength in some of the methods outlined in Table1. The SCI (Table 1) recognises that involving Parish Councils, Ward Committees and other community groups presents opportunities for communities to carry out consultation themselves through work on Village Design Statements and Parish Plans. The SCI (paragraph 5.10) recognises that there are a variety of reasons why hard to reach groups are unlikely to get involved in the planning process. A range of possible methods have been identified in the SCI (Table 1) and potential obstacles to involvement, such as those identified in paragraph 5.10, will be considered in order to determine the optimum consultation approach in each case. Whilst we consider that the methods listed in Table 1 would result in comprehensive consultation, we recognise that it is likely that in carrying out consultation on the LDF, we will develop further approaches for engaging with certain groups, perhaps making use of resources such as Participatory Appraisal and INVOLVE. As methods and approaches develop they can be incorporated into reviews of the SCI. <b>No recommended change to SCI.</b>
<b>Chapter 6: Methods of Community Involvement (Table 1)</b>			
Huntington Parish Council (75/1297)	Comment	Must be obligatory that Parish Councils are consulted by City Development and that the outcome of consultation is reported back.	Parish Councils are a specific consultee in terms of the LDF and in terms of applications which fall within their boundary. The SCI sets out the Council's commitment to providing feedback on LDF consultations (paragraph 7.6 (2)). With regard to planning applications the Council contacts everyone who has commented on an application to inform them of a decision (paragraph 11.1). <b>No recommended change to SCI.</b>
R Firm (460/1326)	Comment	All information available via the Web should be in formats that can be addressed directly via any browser. Default should be HTML with an alternative of formats such as Word but only having tested such formats with OpenOffice. Large documents in PDF are impractical to download by non-broadband users.	Information on the LDF and on planning applications will be made available on the Council's website as set out in Table1, Table 2 and paragraph 10.4. Wherever possible the Council creates web pages (HTML) rather than providing links to other files such as Word and PDFs, however it is not always possible to create accessible web pages (HTML) for large documents. Whilst we recognise that large PDFs are sometimes difficult to download, in most cases PDFs remain the quickest and easiest way to get large documents onto the website. Therefore although at the moment HTML is not the default, as part of future consultations on the LDF, we will investigate whether it is possible to make individual documents available on the Council's website in a range of formats to make them more widely accessible. Open Office usually manages to open even the most up to date version of Word documents and we check documents using Open Office before we put them on the website. <b>No recommended change to SCI.</b>
<b>Chapter 7: Consultation on the LDF (Para 7.5 &amp; 7.7)</b>			
P Crowe (580/1315 & 580/1316)	Objection Soundness Test 4	York is a small City. DPD and SPD issues may appear to be local but in fact can have a Citywide impact. Consultation should be Citywide.	Recognise that some impacts of Area Action Plans or individual site development briefs may be citywide, but that they are likely to have a more significant impact on certain areas therefore consultation needs to reflect this. As stated in paragraph 7.5 of the SCI, consultation on some documents may be focused on a particular area, however, in every case there will be a number of forms of citywide advertisement (as set out in Table 2) for example: circulation of documents to all Parish Councils/Planning Panels; press releases; formal notices; and the Council's website.

