

BATH AND NORTH EAST SOMERSET COUNCIL

INSPECTOR'S REPORT

STATEMENT OF COMMUNITY INVOLVEMENT

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 23rd August 2007

Bath and North East Somerset Council Statement of Community Involvement (April 2007)

INSPECTOR'S REPORT

Introduction

- 1.1 An independent examination of Bath and North East Somerset 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 Annex 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 41 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. The only omission was that Colerne Parish Council was not consulted due to a procedural error at the Regulation 25 stage. This was rectified and Colerne Parish Council was included at all subsequent stages. I am satisfied that Colerne Parish Council has not been prejudiced by this error.
- 2.2 This test is met.

Test 2

- 3.1 Paragraphs 2.8 – 2.12 acknowledge that the Local Development Framework (LDF) is a way of delivering the aims of the Community Strategy and states that the Council will work with the Bath and North East Somerset Local Strategic Partnership (LSP) to make sure that the content of the two documents complement each other and to avoid the duplication of consultation exercises. Paragraph 2.10

also mentions the role of the LSP in the delivery of the Local Area Agreement for Bath and North East Somerset. The SCI also makes reference to other community strategies and initiatives (Paragraphs 2.13 – 2.18), such as the Bath and North East Somerset Compact and states that consideration will be given to how these will be linked in terms of objectives and consultation.

3.2 This test is met.

Test 3

4.1 The Council has set out in Appendix C of the SCI those groups which will be consulted. This list includes the statutory bodies from PPS12 Annex E. It is stated at in Paragraph 3.10 and the text box at the beginning of Appendix C that the Council holds a database of consultee details and that this will be updated as necessary. Contact details to enable an individual or organisation to be added to the consultee database are also provided.

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

4.3 There are, however, some adjustments to the lists in Appendix C that it is necessary to make and I recommend accordingly below.

(R1) PPS12 refers to Specific Consultation bodies not statutory consultees. Therefore the Council should change the phrase Statutory Consultees in Appendix C to "Specific Consultation Bodies" and replace the phrase non statutory consultees with "Other Consultees".

Also remove reference to the Strategic Rail Authority from Appendix C and replace with Network Rail. Additionally as the organisation no longer exists, remove the reference to the Traveller Law Reform Coalition from Appendix C and replace with Friends Families and Travellers.

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

Test 4

5.1 Paragraphs 3.16 – 3.18 and Figures 4 and 5 of the SCI show that the Council will involve and inform people from the early stages of Local Development Document (LDD) preparation and Appendix B sets out the range of methods the Council will employ to do this. The Council clarifies in this appendix and in Figures 4 and 5 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 Documents (DPD) production in accordance with

Regulation 25. I am satisfied that providing these stages are followed the consultation proposed will be undertaken in a timely and accessible manner.

5.2 This test is met.

Test 5

- 6.1 Appendix B 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 indicates in this appendix and also in Figures 4 and 5 at what stages of LDD preparation the various methods might be employed.
- 6.2 The SCI acknowledges at Paragraphs 3.11 – 3.12 that the Council may have to provide extra support to facilitate consultation with certain groups or individuals and proposes in Figure 3 how it might do this. Information in this figure and also in Paragraph 2.2 and Figure 1 explain how the Council will make its information accessible to all members of society thus meeting the 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 6 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 Paragraphs 3.19 – 3.20 explain 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 period explaining how views have been considered and documents changed in light of the community involvement. The SCI should, however, state where these will be made publicly available. I therefore have the following recommendation to make.
- (R2)** Add the following to the end of the second bullet point of Paragraph 3.20:

“These reports will be made available on our website, www.bathnes.gov.uk and in paper copy at the deposit locations used during the consultations.”

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

Test 8

9.1 Section 5 of the SCI explains that the Council continuously monitors and reviews all consultation documents and that the SCI will be formally reviewed as part of this process and reported on through the Annual Monitoring Report.

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 Section 4 of the SCI describes the Council’s policy for consultation on planning applications. The information in Figure 9 meets the minimum requirements and provides details of additional methods of consultation. Figures 7 and 8 distinguish between procedures appropriate to different types and scale of application and Paragraph 4.25 includes 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.

(R3) Insert the following at the end of the first sentence of Paragraph 4.24:

“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 its Appendix E 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 do not affect the substance of the SCI but they do improve the clarity and transparency of the submission SCI. These changes are given in Annex B to this report and I agree that they be implemented below.

(R4) Implement the changes proposed in Annex B to this report.

11.2 The Council has also set out in Appendix E of its regulation 31 Statement a number of factual changes to the SCI. Once again these are amendments which do not affect the substance of the SCI but do improve the accuracy of the submission document. These are given in Annex C to this report and I recommend their implementation below.

(R5) Implement the changes proposed in Annex C to this report.

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, Bath and North East Somerset's SCI (April 2007) is sound.

Keith Holland

Keith Holland

Inspector

ANNEX 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;¹
- 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

¹ The Town and Country Planning (Local Development) (England) Regulations, 2004.

ANNEX B
PROPOSED CHANGES

Appendix E: Schedule of responses to the representations made in the submission stage consultation. Included recommended non factual changes requested.

Schedule of representation made in Statement of Community Involvement submission consultation

The following schedule includes details of all 40 duly made representations made during the submission consultation on the SCI which ran from 26th April to 6th June 2007. Details of all observations/comments submitted by 5 organisations are also included.

A number of changes to the Council have arisen as a result of the May 2007 Council election and subsequent changes to the Council administration. Factual amendments to the SCI are requested to reflect these changes. These suggested amendments are listed at the end of the schedule.

A number of respondents requested either written representations or participation by oral examination as follows:

13 Respondents requesting written representations:

Ann Godfrey (Bath Resident)
Bath Preservation Trust
Claverton Parish Council
David Orme (Bath Resident)
Henrietta Park Residents Association
Keynsham Community Association
Meadow View Residents Action Group
Mentoring Plus
Moorland Road Traders Association
North Wiltshire DC
Paul Howard (Bath Resident)
Whitchurch Parish Council
Woodland Trust

Respondents requesting participation at oral examination:

Diocese of Bath & Wells (see comments 20 & 23)
Federation of Bath Residents' Association (see comment 25)
Keynsham South Forum (see comments 24, 26, 28 & 30)

The reasons for requesting an oral examination are outlined underneath to the corresponding representation and are highlighted in grey.

Respondent Details (response number)	Sound/ Unsound	If unsound, which test of soundness does the representation relate to	If unsound, was the matter raised earlier in SCI consultation?	Comments Made	Proposed Response	Suggested Changes	Factual
SOUND							
20 representations (from 19 different organisations/individuals)							
(1) Jeffrey West, Chairman, Living and Working Sub-Committee Cotswold Conservation Board	Sound	n/a	n/a	The Cotswolds Conservation Board supports the contents of the submission draft SCI	Support noted	none	
(2) Malcolm Watt, Planning Officer, Cotswolds Conservation Board	Sound	n/a	n/a	I have been instructed to inform you that the Cotswolds Conservation Board supports the SCI as now drafted.	Support noted	none	
(3) Colin Rich, Peasedown St John Parish Council	Sound	n/a	n/a	Sound	Support noted	none	
(4) Rose Freeman, Planning Assistant,	Sound	n/a	n/a	Thank you for including the Theatre's Trust in Appendix C and for adding comprehensive contact	Support noted	none	

Theatres Trust				details at the head of this section. We find the SCI to be SOUND and look forward to being consulted on other LDF documents.		
(5) Louisa McKay, Planning Liaison Officer, Environment Agency	Sound	n/a	n/a	We are pleased to see that we are included in the list of statutory consultees who will be involved through all subsequent stages of the Local Development Framework.	Support noted	none
(6) David Vaughan, Policy Officer – Spatial Planning, Somerset County Council	Sound	n/a	n/a	Thank you for consulting Somerset County Council on your submitted SCI. There are no issues for Somerset in this document and I therefore have no formal comments to make. However, you should note that there are a couple of typographical errors in figure 9 (p23), which refers to Appendix B rather than Appendix C. I note that Somerset County Council is identified as a statutory consultee and look forward to consultation on other LDF documents in due course.	Support noted and that the Appendix C should be correctly identified on page 23.	Figure 9 (p23) change both instances 'Appendix B' to 'Appendix C'
(7) Elizabeth James, Clerk to Hinton Charterhouse Parish Council (B&NES)	Sound	n/a	n/a	Support All	Support noted	none

(8) Ron Davies, Network Strategy Manager, Highways Agency	Sound	n/a	n/a	We have reviewed this document and have no substantive comments to make. We note that the Highways Agency is listed within the list of bodies to be consulted about further Local Development Framework documents.	Support noted	none
(9) Ms Briony Waite, Director, Mentoring Plus	Sound	n/a	n/a	Support inclusion of young people as a target group we need to involve in the preparation of the LDF (Figure 3)	Support noted	none
(10) Robert Saunders, Police Architectural Liaison Officer Avon & Somerset Police	Sound	n/a	n/a	Sound	Support noted	none
(11) Nick Cardwell, North Wiltshire District Council	Sound	n/a	n/a	Support the inclusion of North Wiltshire District Council and the North Wiltshire Parish Council's of Colerne and Box within Appendix C	Support noted	none
(12) Claverton Parish Council (B&NES)	Sound	n/a	n/a	Claverton Parish Council supports the SCI. No changes considered to be necessary as SCI considered sound.	Support noted	none
(13) Ken Biggs, Chairman of Ken Biggs Construction	Sound	n/a	n/a	Sound I fail to see how this detail will help as ay present simple things often take a	Support and comment noted	none

