

Appendix 1

Table of Comments Received for the Consultation Draft - Revised Statement of Community Involvement 2018 -2023

Consultation Start 6th August 2018 - Consultation finish 17th September 2018.

Ref	Date rec'd	Name	Comments	Response
001	06/08/18	Stuart Dawes	<ul style="list-style-type: none"> The statement is not clear and accurate in plain english. the average Joe from the local neighbourhood would not have a clue what you are advising them. 	The SCI is a technical document which needs to meet regulatory and statutory requirements. Engagement plans and material will seek to provide information as far as possible in an accessible form and support document with non-technical summaries etc
			<ul style="list-style-type: none"> Suggestion that the planning department ignores its own planning guide lines and gives planning permission, in contravention of their own guidelines. 	<p>All planning applications are determined in accordance with the relevant Local Plan and National Policy taking into account any other material planning considerations.</p> <p>In this respect each application is considered on its merits and this may include considering a range of policies and balancing their respective requirements in coming to a decision.</p>
			<ul style="list-style-type: none"> Do not see the need to consult councillors for their input, due to the fact that they are not suitably qualified. 	Councils have a democrat role to represent their constituents and have significant local knowledge.
			<ul style="list-style-type: none"> At no point is there any advice, advising on the requirement of when a 	The purpose if to set out approach to

			principal designer is required to be in place and employed.	consultation. It is not required to set out detailed operational and resourcing details for Local Plan documents or development management.
002	16/08/18	Yorkshire Wildlife Trust	Thank you for consulting Yorkshire Wildlife Trust on the preparation of the above document. We have no objection or comments to make on the document at this time.	No response required.
003	14/08/18	Historic England	At this stage we have no comments to make regarding its content.	No response required.
004	27/08/18	Andrew Simkins	<p>I can't see where you take into consideration the occupancy rate of existing housing stock or second homes etc. Given the high number of vacant properties this 100% should be a factor when assessing the overall requirement. Given that these properties could be brought into use this would negate some of the pressure to build new and reduce pressure to release green fields for developments. Many of the empty properties are smaller and are suitable for first time or younger buyers whom you reference as underrepresented.</p> <p>My objection would be resolved if you had a clause that means green field sites are out of contention until a significant number of empty homes are back in use. If this means central government need to assist with national legislation to achieve this , then so be it. We all have a responsibility to balance all factors and commercial gain should be a low priority when it comes to management of a national asset</p>	These comments relate to the housing supply and housing requirement Policies of the Local Plan rather than the Statement of Community Involvement.
005	03/09/18	Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.</p> <p>We regret we are unable to comment, in detail, on individual Statements of</p>	No response required

			Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals .		
006	06/09/18	Wakefield MDC	Wakefield MDC have no comments to make on the Revised Draft SCI.		No response required.
007	07/09/18	Environment Agency	<p>We agree with the overall content of the document, including methods of communication for consultees. We note that the Environment Agency (EA) is listed in Appendix 4 as a consultee who will be involved in the local development framework process.</p> <p>We would like to highlight that the EA has introduced a charge for strategic planning advice and non-statutory work across the whole of England which should be reflected in the SCI and may impact on consultation with them.</p> <p>As a consultee in the local plan process going forwards we advise that information should be included within the wording of the revised SCI document regarding our planning advice service and associated charges, this information should also be factored into the consultation process.</p> <p>We strongly support sustainable growth and want to continue giving advice to LPAs and consultants to facilitate development, which protects and enhances the environment. We feel that the service we can provide will help you to achieve better outcomes, in a quicker and more cost effective manner in the long term. Our experience shows that when we engage with LPAs and consultants early on in the plan making process, the likelihood of us finding plans unsound significantly reduces.</p>		<p>Supported noted.</p> <p>It would not be appropriate for the SCI to set out detailed charging arrangements for advice from consultees. This will have to be considered as part of the engagement plan for respective Planning documents.</p> <p>Noted.</p>
008	16/09/18	Tong and Fulneck Valley Association	<p>Para 1.1.3, Page 1 Para 1.1.6 Page 2</p>	Our prime concern is that the objectives stated in the NPPF at paragraph 155 for “early and meaningful” engagement and collaboration are actually put into effect, that the detail of the SCI reflects this and that the processes involved are not made	Paragraph 16 of the revised NPPF sets out the high level expectations of government for Local Plan. This includes an updated reference to the role of engagement under

