

Consultation Statement – August 2023

Somerset Council Statement of Community Involvement

1. Introduction

- 1.1 This document provides details of consultation undertaken to inform the Council's new Statement of Community Involvement (SCI). The purpose of the SCI is to set out how and when Somerset Council will consult with community and stakeholders on the preparation of planning policy document (e.g. the Local Plan) and planning application proposals.
- 1.2 Whilst the SCI is not a Development Plan Document in itself, it was considered important that prior to adoption the draft SCI was subject to consultation to ensure as far as possible the document meets the needs and expectations of our communities and those that use the planning service.

2. Details of Consultation Undertaken

- 2.1 Public consultation on the draft SCI was undertaken for a six week period between the 1st February and 16th March 2023. The consultation document was hosted on the Council's Commonplace Digital Engagement Platform, with comments invited in writing either via the web, email or post. Using the former district Councils and County Councils consultation databases a range of stakeholders were directly notified regarding the consultation and invited to comment, including:
 - Parish, Town and City Councils
 - Applicants, architects and agents
 - Statutory Consultees
 - Representative organisations of protected groups
 - Other local organisations identified on the Council's planning policy database (e.g. Chambers or Commerce, Civic Groups, local societies and trusts).
- 2.2 The start of the public consultation was accompanied by a press release. A youtube video explaining the purpose and content of the SCI was also released and publicised through the Council's website, with the aim of improving the accessibility of the consultation material. In addition to the public consultation exercise on the document, briefing events were also held to raise awareness of the consultation with specific stakeholders and answer any questions. This included presenting the consultation material at agent's forum events and parish Council clerk briefing and training events. Consultation on the SCI was also integrated with the wider communications plan for the planning service to ensure consistent information regarding the consultation.
- 2.3 In addition to consultation with external stakeholders consultation on the draft SCI was also undertaken internally with relevant team and committees. This

Report 2 Appendix 2

included briefing and seeking feedback on the draft SCI from relevant planning and regulatory committees of the four districts and County that existed at the time.

3. Representations

- 3.1 A total of 164 representations were received on the draft SCI. Comments were received from a range of different stakeholders, including members of the public, Parish/Town/City Councils, planning agents/developers, resident and civic groups and statutory consultees. All comments have been considered and a number of changes have been made to final draft of the SCI as a result.
- 3.2 Alongside amendments proposed directly as a result of comments received a number of minor amendments have been made, for example to address typographical errors, provide further clarity and ensure the documents incorporates the new Somerset Council branding.

4. Summary of key changes made as a result of consultation

- 4.1 Appendix 1 of this consultation statement includes a table setting out full details of all comments received and our response to them. Any recommended changes to the SCI following consideration of comments are also set out in Appendix 1.
- 4.2 Below provides a summary of the key changes that have been made to the SCI as a result of comments received. Paragraph numbers refers the numbering as in the finalised SCI document.

SCI document section	Key change
Paragraph 1.7 (introduction)	Additional wording to refer to key importance of engaging with parish/town/city councils and other local groups in all aspects of the planning system. This was following feedback that wording in this regard should be strengthened in the document.
Paragraph 1.14 (equalities and diversity)	Amended text to be clear that information can be made available in different formats, such as large print, easy read, audio and braille. This text now better reflects the Council's wider equalities and accessibility policy.
Paragraph 2.7 (duty to cooperate bodies)	Text amended following feedback to be clear the duty relates to neighbouring planning authorities.
Paragraph 2.13 (Planning Policy)	Wording amended following comments received to be clear that any future review of the Local Development Scheme will include explanation

Report 2 Appendix 2

	regarding any changes in plan preparation timescales.
Paragraphs 2.24 to 2.26 (Planning Policy)	Amendments to be clear that consultation portal will be established in due course prior to commencing new planning policy documents, and to be clear specific consultation bodies don't need to sign up to the portal to be consulted.
Paragraph 2.53 (Conservation Areas)	Changes to text regarding consulting to be clear that conservation area appraisals and boundary reviews will include appropriate local community consultation.
Paragraph 3.8 to 3.12 (Pre-Application Stage)	Section comprehensively amended following feedback to strengthen the expectation for pre-application engagement with local communities, including Parish, Town and City Councils. Section states this should be early enough to genuinely inform proposals. Pre-app fees details included. Examples of consultation methods also now included, and reference made to Quality Review Panel.
Paragraph 3.17 (Who is consulted)	Following feedback from South Somerset regulatory committee reference now made to consultation directions, including for aerodrome safeguarding.
Paragraph 3.19 (Who is consulted)	Following feedback from AONB units wording has been amended when non-statutory consultees are consulted to be clear consultation will be undertaken in line with existing agreements regarding development size/location/constraints.
Paragraph 3.21 (Who is consulted)	Additional paragraph added to be clear amended plans or proposals may trigger the need for re-consultation.
Paragraph 3.27 (How do we consult)	Further wording following feedback from parish Councils to be clear that where consultation periods do not align with parish meetings then case officers will be pragmatic in terms of agreeing extensions of time.

Report 2 Appendix 2

Paragraph 3.29 (How to comment on planning applications)	Wording amended to be consistent with the equalities section and be clear that comments can be made online, via email or post, with details included on site notices and notification letters.
Paragraph 3.32 (What do we do with comments received)	Additional wording added to be clear that all comments received will be reviewed and considered as part of the process of determining an application.
Paragraph 3.34 (What do we do with comments received)	'Landscape' added as an example of a material planning consideration following feedback from AONBs.
Paragraph 3.39 to 3.40 (Decisions)	Section comprehensively amended to refer to the Council's constitution and make reference to the procedures set out here in terms of planning committee arrangements, public speaking and the referral processes.
Paragraph 3.47 (Enforcement)	New enforcement section added following consultation feedback. This links to the Council's published enforcement policy and how people can report a breach.
Appendices	Appendices reviewed based on comments received to improve clarity and name additional specific and general consultation bodies where required.