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
			<b>No recommended change to SCI.</b>
<b>Chapter 7: Consultation on the LDF (Table 2)</b>			
Huntington Parish Council (75/1300)	Comment	The use of email can rule out some Parish Councillors in the consultation process. Danger that plans cannot be read/understood unless care is taken about electronic circulation.	As set out in paragraph 10.1 (d) of the SCI, all Parish Councils are currently consulted on applications by letter, and receive paper plans. However, in line with the Government agenda on e-planning (DCLG), the Council is seeking to move towards more electronic communication (paragraph 10.2 (c)) as it has overall benefits for the consultation process, by allowing for speedier distribution of consultations and making information readily available to a wider audience. The SCI (Table 1) recognises that there are weaknesses in using email and the website as a consultation method and therefore information (e.g. plans, reports, responses) is available for inspection by other means, for example paper copies can be viewed at Planning reception, and where Parish Councils do not have email access, paper correspondence will continue to be used. <b>No recommended change to SCI.</b>
<b>Chapter 8: Consulting on Planning Applications – Involving the Community (General)</b>			
Wheatlands Community Woodland/B Otley (200/1336 & 200/1337)	Objection Soundness Tests 6 & 7	The current planning process relies too heavily on Section 106 conditions which the Council do not have the resources to monitor. A developer bond method should be used instead of conditions. The Council needs a natural environment champion. The Council do not have a clear Green Infrastructure Strategy or Living Landscape Design Codes. These could act as a check list to train ecologists and development control officers and to advise applicants. The LDF is relying on the 1996 Biodiversity Action Plan and the 1996 Landscape Appraisal which are out of date. These should be updated and include geodiversity and the importance of soils.	The comments made by this respondent are not relevant to the SCI and will be taken into account as part of other DPD development and as part of the evidence base being developed to support the LDF. <b>No recommended change to SCI.</b>
<b>Chapter 8: Consulting on Planning Applications – Involving the Community (Para 8.3, 9.1 &amp; 9.4)</b>			
P Crowe (580/1306, 580/1307 & 580/1309)	Objection Soundness Test 4	<ol style="list-style-type: none"> <li>1) It is not sufficient for the Council to rely on applicants to ensure that pre-application community involvement takes place. The fact that an applicant has not carried out recommended discussions does not appear to be a 'material consideration' and therefore cannot be taken into account at the Committee stage. Applicants will therefore not be minded to carry out the process.</li> <li>2) The Council should take the initiative and institute community consultation itself.</li> </ol>	<ol style="list-style-type: none"> <li>1) Section 7.7 of <i>Creating Local Development Frameworks: A Companion Guide to PPS12</i> states that authorities cannot prescribe that developers carry out pre-application consultation or refuse to accept valid applications because they disagree with the way in which an applicant has consulted the community. The approach advocated by the <i>Companion Guide to PPS12</i> is to encourage developers to carry out consultation before formal applications are made to avoid unnecessary objections at a later stage. The SCI therefore seeks to strongly encourage applicants to carry out pre-application consultation by outlining the benefits (SCI, paragraph 9.1).</li> <li>2) Paragraph 9.4 of the SCI encourages applicants to approach a planning officer to discuss how the community should be involved as part of pre-application discussions, and the Council will assist by providing information to support any pre-application consultation (paragraph 9.5). However, it is necessary for Council officers and Councillors to remain impartial, so as to not prejudice the later stages of considering the application.</li> </ol>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
			<b>No recommended change to SCI.</b>
<b>Chapter 9: Community Involvement before a Planning Application is Submitted (General)</b>			
Home Builders Federation (165/1319)	Objection Soundness Test 4	The expectation that applications for major developments and other developments of community significance will undertake pre-submission community involvement is too onerous. This should be more flexible. It is important that the applicant has the flexibility to choose what sort of consultation exercise to undertake that is best suited to reflect the scale and nature of the proposal.	As set out in paragraph 9.2 of the SCI, pre-application consultation is beneficial to the applicant, saving time and resources which might otherwise be required to revise schemes at an advanced stage of the application. The SCI seeks to strongly encourage pre-application consultation on major and locally sensitive applications and provides guidance on what is expected from applicants in paragraph 9.4. However, it is also recognised that there is a need for flexibility and paragraph 9.4 states that the approach should be geared to the nature and scale of the application concerned. <b>No recommended change to SCI.</b>
<b>Chapter 9: Community Involvement before a Planning Application is Submitted (Para 9.8)</b>			