				<p>so complex, technical, difficult to access or remote as to deter individual or community involvement, nor that the engagement is merely advisory of decisions or policies already formulated without real willingness to amend or adjust in response to consultation. There is a danger that consultation becomes a time consuming and largely meaningless box-ticking exercise after critical decisions have been made. We would like to see a clear commitment at an early point in the document that the Council is actively seeking real community participation in the planning process.</p>	<p>criterion (c).</p> <p>Paragraph 1.1.6 set out the key aims for consultation and engagement which amongst other things makes clear the desirability of early engagement. The subsequent content sets out more details on how this could be achieved including the approach at different stages of Local Plan preparation set out in Appendix 4.</p> <p>The aims also recognise the need to seek to ensure accessible information and engagement which recognises the often complex legal and technical requirements of Local Plan preparation.</p> <p>The requirements in NPPF and the supporting guidance recognise the role of engagement as one element which should shape the content of the Local plan. Other technical and regulatory requirements will determine the main approach in order to ensure a robust and sound plan.</p> <p>Proposed change:</p> <p>Proposed update to paragrap1.1.3 to reflect current wording of NPPF paragraph 16 Criterion (c)</p>
			<p>Para 1.3.3 Page 4</p>	<p>We note that the Council had added a category “Low income/low wage”</p>	<p>Paragraph 1.3.3 relates explicitly to the Equality Duty and reflects the nine protected</p>

			<p>Our experience is that there is a substantial category of individuals who approached us with real concerns about the planning process but who do not have the vocal, literacy or IT skills to respond to consultations in the manner envisaged in this SCI. This group is not necessarily encompassed within the “low income/low wage” category. To ensure equality within the SCI we would suggest that consideration should be given to the addition of a further category to encompass this grouping.</p>	<p>characteristics. The aims under 1.1.6 recognise the need to communicate effectively in a number of ways to ensure all sections can engage including reference to groups not traditionally involved.</p>
		<p>Para 2 Pages 5&6</p>	<p>This paragraph, in describing the District, does not recognise the administrative division into the Regional City, encompassing the geographical city of Bradford, and its subdivision into Areas, as set out in the Local Plan Core Strategy. We think that that division should be recognised here, as it is relevant to our comments below about the dissemination of hard copy information.</p>	<p>Section 2 is purely an outline of the Districts Characteristics. Any engagement will need to consider the nature of the planning document and extent to determine the appropriate form of engagement.</p> <p>Other more detailed evidence provides details on a range of information and it is not appropriate for the SCI to go into such detail.</p>
		<p>Para 3.1.2 Page 7</p>	<p>It is surprising that the Council regards its citizens as “customers”. Council officers are public servants, not contractual suppliers. A more appropriate word would be “stakeholders”, which encompasses both those who pay Council Tax and those who do not, as well as other interested parties who are not necessarily beneficiaries or users of Council services.</p>	<p>There are a range of ‘customers’ for the Council including most Citizens but others and it is right that they are seen in such a way by the Council. Section 3 sets out what we mean by Community in more detail.</p> <p>Proposed Change:</p> <p>Amend para 3.1.2 to replace Customers with community and stakeholders.</p>
		<p>Para 3.5 Page 8</p>	<p>Reference to “in the main Council offices” is one of our points of challenge below, and we propose that those words are omitted from this paragraph.</p>	<p>The approach to where documents are placed will depend on the nature and scope of the document. The text sets out the main locations but recognises that other locations may be used at a more local area level (para</p>

					5.8.3). The SCI makes clear that a range of methods will be used to engage with communities in different ways to secure their views at an appropriate stage and also which seeks to make it accessible. In the pas this has resulted in targeted workshops and drop in sessions supported by Planning Aid.
			Para 3.8.1 Page 11	This is admirable, but minutes should be available to the public of such targeted briefings, as we have found ward councillors who claim to be “in the dark” on issues of which we would have expected early briefing. As a matter of confidence, no matter in which ward a resident lives, he should be entitled to know what information has been given to his ward councillor and should not have to rely on the selective dissemination of such information.	The proposed briefings are to ensure the ward members have the knowledge in advance of any engagement to allow them to undertake their democratic duties with their local communities.
			Para 2.4.20 Page 16	The paragraph is wrongly numbered.	Proposed change: Amend paragraph numbering.
			Para 5.25 Page 24	We welcome the Council’s stated commitment to its fulfilment of the duty to co-operate, but this must be translated into positive reality. Evidence given at the Public Examination of the Leeds Site Allocation DPD suggested that there is a perception in Leeds that Bradford has not been as assiduous as it should have been in this regard.	The Council demonstrated clearly through the Core Strategy how it had met the Duty to Cooperate which was tested at the examination and supported by the Inspector. This is based on an agreed Leeds City Region Approach. Work across all Local Plans within the LCR continues under the agree arrangements and the work on the partial review of the Core Strategy and wider Allocations DPD will continue to me the duty and also be reflected in the new Statement of Common Group being developed in lien

