

Schedule of Comments on North Northamptonshire Statement of Community Involvement

Name	Organisation	Section/Page	Comment/Proposed change	Action
Anthony J Smith	Rushden and Higham Council of Churches, Church and Community Planning Partnership.	General	Text should make it clear when consultation is a statutory requirement (see 4.18) Replace "may" by "shall" to ensure statutory requirements are met	Agreed to clarify in more detail in para 4.18 the consultation requirements at different stages according to latest guidance. However will keep current wording in para 4.19 as "may" as it is down to LPA's discretion as to whether they should carry out more extensive consultation than what is statutorily required.
		6.6. line 4	Ditto - Consultation shall take place...	To remove word 'usually'.
		6.9 line 1	Ditto – ditto	To be reworded slightly, but not be overly prescriptive by usage of the word "shall".
George Normand	Braybrooke Parish Council	General (Section 2 and para 4.5)	Section 2 of the draft ("What has changed?") ignores the elephant in the room. In two years we will have new unitary authorities ("the authorities") and a changed relationship between the authorities and the community. Much will be done more easily and efficiently. But the "distance" will be greater, with the authorities possessed of less local focus, increasing the perception that "things are done <u>to</u> us, not <u>with</u> us". It will be a missed opportunity if the way in which community involvement is conducted is not fundamentally reviewed in the light of this change. Specifically, I suggest the role of the town and parish councils ("the councils") needs to be boosted; they are after all supposed to be the bottom rung of the local government ladder, not just another special interest group. They need to be seen as worthwhile	The concerns in regard to the role of Parish/Town Councils especially in the relation to unitary proposals are noted. However due to the announcement only just being made by the Secretary of State and the uncertainty surrounding the specific details of the arrangements of the unitary, it is not considered appropriate for this document to assume the future role of the different councils at this stage. This will be more appropriately dealt with following the inception of unitary and a further updated version of this SCI may be an option in addressing this. In the meantime it is considered the role of Parish/Towns Councils is sufficiently addressed in the SCI at present, which is consistent with national guidance and regulations.

			<p>organisations, the bridge between government and the communities and able to represent each to the other. That is not always the case now. And building up their role will take changes of attitude and approach on both sides. The authorities will need to treat the councils as partners (albeit junior ones) to be consulted and informed; and the councils will need to rise to the challenge of greater responsibility. Can I draw attention to para 4.5 which refers to "...engagement with local residents, Parish and Town Councils, businesses, stakeholders"? In that order. Precisely. It is hardly surprising that councils are seen as having little voice if their input is treated no differently to that of any resident, must await the outcomes of deliberations with no more insight than any bystander, see little result from attempts to represent the community and cannot represent the authority to the community.</p> <p>A number of ways of achieving a change of attitude could be considered. For example, focussing on the local plan process: councils could be invited to review the comments made about their part of the plan and offer a local perspective on the weight to be attributed to opposing views; or a council representative could be invited to join the relevant committee when discussing the part of the local plan that bears on their parish. "To understand all is to forgive all". At present, we are not even informed when the discussions will take place, nor of the outcome until it is public.</p> <p>I have related this to the local planning process but it applies across the board. I know I am suggesting a</p>	<p>Regarding concerns about specific engagement with Parish/Town Councils - Para 4.3 states "Where a plan directly affects a particular community planning officers may attend meetings of the relevant Town and Parish Councils." It will be down to LPA discretion as to whether they choose to engage with Parish/Town Councils beyond this regarding specific issues. Furthermore anyone (including Parish Council members) are welcome to speak at Planning committees if a request is made in advance of the meeting. Calendars of committee meetings are posted on Council websites and agendas of said meetings are published at least a week prior to them taking place.</p> <p>In the mentioned para 4.5, the listed consultees cover all the main statutory consultees. There is no 'order' that would infer one party has priority over another. This is reinforced with the information given in Table 1 which lists Parish councils as a specific consultation body in equal measure to the others listed.</p> <p>With the inclusion of Neighbourhood Plan guidance within this updated SCI (section 5), further recognition is given to the role of Parish/Town Councils in regard to facilitating these plans and their role as conduits between the LPA and the community.</p>
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		<p>General</p>	<p>Moving on to the use of electronic communication for community consultation. There are procedural and technical consequences that need to be thought through. It would be sensible to consider communications between the principal authorities and the town and parish councils seperately from communication with the public, and make sure these work well and are supported, so that the councils can adapt public communication to their local circumstances. That would be an example of the sort of change of attitude to which I refer above.</p> <p>For example:</p> <p>a) because of GDPR, everyone has taken to hiding addressee lists on consultation documents. But knowing who else has or has not seen something is important for efficient conduct of business. Surely this can be done without implications for personal data? For example, I was included in this consultation: our parish clerk seems to have been omitted but that fact was hidden. However she was included in the West Northants equivalent. We discovered by accident at a meeting that as a result we were speaking at crossed purposes and the document had not been circulated onwards to other council members.</p>	<p>All stakeholders currently receive the same electronic communication (including partner councils, government bodies, developers, residents etc.). This is to ensure everyone receives the same information in equal measure.</p> <p>a) As mentioned GDPR does mean that in consultation emails for example recipients need to be blind copied in to the address lists. LPA's (including the JPDU) should hold lists of up to date Parish Councils and their contact details (usually the clerk). It is considered that the Parish Councils will inform them of any changes but these lists will be regularly reviewed by the LPAs. It is considered that the Parish Council clerks will ensure their members are informed of any upcoming consultations. If individual councillors would also like to be added to consultation databases they should contact the LPAs/JPDU with their details separately.</p> <p>b) The JPDU/LPAs are committed to using electronic communication as much as possible during consultations consistent with national guidance and therefore in turn reducing paper usage (e.g. letters and hard copies of planning documents) where appropriate. As above it is considered Parish Clerks will ensure all councillors within their council are aware of any</p>

