

List of responses to Statement of Community Involvement Update consultation held 4 June to 16 July 2019

Respondent	Comment
Backwell Parish Council	<p data-bbox="448 352 1086 384">Page 9 - NEIGHBOURS 2nd paragraph, 4th Line</p> <p data-bbox="448 424 1720 456">"and to the other neighbours that we consider will be directly affected by the application....."</p> <p data-bbox="448 496 1980 592">Backwell Parish Council would like to express its concern over this, and state that it should be left in as the application may have wider influences and affect more than just the houses directly next door, restricting this to such a narrow view means that wider implications could will be overlooked by local residents until it's too late.</p> <p data-bbox="448 600 1317 632">Page 11 - After the decision is reached first paragraph. Last 3 lines</p> <p data-bbox="448 671 1758 703">Copies of decisions and officer reports are also sent to the relevant parish or town council.....</p> <p data-bbox="448 743 1989 943">Backwell Parish Council believe this should be left in and copies sent to the relevant parish or town councils, there should be a duty and interest to let those that have spent a lot of time reviewing and commenting on these applications which is a key part of the planning process, the courtesy of at least knowing the outcomes of the final decision, especially in cases where NSC have gone against the town or parish recommendation, the reasoning of minimising "unnecessary administration costs" should be negated if when the system informs the applicant of it success or failure it included the local town or parish council either by post or more likely email.</p>
Banwell Parish council	Request that email be included as an acceptable way in which responses can be submitted on planning applications.
Bleadon BOB	<p data-bbox="448 1086 1966 1254">In order to ensure community involvement the Statement states that North Somerset Council will consult with "<i>Statutory organisations including town or parish councils ...</i>". In theory that should work but it will not work if parish councils (PC) <u>don't inform or consult with their residents</u> in the community. As far as we're aware our PC didn't inform residents of this key consultation, discuss it in a public forum or respond as a Statutory Consultee, so what government controls are in place to monitor the effectiveness of PC consultation with residents?</p> <p data-bbox="448 1294 1917 1358"><u>What is the role of a Statutory Consultee</u> such as a PC? Is it for a handful of elected/co-opted councillors to make comments, or not, on behalf of the public without informing them, or is it to consult with residents in an open and</p>

transparent manner, then respond? Residents have previously asked our PC to clarify their role in this regard but with no response.

Our community's adopted Parish Plan was stated as submitted to NSC but also stated as lost, therefore over the last few years it has been ultimately ignored as a PC councillor guide to resident's majority views and/or a Supplementary Planning Document. This has led to the PC acting without regard, and sometimes contrary to the Parish Plan and public opinion, when responding to planning applications.

A number of times the PC has stated that it was not aware of public consultations despite them being in the public domain for several weeks/months E.g. Residents had to ask for the Local Plan 2036 Issues and Options consultation to be put on the agenda to discuss in public. The PC put it on their agenda for a meeting held after the public submission deadline, didn't publicly discuss the pre-prepared document but voted and subsequently submitted it.

Large consultations have not appeared on the PC's agenda, minutes or correspondence listing of published information e.g. This Community Involvement consultation, JSP (or its appeal), Airport expansion, the Local Plan 2036 (including potential Settlement Boundary review), etc.

The PC has stated that if they receive a late request to comment they will submit official comments on behalf of residents outside of public viewed meetings, i.e. undocumented discussion and decision making, potentially not even appearing on the parish public record. This can also be used as an excuse not to respond to consultations. This was recently stated as a reason not to respond to the JSP consultation. E.g. Previously, at a public/resident meeting the PC stated that they were waiting for a large contentious application to be made when it had already been submitted and had appeared on the NSC Weekly List three weeks earlier?

When the PC does respond to a consultation their comments are not always accessible, not posted in the minutes, or in a document posted on their website E.g. The PC states a item/consultation will be added to a future Planning sub-committee agenda for discussion in public but it doesn't happen. One response was prepared and submitted by two councillors in a last minute two day time-frame after delaying public discussion for several months.