					with NPPF. Proposed amendment: Update section on Duty to Cooperate in light of new NPPF requirements.
			Para 5.2.7/8 Page24	This arrangement is welcomed	Noted.
			Para 5.3.1 Page 25	We wonder why it is necessary to insert the words “wherever possible”. The word “seeks to” also indicates that this is not an absolute commitment. When would it not be possible to “frontload” consultation? Please omit the words “wherever possible” and replace “seeks to” with “will”	The wording reflect a commitment to front load but recognises that there may be circumstances when this is not possible and where significant issues are more suitably considered later in the process linked to more detailed evidence which may evolve in the preparation process.
			Para 5.3.4 Page 25	The statement that at this stage there is “no formal consultation period” is in context correct, but the subsequent statement that the Council will “informally” consult the duty to co-operate bodies, suggests that this is an optional action on the part of the Council. NPPF paragraphs 178 and 179 make it clear that the duty to co-operate on cross boundary planning issues is continuous at all stages in the planning process and not linked simply to those periods of formal general consultation. This paragraph should be amended to make that duty clear.	Paragraph 5.3.4 provides an overview of the types of engagement at this stage of plan preparation. The section on Duty to Cooperate makes clear the need to comply with the duty and to ensure on-going engagement on Strategic matters. The Section on Duty to cooperate will be updated in light of changes to NPPF.
			Para 5.3.6 Page 26	In line 6 “may” should be replaced with “will”. The Council has regularly undertaken 6 week consultations over holiday periods, only to extend these periods after concerns have been expressed by councillors or members of the public. It should become an <u>absolute practice</u> that consultation periods should not be aimed at times when those difficult to reach	The text reflects the minimum period for representations. It does allow for this to be extended but this is deemed an exception and will depend on circumstances at the time and the nature of the document.

				groups referred to in paragraph 3.6.2 (particularly the inactive majority) are least likely to respond.	
			NO RELEVANT PARAGRAPH	<p>An additional point on Consultation which, so far as we can see is not addressed in the SCI, but which should be, probably at or around paragraph 5.3.6, is that the Council should be ready and willing to accept consultation comments in a variety of forms.</p> <p>It is our experience that the Council prescribes forms for responses, often with constraints attached, such as a separate form for each comment (witness this consultation), which are so complex and off-putting to the public that they virtually guarantee that no response will be received. In Holme Wood and Tong our Association is frequently met with requests about consultations, but as soon as a Council format form is produced the individual is not willing or able to spend the time or has not got the skill needed to meet the Council's requirements. A means should be found of simplifying forms for comment and responses.</p> <p>Many people want to make a point without having to identify pages, paragraphs, diagrams, tables or appendices in exhaustive detail.</p> <p>On the specifics, the Council should issue its forms in all formats. The current response forms, for example, are not in Word format, and not everybody has the software or skills to convert PDF to Word.</p>	<p>Depending on the stage of consultation and document there are a number of engagement mechanisms which will provide information and views, not just formal representations, including workshops etc.</p> <p>However, at key formal stages the Council does seek to provide a template/standard form to assist those making representations (this is prescribe by government/PINS at Publication Draft stage) and also assists with the recording and analysis of issues. The Council and government also increasingly look to the use of electronic means in order to speed up processing and time saving.</p> <p>However, the Council does accept representations that are made in writing in any form.</p> <p>The detailed approach will be set out in more detail in the engagement plan for each stage and the representation material/guidance notes.</p>
			Para 5.3.8 Page 26	The last sentence leaves it open for consultation to be for a reduced period. This sentence should be replaced with the words "This consultation will be on the same basis and for the same minimum period set out in paragraph 5.3.6"	It will be for the appointed examiner/Inspector to determine the appropriate length of any period for consultation. This would normally be a minimum of 6 weeks but may be less depending on the matter and circumstances.