Appendix 1 – Schedule of Comments Received

Comment ID	Name / Organisation	Comments	SC Officer Response
1	Individual (Anonymous)	<p>Checking that a site notice has been erected needs to be more thoroughly checked. Often it's now sent to the application to erect so a photograph from them to be uploaded onto the portal would suffice.</p> <p>Communications between the applicant and the planning officer should mostly be published especially when an application is withdrawn as often the community/public/neighbours are unaware why the application has been withdrawn unless they make a FOI request which seems extreme.</p> <p>If an application is onhold because of phosphates, something should be posted on the portal, just to keep the community etc informed.</p> <p>If an extension of time request is agreed, again this should be uploaded along with the reason to keep everyone informed.</p> <p>The current planning enforcement process is flawed (especially in SWTC). The way you report potholes, flytipping etc should be the same process for enforcement. Also where planning officers are aware works have commenced and then proceed to refuse a planning application, it should be automatically referred to enforcement and something to that effect posted on the portal. Also the way of searching enforcement action should be either like the planning online register or the flytipping map, not like SWTC list which appear very dated.</p> <p>Generally there needs to be more transparency in the planning process.</p>	<p>The points regarding better transparency in relation to specific aspects of the Development Management process are noted (e.g. withdrawn applications, phosphates, extensions of time). We will pass this onto the development management team in terms of areas of service improvement to explore as part of the new Council.</p>
2	Boon Brown Ltd	<p>The SCI would benefit from a section explaining how the Council will advise interested parties of inevitable delays in the production of Development Plans and processing of Planning Applications.</p> <p>This would assist in understanding why delays from stated deadlines have occurred and how/when it is intended to get back on track.</p>	<p>Agree, amendment to refer to reasons for changes in plan preparation timescales to be included in the SCI for when Local Development Schemes are updated.</p>
3	Individual (Anonymous)	<p>Community Involvement when it comes to ACTUAL decision-making is, and always has been, the very last thing that the 'establishment' whether Government or Councils have ever wanted. They only ever pay 'lip service' to public concerns if they threaten to impact on establishment agendas.</p>	<p>Comments noted. The intention is that through the SCI arrangements communities can genuinely influence plan making and</p>

Report 2 Appendix 2

		It is surely time that all changed?	views are taken into account as part of planning application decisions.
4	Individual (Anonymous)	You must stop all new development on green field sites and instead focus on brown field land and in-filling within existing planning boundaries of established towns and larger villages. If any exceptions to this proposed policy are to be considered, they should only do so if there is strong evidence of demand by the majority of those living and working in the settlement. We cannot afford to lose any more green spaces, agricultural land or wildlife habit.	Decisions regarding future housing need and opportunities in relation to brownfield vs greenfield sites will be a key consideration as part of the new Somerset Local Plan.
5	Individual (Anonymous)	<p>The statement appears broadly to have been lifted wholesale from that of the district councils. There do not appear to be any significant changes.</p> <p>That said it appears to completely omit the conduct of application hearings. This is perhaps the most controversial aspect of planning especially given the proposals put forward to limit public participation in planning meetings. That is surely fundamental to the overall picture of public participation.</p>	Agree, a summary of the process for decision making will be added to the document and a cross reference made to the Council's constitution which has now been published.
6	Individual (Anonymous)	I would like more details on how Parish Councils will be consulted and how they can respond. As a Clerk in a Sedgemoor Parish, the present system works well, and it would be good if this was continued	Whilst they may be opportunities for improvement in the future there are not any intentions through the SCI to fundamentally change how parish councils will be consulted and respond to consultations. Existing systems have been carried forward into the new Council.
7	OBK Land & Planning Ltd	<p>It is vitally important that the Council progress a Somerset wide Local Plan as soon as possible to provide as much planning certainty as possible and to ensure the delivery of much needed housing across the Plan area.</p> <p>All relevant stakeholders should be consulted from an early stage, from local residents to developers/ housebuilders.</p>	Noted, preparation of a new Development Plan for the Somerset area will be a critical task going forward.
8	Individual (Anonymous)	What is the point in filling in a form when the last form I filled in about dual councils. I voted for a West Somerset Council as did many other's and won the vote. Democracy was totally ignored. Now money is spent North of Taunton on roads while little is spent on rubbish roads between Taunton/ Bridgwater roads.	Comments noted. No specific changes to the draft SCI needed.
9	Individual (Anonymous)	Havnt read the Content yet !	Comments noted.