(Bath)				year to resolve.		
(14) Simon White, Deputy Headteacher, Wellsway School	Sound	n/a	n/a	Sound	Support noted	none
(15) Esther Parker, Treasurer, Meadow View Residents Action Group	Sound	n/a	Yes – submitted written comments following first draft consultation	<p>Whilst not being initially consulted, at the pre-submission stage, the Meadow View Residents Action Group welcomes the opportunity to see and comment on the current Statement of Community Involvement document. However, we did manage to comment on the previous draft and are pleased to note that many of our comments have been incorporated before this latter document was produced.</p> <p>The document would appear to be sound and is a vast improvement of the previous document. The principles, on which it is based, if applied rigorously, seem to be fair and equitable. We hope that equal care is taken to monitor the processes as</p>	<p>The Meadow View Residents Action group was not directly identified as a group on our LDF consultation database prior to the Reg 26 consultation on the SCI. The group found out about the consultation through a poster in their local area and were able to respond to the consultation on the draft SCI.</p> <p>Noted.</p>	<p>none</p> <p>none</p>

				<p>promised in the document.</p> <p>Care needs to be taken regarding public consultation to make it accessible to a wider majority, bearing in mind that there is not an over reliance on technology such as the internet. There are a limited number of households who own computers especially within the more rural areas and the elderly. This is particularly important in our area which is classified as deprived.</p> <p>Training to understand the planning process and the inherent jargon will also be necessary in order for lay persons to give meaningful contributions at committee and we are pleased to see the comprehensive glossary of terms and the flow chart which goes some way to address this point.</p> <p>We just question how this document will be disseminated out to BANES residents.</p>	<p>Noted – this is reflected in the SCI.</p> <p>Noted – training to understand the new planning process for community and voluntary sector will be looked into.</p> <p>On adoption the SCI will be launched and a leaflet produced summarising the SCI distributed.</p>	<p>none</p> <p>none</p> <p>none</p>
(16) Brian Simmons, All Saints	Sound	n/a	n/a	Sound	Support noted	none

Community Group, Keynsham						
(17) Ann Godfrey Bath Resident	Sound	n/a	n/a	Contact boxes which were not in earlier draft SCI	Support noted	none
(18) PD Marsden, Chairman, Copseland Residents Association	Sound	n/a	n/a	<p>On behalf of the Copseland Residents Association, I return herewith the Submission Stage Representation Form that you recently sent to me along with the policy document.</p> <p>The form appears designed to cater for those wishing to propose modifications to the Policy Document. We feel that this document is an improvement on the previous version in terms of clarity and inclusivity, and is acceptably sound. Our submission is intended to reflect this.</p> <p>At the same time, it is our view that if planning problems of the recent past are to be minimised, it is important that local residents, collectively as a major stakeholder in the future of the Council area, should be involved in the earliest stage in the consideration of major developments. The</p>	Support noted. However Residents' Associations are already identified as a specific Target Group in Figure 3 which the Council will need to involve in the preparation of the Local Development Framework and would include the Federation of Bath Residents' Associations. The Federation of Bath Residents' Associations is included on the Local Development Framework database and, as a Residents Association, the Council will engage them in all stages of the preparation of the Local Development Framework.	none

				umbrella body, the Federation of Bath Residents' Associations, should have a seat at the 'high table' in any discussion of the future of the Local Development Framework that might affect the city, as it does currently on the Local Strategic Partnership. Just how this view could be expressed in the representation form is unclear.		
(19) Peter Duppa-Miller, Combe Hay Parish Council	Sound	n/a	n/a	<p>Sound</p> <p>Recognising that the Submission Statement was prepared before the recent elections, how do the following changes get included in the eventual statement of Community Involvement:</p> <ol style="list-style-type: none"> 1. Page 8 – paragraph 2.13 – the Bath (South) Local Committee has been disbanded. 2. Page 17 – paragraph 4.1 – the Development Control has, I understand been re-organised. 3. Page 24 – paragraph 4.20 – there is now only one Development Control Committee for the whole of 	Support noted	<p>none</p> <p>See factual changes requested at the end of this schedule.</p>

				Bath & North East Somerset.		
(a) Deborah Porter, Somer Valley Friends of the Earth	Sound (not stated but comments raised are not fundamental objections and welcome the purpose and aim of the SCI.	n/a	n/a	<p>Somer Valley Friends of the Earth welcomes greater involvement in planning matters by individual members of the community and community organisations. Below are the Somer Valley FoE comments on the Statement of Community Involvement produced by Bath and North East Somerset Council.</p> <p>Local Strategic Partnership The Local Strategic Partnership, the document says, will work through four 'blocks' to deliver the Local Area Agreement (LAA). Not one of these blocks includes environment or biodiversity, although "Healthier Communities" does cover some environmental aspects. The Local Area Agreement is meant to be a delivery plan for the Sustainable Community Strategy, which sets the strategic vision for an area, according to the Government White Paper,</p>	Support noted.	<p><u>Local Strategic Partnership</u> As this comment relates to the LAA and its relationship with the Community Strategy, not directly to the SCI, the comment has been referred to the Council's Corporate Project team who are responsible for the LAA and the Community Strategy.</p>

			<p><i>Strong and Prosperous Communities.</i> The Community Strategy itself is meant to incorporate an integrated approach based upon sustainable development objectives (PPS 12). The four aims of sustainable development set out in PPS 1 are economic development; social inclusion; environmental protection and prudent use of resources. The Community Strategy and, therefore, the LAA are supposed to encompass all four. It is clear that Community Strategies are meant to incorporate biodiversity and other environmental matters, as cited in paragraph 2.9 of the SCI. Accordingly, it seems entirely inappropriate for a body responsible for delivering, through governance, the LAA to work through blocks not including these matters. It is imperative that this is addressed if Sustainable Development, the Government's primary aim, is to be achieved. It is inconceivable that delivery of a sustainable community strategy would not have</p>		
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			<p>reference to environmental matters. As I pointed out in my last response, there is no strategic approach within B&NES to biodiversity, in particular within the gamete of challenges presented by climate change. It is absent from both the B&NES Biodiversity Action Plan and the Green Spaces Strategy. There appears to be no strategy aimed specifically at an integrated approach to the climate change issue either. Clearly, another 'block' must be added to the list.</p> <p>It is worrying, but unsurprising, that the approach being taken to delivery appears to be entirely socio-economic.</p> <p>The intention to work with the Somer Valley Partnership is sound, but the LPA should be aware that the "Brighter Futures" Community Plan, which it implements, is a flawed document. There are several reasons for this, including the way it has operated; the lack of any Task Group set up to look at environmental issues and a lack of any expertise in</p>	<p>It is not considered appropriate to comment on strategies prepared by other partners as part of the SCI consultation. This is outside the remit of the SCI.</p>	
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			<p>this field within the Midsomer Norton and Radstock MCTI Steering Group; the lack of sufficient applicable studies on which to draw in order to come to conclusions; and the failure to incorporate existing pertinent information, such as pollution levels, travel to work by car, traffic studies and the actual ecological importance of Radstock Railway Land.</p> <p>Appendix B Appendix B states that all documents must be available in non-electronic formats, but does not say that this will be a free service, which is most desirable. There is no specific reference to Braille documents. The hotline is a good idea, but would be a more effective tool if the hotline number were widely distributed. The "Local Publicity" section could make a reference to queries to cover this.</p>	<p>Appendix B Comments noted. It is the Council's corporate policy that all its documents can be made available in a range of community languages, and accessible formats including Braille. This statement is included on the cover of all documents produced by the Planning Service including the SCI. Whilst this may be a free service the Council's policy on charges may change during the life of the SCI.</p> <p>Appendix B states that Council Connect is the first point of contact for planning queries. A</p>	
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				<p>It is suggested that the consultation arrangements for the Local Strategic Partnership and Community Strategy consultation databases are utilised, but first these must be worked on to make sure that they are as extensive as the SCI database.</p> <p>A transparent approach to member selection for Steering/Advisory/Working Groups presumably means that the availability of these posts will be very widely advertised in the most accessible ways and sent to people on the mailing list. It would be helpful if this were spelled out.</p> <p>Appendix C Under the heading, "General consultation bodies" in Appendix C, it is stated that various types will be consulted depending on the nature and relevance of the Local Development Document. However, it does not say</p>	<p>Hotline can be set up and widely publicised as and when deemed necessary.</p> <p>Coordinating consultation arrangements and databases is currently being investigated in order to establish best practice.</p> <p>As outlined in Appendix B key stakeholders, statutory consultees and elected members will be involved in steering/advisory/working groups. Member selection will be transparent but membership will not be open.</p> <p><u>Appendix C</u> Appendix C closely follows the format of Appendix E in PPS12. It explains which category consultation body has to be consulted under the Regulations and which are consulted by the Council should consider the need to consult.</p>	
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			<p>who decides this. It would seem most appropriate to ask those on the mailing list which of the various documents they would like to be consulted on (or notified of the consultation period) and indicate this in the document.</p> <p>Appendix C does not list Cam Valley Wildlife Group. As the group is a particularly active group regarding both planning and wildlife matters in B&NES, but is not a branch of the local Wildlife Trust, we feel that it would be a welcome addition to the, admittedly not exhaustive, list within the list of Environmental Groups. Also, Transport 2000 would be a good organisation to add.</p> <p>Figure 3 In Figure 3 it is stated that extra effort is needed to reach Bath residents, on the basis that they are not represented by Town or Parish Councils. However, although the function of Town or Parish councils is to represent their residents, they do not necessarily do so, and even if a council</p>	<p>The Appendix makes it clear that the list is not intended to be exhaustive whilst providing the opportunity for groups and individuals to be added to the Local Development Framework. The Companion Guide to PPS12 advises against listing names of individual groups as this would become out of date too quickly. Appendix C of the SCI correctly lists the types of groups the Council proposes to involve.</p> <p>Figure 3 Comments noted.</p>	
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			<p>puts forward what it believes to be a majority view, it will not accord with the view of all residents (It should be noted that Norton Radstock Town Council has at present a wholly un-elected council - those who put themselves forward and six co-opted councillors, decided upon by those who had put themselves forward!). A less strenuous effort to reach ordinary residents in areas outside Bath will result in an unequal opportunity for personal involvement between Bath and other parts of the District. Bath residents can approach their B&NES councillors in the same way that residents outside Bath can approach their councillors, so the views of individual residents can be passed on equally well. In some ways it is preferable to have views coming through one tier than through several.</p> <p>Regarding small Businesses (Figure 3), it is my understanding that the Radstock Town Traders feel that their views are best aired via their own organisation, rather than</p>		
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Figure 3 is not intended to be exhaustive but does make it clear that 'organisations representing small businesses will be consulted'. This would include the Radstock

