

Appendix A – Schedule of representations received during consultation on the Draft Statement of Community Involvement (SCI)

User ID	Rep Number	Organisation	Details of Representation	North Northamptonshire Council Comments	Action
1	1	Northamptonshire Police, Northamptonshire Fire and Rescue Service and Northamptonshire Office of the Police, Fire and Crime Commissioner (OPFCC)	<p>Thank you for forwarding this consultation to Northants Fire and Rescue, which is much appreciated.</p> <p>My role is to respond on behalf of Northants Police, Northants Fire and Rescue and the Office of the Police, Fire and Crime Commissioner for Northamptonshire, on planning matters which impact on the resources of these organisations.</p> <p>The growth of North Northamptonshire, has the potential to impact on policing and fire and rescue resources required to meet the needs developments.</p> <p>We would therefore request that Northamptonshire Police is added to the list of consultees on both policy and DM matters, to ensure that consideration can be given to resources, response times and facilities required to serve new developments (both commercial and residential), and seek developer contributions where appropriate.</p> <p>This is a separate role to that of the Crime Prevention Design Advisors, who advise on security, fire protection and Secured by Design.</p> <p>I trust this response is of assistance. Please do not hesitate to contact me, if you require any further information.</p>	<p>The request for Northamptonshire Police to be added as a separate consultee to Northants Fire and Rescue is noted. Northamptonshire Police has been included as a separate contact for Development Management purposes and contact details have now been included on the Council's planning policy consultation database.</p>	<p>Consultee details have been added to the planning policy consultation database and checked and updated where necessary for planning application consultations.</p>

2	1	East Lloyds Community Association	<p>Page 12 item 3.20 IT issues Every application submitted where consultation is requested should have the right to respond to the officer dealing with the application.</p> <p>It is not good enough to say we have IT issues so you can not respond electronically.</p>	<p>Section 3.0 of the document sets out the consultation arrangements for development proposals and planning applications. Any interested party may submit comments relating to development proposals and planning applications. Paragraph 3.5 of the document explains that the Council will review all comments, but only representations relating to material planning considerations will be considered in reaching a decision. Representations can be submitted electronically or in hard copy.</p>	None.
3	1	Hollins Strategic Land	<p>I am writing in response to the invitation to comment on the Draft Statement of Community Involvement - published for consultation.</p> <p>Our comments are as follows:</p> <p>1. We support the general good practice to undertake early community engagement as it can be a positive way to bring forward development. However, the SCI must recognise that this may not always be possible if community representatives are unwilling to engage positively or constructively in that process. In addition, we do not think the SCI should go as far as to suggest it is a mandatory validation requirement as planning law does not require it given that public consultation already forms part of the application process undertaken by Local Authorities. For example, there may be opportunities post-application submission during the determination process for there to be positive engagement from the case officer to amend layouts to take on-board consultee comments. Whilst it is preferable for planning applications to be submitted as if 'best and final', there can be many instances where proposals can be amended and improved to allow for a positive decision.</p>	<p>Support for early engagement in the planning process is noted.</p> <p>The Council encourages early consultation and engagement on all development proposals regardless of size as this may help to reduce delay in determining a planning application once received. Paragraph 3.10 explains that proposals for 'significant development', which are either large in scale or locally significant, are expected to be accompanied by a 'Statement of Local Engagement' outlining the community engagement undertaken and the resulting changes from the proposals. Additional community involvement is considered to be good practice for significant development proposals, given that they will have a more significant impact on the area or create more significant public interest or controversy.</p> <p>Paragraph 3.16 explains that the type and extent of community involvement should relate to the scale and likely impact of the development and the target audiences, therefore the Council recognises this will need to be proportionate and reflect the individual proposal. The Council also offers advice on pre-application consultation on a site-by-site basis and invites applicants to contact the Council before undertaking community involvement to ensure this is undertaken as effectively as possible.</p>	None.

3	2	Hollins Strategic Land	<p>2. We note in the SCI that comments on planning applications may not be available due to IT issues. Comments made on planning applications may raise pertinent issues or queries that applicants should have the opportunity to respond to quickly. It should be made clear that comments can be made available and provided on individual requests to avoid the need for Freedom of Information requests.</p>	<p>Comments noted. Paragraph 3.20 explains that generally comments made by statutory consultees and members of the public will be published on the Council's website; however, there are instances where this may not be possible due to IT limitations. Where this is the case, applicants will be able to request to see comments made on their planning applications by discussing with the relevant case officer and area planning office.</p> <p>Paragraph 3.20 will be amended for clarity, to read: "Generally comments made on a planning application by statutory consultees will be published on the council's websites as will any comments made by members of the public with personal details redacted for data protection purposes. However, it should be noted that due to IT capabilities the ability to upload comments to the website will not be available in relation to <u>planning minerals and waste</u> applications. being dealt with by some of the North Northamptonshire area planning offices. Where comments are available to view on the website this will be until a decision on the application has been made. <u>Comments can be made available upon request to the case officer or area planning office handling the planning application.</u>"</p>	<p>Amend paragraph 3.20 to read:</p> <p>"However, it should be noted that due to IT capabilities the ability to upload comments to the website will not be available in relation to <u>planning minerals and waste</u> applications. being dealt with by some of the North Northamptonshire area planning offices. Where comments are available to view on the website this will be until a decision on the application has been made. <u>Comments can be made available upon request to the case officer or area planning office handling the planning application.</u>"</p>
4	1	Natural England	<p>Consultation on Statement of Community Involvement for North Northamptonshire Council</p> <p>Thank you for your consultation on the above dated</p>	<p>Support for meaningful and early engagement in developing plans and determining planning applications is noted.</p>	<p>None.</p>