York Environment Forum (52/1279) & A Sinclair (197/1284) & Conservation Areas Advisory Panel (441/1289)	Objection	There should be a reference to the need for consultation to be capable of validation. Insert second sentence in paragraph: <i>"If Planning Committee is not persuaded of the transparency and validity of the developer's consultation with the local community, his report may carry less weight in Planning Committee's discussion of the application"</i>	<i>Creating Local Development Frameworks: A Companion Guide to PPS12</i> advises that authorities cannot refuse to accept valid applications because they disagree with the way in which an applicant has consulted the community. Instead the Companion Guide emphasises that failure by the applicant to consult could lead to objections being made which could be material to the determination of the application. Therefore the way in which the applicant has carried out pre-application consultation is not a material consideration, however the SCI encourages applicants to achieve certain standards in their community involvement. Paragraph 9.4 states that applicants should ensure that consultation material is presented factually and without bias, and that consultees should be informed how their comments will be dealt with. <b>No recommended change to SCI.</b>
<b>Chapter 10: Community Involvement when a Planning Application is Submitted (Para 10.1)</b>			
Huntington Parish Council (75/1298)	Comment	<ol style="list-style-type: none"> <li>1) Must maintain statutory obligation to seek Parish Council's view on all planning applications.</li> <li>2) Respond to concerns expressed by the Parish Council regarding a planning application.</li> <li>3) Lack of consistency at Officer level.</li> <li>4) Keep the Parish Council regularly informed about policy changes affecting applications, such as changes affecting LDF.</li> </ol>	<ol style="list-style-type: none"> <li>1) As set out in paragraph 10.1 (d) Parish Councils will be consulted on all planning applications within their area.</li> <li>2) All comments received on an application, including those from Parish Councils, are responded to in the Planning Officer's report (paragraph 10.7).</li> <li>3) The Council seek consistency in dealing with all planning applications, working within policy and practice guidelines, with Part Three of the SCI clarifying consultation procedures.</li> <li>4) Where community involvement is undertaken regarding LDF policy changes, Parish Councils are a specific consultee, as highlighted in Annex 1 of the SCI and will therefore be included in the consultations.</li> </ol> <b>No recommended change to SCI.</b>
Wigginton Parish Council (88/1303)	Comment	<ol style="list-style-type: none"> <li>1) Submission of applications for consideration is always in a rush, more time is needed.</li> <li>2) Plans that have been revised should show what has actually changed.</li> <li>3) Current method of notification to neighbours is wanting. Everyone in the immediate area should be informed by letter.</li> <li>4) All information including objections and results should be on the Website.</li> </ol>	<ol style="list-style-type: none"> <li>1) As set out in Annex 4 of the SCI, an initial 21 day period is given to all consultees to respond. In practice, where a consultee has difficulty in doing so, officers make every effort to extend that period. Late objections are normally accepted even if this means that they can only be reported verbally to the Planning Committees.</li> <li>2) Where consultations take place on revised plans (paragraph 10.6 of the SCI), the accompanying letter specifies the nature of the revision as a guide to people considering the plans. Plans are clearly stamped revised.</li> <li>3) As set out in Annex 4 of the SCI letters of notification are sent on most</li> </ol>

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
			<p>applications to all adjoining properties as defined in Footnote B of Annex 4. As paragraph 10.2 states, the Council will use a combination of ways to inform and involve the community; of which neighbour notification letters are a part. The Council believes that the approach outlined in the SCI will ensure comprehensive consultations which meet and exceed basic statutory requirements, within the overall timescales set by Government for dealing with applications.</p> <p>4) As set out in paragraph 10.4 of the SCI, application files are available on the Council's website. The file will include objections received and the decision.</p> <p><b>No recommended change to SCI.</b></p>
P Crowe (580/1305)	Objection Soundness Test 9	<p>1) In 10.1e what are "near neighbours"? There are instances when people in the neighbourhood have not been adequately informed. Appears to be a policy in place to limit consultation on cost grounds. This is unacceptable.</p> <p>2) Reports to Committee on applications must include objective and full reporting of public representations.</p>	<p>1) Neighbours are defined in Footnote B of Annex 4 of the SCI as the occupants of properties which have a boundary that touches the boundary of the application site. As paragraph 10.2 states, the Council will use a combination of ways to inform and involve the community; of which neighbour notification letters are a part. The Council is committed to the level and range of consultations set out in the SCI and believe that these will ensure comprehensive consultations which meet and exceed basic statutory requirements, within the overall timescales set by Government for dealing with applications.</p> <p>2) Officers seek to summarise representations in a comprehensive and objective way in committee reports. In order to keep the committee documents manageable it is not possible to annex all representations in full. However, as set out in paragraph 10.4, they are available to view in Planning reception on request, and are available on the Council's website.</p> <p><b>No recommended change to SCI.</b></p>