Report 2 Appendix 2

10	Individual (Anonymous)	<p>When a planning application goes to Planning Committee then why doesn't this document cover how many people can speak and for how long (without repetition)?</p> <p>The proposal this week for only 1 objector limited to 3 minutes for all issues regardless of the size and complexity of the planning application is undemocratic and unfair.</p> <p>Will the new Council also consult on the number of objectors and time allowed for every planning application at planning committee?</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
11	Individual (Anonymous)	<p>The idea that planning can be administered for a region as wide as Somerset with a 'Local Plan' covering such a large geographical area, while remaining consistent with existing Neighbourhood Plans is an absolute joke.</p>	<p>The Local Plan will be an important document in updating and providing the strategic policy framework for future development in Somerset. Policies will still need to reflect the varied geography, communities and priorities that make up the new Council area. It is considered Neighbourhood Plans will continue to play an important role in setting our non-strategic policies relating to specific communities.</p>
12	Individual (Anonymous)	<p>The existing "rules" as applied in SWT are workable and understood by not just Cllrs but also members of the public. The proposed rules governing Somerset's new planning committees are seen as an undemocratic and unworkable and importantly a unnecessary process.</p> <p>As it is currently proposed the public speaking against/for applications are limited to three minutes in total and this is unacceptable. The induction of such a timing clearly demonstrates just how much the new council is becoming detached for the public who put them there.</p> <p>SWT typically allow an individual objecting to a planning application to have three minutes to speak - although the number of speakers allowed for each item varies. Under the proposed new rules, objectors would have to share three minutes between them, rather than having three minutes each, Planning is a very emotive subject and key area of council work that residents directly engage with, the current proposal risks making the new council appear remote, undemocratic and indifferent to the views of its residents. A contentious application must be aired publicly, mishandled will directly effect the new unitary councils standing.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>

Report 2 Appendix 2

13	Individual (Anonymous)	There is nothing in this Consultation about how neighbour (private or business) disputes over boundaries are resolved. It is eccentric that 'Planning' can approve building applications which show boundaries, without later being able to resolve disputes that may arise about what they have approved.	The SCI relates to the planning system and the use and development of land. Planning permission is separate from boundary or land ownership disputes which are a civil matter between parties.
14	Individual (Anonymous)	3 minuet time for speakers is insufficient. overall plans are undemocratic	The document will be amended to cross-reference to the constitution which sets out planning committee arrangements. Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution.
15	Individual (Anonymous)	Until the infrastructure of the whole area is improved first, new builds should be restricted to only essential social housing only.	Comment not related to the content of the SCI. There will be an opportunity to comment on these matters including the provision of infrastructure to support development as part of future Somerset Local Plan Consultations.
16	Individual (Anonymous)	Important to be informed.	Comment noted.
17	BOS Events	<p>It doesn't down load.</p> <p>The most important thing to learn is that planning is about people. When they are consulted you get better planning.</p> <p>When you don't respnd to the residents and ignore their concerns (especially when there are hundreds of them involved in the planning outcome) you don't then expect involvement when you want it. You have taught us our views don't count.</p> <p>The point being that planning conditions imposed when giving permission for changes with huge noise and security issues are a waste of time. They are never enforced so become pointless and only serve to discredit the Authority and show their lack of concern. Taking planning to County level will make it even more remote.</p>	Agree – Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views on in relation to the relevant planning considerations.

Report 2 Appendix 2

		<p>At present Sedgemoor has a reputation for only caring about giving way to big companies and that money counts and the living conditions and housing values of residents don't matter a damn.</p> <p>That you need to address before you make even more of a mockery of planning by going ahead without the community behind you.</p> <p>The residents of Burnham are an active community and involved in what goes on but though the Town Council have listened they have been totally ignored and you will inherit the consequences. How do you convince the voters that you will listen? The Councillors who represent us are not planning experts. People don't get involved in planning until it actually involves them. They don't realise just how vital it is to be involved in framing the legislation!.</p> <p>I worked with Tesco and with The Environmental Law Foundation for nine years and was sent round the Country to support campaign groups trying to influence planning decisions. I was greeted each time by a crowd of angry residents whose first words were always 'They don't listen to us!' My response was how have you told them how you are impacted by this? The answer would be that no one knows how to get involved. My job was to teach them the right route and lead them through to being third party representatives at the eventual Inspectors Review. My planning knowledge came from attending courses with Friends of the Earth and eventually helping to lead them. Lord Deny got me involved with The environmental Law Foundation. Planning could be so much more people responsive if only help was available from them for every campaign group. Just having a Duty Officer to listen and guide their first steps was always a must. It starts the relationship right and tells the residents how to find the information they need. Covid has killed all that! Time to re-instate it! It would save you time and aggravation in the long term and you might end up with some planning officers who knew about the area! Most I met were short term visitors from Australia or New Zealand who wouldn't even be here to see the consequences. Why should they care?</p>	
18	North Somerset Council	North Somerset Council are grateful for the opportunity to comment on the SCI but have no response to make.	Comment noted.
19	Individual (Anonymous)	An adjoining property has taken 5 years to extend so far and is still not finished. A time limit for completion of works needs to be in place to avoid 5 years of mostly weekend work.	Comments not related to SCI content but will be passed on to Development Management teams for information.
20	Individual (Anonymous)	List of areas to be considered does not include light pollution, specifically in AONBs and created by industry and more commonly now farmers...!	The SCI does not address specific planning considerations (e.g. light pollution). There will be opportunities to comment on these