Our PC has held only one Planning sub-committee meeting in the last twelve months despite major consultations and applications. If and when planning items are put on the main council meeting agenda there is not time for any council public discussion and so submitted responses are unknown, written by unknown councillors and/or sub-committee members. Declarations of interest are not always stated or followed in terms of councillor voting on issues. Residents have been told a number of times that agenda, minutes and reports do not need to be produced for sub-groups/working groups (including Finance & Personnel), that they do not need to be held in a public space and that

	<p>these influential meetings can be held in councillor's private homes. The views/concerns of residents who are not in these sub-groups may be undocumented and/or ignored. The Chair of the PC supports secret membership to sub-groups so residents don't know what has been discussed and who has been involved in the decision making. E.g. Access to one sub-committee/working group TOR, agenda, minutes, finances, membership only started to become available after 18 months of asking. Sub/working-group Terms of Reference are not published, sent or delayed when asked. The content is not always followed and sometimes contrary to actions, E.g. "<i>Encourage public participation at meetings</i>"</p> <p>There is a particular concern with the <u>Neighbourhood Development Plan consultation to date</u>, indicated to be open to 'positive' participants only. Resident APM questions and concerns have been ignored and left unanswered from the beginning, two years ago, access to TOR, agenda, minutes, etc. only becoming available in the last 6 months. The need to reflect future government policy updates means a potential future cost to the Parish without consultation, especially as NSC services are increasingly being delegated and undertaken without resident consultation and reserved precept being used.</p> <p>Access to <u>accurate and complete public meeting minutes</u> promoted and/or paid for by the PC, including record of chairmanship and attendance, is sometimes difficult, e.g. residents sometimes waiting months and/or years for them to be posted. These minutes directly affect PC decision making but are not accessible until after decisions have been made and/or implemented. When minutes are posted they don't necessarily reflect the outcome the meeting or the vote.</p> <p>Minutes previously posted on the PC website are <u>removed at key times</u> e.g. currently the 2018 Finance & Personnel minutes have been removed during the "Notice of public rights and publication of unaudited annual governance & accountability return accounts for the year ended 31 March 2019"?</p>
	<p>p9 NSC, "<u>Pre-application</u> <i>We strongly encourage applicants to discuss their proposals with local people adjoining the development site, the relevant town or parish council and their North Somerset councillor at an early stage before they submit their planning application.</i>" The PC has previously appeared to agree to a community consultation process with a developer, start to consult with residents, then subsequently decide to withdraw from the process and to disengage with the developer. How do these two approaches work together in practice?</p> <p>As regards <u>GDPR</u> and application comments, surely personal data can be/is already removed, but comments should be retained on the website for future reference. How will decision making and history be preserved, especially if the application is re-submitted?</p>

CLH Pipeline Systems	No comments relating to SCI
Environment Agency	I can confirm that the Environment Agency concurs with the revisions outlined within the SCI and looks forward to future involvement in the Local Development Framework process.
Lin	<p>2. Local Plans....</p> <p>How we will consult, C: The means of consultation proposed all depend on individuals being able to access the written word, in English, and to read. For example, some due to such as visual difficulties need to 'read' through hearing, touch ... An organisation cannot claim to be inclusive if by it's policies, processes and practices it excludes individuals.</p> <p>When we will consult, C: ... 'Once we are satisfied that a <i>fair opportunity</i> has been offered for organisations and individuals to express their views'. How are you going to assure yourselves that a fair opportunity has been provided. Please see previous comments about inclusion.</p> <p>When we will consult, D: ... 'We will formally publish the submission document ...' Presumably in a range of formats and through a range of media being made available, the availability of which is communicated in a way that the individual can independently access them.</p> <p>Supplementary planning documents</p> <p>When we will consult, 3rd point: '<i>... The council understands the difficulty experienced by groups in responding within this time...</i>' This statement does not communicate inclusion of individuals or consideration that time might be an issue for them too.</p> <p>Neighbourhood development plans and orders: '<i>... if the majority of voters in the neighbourhood give approval. ... Who makes up the 'voters in the neighbourhood'? Do individuals/ householders have a vote?</i></p> <p>Neighbourhood development plans and orders: '<i>North Somerset Council will give technical and other advice...</i>' Given NSC will also be a consultee what advice will be given and how is it ensured its 'consultee' status will not influence the advice provided. Also, given its 'advice' it can be acted upon or rejected as seen appropriate by the town/ parish council.</p>
	<p>1 General Principles</p> <p>If the council really is committed to inclusion I feel stating alternative formats including languages will be provided on request excludes people. By definition if needed in an alternative format they cannot access the information in the</p>