<b>Chapter 10: Community Involvement when a Planning Application is Submitted (Para 10.5)</b>			
York Environment Forum (52/1280) & A Sinclair (197/1285) & Conservation Areas Advisory Panel (441/1290)	Objection	Amend paragraph to read " <i>Anyone can make a comment or objection on a planning application to the Development Control Section. Comments can be made by letter,.....etc.</i> " It would be helpful to include the address of the City Strategy Department in Annex 3.	<p>Agree that it would be beneficial to advise that comments on planning applications should be made to Development Control.</p> <p><b>Recommendation: Amend the first sentence of paragraph 10.5 to read: 'Anyone can make a comment or objection on a planning application to the Development Control section. Comments can be made by letter, email, fax or online.'</b></p> <p><b>Recommendation: Include Council contact address in Annex 3.</b></p>
<b>Chapter 10: Community Involvement when a Planning Application is Submitted (Para 10.7)</b>			
York Environment Forum (52/1281) & A Sinclair (197/1286) & Conservation Areas Advisory Panel (441/1291)	Objection	Paragraph does not explain how a member of the public can ensure that an application is taken to a Planning Committee rather than being delegated. Amend delegated authority bullet point to read: " <i>Members are able to request in writing that such applications are considered at committee, if there is a legitimate planning reason to do so. Objectors may therefore ask their Councillor to consider requesting a referral to Planning Committee if it is considered appropriate.</i> "	<p>As outlined in paragraph 10.8 of the SCI, the Council operates a scheme that sets out which applications are determined by committees and which are determined by officers through delegated authority. Members are able to request that applications are considered at committee, rather than being delegated, if there is a legitimate planning reason to do so and it is open to anyone to approach their local Member to discuss any concerns they have about a particular application.</p> <p><b>Recommendation: Add final sentence to the first bullet point under paragraph 10.8 to read: 'Objectors can approach their local Member with concerns regarding an application.'</b></p>
<b>Chapter 10: Community Involvement when a Planning Application is Submitted (Para 10.9)</b>			
Copmanthorpe Parish Council (65/1296)	Objection	If a decision is to be made at Committee the Planning Officer's Report is available to the public who have the opportunity to speak at Committee. If it is delegated the	The Council's delegation scheme (set out in Annex 5 of the SCI) defines the types of application that can be dealt with by delegated decision. It enables more efficient decision making for those applications which do not conflict with national and local

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
		report is only available after the decision. The opportunity to address the reasoning of the report is lost and contrary to the concept of community involvement.	policy or raise controversial or sensitive local issues; helping national targets for decision making to be met and a providing a speedier response for applicants such as householders. It would be difficult to maintain the current contribution that the delegated scheme makes to providing overall, an efficient and responsive Development Control service, if delegated reports were to be made available in a similar way to planning committee reports. The scheme includes safeguards, such as Councillor requests for referral to planning committees, and officers can be approached at any time regarding the progress of an application. <b>No recommended change to SCI.</b>
<b>Chapter 11: After a Decision has been Made (Para 11.1)</b>			
Wigginton Parish Council (88/1304)	Comment	Needs to be feedback from York City Council on Planning applications that have been objected to at Parish Council but passed by the City Council. This would enable Parish Councils to gain a greater understanding of the wider issues.	As set out in paragraph 11.1 of the SCI, the Council contacts everyone who has commented on an application to inform them of a decision, this letter will include the reasons for refusal, or conditions and reasons, if the application is approved. Officer's reports include an assessment of the application taking account of any comments received and provide reasons for their recommendation or decision. These documents are made available on the Council's website as part of the application file or the file can be viewed at Planning reception on request. If more detailed information is required on the reasons for a decision then case officers can be contacted directly for an informal discussion. <b>No recommended change to SCI.</b>