Report 2 Appendix 2

			matters as part of future Somerset Local Plan consultation.
21	Parish Council (specific parish not specified)	<p>The proposal for a single shared three minute speaking period for objectors is totally undemocratic.</p> <p>Previously the West Somerset Planning Committee allowed up to 6 objectors to speak for 3 minutes. If there were more than 6 people wishing to speak, the Chair would ask them to decide between them which six people should speak, and they should ensure those designated to speak used their three minutes wisely, did not just repeated the same issues, but focused on different areas of concern. Often objectors would decide that only 1 or 2 speakers needed to speak.</p>	<p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
22	Individual (Anonymous)	Thorough	Comment noted.
23	Individual (Anonymous)	Please use your powers to simplify the process for the delivery of active travel infrastructure	Comments not related to SCI content but will be passed on to Development Management team for information.
24	Individual (Anonymous)	<p>I strongly believe that the Planning process and decisions should be in the hands of local councils, and not the centralised Unitary Authority. At the moment, local (Parish) councils are consulted, but the final decision is made at District Council level. I think that it will be impossible for a centralised UA to have sufficient knowledge and understanding of local environments to be able to make fully informed decisions regarding local planning applications. The new LCNs are, geographically speaking, a more appropriate size to know all of the important factors which will be necessary to inform any local planning decisions.</p> <p>A common framework and process amongst all LCN areas is of course necessary, unlike the differing processes which currently prevail at DC level, but all decisions should be made by representatives from the area which will be affected by new developments.</p>	<p>The arrangements of maintaining 4 separate area planning committee, with local membership, will ensure that decisions taken into account local knowledge and understanding.</p> <p>Regulatory functions such as planning and licensing are not part of the initial LCN development. We will however work towards making stronger links, particularly in relation to influencing place shaping, as we develop.</p>
25	Individual (Anonymous)	You just like to waste the tax payers money, you don't fix the properties, roads that are in place and make peoples life hell	Comment not addressing SCI or community involvement in planning. The use of relevant budgets for planning services and Local Plan development will go through relevant procurement processes to ensure value for money.
26	Individual (Anonymous)	With reference to commenting on planning applications:	The Council takes data protection requirements very seriously however a

Report 2 Appendix 2

		<p>The council will redact email address, phone number, signature. However, the council will publish a person's home address. It is much easier for a person to change their email address than move house if they are concerned about the possibility of being harassed by an applicant. Surely a person's home address can be redacted for public viewing but retained for the council.</p>	<p>balance needs to be struck with ensuring the planning process is as transparent as possible and therefore anonymous comments cannot be accepted. Personal data will continue to be redacted from the public register in line with GDPR requirements.</p>
27	Network Rail	<p>Thank you for consulting us on the Somerset Statement of Community Involvement. This email forms for the basis of our response.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>In respect of plan making, the Council is required to engage with some groups to meet the regulations. Network Rail has been identified as a specific consultation body for Local Plans. Rail Network operators have also been identified for consultation on applications for planning permission.</p> <p>Network Rail wish to be consulted on the two main areas of planning both, planning policy, and planning proposals within 10m of railway land or on any development that may adversely affect/impact the safe operation of the railway.</p> <p>Network Rail require to be consulted on Neighbourhood plans where railway/ level crossings are included within the plan area.</p> <p>Level Crossings</p> <p>Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders</p>	<p>Comment noted. Network rail identified as specific consultation body and statutory consultee for plan making / decision taking.</p>

		<p>and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> * By a proposal being directly next to a level crossing * By the cumulative effect of development added over time * By the type of crossing involved * By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing * By developments that might impede pedestrians ability to hear approaching trains * By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs * By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing * By any development or enhancement of the public rights of way <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p> <p>* (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.</p>	
--	--	--	--

Report 2 Appendix 2

		<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>We trust these comments will be useful in the preparation of the forthcoming plan documents.</p>	
28	Individual (Anonymous)	<p>The new Unitary MUST involve and take account of grass root local opinion when Planning Applications are brought forward. Local people must have a fair and equal say in all development matters. The best way to achieve this is to retain the consultation system currently used by Parish Councils. Any Neighbourhood or Local Plan must also be retained and upheld. Local people have voluntarily spent hours of their own time and energy creating Neighbourhood Plans and it would be insulting to communities if these fell by the wayside. Local people know their own areas better than anyone else and their views must be heard.</p>	<p>Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views in relation to the relevant planning considerations.</p> <p>Like Local Plans when adopted Neighbourhood Plans are part of the Development Plan for decision making going forward, with weight afforded to policies consistent with the NPPF. Moving forward they will continue to form part of the Development Plan for the Unitary Council.</p>
29	Individual (Anonymous)	<p>Community involvement is a mirage created to fool people into believing that they have any power at all in the face of corruption and development</p>	<p>Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views in relation to the relevant planning considerations.</p>
30	Individual (Anonymous)	<p>The existing Planning dept. does not take into account residents concerns regarding new homes. Watchet is inundated with new housing developments taking over green field sites. They do not take into consideration that there is no local employment opportunities therefore all new residents are adding to the traffic on the A39 & A358. The planners think people will walk or cycle, not feasible. There is no suitable public transport - a lot of work is for shift workers so they have to go by car. It is impossible for existing residents to access doctors & dentists. The sewage infrastrure is already inadequate. Government quotas dictate that we have to build, build, build but with no regard to whether these sites are suitable. The</p>	<p>There will be opportunities to comment on these matters, including the provision of infrastructure to support new development, as part of future Somerset Local Plan consultation. Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is</p>