	format provided to make the request. Surely a drop down menu could be provided for the most prevalent languages used in the NSC area. There is an assumption that the individual has access to support which would enable them to make the request, which will not be necessarily correct. People who need to access information/ documents in alternative formats and have access to a computer or equivalent with internet access should be able to access alternative formats via online adaptive resources. How will the consultations be made known to those who do not have access to technology or teh internet?
Mary Adams	1 General Principles I would like to see a principle around coproduction. As a Healthier Together Partner it would be helpful to align NSC consultation and engagement approaches with the other system partners.
Natural England	No comments
Nick Cottle	In ALL cases a mailed advisory notice relating to property planning should be sent to all appropriate neighbours as well as a fixed location notice and signed up emailing.
Portishead Town Council	No objection to the changes in the SCI document.
Sport England	No specific comments
Weston Civic Society	Neighbourhood Plans Query procedure for local community to vote on Neighbourhood Plans.
	3 Planning Applications Pre-applications What are the criteria for deciding whether a pre-application request is confidential or not?
	3 Planning Applications Neighbours Notification letters should also be sent to those properties who overlook the site.
	3 Planning Applications Neighbours What is the criteria for deciding if the response period should be shorter than 21 days ie “certain types of proposal”
	3 Planning Applications Neighbours All comments form part of the planning file and are normally (<i>What is the criteria for not normal?</i>) placed on the council’s website for viewing via the internet.
	3 Planning Applications Neighbours

	<p>After the period for appeals to be made has passed <u>Once the decision is made</u> we remove comments made by the general public. This is done seven months after the application is decided. This complies with the Data Protection Act which requires us not to keep personal information longer than is necessary. <u>from our website to protect people's personal data as required by the General Data Protection Regulations.</u></p> <p><i>(Why cannot personal data be redacted but retained on the file? Comments from organisations should be left on)</i></p> <p>If amended details are received we will re-consult on proposals where, as a result of <u>because of</u> the amendment, we consider that there is likely to be a significantly greater detrimental impact, for example, on the occupants of adjoining properties. <i>(What if it is an improvement but still likely to raise objection re-consultation should be considered)</i></p>
Wrighton Parish Council	<ol style="list-style-type: none"> 1. The Page numbering of the draft document in .pdf format entitled 'Statement of Community Involvement' appears to omit pages 5 and 6 which were previously dedicated to 'Local Plans and other planning policy documents'. This heading is now appearing on Page 7. Other pages are also not numbered correctly, and a full review is required prior to adoption of the draft document. Please adjust accordingly. If there should be Pages 5 and 6 in the draft document for consultation, please revisit and advise consultees accordingly. 2. Page 8, Paragraph (a) – on the first line, there is repetition of the word 'will'. Please delete one of them. 3. Page 8, Paragraph (b) – The word in red 'plan' should be replaced with 'policy document'. (There is no plan at the engagement stage). Immediately after the text in red, replace 'help to ensure' with 'enable', and on the following line delete 'are' and replace with 'to be' in order to be grammatically correct. 4. Page 8, Paragraph (c) – line 6 – insert the word 'all' between 'out' and 'options'. 5. Page 9 under heading 'Neighbourhood development plans and orders' the first phrase is repeated ('Unlike the other Local Plan documents,'). Please delete one of them. 6. Section 3 – Planning Applications – also numbered Page 9! Under the heading of 'Neighbours' – the words to be deleted ('and to other neighbours that we consider will be directly affected by the application') should not be deleted. It is right and proper that <u>all</u> affected neighbours/parties should be informed where an application has the potential to have an adverse impact upon them and it should be the duty of the Local Planning Authority to ensure such parties are not excluded from having the opportunity to comment upon matters which affect them. If other affected parties are not aware that they need to sign up to NSC's system (as we suspect the majority are not aware), then they will be denied the opportunity to comment, which contravenes their rights. 7. Further down that same Page, it is proposed that the words 'take into account' be replaced by 'consider.....' This Council would seek to retain the original wording, on the basis that the proposed change represents a significant

	<p>shift in policy and weakens the position of objectors. In the interests of equality and transparency the original wording should remain unaltered.</p>
	<p>8. Page 1 (which should be Page 11 we would suggest!), under the heading 'After the decision is reached', the section which is proposed be deleted ('Copies of decisions and officer reports are also sent to the relevant town or parish council.') should be retained. It is of great importance that local councils are notified of decisions reached within their boundaries and to deny them this service would be a retrograde step and of little saving. The sending of such information can be easily accommodated as an electronic automated service, delivered by e-mail, at no cost to NSC and this Council values the service greatly. We would suggest that this Council will not be alone in seeking to have this deletion re-instated and would urge NSC most strongly to re-consider such a retrograde change.</p>
	<p>9. Page 11 – Reviewing the SCI – In the final paragraph, the word 'refresh' is used as a noun, when in fact the word is a verb. In order to impart the meaning which appears to be desired, this word needs to be replaced with, we would suggest, 'refreshment', which is a noun and would be grammatically correct.</p>

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