			<p>Para 5.4.6 Page 28</p>	<p>As with 5.3.6 please replace “may” with “will”.</p>	<p>The text reflects the minimum period for representations. It does allow for this to be extended but this is deemed an exception and will depend on circumstances at the time and the nature of the document.</p>
			<p>Para 5.8.2 Page 32</p>	<p>A particular concern of our Association during the Consultations which took place on the Tong and Holme Wood Neighbourhood Plan and the various stages of what is now the Local Plan was that we had to press for information to be made available to the substantial numbers of interested members of the public locally, that is within reasonable distance of the homes of affected residents. The Council should recognise that in disadvantaged areas the cost of bus fares is such that a trip to Bradford City centre has to be justified and will not be spent on a visit to a central Council Office to look at plans. The Council must be proactive in bringing plans to the people. We therefore propose that as a matter of course all Local Plan documents should be made available in publicly accessible buildings (if Council offices or libraries are not available) at reasonable hours of opening weekday and weekend at least in every Area of the Regional City. If the Council is genuine in wishing to access the difficult to reach groups, it must recognise that the Council’s “principal offices....normal office hours” are not ones that coincide with the times that the “inactive majority” can make itself available to look at plans. Local Plan Documents must receive wider publicity and accessibility than is suggested in this paragraph.</p>	<p>The approach to where documents are placed will depend on the nature and scope of the document. The text sets out the main locations but recognises that other locations may be used at a more local area level (para 5.8.3).</p> <p>The SCI makes clear that a range of methods will be used to engage with communities in different ways to secure their views at an appropriate stage and also which seeks to make it accessible. In the pas this has resulted in targeted workshops and drop in sessions supported by Planning Aid.</p>
			<p>Para 5.8.6 Page 33</p>	<p>The cost of copying Local Plan Documents where individuals or groups seek copies from the Council, or to download and print at home, is significant. We have found that a particular problem in copying at home</p>	<p>The local plan documents normally follow a standard A4 template (though some evidence documents may vary due to mapping requirements). Hard copies are</p>

			<p>is that the Council produces documents with substantial levels of colour use. While this looks good, and we have no problem with the Council producing such “glossy” versions of its documents, much of the use of colour is unnecessary, and particularly where dark backgrounds are employed, copying become very expensive and in many cases difficult to read. The Council also uses unusual page sizes (for example the Tong and Holme Wood Neighbourhood Plan documents were all 24 inches or more in width).</p> <p>We therefore propose that in every case, where documentation relates to the Local Plan or to Neighbourhood Plans the Council should think carefully about the cost of copying including copying its documents downloaded from the internet. To this end it should avoid dark colours and produce a readily copy able greyscale version in standard A4 sizing.</p>	<p>available at cost.</p> <p>All key documents are made available on the Councils web site which allows them to be printed in whole or in part as required. The Council will look at the format but the need for clarity of the document in both text and graphics is paramount to ensure clarity for the user.</p>
		Para 5.8.7 Page 33	To give effect to our concerns in the preceding paragraph, please add after “user friendly to” “and easily and cheaply copy able by”	<p>Proposed amendment:</p> <p>Add in reference at end of 5.8.7 which seeks to as far as possible make available printer friend versions of key documents</p>
		Paras 6.3.2 - 6.3.9	We should record our concern that the pre application stage seems to be producing applications which are to all intents and purposes ones which will pass the subsequent planning stages, with Council pre-application input being based on no, or very little, or limited, consultation with the community. By placing the onus on the developer to conduct the consultations at this stage, the Council is giving the developer the discretion as to which individuals or communities it considers “could have a material interest in the development” and over how, or whether, consultation actually takes place. There have been, for example within our area of concern in the Tong Valley, three recent planning applications involving	The text reflects the national planning practice guidance government guidance that Local Planning Authorities should encourage pre application engagement with local communities and sets out the type and level of consultation required based on the nature and scale of the draft development proposal. Whilst Local Planning Authorities cannot prescribe the nature of the pre consultation, the Bradford Local Information Requirements does requires applicants for all major planning applications to submit a supporting

				<p>“events” type facilities with material potential traffic consequences for the residents of the Tong area on which there has been no consultation or information given to local residents or organisations at the pre-application stage, and on which Highways have apparently commented without themselves engaging with local residents as to the effects. So far as it may legally be possible, we would therefore like it to be a requirement that, when any application is submitted with these paragraphs, the application includes a detailed report on the extent and effect of community consultation.</p>	<p>statement describing the extent of the pre application consultation undertaken, any outcomes and how proposals have been amended to reflect the outcomes from that consultation.</p>
			<p>Para 6.3.8 Page37</p>	<p>In the Tong Valley, which is our concern, most sites are isolated, and site notices, whilst essential, do not attract the attention of all affected parties. In those cases site notices should be accompanied by neighbour letters. “instead of or” should be deleted and “together with” substituted.</p>	<p>Posting site notices for residential commercial planning applications not in the vicinity of residential properties is the most effect form of publicity. For householder applications in similar locations neighbour notification letters will be sent where there are adjacent residential properties.</p>
			<p>Para 6.3.11 Page 38</p>	<p>We have experience a number of instances where applications with significant potential traffic, noise or environmental impact have not been the subject of Neighbour Notifications. It should be recognised in this document that planning applications can have a wider effect than simply on contiguous or adjoining property, particularly in Conservation Areas or the Green Belt, and that the Council will in such cases provide further publicity by Neighbour Notifications.</p>	<p>The Council applies the statutory publicity requirements in order to ensure the most efficient, consistent and proportionate approach to the publicity of planning applications. Where relevant, for residential, industrial and commercial planning applications the Council will send neighbour notification letters to adjoining residential properties (excluding flats) to supplement site notices. Other residential properties will generally only be consulted where they will be materially affected by a particular proposal.</p>
			<p>Paragraph 7 Page41</p>	<p>Lack of financial resource should not form the basis for the Council not engaging in effective consultation. Local</p>	<p>The SCI clearly sets out the broad approach and commitment to how the Council will</p>