Report 2 Appendix 2

		local council does nothing to build social housing. Why will any reorganisation make any difference?	fully informed by local communities views in relation to the relevant planning considerations.
31	Individual (Anonymous)	<p>I presume that the new Unitary Authority will wish to process planning Applications to a common standard across its area, using agreed, standard protocols, which, themselves, are placed in the public domain. Ideally, that would mean designing and using the same Application Form for a given type of Application throughout the Unitary area; validating (or rejecting) the Forms using a standard procedure; and only then, permitting certain information to be redacted from the Forms (if requested by the Applicant), for specified, valid reasons, as stated in, for instance, a Planning Procedure Code of Practice.</p> <p>Such a Procedure would eliminate the all too common processing of Applications where material information is omitted from an Application Form, incorrect information is given, or redactions are permitted arbitrarily - all of which are incompatible with the need for consistency, integrity, and the requirement to minimise the possibility of the perception of bias.</p> <p>As regards the electronic audit-trail of planning documents, the public file for each Application should record the date on which the LPA received a given document, AND the date on which it is placed on the public file (which have been years apart, in my recent experience).</p>	Yes, the intention as the reorganisation progresses is to move towards consistent processes between the former district area for the various planning process stages, including issues around validation.
32		<p>I have concerns that the draft does not give enough weight to Parish and Town Councils comments in planning applications, as they have the local knowledge, which is in danger of being lost when committees have to cover larger areas...I believe not given LCNs a role in planning is a backward step, and will make them somewhat pointless talking shops. I had high hopes for a fairer planning system under the County Council, but so far there is very little sign of this. There is insufficient guidance in environmental issues, heritage conservation and if the system will tighten up on enforcement. Where I live several large developments have been in breach of their planning conditions but no attempt has been made to force them to comply, which sends a message to developers, that they can run free and to the public that the system is not fit for purpose. This draft gives very information on how this will be tackled and how the public will be heard....sadly lacking in detail and taking the worse practices from the worse districts, heaven help us</p>	<p>Agree, the importance of including parish and town councils and other local groups as part of the planning process will be emphasised in the SCI (last para of introduction section). We agree that local knowledge is critical when taking into account the various planning considerations relevant to a plan or proposal.</p> <p>Regulatory functions such as planning and licensing are not part of the initial LCN development. We will however work towards making stronger links, particularly in relation to influencing place shaping, as we develop.</p> <p>Agree to include more detail on the enforcement process in the SCI and link to</p>

Report 2 Appendix 2

			the new Council enforcement policy and how the public can report a breach.
33	Individual (Anonymous)	It is important that the local community are consulted in the locality of the development. Not just online. would also like to see more emphasis on developing brownfield sites and town centre regeneration and not letting development sites sit idle for years.	<p>Agree, the SCI refers to use of workshops and drop in events, which are likely to be focused on locations where development is proposed to be allocated.</p> <p>The balance between greenfield and brownfield will be an important consideration for future Local Plan consultation.</p>
34	Individual (Anonymous)	Excellent idea.	Comment noted.
35	Individual (Anonymous)	Greater impact should be given to community involvement in the decision of planning due to the varied nature of somerset	Agree. Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views in relation to the relevant planning considerations.
36	Winsham Parish Council	Please consider making mandatory the referral to a higher planning authority (above officer level) when a rejection of a planning application by the Parish Council is made. The idea that local views count is dismissed if this requirement can be overridden by the planning officer.	<p>Planning officers through delegated approvals/refusals still need to take into account all relevant planning considerations, including those raised locally and through the parish council.</p> <p>The constitution sets out that where officer recommendation is not in agreement with Parish then major development are automatically referred to area based committee. Non-major are referred to committee chair/vice chair who will decide whether to refer to committee.</p>

Report 2 Appendix 2

37	Individual (Anonymous)	Really don't think that county council make all the decisions on planning .After all the vast majority won't live local to the area so shouldn't make decisions on local planning	The constitution sets out the arrangements for 4 area-based committees, reflecting the former districts geographies.
38	Individual (Anonymous)	More consultation time must be available for objections.	Consultation periods are set in legislation for both plan making an determination of planning applications.
39	Individual (Anonymous)	In Appendix 1 The list of organisations to be consulted on housing issues should be extended to include community led organisations (see NPPF consultation) such as Community Land Trusts and Almshouse Trusts.	Agree – amendment included in Appendix.
40	Individual (Anonymous)	Parish Councils should continue to be consultees and their comments should be taken into account. Building Control and Planning need to consult each other.	Comment noted. Parishes will continue to be statutory consultees.
41	Seavington Parish Council	As this appears to be similar to how South Somersets current practice we are happy with it	Comment noted.
42	Hinton St. George Parish Council	<p>The Parish Council wishes to make the following comments:</p> <p>Section 3 Diversity and Equality states "letters of comment can be received online, by email or by post and can be made on behalf of other individuals". The majority of people are unaware they can comment by post, so how will this be made clear on the County Council website and will a postal address be included on all planning notices and the website welcoming postal engagement ?</p> <p>Currently SSDC encourage public comments via public portal with a time limit and no opportunity to submit photographs or plans. This deters members of the public from commenting and should be reviewed.</p> <p>Section 4 The Local Plan - you state the former district level local plans will apply until they are superseded by the Somerset side local plan in 2028.</p> <p>Locally there are cases of developments being put forward on land identified as part of the emerging local plan which has never been adopted, using sites identified via HELAA reviews for 2020-2040 local plan. Some of these have been successful in gaining planning consent. Will the County Council stop this practice and stick to the AGREED local plans, so that only those sites adopted under the current local plans will be considered for development ?</p>	<p>Agree. SCI will be updated to be clear that comments can be made via email and post and confirm that these details are included on relevant correspondence, including site notices.</p> <p>Noted – We will pass this onto the Somerset South development management team as an area for potential service improvement.</p> <p>This is not possible based on the current national policy. The weight to be afforded to the adopted development plan depends on its status and other material considerations (e.g. land supply position).</p>