			<p>17 December 2021 which was received by Natural England on 17 December 2021.</p> <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 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/guidance/local-planning-authorities-get-environmental-advice</p> <p>We now ask that all planning consultations are sent electronically to the central hub for our planning and development advisory service at the following address: consultations@naturalengland.org.uk. This system enables us to deliver the most efficient and effective service to our customers.</p>	<p>The Council can confirm that the suggested contact email is included as a Development Management consultee and also on the planning policy consultation database.</p>	
5	1	Apethorpe Village Meeting	<p>The Draft Statement of Community Involvement document has been reviewed by the Officers of the Apethorpe Village Meeting and our Chairman has made the following observation on our behalf:</p> <p>In numerous places in the draft SCI, the requirement to consult with “Town and Parish Councils” is stated. This should also include Parish Meetings. North Northants is a rural area and many of the small parishes do not have a council. We request that the wording be amended to include Parish Meetings, for example: “Town and Parish Councils and Parish</p>	<p>Comments noted. Parish Meetings are consulted in the same way as Town and Parish Councils. The document will be amended to include “Parish Meetings” alongside Town and Parish Councils.</p>	<p>Amend table 1, paragraph 3.4 and paragraph 3.10 to include “parish meetings”</p>

			<p>Meetings”.</p> <p>Without this amendment, there is no stated requirement to consult with Parish Meetings, which is surely an oversight. We look forward to your response.</p>		
6	1	Wilbarston Parish Council	<p>Wilbarston Parish Council discussed the Draft Statement of Community Involvement at its meeting last Thursday.</p> <p>The Parish Council would like clarification as to when the 24 day period for consultation on a planning application starts from. The Parish Council could think of 3 possible options for instance the date of the letter, the date of the advert etc.</p>	<p>Consultation on a planning application begins on the date that the application is published. In most cases the date of validation and publication will be the same, but legislation (Section 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015) requires the consultation period to commence from the date of publishing the planning application, which will include publishing on the Council's website, erecting a site notice and notifying consultees. The date by which comments must be submitted to the Council will be included on the site notice and other information notifying of the application and commencement of consultation.</p>	<p>Amend first sentence of paragraph 3.8 to read:</p> <p>“The normal period for consultation on a planning application is 24 days <u>from publication.</u>”</p>

7	1	Wellingborough Civic Society	<p>I am in receipt of your email dated 17 December on the Draft Statement of Community Involvement (SCI), which has been published by NNC and is currently out for consultation.</p> <p>Wellingborough Civic Society is pleased to provide the following general and specific observations, and concluding comments:</p> <p>GENERAL OBSERVATIONS</p> <p>We feel it is positive that consultation practices are being updated and the draft SCI is concise, appears pragmatic and is written in relatively Plain English. In speaking with Civic Voice, which is the national charity for the Civic Movement, we understand that the draft, in parts, goes further than the statutory minimum standards.</p> <p>We do wonder however whether more visuality can be provided in the document, and believe that it could benefit from additional diagrams, tables/flowcharts to improve the accessibility of the information for people who are unfamiliar with the planning system.</p>	<p>General support for the document is noted.</p> <p>The SCI has been prepared in accordance with accessibility standards, which recommend only using visual aids where absolutely necessary. Figures 1 and 2 within the SCI show plan making and the process of local plan preparation and consultation in visual form. Table 1 sets out the specific and general consultation bodies in table form and figure 3 shows the neighbourhood plan process in a flow diagram. These visual aids are felt to be sufficient to assist the reader, whilst meeting the required accessibility standards.</p>	None.
7	2	Wellingborough Civic Society	<p>SPECIFIC OBSERVATIONS</p> <p><u>Section 2</u></p> <p>Para 2.9 - we would wish to check that Wellingborough Civic Society is clearly listed on your consultee database?</p> <p>Para 2.13 - in Table 1 we would request that Wellingborough Civic Society, or at least a reference to civic societies, is added to the table as a general consultee.</p> <p>Para 2.16 - we feel it would be beneficial if the "hard to reach" groups are clearly identified. This would then help determine how best to engage such groups</p>	<p>Comments noted.</p> <p>Wellingborough Civic Society has been added to the Council's planning policy consultation database.</p> <p>Civic societies will be added to the list of general consultation bodies within table 1.</p> <p>The document will include examples of 'hard to reach' groups.</p> <p>It is not considered necessary to repeat Planning Practice Guidance within the SCI.</p> <p>For clarification, paragraph 3.10 will be amended to read:</p>	<p>Consultee details have been added to the planning policy consultation database.</p> <p>Insert "civic societies" within table 1.</p> <p>Insert the following text at paragraph 2.16:</p>

			<p>in planning.</p> <p><u>Section 3</u></p> <p>In line with the Consultation and Pre-Decision matters section of the Government's Planning Practice Guidance, particularly Paragraph:001, which describes the four main types of planning consultation - we would request that Wellingborough Civic Society is added to the SCI as a non-statutory consultee. We would also suggest that the SCI also refers to the main types of planning consultation to align with the national guidance.</p> <p>Para 3.10 - we request that Wellingborough Civic Society is included alongside town/parish councils and neighbourhood planning groups.</p>	<p>"Where a proposal/application is deemed to be significant by the planning authority by virtue of being large in scale or otherwise locally significant (see below), developers/applicants will be expected to undertake community engagement and involvement in drawing up their proposals. This will include, <u>but is not limited to</u>, town and parish councils, <u>parish meetings</u> and any neighbourhood planning group. Developers/applicants will need to submit a 'Statement of Local Engagement' showing how they have engaged the community in their proposals and how it has changed as a consequence."</p>	<p>"Hard to reach groups include but are not limited to:</p> <ul style="list-style-type: none"> • Youth • Elderly • Disabled • BME • Isolated / rural communities • Faith groups • Gypsies & travellers • Non-registered local organisations." <p>Amend part of paragraph 3.10 to read:</p> <p>"This will include, <u>but is not limited to</u>, town and parish councils, <u>parish meetings</u> and any neighbourhood planning group."</p>
7	3	Wellingborough Civic Society	<p>CONCLUDING COMMENTS</p> <p>Once the document is finalised we believe it very important that the SCI is clearly labelled on the website and easy to locate. This will ensure that the information is widely promoted.</p> <p>Wellingborough Civic Society looks forward to continuing a constructive working relationship with the new Council, and in that light would be very happy to receiving feedback on any of our recent planning</p>	<p>The adopted SCI will be available on the planning policy pages of the Council's website and in hard copy at the main Council offices.</p>	<p>None.</p>