York Environment Forum (52/1282) & A Sinclair (197/1287) & Conservation Areas Advisory Panel (441/1292)	Objection	Should be a commitment to provide an explanation of why comments may not have been acted upon. Paragraph should be amended to include a reference to Officers' responses to objections normally included with their report to Planning Committee. These could also be included with the notification letter to objectors.	It would not be feasible for the Council to provide detailed responses to individual representations, as part of informing respondents about decisions. As paragraph 10.7 of the SCI explains, comments are drawn together as part of the overall analysis of the application in the officer's report, and these reports are publicly available, either on the Council's website or in Planning reception, if an objector wishes to find out more information on how comments have been considered. <b>No recommended change to SCI.</b>
<b>Chapter 12: Resources (General)</b>			
P Crowe (580/1310 & 580/1311 & 580/1312)	Objection Soundness Test 6	Workload resulting from consultation procedures proposed will be heavy. Do not believe that resources are in place. Council appears to rely on Yorkshire Planning Aid for much of its support. Do not believe that Yorkshire Planning Aid is set up to provide this service in the way envisaged.	The resources needed to fulfil the procedures of the SCI will be provided, as set out in paragraphs 12.1 to 12.5 of the SCI. Planning Aid is mentioned to highlight it as a resource which is available to the public. <b>No recommended change to SCI.</b>
<b>Chapter 12: Resources (Para 12.2)</b>			
Huntington Parish Council (75/1299)	Comment	Must be adequate resources, particularly staff, to be able to assess and deliver. Prefer to have identified staff to deal with a particular area of the City of York to avoid re-familiarisation with local needs.	The resources needed to fulfil the procedures of the SCI will be provided, as set out in paragraphs 12.1 to 12.5 of the SCI. The Development Control section are arranged into two teams who deal with different areas of the City of York. Individual Officers within these teams will only deal with applications relating to their team's area and will therefore become familiar with a particular area of the City. Although familiarity is important and hence there are area teams, consistency in applying planning policy and guidance across the City must also be considered. A small area for each officer would raise such issues and could prove difficult in balancing workloads. <b>No recommended change to SCI.</b>
<b>Chapter 12: Resources (Para 12.3)</b>			

Respondent (Ref)	Comments /Objections/ Supports	Summary of Comment	CYC Response and Recommendation
York Environment Forum (52/1283) & A Sinclair (197/1288) & Conservation Areas Advisory Panel (441/1293)	Objection	The Community Planning Officer posts referred to are not both full-time. Also the development control budget has been cut so that consultation on planning applications will be curtailed. The paragraph should include a statement guaranteeing that adequate resources in terms of the Department's budget and Officers' time will be available to carry out the consultation promised in the SCI.	The resources needed to fulfil the procedures of the SCI will be provided, as set out in paragraphs 12.1 to 12.5 of the SCI. <b>No recommended change to SCI.</b>
<b>Annex 1</b>			
Natural England (4/1273)	Comment	Test of Soundness 3 – would welcome inclusion of the Local Biodiversity Action Planning Group and the Local Access Forum in Annex 1.	The Local Access Forum is not currently operating and York does not yet have a Local Biodiversity Action Planning Group in place. Therefore, it would not be appropriate to include these as contacts in the SCI at this stage. However, should any new groups be identified in the future then they will be added to the LDF database (as outlined in paragraph 5.15 of the SCI) and where appropriate will be added to Annex 1 as part of any future revisions of the SCI. <b>No recommended change to SCI</b>
Learning Difficulties Forum (251/1321)	Comment	Seems perverse not to include the Partnership Boards that the Council has set up and supports in the list of organisations to be consulted. The absence of attempts to reach carers is also puzzling.	The Council's partnership boards which form part of the Without Walls Local Strategic Partnership are included in Annex 1 of the SCI and are on the LDF database. Annex 1 of the SCI provides an overview of the types of groups we intend to involve in the LDF and major planning applications. However, it not intended to be a comprehensive list of every group we will involve, therefore the specific carers groups referred to in the response have been added to the LDF database, to ensure that they are consulted on future LDF consultations, rather than being included in Annex 1. <b>No recommended change to SCI</b>
Yorkshire Forward (479/1329)	Comment	Yorkshire Forward should be specifically listed in Annex 1. In addition the York and North Yorkshire Partnership Unit could be included as a body "representing the interests of the business community and employees within the area".	<b>Recommendation: Amend Annex 1 to refer specifically to 'Yorkshire Forward'. Recommendation: Amend Annex 1 to refer to the York and North Yorkshire Partnership Unit as a body representing the interests of the business community and employees within the area.</b>
The Woodland Trust (569/1335)	Comment	Request that the Woodland Trust be added to the list of bodies under Environmental Interest Groups.	<b>Recommendation: Amend Annex 1 to refer to the Woodland Trust under the list of environmental interest groups.</b>
Home Builders Federation (165/1318)	Support	House Builders Federation is now trading as Home Builders Federation.	<b>Recommendation: Amend Annex 1 to refer to the 'Home Builders Federation'.</b>