			<p>through the Norton Radstock Chamber of Commerce. Midsomer Norton is the larger trading town with a different role to that of Radstock. The consensus within the Chamber will tend to reflect this, leading to a situation where the particular concerns of Radstock Traders could be under-represented. The Radstock town Traders could be added to the list in the box.</p> <p>Paragraph 3.17 states that the timetable for production of policy documents can be viewed in the Local Development Scheme on the council's website or at Planning reception. To connect to the Internet at a library now costs over £3.00. The timetable is a very useful document for anyone wishing to participate. At the very least, the timetable should be available on request from Council Connect, published in "Council News" (delivered through people's doors), posted on Parish notice boards, kept in Town Council offices and sent to those on the mailing list. To</p>	<p>Town Traders.</p> <p><u>Paragraph 3.17</u> Comments noted. The Council will ensure that a current version of the Local Development Scheme is made available for inspection at all LDF deposit stations (listed in p50 of submission SCI).</p>	
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			<p>restrict the access to information in the way apparently prescribed works against the purpose of the SCI and conflicts with the methods of involvement set out in Appendix B, which is far more comprehensive. People moving to the District and groups/individuals not on the mailing list could be excluded.</p> <p>The wording of paragraph 4.4 could be more positive than "it is advisable". It would be best if this were a requirement.</p> <p>It seems that ecological considerations lose out too often within the planning system. If there is a case for certain pre-application advice to be exempt from charge, then this is an area that would benefit greatly from this. It is much better to 'design in' ecological features and considerations (to work with them) than to 'bolt them on' or adapt a plan at a later stage, which is almost always unsatisfactory, and the LPA could use advice in this</p>	<p>It is considered that this wording is appropriate. Para 4.11 also reflects that the Council 'actively encourages' pre-application consultation.</p> <p>As the Council has not yet introduced a charging system it is not considered appropriate to state specifically which advise may be exempt from change.</p>	
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			<p>area, which is often poorly understood. The consideration of ecological matters as early in the process as possible is pretty much essential if conservation opportunities and gains are to be properly achieved or maximised, and can result in less cost to the applicant and delay in processing, thus enabling greater gains to be achieved. This could be addressed in paragraph 4.9.</p> <p>Figures 7 and 8 Figure 8 still contains reference to applications on Greenfield land that the council “resolves to approve” as qualifying for the Level 2 definition. This does not make sense in the context of the purpose of the SCI and the process of community involvement. That the council resolves to approve something suggests strongly that the application has already reached an advanced stage and that the decision is essentially a political rather than planning decision, which makes the ‘frontloading’ approach defunct in these</p>	<p>This schedule comes from the government publication <i>Statements of Community Involvement and Planning Applications</i> (2004). The phrase ‘which the Council resolve to approve’ refers to planning applications based on site allocations agreed in Planning Policy by elected members.</p> <p>It is not considered appropriate to comment on previous examples consultation of as part of the SCI consultation. This is outside the remit of the SCI.</p>	
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			<p>circumstances. Rather than taking this line, it would be preferable to emphasis allocation in the plan, which suggests that approval is possible. It does not seem to be appropriate to preempt a decision. In any case, if the council has already made up its mind, there is nothing that community opinion will do to change it, it seems, as in the case of Radstock Railway Land (arguably a greenfield site), where the Town Council and the results of two community polls (the Parish Poll and the Community Coalition Exit Poll) were ignored and the political decision on the application was pushed through before the people were able to vote out supporters of the plan in the May election and vote into office B&NES councillors opposed to it. The Level 3 definition includes sites 'sensitive' to development, and this is defined partially in Figure 8. Presumably, this takes the Government's lead, as does Figure 7. However, "substantial development of a Conservation Area" is no light matter, and the level</p>		
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				<p>of consultation in Figure 7 would seem to be rather inadequate. There is a potential considerable effect on local communities from Level 3 developments in B&NES from adverse effects on a Conservation Area, loss of allotment land, which is already well under-supplied in the District, and replacement of employment land with housing and, in certain circumstances, development adjoining a listed building. There appears to be a case in B&NES for going beyond the guidelines provided by the Government and providing for greater community involvement for Level 3 applications, such as interactive events where members of the community and representatives of community and other organisations come together to explore aspects of development. Exhibitions are too easily used to manipulate information and responses, providing the veneer of community support for a scheme that will not have it when it finally comes to committee. The descriptions of Levels 1 and 2 cite controversy, but</p>		
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			<p>conflict is a useful concept that could be flagged up. Conflicting needs/purposes/uses are an area in which the community needs to be involved, and in a way in which it is made aware of the nature and implications of the conflict. Controversy implies that the community is already aware of conflicts, which may well not be the case. A development may be seen as not "contrary to LDF policy", but does encompass conflict, where it is in accordance in one respect and contrary in another. The Level 1 definition could be adapted to include this. There is no reason why B&NES should not adapt the terminology provided by the Government.</p> <p>Again, a definition, this time Level 1, implies that a judgement needs to be made that anticipates whether or not a plan is likely to depart from the LDF. Although in some cases, this would be obvious, in others departure may only become apparent after a considerable amount of</p>		
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				<p>work has been done on the application. That essentially rules out 'frontloading' and transforms it into an exercise in which the public is then simply used to give credence to a plan, no matter what the real feeling, thus neatly bypassing real community involvement whilst giving the appearance of involvement by the community at an early stage! Again, the concept of potential conflict could be used.</p> <p>It is not made clear in what capacity the media would be used for Level 1 applications (figure 7) or why it only applies to them. It would seem sensible to notify the media of all Level 1 – 3 applications and to encourage participation through it. This would be in line with Appendix B and the text of the SCI, which provides a framework the purpose of which is to provide good opportunities for participation.</p>	<p>Appendix B is a toolbox of methods to be used in involving the community in the preparation of the LDF not in planning applications.</p> <p>Comment noted. It is considered that para 5.6 clearly states that feedback will be provided by the</p>	
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				<p>Frontloading and the nature of community consultation</p> <p>If the community is to truly be able to influence decisions that affect it, frontloading is essential, and it is also essential that the approach to frontloading is correct – not left in the hands of the developer to engineer the desired result.</p> <p>The involvement of the Development Control Teams is cited in paragraph 5.6 with reference to the frequency and nature of developer-led consultation and the final sentence contains a list, which includes both details on the nature of developer-led consultation and feedback from the community. However, nowhere does it stipulate by which mechanism the Teams will be informed in this regard. It sounds as if the feedback will be from the developer. The SCI is a bit woolly regarding its expectations of developers in this respect, saying in paragraph 4.13 that it should be “in accordance with the SCI” and that</p>	<p>Development Management (formerly Development Control).</p> <p>Pre-application consultation is recommended by the government and opportunities for public consultation run by the Council are held once a planning application has been submitted as outlined in the SCI. It is considered that para 4.13 contains an appropriate level of detail.</p>	
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			<p>appropriate people should be involved. Developers can, and do, misrepresent the results of consultations, and although councils are perfectly capable of doing the same, it does not usually have a commercial interest spurring it on. It would seem appropriate for the council to back up its wish that consultation be suitable with a mechanism whereby the public's view on the consultation is sought, thereby providing a means of exposing behaviour designed to fool the council. There appears to be no such mechanism suggested within the SCI, which leaves the system open to abuse. It is unclear how the Development control Manager can adequately oversee developer-led consultation (paragraph 6.6), if there is no mechanism for assessing the efficacy of and public satisfaction with, that consultation. This needs to be addressed if there is to be any confidence in the process of involvement and if the whole thing is not to be seen as a clever way of appearing to give public validation to developments</p>	<p>The Planning reception</p>	
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			<p>foisted upon them.</p> <p>Paragraph 4.16 states that hard copies of applications can be viewed at Planning reception. It is important to ensure that this Planning reception is available not only in Bath, but also in Keynsham, Midsomer Norton and Radstock, all of which have council offices. Applications being available in Trim Street advantages Bath residents over those in the rest of the authority, effectively involving them more in the planning process through greater ease of access. It is important that as many residents as possible have equal opportunities. There is also a case for holding copies of applications pertinent to the Parishes within those Parishes, if involvement is to be fairly apportioned. After all, the Parish Council should see applications anyhow, in order to offer a properly considered view.</p> <p>Paragraph 4.17 specifies a further 14 days for comment on significant</p>	<p>is currently only based in Bath. Copies of LDF documents are available in deposit stations as listed in p50 of the submission SCI.</p> <p>Parish Councils are provided with planning applications which may be able to view (see Figure 9).</p> <p>It is not considered that this should be altered as this reflects standard practice.</p>	
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			<p>changes to an application, which represents no advance on the current provision. It is difficult for local organisations and individuals to respond adequately within 21 days, let alone 14. That there was knowledge that an application would come forward is really no argument, as a response often must be fitted in around existing commitments. A response to substantial changes can be every bit as complicated as a response to an original application. A further 21 days would help to achieve the greater participation that the SCI aims to foster.</p> <p>Figure 9 It would be useful to publicise the fact that the weekly list is distributed in the way stated, so that those without easy or cheap access to the Internet know where to go.</p> <p>There is still no commitment to display notices in multiple locations if necessary and where they are most likely to be seen by the public. "Prominent place" and "near the site"</p>	<p>Comment noted</p> <p>As stated in the SCI the display of site notices is carried out in accordance with the <i>Town & Country Planning Act (General Permitted Development) Order</i>.</p>	
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			<p>are rather vague – the notice could be in a prominent location, but not one that is visited much by those most interested, or that is round the corner from a site and so not taken notice of. The council could included some sort of commitment to trying to ensure that notices are displayed in a location, if available, that will prevent malicious removal, in addition to other locations, and that it can be read by those who have difficulty. Sheets larger than A4 should be considered, as the A4s are difficult for older people to read, and a Braille message should be included. At the least, large print should advertise the dates and the contact details for further information.</p> <p>It is not clear what mechanism is in place that will ensure that the Case Officer, regarding consulting non-statutory organisations, encourages appropriate groups to be consulted. Given that there will be a SCI database and that community groups will be on it, it would seem</p>	<p>The database includes details of what the organisation or individual are broadly interested in. The administration of this system within the Council is not considered to be an issue for the SCI.</p>	
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			<p>appropriate for the groups to say which types of application they would wish to be involved with in which areas, and remove the guesswork. There appears to be no commitment to such a mechanism. Without this, groups that would like to be consulted, and may be assuming they will be (in line with involvement laid out in Appendix B) because they have registered their interest in being consulted, may not be.</p> <p>The methods of publicising set out in Figure 9 include planning applications advertised in the Bath chronicle, yet the notice of consultation periods in Appendix B specifies a larger range of publications. This larger range is more appropriate. Obviously, there would be little point in the Norton Radstock Journal carrying <i>all</i> applications irrespective of location, unless it had a desire to do so (being a smaller publication), but the Somerset Guardian is a substantial sister-paper to the Bath Chronicle serving a different part of B&NES, and should, therefore, carry</p>	<p>The Council is aware of this issue which was also raised at the pre-submission consultation. The procedure for newspaper advertisement of planning applications is currently being reviewed by the Development Management Manager.</p> <p>In the interim summaries of planning applications are presented in many of the local papers for example in the Somerset Guardian, however this is the newspapers own summary and not all applications are included.</p>	
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			<p>the same level of information. The Bath Chronicle is not, on the whole, interested in events in the Norton Radstock Area, and will have a lower circulation in that area. By placing the entire list in the Bath chronicle and not in the Somerset Guardian, a bias towards greater planning involvement by Bath Residents is created. This must be remedied if the aims of the SCI are to be upheld.</p> <p>Paragraph 4.21 includes a list of points where access to committee papers will be granted. Radstock library and the Norton Radstock Town Council Office in Victoria Hall, Radstock should be added to this list. The bus fares the short distance to Midsomer Norton from Radstock are exorbitant and a barrier to involvement. If the council is serious about increasing public access and participation, it should grant as easy access to the town of Radstock as to Midsomer Norton.</p> <p>Paragraph 4.24 states a "minimum" of 21 days, but</p>	<p>The list in 4.21 is a standard location for committee papers as decided by Democratic Services. This comment has been referred to Democratic Services.</p> <p>The wording "normally 21 days" was changed to "a minimum of 21 days", so that there is no doubt about the minimum period for</p>	
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			<p>goes on to say that comments received after the deadline are not required to be considered. Should it say, "maximum"? It would be preferable if the council committed to the intention to try to be flexible, where possible, regarding the receipt of comments.</p> <p>Paragraph 4.26 includes a list of issues for focus. However, most of these issues are covered within the headings, "suitability of the site for development" and "planning policies, government and planning case law including previous decisions of the council". The matter of the impact on a Conservation Area, which is considered separately from other matters at present, appears within a larger sub-list, but would be more appropriately listed separately. The inclusion of all other matters apart from the general points at the start and end of the list (above) and not others, for example wildlife, suggests that some parts of planning policy are more important than others and also directs members of the public to</p>	<p>making comments/representations following the previous (Reg. 26) consultation.</p> <p>As specified in para 4.26 this paragraph is not intended to list all issues which comments can be raised, it is meant to be an aid to those who are unsure about what constitutes a material consideration.</p>	
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			<p>address certain issues. This is undesirable and smacks of shifting the focus away from 'problem area' such as wildlife and biodiversity and from areas that the council would wish to deal with itself, such as socio-economic matters. If there is to be a list of relevant issues it must be comprehensive. It would be better to either include this list or direct people to a guide that spells out all the matters considered for planning applications.</p> <p>As stated in the previous submission, 3 minutes for an unspecified number of members of the public to speak to the committee is entirely inadequate. (paragraph 4.29). It is difficult enough for a person to put into 3 minutes the pertinent points, let alone a group of people. There must be a commitment to flexibility on this issue.</p> <p>Paragraph 4.30 states that verbal comments will not be recorded, although related comments made by councillors will be. This does not seem right if a participatory and</p>	<p>As stated in the previous consultation: For expedience it is Council policy that three minutes is standard time for comments to be made at committee. We encourage detailed statements to be made in the form of written representations. No change to the SCI is recommended.</p> <p>We encourage detailed statements to be made in the form of written representations. No change to the SCI is recommended. The details of which parts of committee meeting are recorded is the same for all Committees and is decided by Democratic</p>	
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			<p>transparent culture is to be encouraged. It would seem appropriate to include that written records of the spoken comments (provided by the one commenting), could be entered into the records. If necessary there could be a requirement to provide these at the start of the meeting in order that they can be checked and corrected as necessary at the time of speaking.</p> <p>Post-determination There is no reference in this section to legal redress through Judicial Review and no reference to the Environmental Law Foundation, or other bodies that can be contacted in a case where a non-applicant is unhappy with a decision. The lack of this sort of information is unhelpful and could lead members of the public to believe that there is no redress other than complaints about community involvement through the council's own complaints procedure (paragraph 4.36), and therefore no redress on matters outside the list in Appendix E. There is also</p>	<p>Services.</p> <p>It is considered that for the SCI reference to the Council's complaints procedures and details about the Ombudsman are sufficient. It is not considered appropriate for the SCI to outline the procedures for making complaints about the conduct of members. Details can be sought on our website and via Council Connect.</p>	
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				no reference to cases where a member of the public or organisation believes that a councillor has acted improperly, which would also be helpful in fostering community engagement with the process.		
UNSOUND						
21 representations (made by 12 different organisations/individuals)						
(20) Revd Nick Williams, Diocesan Ecumenical Officer, Diocese of Bath & Wells	Unsound	Test 3	No –'this is the first time I have seen the document'	Page 7 para 2.9 makes no mention of faith communities	Para 2.9 refers to the membership of the Local Strategic Partnership the membership of which is outside the scope of the SCI. The comment has been referred to the Council's Corporate Project team.	none
<p>The Diocese of Bath & Wells consider it necessary to take part in an oral examination because: 'The faith community is seen to be a very significant contribution to social capital, sustainability and cohesion'.</p> <p>The Council takes the view that this comment relates to Bath & North East Somerset's Local Strategic Partnership rather than the content of the SCI and therefore this can be responded to via written representations.</p>						
(21) Joanna Robinson, Conservation Officer, Bath Preservation Trust	Unsound	Test 3	No – unfortunately the trust failed to take advantage of the opportunity to comment earlier in the process	Para 3.10 to 3.12 Figure 3 Appendix C As currently drafted Section 3 of the SCI makes no reference to the special status of the City of Bath (the only complete city in the UK to be designated as a World Heritage Site). In addition to targeting the 'hard to reach groups listed in figure 3, the SCI should highlight the need to	Section 3 addresses how the community will be involved in the preparation of the LDF. As a consultation strategy it is not the purpose of the SCI to describe the District's environmental or historic assets. Nor is it the intention of Section 3 to set out how the Council intends to work with specific groups. Appendix C of the SCI	none