Report 2 Appendix 2

	<p>If Somerset Council undertakes a "call for sites" as part of the County wide Local Plan will any identified sites, or increase in capacity of existing sites be discounted until the adoption of the new 2028 Local Plan ?</p> <p>4.5 Conservation Area appraisals - many of the current SSDC Conservation areas were designated between 1970 and 1990, and have not been regularly reviewed. Will the appraisals cover all existing Conservation areas as part of the 2028 local plan with a view to increasing protection of the setting of a conservation area and taking into account the Local Heritage Listings over the last year as part of the SouthWest Heritage project ?</p> <p>The draft guidance says " you may engage with local groups, such as Parish Councils" we believe this should be amended to " WILL ENGAGE" as local knowledge has an important part to play in this process.</p> <p>For smaller Parishes, with no neighbourhood plan, what weight, if any, will be given to the Village Plans, or Design Statements, which have been agreed with local councils, when planning applications and the 2028 Local Plans are considered ?</p> <p>Your draft policy makes no mention of ARTICLE 4 DIRECTIONS, we believe they should be applied to conservation areas as part of the review.</p> <p>There is also no mention of a review of local wildlife sites, or Nature Reserves as part of the 2028 local plan, yet conservation and protection of the environment should be a major part of any local plan and planning policies as highlighted by Natural England in their recently released Green Infrastructure Strategy</p> <p>5.2 Pre application stage - we would like to see a stronger commitment to encouraging applicants to engage with the local community and the Parish Councils in any pre application discussions with the local planning authority. Local knowledge is again key at this stage and getting an application right at this early stage could speed up the planning process and lessen any future possible tensions between developers and the local community.</p> <p>5.3 Planning consultation. - any reduction in advertising, either by public notices or letters to neighbouring properties seems to be detrimental to the process and likely to lessen public engagement with the planning process.</p> <p>Within this consultation section you say a link to comment online will be included, but under the Equality Section 3, you state " letters of comment can be received online, by email or by post" This should be clear on all planning notices, regardless of the size of the development and the proposals, to ensure all members of the community are able to engage.</p>	<p>See comment above.</p> <p>Conservations Area Appraisals and Management Plan are likely to be progressed separate from Local Plan based on conservation officer resource. Local listing will be a material considerations for decisions.</p> <p>Section will be reviewed to be inline with legislative requirements.</p> <p>They will be a material consideration. Weight will be dependent on their age and consistency with NPPF and Local Plan.</p> <p>Whether article 4 directions would be justified would be need to be informed by any review and the recommendations management plans.</p> <p>The policy wording for the protection/enhancements of such sites will form part of the Local Plan review.</p> <p>Agree – wording in relation to pre-application engagement will local community will be reviewed and amended.</p> <p>There is no intention to reduce the publicity of planning applications as part of the new Unitary Authority.</p>
--	---	---

Report 2 Appendix 2

		<p>There is no mention of increasing the weight given to comments made by Parish Councils. As the County planning committees will cover a larger area, local knowledge will be vital and time within meetings will be limited, so the comments from the local Parish Council should be given full consideration and Parish Councils should have a designated telephone number and email address for planning enquiries.</p>	<p>Agree – amend ‘how to comment on planning applications section’ to refer to comments also being accepted by email and post. It has been agreed that site notices will display all contact details to allow for different methods of commenting on planning applications.</p> <p>Agree. Area-based planning committees will be in place to ensure sufficient time for consideration of applications. All comments on planning considerations will be taken into account. The weight afforded in decision making will be dependent on Development Plan policies and national policy.</p>
43	Kilve Parish Council	<p>The first part of the document is worded in a fairly vague language suggesting things may be, could be, can be.</p> <p>The actual decision making arrangements are not included. Some things are currently agreed by the Planning Officer, others in Planning Committee and others in Full Council. What is the plan for the Unitary Council?</p> <p>The post decision process is not covered. Currently the Council has responsibility for enforcing the conditions set in the decision process but has no resources/capability to follow them up. What arrangements will the Unitary Authority have?</p> <p>Appendix 1 ONR also have responsibility for Hinkley Point C.</p> <p>Under transport, there is no mention of horse riders, British Horse Society etc. Across Somerset there are many rights of way that need consultation with all possible users.</p>	<p>The document purposely uses wording that’s allows flexibility about the appropriate consultation methods for the circumstance which are not set in legislation.</p> <p>Agree -The document will be amended to cross-reference to the constitution which sets out decision making and planning committee arrangements.</p> <p>Agree to include more detail on the enforcement process in the SCI and link to the new Council enforcement policy and how the public can report a breach.</p> <p>In relation ONR, Hinkley Point C this is covered by the DCO process.</p> <p>Agree – Amend list of general consultation bodies to also list these examples in relation to horse riders.</p>