			<p>democracy is not well served if the Council officers can determine consultation priorities on the basis of resource only, and the structure should provide for members to be involved in and accountable for any such prioritisation.</p>	<p>engage. This will be taken into account in the resource planning for relevant Local Plan Documents. The LDS adopted in July 2018 set out the headline position in terms of resourcing for the Local Plan.</p> <p>The approach to engagement will be determined with regard to the SCI for each document and the stage. This will take account of available resources and ensure an appropriate level of engagement based on the regulatory requirements and the SCI.</p> <p>The SCI is considered and the decision to adopt lies ultimately with Executive.</p>
		Paragraph 8 Page 42	Members should be involved in and accountable for the outcome of such reviews.	Any review of the SCI will be considered by Executive following consultation.
		APPENDIX 2		
		A Page 49	Amend as per our comments on para 5.8.2	See response to paragraph 5.8.2.
		R Page 57/8	<p>A limitation not mentioned is that members who are members of the Planning Committee will not discuss planning issues with their constituents if they may come before them. This effectively disenfranchises those constituents from this method of consultation.</p>	<p>Members of Planning Panels and Regulatory & Appeals Committee are required to comply with the 'MEMBER AND OFFICER PLANNING CODE OF CONDUCT' in Part 4B of the Council's Constitution.</p> <p>This does not allow members on The Panels or Committee to advocate for them or express a view on a proposal in advance of determination. Members can pass on constituents representations to the case officer and they can be directed to another</p>

					ward member who is not on the relevant Panel /Committee.
			APPENDIX 5 Stage 2 & 3 Page 74.75	Please note that although the Council’s website says that the e newsletter “Plan-it Bradford” is intended to be produced quarterly, the latest version on the website <u>is July 2017</u> and our experience is that it has never been produced regularly or in a sufficiently timely manner to be useful as part of the consultation process.	The editions of PLAN IT as issued when there is sufficient information to update stakeholders. The decision to publish versions is therefore linked to the work program and key stages. The Council aims to provide more regular updates as the Local Plan progresses in line with the newly adopted LDS.
			APPENDIX 6 /7 Stages 1,2 Page 76,77, 82, 83	Please note the although the Council’s website says that the e newsletter “Plan-it Bradford” is intended to be produced quarterly, the latest version on the website <u>is July 2017</u> and our experience is that it has never been produced regularly or in a sufficiently timely manner to be useful as part of the consultation process.	See above.
009	17/09/18	Val Harris	The outlined policy is quite aspirational and its not clear where the resources will come from to actively engage people as you have no community developments workers left. It needs to be clearer about the role of private developers in being much more active and outward going the than the standard library/ village hall event one afternoon/ tea time sham event that they currently do to tick the boxes.	The approach to consultation will take account of the aims of the SCI and tools/mechanisms. It will be for each Local Plan Document to consider the appropriate form of engagement with reference to the type of document and stage. The costs of engagement will be considered as part of the project planning of any Local Plan preparation process. The Council and government encourages developers to undertake pre application engagement. It is for them to determine the appropriate mechanism for this.	

			<p>The council has a number of lands and buildings left to them in various charitable trusts, there appears to be no development plans for these green spaces that have been agreed with relevant friends of groups and other interested bodies, which leaves these spaces very vulnerable when the council or other developers are looking for land. There should be something in this policy about these lands and how management, maintenance and development plans are created and monitored.</p>	<p>The role of the SCI is to set out the approach to consultation and engagement on planning matters. It does not consider appropriate uses and guide development itself which is the role of the Local Plan, Neighbourhood Plans and Supplementary Planning Documents.</p>