			<p>ensure effective involvement of voluntary organisations which exist to preserve the historic character and amenities of the city. Specifically a new paragraph should be added between paragraph 3.9 and 3.10 confirming the Council's commitment to working effectively with these organisations to ensure the LDF achieves effective stewardship of the WHS, and national organisations such as ICOMOS, the Georgian Society and the Victorian Society and local organisations such as the Bath Preservation Trust should be included in the list at Appendix C. It would also be useful to include a short explanation of the role of the Steering Committee for the WHS Management Plan in preparation of the LDF.</p> <p>The SCI correctly highlights in Figure 3 the extra effort needed to reach residents of Bath: the Bath Preservation Trust is surprised that residents appear as the last item in this lengthy list (particularly</p>	<p>correctly lists the types of groups the Council proposes to involve. The Companion Guide to PPS12 advises against listing names of individual groups as this would become out of date too quickly. Furthermore, English Heritage have provided an up to date list of heritage organisations (including those mentioned) which have been added to our consultation database.</p> <p>Figure 3, which is no order of priority, highlights groups which the Council is particularly keen to involve in the preparation of the LDF who in the past have</p>	
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			<p>as the heading 'residents' subsumes all the specific groups listed in figure 3). Although this is a point of presentation rather than substance, we consider that 'Residents' should be the first target group highlighted in Figure 3 not a 'catch all' entry at the end of the list.</p> <p>In Appendix C we assume that 'Residents Groups and Associations; would include the Federation of Bath Residents' Associations, but it might be worth making this clear given the acknowledged need for special efforts to engage with residents of the City of Bath.</p> <p>We are not seeing the inclusion of heritage groups such as BPT in Figure 3 since they do not come into the category of 'hard to reach'.</p> <p>The Bath Preservation Trust is surprised and concerned that the SCI fails to commit the Council to ensuring effective stewardship of the WHS through the LDF process, and would welcome the opportunity to</p>	<p>been under represented or more difficult to engage in planning issues. The BPT is a well informed group which takes every opportunity to engage in the planning process and therefore can not be categorised as 'hard to reach'.</p> <p>As noted, Residents Groups and Associations would include the Federation of Bath Residents' Associations.</p> <p>Comment noted.</p> <p>It is not the purpose of the SCI to commit the Council to ensuring effective stewardship of the WHS through the LDF process. Appendix C makes it clear that</p>	
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				set out at the hearing the importance of proper engagement with the appropriate expert bodies.	organisations will be consulted depending on the nature and relevance of the LDD	
(22) Justin Milward, Regional Policy Officer, Woodland Trust	Unsound	Test 3	Yes	para 3.10 (p11) and Appendix C (p42). We are pleased to see the Woodland Trust included in Appendix C under Environmental Groups in 'examples of non-statutory consultees' but would point out that our correct name is Woodland Trust, not Trusts.	Agree that the Woodland Trust should be correctly referred to in the text.	Appendix C (p42) change 'Woodland Trusts' to 'Woodland Trust'.
(23) Revd Nick Williams, Diocesan Ecumenical Officer, Diocese of Bath & Wells	Unsound	Test 3	No –'this is the first time I have seen the document'	Page 12 figure 3 '(e.g. the LSP) is considering how best to engage faith communities'. The place to start is Somerset Churches Together contact Mr Robin Dixon, 25 Claverton Road West, Saltford, Bristol, BS31 3AL 01225 872903	This comment again refers to the Local Strategic Partnership the details of which are outside the scope of the SCI. The comment has been referred to the Council's Corporate Project team. The SCI already acknowledges that further work needs to be done to engage faith communities (Figure 3) and the contact details provided have been added to the Planning Policy LDF consultation database.	none