Report 2 Appendix 2

44	Yeovil Without Parish Council	We note the SCI and await the official report	Comment noted.
45	Badgworth Parish Council	Where contractors/developers are required to carry out public consultation for development, there should be clarity on what the consultation must include/achieve and how it should be carried out, to ensure robust local consultation takes place.	Whilst the Council can encourage pre-app consultation by the applicant, under gov policy we are not able to mandate that it is undertaken, or what it must specifically include/achieve.
46	Individual (Anonymous)	I am a District and Well City councillor I am really concerned what will happen in the first year of Somerset's combination Council. It feels like it is not at all ready to operate I would like to know who is my direct contact and where the services the people I represent can access and who I need to contact. I want a direct link to officers like I did at Mendip!! If I was asked a question I knew who to speak to in Somerset!! There has not been 1 Mendip offices employed in the first 3 tiers of Somerset!! Who will know what happens in our area!! I realise we have some very experienced Somerset Councillors who will represent us and we have a good relationship with them but I need contacts with the offices as I did before is it possible to have a list of all contacts and their officer duties	Comment is not a matter for the SCI. Councillors are given a direct contact details with case officers when consultation notifications are sent out.
47	Chedzoy Parish Council.	<p>"Development to be focussed in urban areas, brown field sites and in-fill within existing planning boundaries.</p> <p>Green spaces to be protected ensuring that no development is to be allowed on green field sites or agricultural land other than where no other exists within a 10 mile radius, and then only if suitable green field and wildlife enhancements are provided for by a levy.</p> <p>Development of green spaces to be considered only if there is evidence that the majority of existing residents are in favour of any proposed development.</p> <p>Parish Councils to be given a veto on any housing development over a given size (say 5 dwellings) and any application for commercial purposes."</p>	<p>Comments not a matter to be considered in the SCI. These different matters will be considered as part of preparation of the Somerset Local Plan.</p> <p>Planning legislation does not allow for any sort of 'veto' rights as described.</p>
48	Ditchat Parish Council	Ditchat Parish Council (DPC) does not believe that the draft Statement of Community Involvement significantly impacts the Parish Council at this time as the process described in the document appears for the foreseeable future to be same as the current process. DPC would like the opportunity to comment in future if and when changes are made to the process.	Comment noted.
49	Chard Area Resilience Group (CARG)	<p>General support for the draft.</p> <p>CARG is a constituted association of residents and works on an evidence basis.</p>	Comments noted. There will be an opportunity for the group to put their views across in relation to these planning issues

Report 2 Appendix 2

		<p>This is an opportunity to have the development of towns and villages led by the community, rather than developer and profit/dividend led.</p> <p>We do not have a problem with residential or commercial development per se, but where the existing Local Plan is not fit for purpose now it is exacerbating flooding, traffic, crime and other matters.</p> <p>We welcome being consulted and would seek to be on any future list.</p>	<p>and how the next Local Plan should address them when we carry out consultation in the future.</p>
50	Individual (Anonymous)	<p>My additions = **</p> <p>and/or</p> <p>My Corrections = !!</p> <p>Infrastructure providers:</p> <p>National Grid Western Power Distribution Wales and West Utilities RWE npower renewables EDF Energy Office for Nuclear Regulation (for matters relating to Hinkley A and B) South West Water Wessex Water Parrett Internal Drainage Board British Telecom PLC Commpro Telecommunications Mobile Operators Association (MOA) Mono Consultants Ltd. T-Mobile (UK) Ltd O2 (UK) Ltd Orange Personal Communications Vodafone Ltd</p> <p>** Virgin media(broadband infrastructure)</p> <p>** Jurrassic Fibre (broadband infrastructure)</p> <p>** Truspeed (broadband infrastructure)</p> <p>** Hutchinson LTD (three mobile, mobile/mobile broadband infrastructure)</p> <p>** Bristol Water (provides Burnham On Sea in collab with wessex water)</p> <p>**!! O2 (UK) LTD > Telefónica UK Limited/LTD</p>	<p>Agree there are some omissions in the draft SCI. We will review the infrastructure providers listed in Appendix 1 to ensure it correct and includes Bristol Water and relevant broadband/mobile providers.</p>

Report 2 Appendix 2

		** EE LTD	
51	Individual (Anonymous)	I am pleased to see that the parish councils will be consulted on the local planning applications as this is a must as they have the local knowledge.	Agree and comment noted.
52	Individual (Anonymous)	There seems to be no comment on a Dark Skies Policy. By reducing lighting on more rural roads will reduce electricity consumption and cost. I particularly have in mind using timers to switch off street lights on rural roads between 12 midnight until 6am. These timing can be varied.	The SCI would not be the place to address specific policy topics. There will be opportunities to comment on these matters, including light pollution, as part of a future Somerset Local Plan consultation.
53	Individual (Anonymous)	At first sight it doesn't seem to be very different from present practice	Comment noted.
54	Individual (Anonymous)	<p>The Local Plan for areas of Somerset should be very carefully considered. There should not be a blanket 5-year plan to meet, as many areas of Somerset which may seem on the face of it to be suitable for development, are vulnerable to flooding. Much more care needs to be taken in identifying sites which can be developed, so that once sites have been developed and the builders have gone, residents are not left with having to deal with properties which should not have been allowed. Town/parish councils should be a lot more approachable, so that members of the public can be more involved. In Crewkerne there is still no Neighbourhood Plan in place.</p> <p>With regards to being able to comment on planning applications, it should be possible for members of the public who do not have access to the internet to send their comments by post. Details on how they can do this should be made available. Pre-applications should always be available to the public to comment on. On major developments, the local council, developer and members of the public should be able to discuss plans prior to planning applications being submitted. That way a lot of the problems can be dealt with early on in the process which should mean that when a planning application is submitted, the documents are of a better quality and the process of consideration should be much quicker as there may be fewer objections from the public and consultees.</p>	<p>Comment regarding policy noted, not a matter for the SCI. There will be opportunities to comment on these matters, including the location of development, as part of a future Somerset Local Plan consultation.</p> <p>Comment regarding commenting without internet access noted and this will be updated in the 'how to comment section'.</p> <p>Pre-apps direct to the LPA are not consulted on. This would increase costs disproportionately, discouraging early engagement. The SCI does however encourage developers to also undertake pre-app with the local community.</p>
55	Crewkerne Town Council	Crewkerne Town Council would like to see more weight given to the views of the Town and Parish Council consultees in the planning process. As the most local level of representation, these authorities are best placed to comment on local needs and views and this should be taken into consideration by Somerset Council. The Town Council would also like to be consulted on applications for works to trees, and have access to professional reports supporting these applications where possible.	Agree. Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views in relation to the relevant planning considerations. Parish