			<p>application responses.</p> <p>We look forward to your reply on our response to the SCI consultation document in due course.</p>		
8	1	Sudborough Parish Council	<p>Introduction</p> <p>North Northamptonshire Council have sought comments on their draft Statement of Community Involvement. This sets out the Council's suggestions about how they will make local people and organisations aware of their proposed future planning policies and development plans, give them a fair opportunity to comment on those proposed policies and plans and then take account of those comments. Likewise, the Statement of Community Involvement sets out the Council's suggestions about how they will make local people and organisations aware of planning applications which have been submitted, give them a fair opportunity to comment on those applications and then take account of those comments.</p>	Noted.	None.
8	2	Sudborough Parish Council	<p>Response</p> <p>General Comments</p> <p>Whatever methods NNC might use to engage with local individuals or communities about planning proposals or planning applications, their planning officers should at all times strive to do so in plain English – avoiding technical jargon as far as possible. For example, instead of saying that an area of land is proposed to be 'designated for employment use', they could say it is proposed to earmark the area for the construction of factories/warehouses/offices (whichever is applicable). Where the use of technical language is unavoidable, an explanation in plain English could be given, or a glossary provided, to make it easier for lay people to understand what is being said.</p> <p>There needs to be a vast improvement in the way in which the ordinary person can gain access to online planning applications and comment on them. One area that particularly requires review is the layout of</p>	<p>Noted. The Council endeavours to use plain English wherever possible or include a glossary within documents where technical jargon is unavoidable.</p> <p>Following unitary reorganisation, the Council's website is undergoing transformation, which will improve consistency and access to planning applications via the Planning Portal.</p>	None.

			<p>planning application pages on the Council's website. The way in which documents are uploaded to the website should be more consistent and greater care should be taken over the way in which documents are described as they are being uploaded.</p>		
8	3	Sudborough Parish Council	<p>Specific comments Para 2.7 The Council have rightly identified that one of their biggest challenges is making ordinary people aware of what is in the Council's proposed Local Plans (including updated Local Plans). They say there will be increased usage of social media to inform the public about each stage of the consultation process. This is very welcome but more information about the Council's intended social media strategy would be helpful. There needs to be some re-assurance that enough use – in terms of frequency and range - will be made of the various available forms of social media, and of the different available platforms, to enable the Council to reach and engage with the types of people who are unlikely to be reached through more traditional forms of communication.</p> <p>The suggestion that planning officers should attend relevant town and parish council meetings to talk about relevant planning proposals is also welcome.</p>	<p>Support for increased use of social media is noted. Paragraph 2.7 of the SCI states that the most appropriate method of consultation will be used for the different stages of the plan-making process. The SCI also recognises the relevance of electronic communication methods to inform the public about the stages of the consultation process, including social media; which will be carried out in consultation with the Council's Communications team.</p> <p>Furthermore, all Council related consultation and engagement activities are published on the Council's dedicated Consultation Hub. Reference to the Consultation Hub will be included in the SCI.</p>	<p>Insert reference and link to the "Consultation Hub" at paragraph 2.21.</p>

8	4	Sudborough Parish Council	<p>Para 2.9 The Council's willingness to target communities that are likely to be adversely affected by proposed land allocations in their neighbourhood, when Local Plans are being made or reviewed, is also welcome. They say: "<i>In addition to information being made available through the methods mentioned above [i.e. by email to those on the Council's database; via the Council's website; by press release and through social media], the Council will make provision for engaging with the specific communities that could be affected by such an allocation. This could be done through a variety of methods which will be tailored to specific circumstances. Other than this, unless you are included on the consultation database, you will not be notified or consulted directly, and will need to refer to the Council's website and the local press, or [to] other organisations that might promote this such as parish councils, for information about plan consultations.</i>"</p> <p>It would be helpful if NNC were to set out in this paragraph some practical examples of alternative or additional ways in which they would or could engage with communities that might be affected by proposed land allocations, whether for housing or commercial development purposes.</p>	<p>Paragraph 2.9 explains that engaging with specific communities could be done by a variety of methods that will be tailored to specific circumstances. There is a wealth of best practice on engaging with local communities; therefore, it is not considered necessary to list specific methods within the SCI when these will need to reflect specific circumstances.</p>	None.
8	5	Sudborough Parish Council	<p>Para 2.16 The Council are making a more general commitment to ensure that when they consult with local people on planning policy issues, they will take additional steps to engage with so-called 'hard-to-reach' individuals in the community. This is understood to be a reference to people who, for example, don't have access to computers or who don't read or understand English. The Council says that they will "<i>... try to directly liaise with these 'hard-to-reach' groups through targeted engagement or specific techniques that take account of their particular needs.</i>" Again, however, it would be helpful if the Council would set out in this paragraph some practical examples of such 'targeted engagement' and of such 'specific techniques'.</p>	<p>Paragraph 2.16 explains that liaising with 'hard to reach' groups through targeted engagement or specific techniques will take account of their particular needs; therefore it is not considered necessary to list specific methods within the SCI that will need to reflect specific circumstances.</p> <p>For clarity, the document will include examples of 'hard to reach' groups.</p>	<p>Insert the following text at paragraph 2.16:</p> <p>"Hard to reach groups include but are not limited to:</p> <ul style="list-style-type: none"> • Youth • Elderly • Disabled • BME • Isolated / rural communities • Faith groups