The Diocese of Bath & Wells consider it necessary to take part in an oral examination because:

'The faith community is seen to be a very significant contribution to social capital, sustainability and cohesion'.

The Council takes the view that this comment can be responded to via written representations as in part it refers to Bath & North East Somerset's Local Strategic Partnership rather than the content of the SCI. Furthermore, the SCI already addresses the issue of involving faith communities.

(24) Phyllis Cook Chair of Keynsham South Forum	Unsound	Test 3	No – not aware of SCI, no consultation notice received	<p>All sections that refer to community participation/involvement including Fig 3 and Appendix B</p> <p>The Statement does not say how community groups will be identified and how this list will be updated (we were not included in the earlier parts of this consultation for example). Specifically the required contacts may not just be residents association, but also community and neighbourhood groups, community networks (including those who support mental health, older people etc).</p>	<p>Paras 3.9 -3.10 set out in general terms how the Council intends to engage organisations and community groups in the Local Development Framework process and Appendix C sets out the list the consultation bodies to be involved in the process.</p> <p>Appendix B makes it clear that the list is not intended to be exhaustive whilst providing the opportunity for groups and individuals to be added to the Local Development Framework. The Appendix follows the guidance given in PPS12 and is not too details, to ensure that the SCI does not date rapidly.</p> <p>This LDF database is continuously maintained with details being collated across service areas in line with the data protection legislation. Individuals and organisations are</p>	none
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					also invited to join this. The database reflects the advice given in PPS12 about which groups should be identified for consultation.	
<p>The Keynsham South Forum consider it necessary to take part in an oral examination because: ‘Residents feel that an oral examination will be more accessible, encourage greater participation and promote better understanding of community involvement issues’</p> <p>The Council takes the view that it is not the purpose of an oral examination to encourage participation and promote a better understanding of community involvement issues but that ‘the purpose is to consider whether the Statement of Community Involvement is sound’ (PPS12, 2004 p76). Therefore it is considered that written representations can respond thoroughly to the comments made.</p>						
(25) Alun Morgan, Secretary, Federation of Bath Residents Associations	Unsound	Test 4	Yes (did reply to previous consultations although issues raised here are not the same)	Section 3 para 3.12 and Figure 3 Residents: 1. The Federation of Bath Residents Associations role equates to that of Parish Councillors, thus, it should retain a specific place on LSP committee, and be informed of major planning applications. 2. The Federation has some 4500 members in Bath 3. The main committee meets every 2 months to discuss common problems such as: a. Planning Applications – major and minor b. Licensing problems c. City Centre Improvements and Proposals d. Traffic problems in Bath	<u>Issue of LSP members</u> This comment refers to the Local Strategic Partnership the details of which are outside the scope of the SCI. The comment has been referred to the Council’s Corporate Project team. <u>Advertisement of Major Planning Applications</u> It is considered that the methods described in the SCI are appropriate for advertising major applications i.e. pre-application consultation (details of local organisations and residents associations being provided on request), weekly list advertisement, Council	none

				<p>e. Council policy on rubbish disposal</p> <p>f. Impact of student housing on Bath</p> <p>4. It should have similar status to Parish Councils, be kept informed of planning applications, and be a full member of the LSP committee.</p>	<p>website, site notices, consultation of non-statutory organisations at the discretion of the case officer (for example Federation of Bath Residents Associations), Local advertisement and provision of information from Council Connect.</p> <p>In this way the Federation of Bath Residents Associations and the residents of Bath have ample opportunity to comment on major planning applications.</p>	
<p>The Federation of Bath Residents Associations consider it necessary to take part in an oral examination because: 'The Inspector is unlikely to be aware of the unusual role of the Federation of Bath Residents Association, and the overarching nature of its concerns'.</p> <p>The Council takes the view that written representations would be adequate to consider the issues in relation consultation with the Federation of Bath Residents Associations and that written representations can convey the role and characteristics of the organisation.</p>						
(26) Phyllis Cook, Keynsham South Forum	Unsound	Test 4	No – Not aware of SCI, no consultation notice received	<p>All sections that refer to community participation/involvement esp. Appendix B</p> <p>The draft SCI does not say enough about how B&NES Planning will consult with people who are not able to attend road shows etc e.g. people who work, have dependents, are housebound, or some 'groups' who never take part in standard</p>	<p>Fig 3 refers directly to how we will engage with groups who have not traditionally been involved in planning.</p> <p>Furthermore, a wide range of techniques for community involvement are outlined in Appendix B. These range from providing information, consultation and participation which should suit a variety of people.</p>	none

				<p>consultations such as focus groups etc The most difficult and important aspects is how residents who do not normally take part will be encouraged to do so – the SCI does not fully address this.</p> <p>The draft SCI does not say how groups will be identified and how list will be reviewed and updated.</p> <p>This consultation paper is not written in plain understandable language, and misses the main audience who are residents. Based on this, Community Involvement will not work.</p>	<p>These issues are addressed in Appendix C. The LDF stakeholder database was prepared in accordance with PPS12 and was also informed by a number of service areas across the Council. This database will continue to be updated.</p> <p>The SCI was reviewed by a member of Council staff with a plain English qualification prior to submission. On adoption the SCI will be launched and a leaflet produced summarising the SCI distributed.</p>	
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**The Keynsham South Forum consider it necessary to take part in an oral examination because:
‘Residents feel that an oral examination will be more accessible, encourage greater participation and promote better understanding of community involvement issues’**

The Council takes the view that it is not the purpose of an oral examination to encourage participation and promote a better understanding of community involvement issues but that ‘the purpose is to consider whether the Statement of Community Involvement is sound’ (PPS12, 2004 p76). Therefore it is considered that written representations can respond thoroughly to the comments made.