			<p>b) some councillors, or at least some candidates to be councillors, cannot or will not use the internet or operate an email account. Having to operate separate non-electronic communications will affect how we do routine business, increasing costs and slowing everything down. But in principle it seems no different to making reasonable changes to accommodate those with a disability. How will that be done?</p> <p>c) we recently received a consultants' report, commissioned by NCC. Much of it comprised maps created using specialist (and very expensive) software without which they could be read through a browser but not printed or extracted. So they were in practice inaccessible to the community they were intended for. We are likely to see similar consequences when all planning documents are circulated electronically.</p> <p>d) some time ago, we stopped receiving emails from KBC. It emerged that they had "bounced" back, but it took several weeks for anyone to notice. After months of investigation (and payments to computer advisers) it emerged that KBC IT services had changed an email parameter causing Gmail to reject messages passing through our mail forwarders. KBC IT services did not spot this but when their attention was drawn to it, I was informed that the change was a consequence of government policy/GDPR and could not be reversed. But a few months later, after we had put a lot of fruitless work into looking for a way round, without</p>	<p>ongoing consultations, particularly those who may not have internet access. Hard copies of key plans/documents should be available at council offices and libraries and may also be available on request (para 4.17). LPAs also welcome and accept representations made via post etc.</p> <p>c) Noted, this is an individual issue for NCC/consultants. It is unlikely LPAs would use such specialist software that it be unusable for consultees. If hard copies are required of certain maps/documents that aren't available elsewhere they can be requested.</p> <p>d) Noted, exceptional issue with KBC that appears to have been resolved.</p>
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			comment it was reversed and messages started to be received again.	
Carol Aston	Cambridgeshire Police	General	No comments on the Statement of Community Involvement Document and happy to support.	Noted - no action required.
Emilie Carr	Historic England	Tables 1 & 2	We support the general aims and approach to the Update Statement of Community Involvement. The acknowledgement of Historic England as a statutory consultee under the duty to co-operate as a specific consultation body with respect to Local Plans at Table 1 and Table 2 is welcomed. Please clarify consultation with statutory consultees in respect of respect of consultations on planning applications.	Noted – reference to consulting statutory consultees on planning applications is set out in para 6.10.
		Section 5	With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected. It would be helpful if the SCI could be updated to reflect this. We have guidance on neighbourhood planning, which can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/	Text to be included in Section 5 to clarify at what stages of Neighbourhood Plan preparation consultation will take place and who should be consulted.

		General	We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement. For information and for further consultations, please note our new consultation email address e-midlands@HistoricEngland.org.uk.	Noted.
Jon Hendy	N/a	Para 4.6	<p>I wish to object to the SCI Update as it stands.</p> <p>My objection relates to paragraph 4.6 and how the public are consulted on iterations of the local plan.</p> <p>I do not feel the measures proposed are good enough to make sure that the public are consulted on matters that might affect them, such as allocations that might appear in a draft plan or a Pre-Submission Local Plan for housing, Gypsies and travellers, Employment, Town Centre uses, Wind Turbines, and in essence anything that you are proposing a policy or allocation about that, if there were to be a planning application, the public would be likely to want to have a say.</p> <p>When consulting throughout the local plan process (but most importantly at the start of it) on draft allocations, each property potentially affected by that allocation should receive a letter, in the same way that they do currently if a full or outline planning application is received. They could then choose to be contacted by email on later iterations of the plan.</p> <p>An allocation in a local plan equates to an outline planning permission, minus the time limit but the</p>	Agreed to make change; wording to be included to para 4.6 to ensure that early engagement with communities on local plan allocations is undertaken. However, the SCI should not be too prescriptive in terms of the specific methods on how LPAs should do this, but examples will be given e.g. site notices and social media.

		<p>principle is the same, and the consultation measures should also be the same.</p> <p>Currently the situation is a bit like - "Here is the local plan process and you can find out about it if you like?"</p> <p>That isn't good enough. If you live opposite / close to a site that might in the future be developed and change your village / town substantially, the public should be informed at the outset of the process so that they all have the right to try and do something about it from the start.</p> <p>I note paragraph 2.2 of the document that states "The Government has placed even greater emphasis <u>on the early engagement</u> of communities in the planning process. <u>The intention is to enable local people to influence and make changes to plans and development proposals where there is still genuine prospects to influence and participate in evaluating different options</u>". (my underline)</p> <p>Therefore I would urge you to change the SCI so that residents potentially affected by draft allocations should be consulted in the same way as if an outline planning application were to be submitted I.e. they should receive a letter. Such a change would properly be within the spirit of engaging with local people about matters that affect them.</p> <p>Without such a change, it will be very easy for large numbers of people to remain disenfranchised until it is too late.</p>	
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			The exact wording of the change, I am happy to leave up to you, however, if you would like me to suggest some exact wording I am happy to do so.	
Carla Wright	Natural England	General	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.	Noted – no action required.
Mrs P Page	Rothwell Town Council	General	The town council had no additional comments to make.	Noted – no action required.