					<ul style="list-style-type: none"> • Gypsies & travellers • Non-registered local organisations.”
8	6	Sudborough Parish Council	<p>Para 3.4</p> <p>The Council says that when it comes to publicising planning applications, neighbouring parish and town councils are statutory consultees and have to be consulted. However, it isn't explained exactly how this works in practice – particularly with applications for large developments. How does the Council decide which town and/or parish councils, if any, should be notified other than the town or parish council for the area in which the application site is located? Our recent experience with one former Borough Council is that they did not cast their net widely enough. In particular, insufficient thought was given to which towns or parishes situated away from the proposed development would or might nevertheless be adversely affected by it as a result of, for example, significantly increased traffic levels or a raised risk of rivers flooding.</p>	<p>Paragraph 3.4 states “Other consultees depend on the application and may include immediate and not so immediate neighbours to the proposed development”. In practice the Development Management case officer will make a judgement on the extent of consultation and engagement having regard to the characteristics of the application and its conformity with national and local planning policy.</p> <p>The final sentence of paragraph 3.4 will be amended for clarity to read: “Others <u>could be directly impacted by consultees depend on</u> the application and may include immediate and not so immediate neighbours <u>and parish councils</u> to the proposed development, <u>and in those cases they will also be consulted as appropriate.</u>”</p>	<p>Amend final sentence of paragraph 3.4 to read:</p> <p>“Others <u>could be directly impacted by consultees depend on</u> the application and may include immediate and not so immediate neighbours <u>and parish councils</u> to the proposed development, <u>and in those cases they will also be consulted as appropriate.</u>”</p>
8	7	Sudborough Parish Council	<p>Para 3.5</p> <p>This is the section of the document dealing with how the Council will publicise planning applications. They say: “<i>We will listen to what people have to say but will make clear in publicity that only representations relating to material planning considerations will be taken into account in reaching a decision. Matters such as loss of a private view, or the character or motivations of the applicant (as examples) are not material planning considerations and, consequently, cannot be considered in determining an application.</i>”</p> <p>This wording could be seen as being designed to discourage objections to planning applications. It</p>	<p>National Planning Practice Guidance (Paragraphs: 008 and 009 Reference ID: 21b-008-20140306 and 21b-009-20140306) offer further guidance of what constitutes a material planning consideration and the weight that can be attached to these. It is not considered necessary to repeat national planning guidance within the SCI.</p> <p>Paragraphs 3.17-20 explain how responses to planning applications will be considered in determining a planning application, including whether the application will be determined by a case officer under delegated authority or by a planning</p>	<p>None.</p>

			<p>would be helpful (and provide more balance) if the Council were to give some practical examples in the paragraph of things which generally are considered to be material planning considerations. It would also be helpful to provide an objective explanation of who, in any particular planning application, will actually decide what is, and what is not, a material planning consideration and what weight should be attached to those considerations which are found to be material. People might be surprised to learn that these are matters which are ultimately decided by whoever is determining the planning application (i.e. by councillors on planning committees or, as the case may be, by Council planning officers) and are generally not susceptible to appeal.</p>	<p>committee. The information provided is considered to be sufficiently clear.</p>	
8	8	Sudborough Parish Council	<p>Para 3.7 The Council say: "<i>When an application has been submitted, consultation can take many forms.... Comments received will help the Council to be responsive to the needs of stakeholders and improve the quality of development.</i>"</p> <p>This is an over-simplification of the purpose of consultation and arguably gives the impression, intentionally or otherwise, that the Council's expectation is that planning applications will be granted as a matter of course but that as a result of the consultation exercise, additional conditions (and/or a s106 agreement) may be attached to the grant of planning permission in order to cater for the 'needs' of local people and to improve the quality of the build. This section of the text should at the very least be expanded to make it clear that one of the purposes of consulting on a planning application is to help the Council to decide whether or not the application should be granted.</p>	<p>The National Planning Policy Framework requires development plans and planning decisions to apply a presumption in favour of sustainable development. For decision-making this means approving proposals for development unless they conflict with the development plan or material planning considerations indicate otherwise.</p> <p>Consultation offers the opportunity for individuals and organisations to inform the Council of material issues for consideration in determining development proposals, but also to help shape the proposals if permitted. Paragraphs 3.17-20 explain how responses to planning applications will be considered in determining a planning application, which is considered to be sufficiently clear.</p>	None.

8	9	Sudborough Parish Council	<p>Para 3.8 The Council say: “<i>The normal period for consultation on a planning application is 24 days.</i>” However, they don’t make clear whether this is calendar days or working days. Nor do they explain from what date or event the period of 24 days begins to run. Also, it would be helpful to know when some period other than the “normal” period of 24 days would or might apply.</p> <p>Later in the paragraph the Council say: “<i>Any subsequent consultations on changes to the application may be shorter than the 24 days and are at the discretion of the Council.</i>” It would be helpful if there was clarification here about (a) what type(s) of changes to a planning application would trigger a further or subsequent consultation, (b) the circumstances in which such subsequent consultations would be for less than 24 days and (c) whether the Council’s discretion is limited to the length of such subsequent consultations or also extends to whether in any particular situation to hold a subsequent consultation.</p>	<p>Consultation on a planning application begins on the date that the application is published. The period of consultation relates to calendar days and will be specified in the text.</p> <p>Where a consultation is not for the normal period of 24 days, this will be clearly set out within the information notifying of the application and commencement of consultation.</p> <p>Similarly, where subsequent consultations take place that are shorter than 24 days, this will be clearly communicated within the information notifying of the application and commencement of subsequent consultation.</p>	<p>Amend first sentence of paragraph 3.8 to read:</p> <p>“The normal period for consultation on a planning application is 24 <u>calendar</u> days <u>from publication.</u>”</p>
8	10	Sudborough Parish Council	<p>Para 3.17 The Council say that although some planning applications are determined by planning officers under delegated powers, more significant applications are usually determined by a planning committee. Two points require clarification here. First, with any particular application, how in practice is it decided whether the application is suitable for determination by a planning officer? Second, as the Council has two types of planning committee, how is it decided which applications should be determined by the strategic planning committee and which by the local area planning committee?</p>	<p>The Council’s Scheme of Delegation, as referred to in paragraph 3.17, is included within the Constitution on the Council’s website. A link will be inserted within the SCI at paragraph 3.17.</p>	<p>Insert link to Scheme of Delegation¹ at paragraph 3.17.</p>

¹ [North Northamptonshire Council Constitution](#)