(27) Ann Godfrey, Bath Resident	Unsound	Test 5	Yes	<p>1. Introduction weak. Community covers everyone who lives, works, invests in B&NES. Individuals are involved in the community on their own behalf and/or as members of one or more of the many local interest groups or 'communities' (to which reference is made elsewhere in the SCI)</p> <p>2. Section 3 LDF outline is still not easy to understand Figure 2 is not clear – perhaps because monochrome – needs to appear alongside explanatory paras not overleaf as now</p> <p>3. In para 3.5 consider replacing 'statutory processes' with 'regulations' to distinguish from para 3.8</p> <p>4. Is SPDs supplement planning policies really adequate to explain what they are/do? 3.7</p> <p>5. para 3.6 'site</p>	<p>1. It is considered that the introduction is already clear and concise and that the wording suggested would not improve clarity.</p> <p>2. Diagram is taken from PPS12 and is considered to be an improvement on the previous diagram. It appears in colour in the original pdf document available on the website but in monochrome in the distributed copy due to cost of colour printing.</p> <p>3. The terminology in paras 3.5 and 3.8 are considered sufficiently explicit in the context of each respective paragraph.</p> <p>4. The Glossary on page 49 explains clearly the purpose of SPDs.</p> <p>5. The term 'Site</p>	none
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			<p>specific allocations document' would be clearer</p> <p>6. para 3.19 – re feedback – need to explain to community why their views have not been adopted otherwise 'one track minds' will claim they have been ignored/ involvement was a waste of time and will be less willing to be involved in future.</p> <p>7. Often gives impression of statement of intent rather than a description of established process – in sections 3.5 & 6 the future tense is used in places where one hopes the present tense is appropriate</p> <p>8. Appendix B – target group column – omit 'no target group' because 'wide</p>	<p>Allocations Development Plan Documents' is considered sufficiently explicit within the context of the para 3.6. This wording also reflects the wording the Local Development Scheme.</p> <p>6. This is current practice and is reflected in 3.20 where it is stated that a schedule of comments will be prepared with the Council's response to all comments made.</p> <p>7. This statement looks beyond current practice and aims to improve community involvement by increasing the opportunities and making it easier to get involved. Therefore it is not just a statement of current practice, but is also aspirational and sets standards for the future.</p> <p>8. Agree with proposed change as will add to clarity</p>	<p>Appendix B – target group column – omit 'no target group' and replace</p>
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				<p>audience is the target group' – or replace whole entry with 'no particular target group' or 'general public'</p> <p>9. Glossary – repetition is not explanation, also format is inconsistent between entries. Needs re-writing in plain English.</p>	<p>9. This appendix is strongly based on the wording used by Planning Aid and is considered to be useful and well written.</p>	with 'general public'
(28) Phyllis Cook, Chair Keynsham South Forum	Unsound	Test 5	<p>No – Not aware of SCI, no consultation notice received</p>	<p>All sections that refer to community participation/involvement especially Appendix B</p> <p>How and whom – Appendix B does not say enough about how this will be done with people who rarely participate.</p> <p>This consultation paper is not written in plain understandable language and misses the main audience who are residents. Based on this, the SCI will not work.</p>	<p>SCI is essentially a process document and must set out detailed policy. On adoption the SCI will be launched and awareness of the document publicised. The wide range of techniques outlined in Appendix B and the target groups identified in table 3, section 2 and the groups listed in Appendix C shows who we will involve and how. It is also acknowledged in para 3.12 that these methods are aimed at reaching a wider target audience.</p> <p>The SCI was reviewed by a member of Council staff with a plain English qualification prior to submission.</p>	none

<p>The Keynsham South Forum consider it necessary to take part in an oral examination because: ‘Residents feel that an oral examination will be more accessible, encourage greater participation and promote better understanding of community involvement issues’</p> <p>The Council takes the view that it is not the purpose of an oral examination to encourage participation and promote a better understanding of community involvement issues but that ‘the purpose is to consider whether the Statement of Community Involvement is sound’ (PPS12, 2004 p76). Therefore it is considered that written representations can respond thoroughly to the comments made.</p>						
(29) Sheila Crocombe, Secretary, Keynsham Community Association	Unsound	Test 6	Yes (did reply to previous consultations although issues raised here are not the same)	<p>It would be helpful to have a <u>named officer</u> as a link to avoid being shunted around from one department to another.</p> <p>Our experience has been: - Response to letters and emails within statutory time – yes except for one critical email to an officer with whom we had been liaising with but who then left the Authority without our knowledge. No one picked up his emails.</p> <p>Face to face meetings – yes</p> <p>Answers to questions – no</p> <p>In particular in 1998 a plan was drawn up for a food store and community hall on a central site in Keynsham. The deal was that the shell of a community centre would be erected by the developer as</p>	<p>It is not considered appropriate to name officers within the SCI as this would rapidly date the document. Named officers are given for all planning applications and also on correspondence issued by the Council.</p> <p>It is not considered appropriate to comment on previous examples consultation of as part of the SCI consultation. This is outside the remit of the SCI.</p>	none

				<p>a payback and Keynsham Community Association would fundraise to refurbish it. In 1999, following the advice of the Lottery fund consultant, we applied to the Council for specific factual information needed to complete the application form. The information was never forthcoming so we were unable to make the application and will never know whether or not we would have been successful.</p> <p>In 2001 we were given an ultimatum – 6 weeks in which to find a guarantee for £75,000. This was so unrealistic we were effectively bounced of discussions.</p> <p>It is now 2007 and not a stone has been turned on the site in question so where was the urgency. If a similar situation should arise in the future would this document produce any safeguards for a more satisfactory conclusion.</p>		
(30) Phyllis Cook Chair Keynsham South Forum	Unsound	Test 6	No – not aware of SCI, no consultation notice received	<p>Section 6 which refers to resources and budget for these changes.</p> <p>The statement does not give enough detail about an adequate budget. Are</p>	It is considered that section 6 of the SCI adequately explains how the level of community involvement outlined in the SCI will be resourced by Planning	none

				details of the figures/potential resources available?	Services.	
<p>The Keynsham South Forum consider it necessary to take part in an oral examination because: 'Residents feel that an oral examination will be more accessible, encourage greater participation and promote better understanding of community involvement issues'</p> <p>The Council takes the view that it is not the purpose of an oral examination to encourage participation and promote a better understanding of community involvement issues but that 'the purpose is to consider whether the Statement of Community Involvement is sound' (PPS12, 2004 p76). Therefore it is considered that written representations can respond thoroughly to the comments made.</p>						
(31) Ann Godfrey Bath Resident	Unsound	Test 9	No - Previous consultation asked specific questions, not covering present subject matter	<p>SCI document is insufficiently clear/succinct/accessible/consistent/unambiguous – [was it read before the consultation by anyone not involved in planning/] – too much jargon.</p> <p>Plain English required here and throughout the planning process</p> <p>Need to attract and hold the interest of the general public</p> <p>Specific to planning applications:</p> <p>1. Needs clear, logically sequenced exposition of the why, what how and when of development control and public involvement</p>	<p>The SCI was reviewed by a member of Council staff with a plain English qualification prior to submission. The Glossary on page 46 explains the more generally used planning terms found throughout the SCI.</p> <p>The sequencing of the Planning Applications chapter of the SCI is perceived to be logical. The subheading in this chapter follow the life-cycle of a planning application:</p> <ul style="list-style-type: none"> • Introduction • Pre-application • Submission of application • Considering an application • Determination • Post determination 	<p>none</p> <p>none</p>

				<p>2. needs clear statement of levels of development, including permitted development – GPDO is mentioned in the glossary but otherwise no reference</p>	<p>It is not the purpose of the SCI to explain permitted development or repeat the GPDO.</p>	<p>none</p>
				<p>3. needs clear indication of time scale for determining/deciding 'normal' application. Perhaps an extra para between 4.16 and 4.17</p>	<p>This is covered in para 4.31 and 4.32</p>	<p>none</p>
				<p>4. para 4.12 – Council should expect (not merely encourage) pre-application consultation at the appropriate level</p>	<p>Para 4.11 states that the Council 'actively encourages' pre-application consultation. This wording is considered appropriate.</p>	<p>none</p>
				<p>5. para 4.24 use of 'minimum' is ambiguous – give impression that comments can be received at any time thereafter in absence of other reference to target times</p>	<p>The wording "normally 21 days" was changed to "a minimum of 21 days" to reflect the legislation in the previous (Reg. 26) consultation.</p>	<p>none</p>
				<p>6. Figure 7 and glossary – 'Local Architectural or design team' gives the impression that architecture and design are alternatives! Rename Local Architectural Design team (and get them working soon)</p>	<p>It is not considered that this wording reflects this sentiment.</p>	<p>none</p>