8	11	Sudborough Parish Council	<p>Para 3.18 This paragraph deals with planning committee meetings and, given the current very restrictive arrangements in the NNC Constitution for public participation at planning committee meetings, it is perhaps surprising to read the following statement by the Council: “<i>Members of the public can attend committee meetings and those who wish to speak in relation to an application will normally be given the opportunity to do so – the process for this will be set out in the notification letter/email.</i>” Hopefully this is an encouraging sign of how it is intended to improve the arrangements for public participation in planning meetings when this part of the Council’s constitution is reviewed.</p>	Noted.	None.
8	12	Sudborough Parish Council	<p>Para 3.20 The Council say: “<i>Generally comments made on a planning application by statutory consultees will be published on the Council’s websites as will any comments made by members of the public with personal details redacted for data protection purposes.</i>” It would be helpful if the Council could explain the use of the word “generally” here. In what circumstances would comments made by either a statutory consultee or a member of the public not be published? Our experience is that although the initial responses of statutory consultees are invariably uploaded to the relevant page on the Council’s website, follow-up responses and other relevant written communications between the planning officers and the consultees are frequently not uploaded. Likewise, whether consultation responses from members of the public are, or are not, uploaded to the relevant page on the Council’s website can sometimes be rather hit or miss. It is noted that “<i>due to IT capabilities the ability to upload comments to the website will not be available in relation to planning applications being dealt with by some of the North Northamptonshire area planning offices.</i>” However, that state of affairs is unacceptable and must be remedied without delay.</p>	<p>Comments noted. Paragraph 3.20 explains that generally comments made by statutory consultees and members of the public will be published on the Council’s website; however, there are instances where this may not be possible due to IT limitations. Where this is the case, interested parties will be able to request to see comments made on individual planning applications by discussing with the relevant case officer and area planning office.</p> <p>Paragraph 3.20 will be amended for clarity, to read: “Generally comments made on a planning application by statutory consultees will be published on the council’s websites as will any comments made by members of the public with personal details redacted for data protection purposes. However, it should be noted that due to IT capabilities the ability to upload comments to the website will not be available in relation to <u>planning minerals and waste</u> applications. <u>being dealt with by some of the North Northamptonshire area planning offices.</u> Where comments are available to view on the website this will be until a decision on the application has been made. <u>Comments can be made available upon request to the case officer or area planning office handling the planning application.</u>”</p>	<p>Amend paragraph 3.20 to read:</p> <p>“However, it should be noted that due to IT capabilities the ability to upload comments to the website will not be available in relation to <u>planning minerals and waste</u> applications. <u>being dealt with by some of the North Northamptonshire area planning offices.</u> Where comments are available to view on the website this will be until a decision on the</p>

			<p>The final sentence of this paragraph (“<i>Where comments are available to view on the website this will be until a decision on the application has been made</i>”) does not match up with our experience which is that once comments on a planning application have been uploaded, they remain on the website even after a decision on the application has been made. Does this sentence need to be re-phrased?</p>	<p>Comments relating to the final sentence of paragraph 3.20 are noted. This sentence will be deleted.</p>	<p>application has been made. <u>Comments can be made available upon request to the case officer or area planning office handling the planning application.</u></p>
9	1	Braybrooke Parish Council	<p>This is a response to the consultation on the Statement of Community Consultation.</p> <p>The elephant in the room, in this policy statement, is the transition to Unitary Status. That will mean, inevitably as the Unitary organisation is increasingly rationalised and centralised, an increasing distance from the communities that the council serves and reduced local knowledge amongst the planners. It is happening already because staff shortages have reduced the amount of communication between planners and parish councils.</p> <p>So one would expect the statement of consultation to change in some way to recognise a need for more cooperation with the Town and Parish Councils who, unlike the other consultation bodies, are not lobbying for a particular interest or topic but relate to their communities across the board and can draw on local knowledge. The Town and Parish Councils are in a position to help the work of planners and promote it with their communities, or to dispute and oppose it, depending on whether the relationship is a positive one.</p>	<p>Comments noted. The Council recognises the importance of engaging parish/town councils and neighbourhood planning groups in plan making and planning decisions.</p> <p>Table 1 includes parish councils within the list of specific consultation bodies to be consulted in the plan making process and parish and town councils are identified as statutory consultees when publicising planning applications. Table 1 will be updated to also include town councils as a specific consultation body.</p> <p>The SCI aims to build on existing relationships with parish and town councils and encourages early engagement through plan making and when involving local communities in the planning application process.</p>	<p>Insert “town councils” within table 1.</p>

9	2	Braybrooke Parish Council	<p>That being so, it is surprising that Table 1 of the draft, under the heading General Consultation Bodies, refers to residents groups and to Neighbourhood Planning Groups and Forums but not to Town and Parish Councils. I note that NNC's Consultation and Engagement Framework 2021, at para 5.6, says "In addition, we will ensure that Town and Parish Councils are informed and involved in decisions affecting their local area". I would have hoped that the SCI would contain a statement at least as strong as that - preferably stronger. And it should not be impliedly confined to those issues on which the T&PCs must be consulted by regulation.</p>	<p>Table 1 includes parish councils within the list of specific consultation bodies to be consulted in the plan making process and parish and town councils are identified as statutory consultees when publicising planning applications. Table 1 will be updated to also include town councils as a specific consultation body.</p>	<p>Insert "town councils" within table 1.</p>
9	3	Braybrooke Parish Council	<p>Picking up that latter point, section 3 strongly implies that consultations will be confined to those required by regulation. I suggest that Town and Parish Councils should be consulted or at least informed, either formally or informally, on all matters affecting their parish, including on applications where formal consultation is not required. These include applications for work on trees in conservation areas; applications for certificates of permitted development; applications in closely neighbouring locations etc etc. These are all matters in which local knowledge may be relevant. What is more, the relationship created by a pattern of informal consultation can have wider advantages.</p> <p>I make this latter point because there are recent indications of planning officers confining their consultation strictly to "what they are required to do". This is an understandable reaction to time pressures, but adding an address to an email is not onerous.</p>	<p>Comments noted. Paragraph 3.3 explains that many permitted development works do not require an application to the Council, and as a result no consultation is undertaken.</p> <p>Paragraph 3.6 explains that the minimum scale and type of consultation required on planning applications will relate to the impact of the proposal and is set by regulation. The SCI does, however, encourage applicants to discuss proposals with occupiers and owners of neighbouring land and properties before submitting an application to provide an early opportunity to address concerns and help to reduce delays in determining applications.</p> <p>In particular for 'significant' developments the Council encourages developers and applicants to involve the community at the earliest opportunity.</p>	<p>None.</p>

10	1	Historic England	<p>North Northamptonshire Statement of Community Involvement Consultation draft</p> <p>Thank you for consulting Historic England on the Draft Statement of Community Involvement (SCI) for North Northamptonshire. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.</p> <p>We support the general aims and approach to the draft Statement of Community Involvement. We welcome the acknowledgement of Historic England as a statutory consultee with respect to Local Plans in Table 1, paragraph 2.13.</p>	Support noted.	None.
10	2	Historic England	<p>With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected. We have guidance on neighbourhood planning, which can be found at: https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/</p> <p>Reference to the appropriate consultation bodies, which includes Historic England as it is now known, as set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 is welcomed.</p> <p>We would welcome consultation at an informal level, in addition to the requirements of the legislation, where issues may benefit from our early involvement. We hope that the above comments are of assistance. If you would like any clarification or would like to discuss the above please do not hesitate to contact me.</p>	Noted. The Council will continue to consult Historic England as an appropriate consultation body.	None.

11	1	Higham Ferrers Town Council	<p>The Council considered the consultation at their meeting last night and agreed the following response:-</p> <p><i>That the Council have no comments to make on the body of the document, but are disappointed at the timing of the consultation which started on 17th December, just before a major holiday period. Timing of consultations needs to be considered as part of the process.</i></p>	<p>Noted. There is no requirement in legislation for the Council to consult when reviewing or updating the SCI; however, consultation was undertaken to keep the local community informed and involved.</p> <p>Paragraph 2.18 explains that all consultation will meet statutory requirements; however, these will be extended to take account of key holiday periods.</p>	None.
12	1	Environment Agency – Lincolnshire and Northamptonshire Area	<p>Thank you for consulting us on the Draft Statement of Community Involvement.</p> <p>We are pleased that we are identified within Table 1 as a specific consultation body. Within the general consultation bodies: Who this means, the SoCI may want to include Risk Management Authorities to encompass all those who are responsible for managing flood risk and also those not specifically identified such as reservoir undertakers.</p> <p>Should you wish to discuss my comments please contact me using the details below.</p>	<p>Noted. Further discussions have taken place with the Environment Agency and table 1 will be updated to include Lead Local Flood Authorities.</p>	Insert “Lead Local Flood Authorities” within table 1.
13	1	Civic Voice	<p>RE: North Northamptonshire Statement of Community Involvement – consultation draft (December 2021)</p> <p>Civic Voice is the national charity for the civic movement. We are campaigning for a more accessible, balanced, collaborative, and democratic system, as set out in our Manifesto 2020-23. Since we set up in 2010, we have been joined by hundreds of volunteer-led, community based civic societies with over 76,000 individual members.</p> <p>Civic societies exist in over 70% of local authority areas and are some of the most numerous participants in the planning system. They seek to improve the quality of the built, historic, and natural environment in the places where we live, for the benefit of all.</p>	Noted.	None.

			<p>Civic Voice has been alerted to your consultation by one of our members, Wellingborough Civic Society. We offer the following comments on your draft Statement of Community of Involvement (SCI) in the spirit of helpfulness and recommend that they be incorporated into your final SCI.</p> <p>You may also be interested to read our recent research into SCIs nationally, which was undertaken by the University of Reading: ‘Paper Tigers: A Critical Review of Statements of Community Involvement in England’ (2021), to see how your draft SCI compares nationally.</p>		
13	2	Civic Voice	<p>General comments</p> <p>Overall, Civic Voice welcomes the draft SCI and the opportunity to comment. We are pleased to see you consult with Wellingborough Civic Society for feedback on the draft SCI. It is also positive that your new unitary authority is updating its consultation practices, following significant local administrative change.</p> <p>In our view, the draft SCI is concise, written in Plain English and pragmatic. Civic Voice particularly welcomes North Northamptonshire Council’s aims to go further than the statutory minimum standards for consultation, particularly in section 3.0 Consultation on Development Proposals and Planning Applications regarding additional community engagement for ‘significant developments’.</p> <p>However, Civic Voice recommends the following changes to improve the SCI and wider community engagement on planning matters, particularly for civic societies.</p> <p>Whilst the draft SCI is written in Plain English, it is not very visual and would benefit from additional diagrams, tables, or flowcharts to improve the</p>	<p>Support for the document is noted.</p> <p>The SCI has been prepared in accordance with accessibility standards, which recommend only using visual aids where absolutely necessary. Figures 1 and 2 within the SCI show plan making and the process of local plan preparation and consultation in visual form. Table 1 sets out the specific and general consultation bodies in table form and figure 3 shows the neighbourhood plan process in a flow diagram. These visual aids are felt to be sufficient to assist the reader, whilst meeting the required accessibility standards.</p> <p>The document will include examples of ‘hard to reach’ groups.</p>	<p>Insert the following text at paragraph 2.16:</p> <p>“Hard to reach groups include but are not limited to:</p> <ul style="list-style-type: none"> • Youth • Elderly • Disabled • BME • Isolated / rural communities • Faith groups • Gypsies & travellers • Non-registered local organisations.”

			<p>accessibility of the information for people who are unfamiliar with the planning system.</p> <p>Civic Voice welcomes that North Northamptonshire Council aims to directly liaise with 'hard to reach' groups through targeted engagement or specific techniques that takes account of their needs (Para. 2.16). However, we would advise that you need to explain who the 'hard to reach' groups are in North Northamptonshire that you are seeking to engage. This will help determine how best to engage such groups of people in planning.</p>		
13	3	Civic Voice	<p>Engagement with civic societies</p> <p>There are two Civic Voice member societies within your area, Wellingborough Civic Society and Desborough Civic Society.</p> <p>Civic Voice recommends that the Council specifically names civic societies within your area as consultees on planning matters.</p> <p>Other local authorities have named civic societies in their SCIs. We draw your attention to Blackpool Civic Trust, Bollington Civic Society, Epsom Civic Society, Harlow Civic Society and Isleworth Society for information.</p> <p>The specifics of which planning matters individual civic societies wish to engage on can be agreed locally. For example, we know that Wellingborough Civic Society is open to a conversation with Council officers to discuss this further.</p> <p>We would also draw your attention to the Consultation and pre-decision matters section of the Government's Planning Practice Guidance, particularly Paragraph: 001, which describes the four main types of planning consultation. Civic Voice recommends that North Northamptonshire Council adds civic societies to the SCI as a non-statutory</p>	<p>Noted. Civic societies will be added to the list of general consultation bodies within table 1.</p> <p>It is not considered necessary to repeat national guidance within the SCI.</p>	<p>Insert "civic societies" within table 1.</p>