				<p>7. para 4.28 – Why are spoken statements incorrectly called ‘verbal’ here and correctly named ‘oral’ in relation to the Inspector. Please use oral.</p> <p>8. para 4.33 actions taken by aggrieved parties</p> <p>9. para 4.37 – add breach of condition to reasons for contacting Enforcement officer</p>	<p>Agree with proposed change</p> <p>Agree with proposed change</p> <p>It is not the purpose of this document to give detail about enforcement action. However, suggest changing wording in para 4.37 to say ‘Contact the enforcement team if you consider a breach of planning control has occurred’.</p>	<p>para 4.28 – replace ‘verbal’ here with ‘oral’</p> <p>Para 4.33 – replace ‘for’ with ‘by’</p> <p>Delete current para 4.37 and replace with ‘Contact the enforcement team if you consider a breach of planning control has occurred’.</p>
(32) David Orme Bath Resident	Unsound	Test 9 (marked test 4 but comment relates to Planning Applications section so reclassified as test 9).	No ‘haven’t seen the document until last week’	It’s a minor tweak required, but the diagram on page 18 shows an arrow going from the ‘appeal’ box back into the ‘issue decision’ box. This can’t be right – surely there is some review of the application in response to the appeal before a second decision is taken? In which case the arrow should perhaps go back to the ‘negotiate with applicant’ or ‘assess applications’ box.	Figure 6 is a summary diagram to show how a planning application is decided. Full details of the appeal process is outlined in para 4.34 and 4.35. However, agree with the comment that this could cause confusion and suggest changing the box in Figure 6 which currently states ‘appeal’ to say ‘appeal process’ for the purposes of clarity.	Change box in Figure 6 which currently states ‘appeal’ to say ‘appeal process’

(33) Mrs Suzanne Dyer, Parish Clerk, Whitchurch Parish Council	Unsound	Test 9		Figure 9 (p25) sets out methods used to publicise applications. It says that weekly lists will be sent to Parish Councils and that Parish Councils will be consulted. We assume that a full copy of the application will be received but the document does not actually say so.	Agree with proposed change to clarify and reflect current practice.	Figure 9 (p25) Consult Town or Parish Councils add the following text: 'Town and Parish Councils will be consulted on all planning applications made within their administrative boundary (copies of these applications will be provided). Town and Parish Councils that will be consulted are...'
(34) Justin Milward, Regional Policy Officer, Woodland Trust	Unsound	Test 9	Yes	<p>Figure 9 (p23) Wording in the 7th row of this table is confusing – we do not understand what 'special interest groups or community groups will be encouraged to be consulted...' means.</p> <p>We would like to see a clear commitment to consult special interest groups without any qualification. For instance the Woodland Trust should be consulted for all planning applications that affect the irreplaceable semi natural habitat of ancient woodland (quote from PPS9 para 10).</p> <p>Some local authorities have already listed the Woodland Trust as non-statutory consultee for planning applications in their</p>	<p>Details of non-statutory consultees are listed in Appendix C. This list is available to Development Control case officers.</p> <p>For consultees with a particular area of specialty such as the Woodland Trust, current practice is that the Development Control case officer will initially contact specialists within the Council e.g. Trees & Woodlands team, who would then consult the Woodland Trust as appropriate. It is considered that this is a more effective method of consultation that direct contact from the case officer.</p>	Figure 9 'Consult non-statutory organisations' At end of text add 'Specialist teams within the Council will also be consulted on Planning Applications e.g. Historic Environment, Trees & Woodland who will in turn consult non-statutory organisations as appropriate.'

				adopted SCIs, such as Lichfield District Council, Bridgnorth District Council and North Warwickshire District Council. The Woodland Trust would therefore like to see similar commitment in this SCI.	It is suggested that additional wording is added to Figure 9 to this effect.	
(35) Joanna Robinson, Conservation Officer, Bath Preservation Trust	Unsound	Test 9	No – unfortunately the trust failed to take advantage of the opportunity to comment earlier in the process	<p>Paras 4.17</p> <p>The undertaking in para 4.17 to re-notify consultees should cover the submission of later full details (reserved matters) related to outline planning applications as well as significant changes to planning applications.</p> <p>The Bath Preservation Trust considers that outline planning applications should not be used at all in a World Heritage Site such as the City of Bath, but if OPAs are used, then it is essential that all interested parties are notified of all later information which is submitted.</p>	<p>It is considered that this level of detail is not appropriate for inclusion in the SCI.</p> <p>This is not something which can be addressed in the SCI.</p>	none
(36) Joanna Robinson, Conservation Officer, Bath Preservation Trust	Unsound	Test 9	No – unfortunately the trust failed to take advantage of the opportunity to comment	Paragraph 4.20 will need to be amended to reflect the changes to the Committee structure made by the new Council, as will 2.13	Agree with proposed change	See factual changes at the end of this schedule

			earlier in the process			
(37) Paul Howard Bath Resident	Unsound	Test 9 (marked test 5 but comment relates to Planning Applications section so reclassified as test 9).	No – I was not aware of the previous stages of the involvement process	<p>4.17 The statement fails to address involvement my members of the community who attended consultation events for major development, are satisfied with what is shown to them, only to discover a significant change in the planning application when it is too late.</p> <p>A number of people have said they saw models of Southgate with Churchill House retained at consultation events and went away satisfied, and were subsequently surprised to see that it was to be demolished. Had these people been contacted when the application changed, the Churchill House issue might have been addressed earlier and better by the Council and developers, instead of provoking so much controversy and marches in the street at election time</p>	<p>It is considered that the methods described in the SCI are appropriate for advertising major applications i.e. pre-application consultation with details of local organisations and residents associations being provided on request, weekly list advertisement, Council website, site notices, consultation of non-statutory organisations at the discretion of the case officer or specialist team within the Council. Local advertisement and provision of information from Council Connect.</p> <p>It is not considered appropriate to comment on previous examples consultation of as part of the SCI consultation. This is outside the remit of the SCI.</p>	none

				<p>Also re 4.17 the statement does not cover the circumstance where an applicant withdraws the application and submits a new one. This happened recently with the Dyson Academy application, and objectors to the original application were not notified of the new one. This happened recently with the Dyson Academy application, and objectors to the original application were not notified of the new one. Developers could get round the provision of 4.17 by withdrawing and resubmitting an application, instead of making a significant change to an existing one, and objectors who took their eye off the ball could miss out on their chance to object to a revised application in which they were interested.</p>		
(38) Barry Cruse, Chairman of the Moorland Road Traders Association	Unsound	Test 9	Yes	Neighbour Notification Letter – It is not sufficient for the immediate neighbours to be informed when a major development is proposed a wider area must be contacted by post	For major development consultation will occur as appropriate. For example for major applications pre-application consultation as well as the other methods for publicising planning applications outlined in Figure 9. Furthermore, for very	none

					largest schemes SPDs will be produced.	
(39) Mrs Suzanne Dyer, Parish Clerk, Whitchurch Parish Council	Unsound	Test 9		Figure 9 (p25) says that all applications will be advertised in the Bath Chronicle. This is not much use to the Parish of Whitchurch. The Bristol Evening Post should be included on the list (as it is in the arrangements for publicising the Local Development Framework (p35)	The Council is aware of this issue which was also raised at the pre-submission consultation. The procedure for newspaper advertisement of planning applications is currently being reviewed by the Development Management Team. Amendments to figure 9 are proposed to address this.	See factual changes at the end of this schedule
(40) Mr Francis Holtham, Henrietta Park Residents Association	Unsound	None (objector identified as Test 9 but does comment does not relate to planning application)	No – lack of time to look at documents i.e. too busy	The Statement is far too long and complicated. It needs to be well written, concise and straight forward.	The SCI is intended to set out clearly how and when the community can be engaged in the planning process. It has been drafted in line with Government guidance. The SCI was also reviewed by a member of Council staff with a plain English qualification prior to submission.	none

Observations

The following comments were not classified as representations as they do not request material changes to the SCI or declare the SCI unsound (as discussed with Albert Tynning, Planning Inspectorate)

OBSERVATIONS

Peter Brown, Director of Policy and Planning, South West Regional Assembly	-	n/a	n/a	Thank you for your letter dated 24 th April 2007 and received by this office on 1 st May 2007 notifying the Regional Assembly of Bath & North East Somerset Council's consultation on the SCI. The Assembly will endeavour to respond within the consultation period if deemed appropriate.	Comment noted	none
David Jones, Planning Manager, Government Office for the South West	-	n/a	n/a	Para 2.11 line 5 add ' <i>will</i> ' between ' <i>this</i> ' and ' <i>lead</i> '	Agree that grammatical error should be corrected.	Para 2.11 line 5 add ' <i>will</i> ' between ' <i>this</i> ' and ' <i>lead</i> '
David Jones, Planning Manager, Government Office for the South West	-	n/a	n/a	Para 2.18 You might consider whether a link is required here so readers can view the Bath & North East Somerset Contact	Agree with proposed change	Add an information box on page 6 underneath para 2.18 containing the following text: "Find out more about the Bath & North East Somerset Compact ☎ 01225 396267 ✉ Equalities@bathnes.gov.uk Look at the Compact on the Council website www.bathnes.gov.uk"
David Jones, Planning	-	n/a	n/a	Pre-application consultation, para 4.12	Agree that grammatical error should be	Pre-application consultation, para 4.12