			<p>consultee, as per this guidance. We also recommend that the Council refers to the main types of planning consultation e.g. non-statutory consultees in the SCI, particularly in section 3.0, to align with national guidance.</p>		
13	4	Civic Voice	<p>Turning to specific sections of the draft SCI:</p> <p>2.0 Consultation on North Northamptonshire's Plans</p> <p>Table 1 – We recommend that Wellingborough Civic Society and Desborough Civic Society (or as a minimum, civic societies) are added to this table as general consultees.</p>	<p>Noted. Civic societies will be added to the list of general consultation bodies within table 1.</p>	<p>Insert “civic societies” within table 1.</p>
13	5	Civic Voice	<p>3.0 Consultation on Development Proposals and Planning Applications</p> <p>Civic Voice welcomes North Northamptonshire Council defining circumstances where additional community engagement is required – ‘large-scale developments’ or ‘locally significant developments’. This is positive and goes above minimum standards.</p> <p>In Para. 3.10 we recommend that ‘civic societies’ is included (alongside town and parish councils and neighbourhood planning groups). In Para. 3.16, please note that many civic societies welcome being involved in pre-application discussions and local authorities often direct developers to the local civic society for advice, guidance and help with wider consultation with the community. This may be something the civic societies in your area may welcome, we’d advise that you speak with them directly to discuss.</p> <p>We hope that this consultation response is helpful as you work towards finalising the North Northamptonshire Statement of Community Involvement. If Civic Voice can help with additional advice on community engagement or you wish to</p>	<p>Support for additional community engagement is noted.</p> <p>The requirement to consult parish/town councils and neighbourhood planning groups accords with the legislation. Paragraph 3.16 of the SCI explains that community involvement will relate to the scale and likely impact of the development and to the target audience, therefore a proportionate and pragmatic approach will be taken on a case-by-case basis.</p>	<p>None.</p>

			discuss our response further, do not hesitate to contact me on the above details.		
14	1	STAUNCH (Save Titchmarsh and Upper Nene Valley Countryside and Habitats)	<p>STAUNCH welcomes this new Statement of Community Involvement, and the consultation that the council has launched on it.</p> <p>We have the following comments on the proposals:</p> <p>1. The document sets out in some detail how consultation on local plans will be conducted. We welcome the commitment to helping parishes and other communities to develop neighbourhood plans, and the offer of help to seek funding for the process. However, it would be good to insert some more flexibility into the process for examining higher-level Local Plans.</p> <p>There are often cases where, for good reasons, a parish council (or other consultees) will not comment in early rounds of public consultation on local plans, simply because there are no major changes proposed to site allocations, or policies, that will effect the immediate area. However, if a developer then seeks to alter the local plan to accommodate a new development, it does not seem reasonable to deny the local parish council, or another consultee, a seat at the table (or the right to appear at the public enquiry) simply because they did not comment before.</p> <p>We hope the SCI can be adjusted to say that discretion, and common sense, will be applied, to allow such bodies to make representations on local plans which have changed during the consultation process, even if they did not comment initially. There is a specific issue here in Titchmarsh, with a large proposal for warehousing on a greenfield site that was not allocated for development in the first draft of the local plan, which a developer is now seeking to change to allow development there.</p>	The Council welcomes comments from all parties at public consultation stages on an emerging Plan. Not commenting on a previous consultation does not preclude individuals or organisations from commenting at subsequent stages; however, in order to appear at the examination in public, which would be at the invitation of an independent Inspector, a consultee must have commented at the Publication (Regulation 19) stage and comments must relate exclusively to the soundness of the Plan.	None.

14	2	STAUNCH (Save Titchmarsh and Upper Nene Valley Countryside and Habitats)	<p>2. The document is silent on consultation on, or notifications about, “screening” applications for Environmental Impact Assessments or other similar regulations.</p> <p>In Titchmarsh, the parish council was recently not notified of a screening application for a large warehouse site, at which the developer was arguing that a full EIA was not necessary. The first that the parish council heard about the proposed huge development was by accident, not from North Northants council, after the application was spotted by an eagle-eyed villager who was trawling through the council's website and found the screening application.</p> <p>The council should insist on pre-consultation by developers with parishes before this sort of EIA application is made, or else tell villages and communities affected about the scale of proposed development if a developer refuses to do so. In all cases, the emphasis should be on developers, and if necessary, the council, to notify local communities of development proposals as soon as they are in the public domain, rather than just put details of EIA screening applications etc on the council's website without any notification. The SCI document rightly says that notification of planning applications is largely “a reactive process”, responding to applications as they come in. But more should be done to make it more of a proactive process, with developers required to do pre-application consultation before EIA screening applications for very large developments are submitted.</p>	<p>The National Planning Policy Framework and Planning Practice Guidance highlight the importance of considering environmental issues at the pre-application stage, which is encouraged within the SCI.</p> <p>At paragraph 3.10 the SCI explains that where a proposal is deemed to be significant by virtue of being large in scale or otherwise locally significant then developers or applicants will be expected to undertake community engagement and involvement in drawing up their proposals. This may include proposals requiring submission of an Environmental Impact Assessment.</p>	None
14	3	STAUNCH (Save Titchmarsh and Upper Nene Valley Countryside and Habitats)	<p>3. The Draft SCI says that, when planning applications come to committee for determination, “Members of the public can attend committee meetings and those who wish to speak in relation to an application will normally be given the opportunity to do so- the process for this will be set out in the notification letter/email.” We hope this means that</p>	<p>Any person can request to speak at planning committee meetings, these requests should be made through the Council's committee services team. Paragraph 3.16 explains that the process for this will be set out in the notification letter or email publicising the individual planning application.</p>	None.

			<p>more than one objector will be allowed to speak, as we aware of some disquiet over a recent planning application in the Kettering area (Weekley Hall Woods), on which the council only allowed one or two objectors to speak at the planning committee meeting when it was determined. We accept that a planning committee meeting is not the “be all and end all” of the planning process, and that is sometimes necessary to limit the number of speakers, and how long they can speak for, to avoid repetition and to ensure that meetings do not last too long. But giving local communities only a few minutes to speak on such huge developments before councillors vote on them is not good for public confidence in the planning process, and we hope the SCI can codify more clearly what the guidelines are, how time will be allocated if there are multiple speakers for and/or against applications, and what discretion the planning committee chair has.</p>		
14	4	STAUNCH (Save Titchmarsh and Upper Nene Valley Countryside and Habitats)	<p>4. The document is also silent about consultation on how section 106 or Community Infrastructure Levy (CIL) money is spent. We hope that a new section can be added, setting out how local communities will be consulted on local needs, and what amelioration is required, if large developments in the locality are granted consent.</p>	<p>The SCI is not required to set out how developer contributions will be spent. The Council is required to publish annually an Infrastructure Funding Statement outlining matters relating to Section 106 monies and CIL where appropriate.</p>	None.
15	1	Cottingham Parish Council	<p>Section 1:</p> <p>CPC welcomes this attempt to harmonise the various former SCIs and the ethos of ensuring, in particular, that processes and communications concerning Planning Applications are brought up to a uniform, verifiable high standard. We urge all involved to take an honest, self-aware approach so that the outcome is the best of former practices and omits the, frankly, sometimes awful methods, practices and attitudes that have so often been our experience of Corby’s Planning Department</p>	Noted.	None.

15	2	Cottingham Parish Council	<p>2.2 ... Neighbourhood Plans, when brought into force, become part of the statutory development plan for the area that they cover alongside any relevant local plans:</p> <p>CPC welcomes the inclusion of this explicit statement</p>	Support noted.	None.
15	3	Cottingham Parish Council	<p>2.8 and 2.9:</p> <p>CPC welcomes the attention to detail about proposed methods of informing, consulting and reporting in these two sub-sections. However, we feel they stop short of being a properly formed, coherent, proactive Communication Plan. They read more like a list of media and channels that NNC may or may not employ.</p>	<p>Paragraph 2.9 is clear in explaining that notifying those on the consultation database will form the main basis of communicating consultation information with interested parties relating to local plan preparation. Other measures are identified, which will be employed where considered necessary and effective.</p> <p>Paragraph 2.5 also explains that the Council may carry out more extensive measures than required by the regulations, depending on the nature, coverage and scope of the local plan.</p>	
15	4	Cottingham Parish Council	<p>2.20 ... A charge to cover costs may be made for other requests:</p> <p>It is extremely unfortunate that someone thought that such a statement has any place in a document whose principle aim is to engage, involve and motivate people.</p>	Noted.	None.
15	5	Cottingham Parish Council	<p>3.3 ... advisable to avoid unnecessary risk, expense and retrospective applications:</p> <p>Is it within the legal powers of NNC to do more to actively discourage, penalise or even ban, retrospective applications?</p>	The Council encourages developers and applicants to obtain advice from the Council in the first instance to avoid unnecessary risk, expense and retrospective applications; however, the Council is required to consider and determine a retrospective planning application as with any other planning application.	None.
15	6	Cottingham Parish Council	<p>3.4 ... There are a number of consultees, for example government bodies, neighbouring councils and parish and town councils, that are statutory consultees and have to be consulted:</p> <p>NNC Planning Officers and several NNC Councillors are no doubt already aware of the intense frustration and anger expressed by CPC and other Parish Councils at Corby Borough Council's, and now NNC's, appalling lack of proactivity in notification,</p>	Noted.	None.

			responding to queries and consulting generally on Planning Applications		
15	7	Cottingham Parish Council	<p>3.8 ... Statutory consultees should also respond within 24 days...:</p> <p>CPC feel that this sub-section, and others referencing this matter, inadequately address the legal obligations pertaining to NNC's consultation with Parish Councils. These obligations are largely set out in Article 25 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, revised 2018. Putting the Act's requirements into the relevant context, the Legislation specifically requires:</p> <ul style="list-style-type: none"> • NNC to notify CPC at least 21 days before NNC holds a decision-making hearing of any planning application pertaining to the parish of Cottingham • CPC to inform NNC of its intention to respond or otherwise within 21 days of receipt of notification • NNC not to determine any application in respect of which CPC is required to be given information before one of the following has occurred (whichever occurs first) <ul style="list-style-type: none"> ○ Either the CPC inform NNC that they do not propose to make any representations ○ Or representations are made by CPC ○ Or the period of 21 days explained above has elapsed • In determining the application NNC must take into account any representations received from CPC <p>We have recorded many examples of NNC failing to comply with these legal obligations. Hopefully this revised and harmonised SCI will ensure this stops happening.</p>	Comments noted. The Council will endeavour to meet the legal requirements as a minimum.	None.
15	8	Cottingham Parish Council	3.10 to 3.16:	Support noted.	None.

			CPC welcomes the clarity and detail around NNC's stipulations and process regarding Significant, Large Scale and Locally Significant Developments		
15	9	Cottingham Parish Council	<p>3.17 and 3.19:</p> <p>Of all the sections in the SCI draft, the most concerning for CPC is the prospect of any great use of delegated powers of decision to Officers. Perhaps when the well-publicised manpower resource shortage, and reliance on contracting officers passes, we may start to feel some confidence that Officers can be trusted to make sensible, well-reasoned decisions or advise Members about applications. We have a sad litany of local examples where Officer contact and communications with applicants and CPC alike could only be described as the antithesis of what this SCI document is trying to achieve.</p> <p>We should like to add, however, that our dealings with certain officers during the various stages of our Neighbourhood Plan have been very positive, collaborative and productive.</p>	<p>Noted. The Council's Scheme of Delegation, as referred to in paragraph 3.17, sets out when planning applications will be delegated and when they will be determined by committee. A link will be inserted within the SCI at paragraph 3.17 to the Scheme of Delegation which is include within the Council's Constitution.</p> <p>Positive neighbourhood planning experience is noted.</p>	Insert link to Scheme of Delegation ² at paragraph 3.17.
15	10	Cottingham Parish Council	<p>Section 4 and Appendix 1:</p> <p>CPC welcomes the thoroughness and weighting given to the processes and status of Neighbourhood Plans in the SCI, and NNC's clear commitment to their place in NNC's Planning strategies.</p>	Support in relation to neighbourhood plans is noted.	None.
15	11	Cottingham Parish Council	<p>And finally...</p> <p>For us the glaring omission in this SCI is any reference to Enforcement. This has become a major topic across the North Northants area and we earnestly urge you to include a section on it in the new version of SCI.</p>	The SCI is not required to detail matters relating to planning enforcement.	None.

² [North Northamptonshire Council Constitution](#)