Manager, Government Office for the South West				Reword first sentence to read: 'To ensure that a developer undertakes pre-application community involvement that is suitable for the size and type of development proposed (take out superfluous is proposed). Guidelines for the level of community involvement have been produced.'	corrected.	Reword first sentence to read: 'To ensure that a developer undertakes pre-application community involvement that is suitable for the size and type of development proposed, guidelines for the level of community involvement that will be encouraged have been produced.'
David Jones, Planning Manager, Government Office for the South West	-	n/a	n/a	List of consultation bodies Statutory consultees remove 'District' from North Somerset and South Gloucestershire Councils	Agree that the neighbouring local authorities should be correctly entitled in Appendix C.	List of consultation bodies (Appendix C) Statutory consultees remove 'District' from North Somerset and South Gloucestershire Councils
David Jones, Planning Manager, Government Office for the South West	-	n/a	n/a	Glossary Local Development Scheme – first line add 'is' between 'This' and 'a'. Local Plan – first line, amend 'set' to 'sets'. Line 3, amend 2011 to 2010.	Agree that grammatical error should be corrected.	Glossary Local Development Scheme – first line add 'is' between 'This' and 'a'. Local Plan – first line, amend 'set' to 'sets'. Line 3, amend 2011 to 2010.
JES Webb, Chairman and Planning Officer – Avon & Wilts Branch, The Inland Waterways Association	-	n/a	n/a	We are totally disillusioned with and have no confidence whatsoever with your Council when it comes to public consultation. Your Council appears to pay token lip-service to the process and after wasting everyone's time then	These comments do not refer to the Statement of Community Involvement but the Inland Waterways experiences of working with the Council generally.	none

			<p>proceeds to ignore what has been discussed when making vitally important decisions. This situation would appear to be not unrelated to officers taking the easy option and hiding behind documents that have still to be published.</p> <p>The Association obviously confines its criticism to matters related to the waterways within the Council's area, and this principally involves the River Avon through Bath. This is an area where we have tried very hard to work with the Council, albeit without success, hence our comments as recorded above.</p> <p>We note that an Inspector is to be appointed to carry out an Independent Examination of the process and when he does this we would formally request that he is provided with a copy of this letter.</p> <p>Some examples of our concerns which have given rise to our recorded position are as follows:</p> <p>1. In April 2002 the</p>	<p>It is not considered appropriate to comment on previous examples consultation of as part of the SCI consultation. This is outside the remit of the SCI.</p>	
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			<p>Council commenced an initiative at a public meeting at St. Mary's Bathwick, to enhance the River Avon and to reverse the City's previous policy of "turning its back on the river". The proposal was that a River Avon Corridor Study would be produced. This was an initiative that we strongly supported and at that time there was a realistic expectation that the document would take 18 months to two years to produce. Against this background we did say that it was important not to await the publication of the document before starting to apply the planning objectives. This was against the background that opportunities had in the past been lost and that this situation must not reoccur. Despite receiving these assurances a number of opportunities were lost.</p> <p>2. The IWA signed up to be a Partner in the Study Group tasked with assisting with the publication of the Corridor Study Document. Our involvement included not only attending meetings but arranging inspection</p>		
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			<p>cruises so that the "River Bank" could be viewed from the water and also surveys of "boaters" to see what they felt about the river.</p> <p>3. An element identified at an early date was that it was vitally important to get rid of the "steel piled trough" and for the south bank to introduce a "stepped towpath" which is a brilliant success outside the Rugby Ground below Pulteney Weir. Pursuant to the closing part of 1 above the Council chose not to impose this condition when granting Outline Planning Permission for the vitally important Western Riverside Development. We are now faced with the prospect of the having a multi million pound development on the South Bank with the river running through a steel sheet piled trough and being largely inaccessible to the residents and the public. The words "Opportunity Lost" come to mind. Is it any wonder that with Bath's approach to planning that it is in danger of losing its World Heritage Status?</p>		
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			<p>4. Another example of lack of consultation was the sacrifice of the previously imposed Section 106 Planning Condition over the provision of a landing stage at the Transport Interchange adjacent to Churchill Bridge, this in response to commercial pressure from the Developers. We would welcome an Independent investigation into the "Consultation" process which approved this.</p> <p>5. Further examples of the situation covered by the closing part of 1 above are the lost opportunity in respect of the Student Accommodation between Lower Bristol Road and the river bank and the permission to get rid of the historic timber building behind the Morris Minor Centre again in Lower Bristol Road. Currently the process applicable to the Dyson University Building at South Quay appears to be following the same pattern.</p> <p>6. After an introductory period when things appeared to be moving</p>		
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			<p>forward satisfactorily with the Study Group (See 2 above) its activities were allowed to lapse and we were fobbed off with explanations as to pressure on staff etc. It was only after some two years that we were told that the assignment to produce the Corridor Study had been passed to a Major Projects Team who had chosen to ignore our previous involvement. An informal meeting with them produced further placatory noises but again absolutely no further contact and we continue to be kept in the dark. Nothing seems to change.</p> <p>7. We received and commented upon the Bath Western Riverside SPD reiterating what we had already stated and again absolutely no notice was taken. The document was, as far as the river was concerned a complete disappointment. It failed completely to put into words your previously expressed and encouraging aspirations as to maximising the river's potential.</p>		
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				<p>I am disappointed that I have to write in this manner. This is solely the result of the Council completely failing in their duty to conduct reasonable consultative processes. Our only redress will in future be to strongly oppose the scheme insofar that the Council have allowed a scheme to go forward which totally fails to recognise the river's potential.</p> <p>I do not at this stage propose to waste further valuable time in involving myself in commenting on a consultation process which it is obvious you only at the best treat in a token fashion. I will however be prepared to provide chapter and verse of the situation for the Inspector when he commences with the task of reviewing what has, or should I say has not, happened.</p>		
Peacock and Smith Ltd on behalf of WM Morrisons Ltd	-	n/a	n/a	At this stage, the company does not have any particular comment to make about the SCI, however, it is keen to ensure that it is consulted at future stages of	Comment noted. Peacock & Smith included in the consultation database representing WM Morrisons Ltd	none

				document preparation, and we would advise that as both Peacock & Smith and the headquarters of Morrisons are located outside of the area, the most appropriate methods of consultation are by direct mailing (kate@peacockandsmith.com) and on-line. In this regards can you please ensure that Peacock & Smith is included on behalf of Morrisons within the Council's consultation database.		
MONO Consultants Limited, Mobile Operators Association	-	n/a	n/a	With reference to the above document we welcome the Council's inclusion of the Telecommunications operators within the list of Specific Consultation bodies in Appendix C of the document and the intention to consult these bodies on the Council's LDDs. We would therefore request that future consultations on such documents to be sent to the five Mobile Phone Network Operators listed are sent to me at the above address.	Comment noted and MONO Consultants (representing the Mobile Operators Association) are included on the LDF consultation database.	None

ANNEX C
FACTUAL CHANGES

FACTUAL CHANGES

4.1 Changes to structure of Development Management Department

The Development Management teams have been restructured since the submission of the Statement of Community Involvement in April 2007. To reflect these changes:

Change para 4.1 to read 'Within Development Management there are currently three teams: the Major/Minor team, a team dealing with major/complex applications and a team dealing with applications within the 'other category' (for example householder applications, listed buildings applications and applications relating to certain changes of use).

4.20 Changes to Development Management Committee Structure

The Development Management Committee system has been restructured, to reflect the changes agreed by Council on 17th May 2007 the following changes are requested:

Change para 4.20 'There are currently three Development Control Committees:-

- ~~Area A Committee covers the Bath Area and meets every 4 weeks;~~
- ~~Area B Committee covers the surrounding rural area and meets every 4 weeks;~~
- ~~The General Development Control Committee deals with applications that have district wide implications or which straddle the boundaries of the other committees and meets quarterly.~~

To:

There is a dedicated **Development Control Committee** which meets monthly.

2.13 Disbanding of Local Area Initiatives

The Bath South Local Committee was disbanded by the Council on 17th May 2007.

Amend para 2.13 'The ~~Bath South Local Committee~~ which covers 7 wards in the South of Bath'

Appendix D: Anticipated changes to the Delegation Scheme

The existing delegation scheme is currently under review. It is suggested that if a new delegation scheme is approved by the time of the inspection that Appendix D be amended to reflect the new delegation scheme.

Removal of redundant text

Remove Preface for submission consultation (p1)

Add summary of Submission SCI consultation to Appendix A as follows:

'Under regulation 28 of the *Town & Country Planning (Local Development) (England) Regulations 2004* a six-week consultation was carried out from 26th April – 6th June 2007 following the submission of the SCI to the Secretary of State. All comments made were submitted to the Planning Inspector who examined the SCI on behalf of the Secretary of State.'

Change reference to 'Development Control'

Change all instances of 'development control' throughout the SCI to read 'development management' (with the exception of the committee name 'Development Control Committee').

Factual change in relation to local advertisement for district

Local advertisement of planning applications in the district is currently being reviewed by Development Management Manager, as such the following change is requested:

Amend Figure 9 to say 'Local Advertisement in the Bath Chronicle' and 'All Planning applications are advertised in the Bath Chronicle, each Friday newspaper(s) circulating in the district.'