Report 2 Appendix 2

			and Town Councils will continue to be consulted/notified as appropriate in relation to works to trees.
56	Individual (Anonymous)	<p>Notification of Planning application to neighbours. Is it those to left and right, in front or behind ?</p> <p>Evidence that neighbours were notified.</p> <p>The responses from statutory bodies must indicate that have responded. Either with the response or No comment. That no response has been received MUST be clearly stated.</p> <p>Material considerations when including "Previous decisions" must take into account the views of the LOCAL residents who know far more than any Planner ever can aspire.</p> <p>Loss of productive agricultural land must only be allowed in very exceptional circumstances.</p> <p>PINs, in Appeal situations, must generally visit the site and consult. Desk top decisions must not be accepted.</p> <p>Third parties MUST have a say in PIN's decisions. There is evidence that PINs can be operating in an illegal manner.</p> <p>Whitehall never knows best and SCC must be prepared to challenge any perceived nonsense from the civil service</p> <p>Planning Committees are not enrolled to "rubber stamp" Government diktat otherwise why not abolish such committees.</p>	<p>As set out in the SCI it is any adjoining owner or occupier to the application site.</p> <p>Comments noted. Officer will indicate 'non-responses' as part of reporting.</p> <p>All local comments will be taken into account.</p> <p>NPPF is clear that where there is significant development on agricultural land areas of poorer quality should be preferred.</p> <p>These are matters for the Planning Inspectorate operations is not for the SCI.</p> <p>Planning Committees are under no obligation to follow the officer's recommendations.</p>
57	Individual (Anonymous)	<p>The community needs to be confident that the Planning decision makers are familiar with the local context of the proposed plans. This requires members of the new One Somerset Planning Committee to make visits to villages etc with which they have not hitherto been familiar. Controversial plans should always involve a site visit by the Committee and Planning Officers. This should be an opportunity for members of the relevant community to make their views known in person in an orderly way.</p>	<p>The constitution sets out the arrangements for 4 area-based committees (reflecting the former districts geographies) to ensure membership is relevant to the specific geographies.</p> <p>The Councils new constitution sets our arrangements for planning committee site visits. SCI will be amended to reference site visits and link to the new constitution.</p>

Report 2 Appendix 2

58	Castle Cary Town Council	We generally accept this document but would like to point out that the Neighbourhood Plan which we in Castle Cary spent a HUGE amount of time writing is largely disregarded when planning decisions are made. We urge Somerset Council to listen and act on the local knowledge & expertise that has contributed to the neighbourhood plans.	Comment noted. Not a matter for the SCI. However, once adopted the weight given to non-strategic Neighbourhood Plan policies should be in accordance with NPPF para 30.
59	Dorset AONB Team	<p>Dorset AONB Team advise that further consideration be given to the mechanisms to engage Dorset AONB Team for advice on pre-application enquiries and full planning applications that may significantly impact the designated area. Historically, there has been a planning protocol, which contains a number of thresholds (as per section 4.2 of https://www.dorsetaonb.org.uk/wp-content/uploads/2019/05/Dorset_AONB_Planning_Protocol.pdf).</p> <p>It is understood that consultation with AONB Teams on applications is stated to be at the discretion of the case officer. This decision could be informed by guidance as to the parameters/circumstances that might suggest that a consultation should be issued. It should also be noted that the extant protocol suggests that pre-application advice for the team would normally be provided to the LPA, not directly to the applicant. Consequently, Dorset AONB Team does not provide a pre-application advice service that operates in the manner suggested within the consultation document.</p>	It is intended to ensure that AONB units continue to be effectively engaged throughout the planning process. For example consultation thresholds previously agreed with continue to apply and will only be amended in the future through mutual agreement with the AONB units. The SCI will be amended accordingly with regard to pre-application advice to ensure it is consistent with regard to this only applying for those stakeholder that offer their own pre-application advice service directly with applicants.
60	Individual (Anonymous)	<p>1) I would like to see developers engage in green energy, solar panels, solar roof tiles, solar battery storage as well as heat source recovery and home car charging station all to be included in development plans.</p> <p>2) Surface water recovery to be included in development, water recovery from roofs and other buildings to be directed into ponds for filtration into the water table, that will also involve wildlife protection and natural habitat around the water recovery pond. This is to maintain water levels due to climate change.</p> <p>3) When a local plan is proposed make sure that infrastructure of waste system, road surface water, roads, doctors, schools and NHS dentist are addressed to keep up with population and traffic demands and developers are obliged to survey residents of proposed development area for that area's needs.</p> <p>4) Hedges, trees and green space to be saved and incorporated into development plans for natural habitat wildlife protection.</p> <p>5) all developers to be directed to use brown field sites for priority use whether they are sited in large towns or old industrial sites in towns that have stood empty.</p>	<p>Comments are not matters for the SCI, however the importance of sustainability, energy efficiency, renewables and the other planning considerations listed will be important matters for the next Local Plan to consider.</p> <p>Given the NPPF presumption in favour of sustainable development, Local Plan overall housing numbers are unlikely to be able to act as a 'cap' (once reached) under the current national planning regime.</p>

Report 2 Appendix 2

		6) when a local plan has been established and a set number of houses have been set to be built in that time period and that set number has been reached then no more development will be done until the next scheduled local plan has been set out, stick to what has been set and no bending of the rules.	
61	Ruishton & Thornfalcon Parish Council	The Council wish to object to the 3 minute time slot allowed in total for objections to planning applications despite their size or complexity. This is undemocratic and unfair for the public to have a say	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
62	Tintinhull Parish Council	The Council wish to object to the 3 minute time slot allowed in total for objections to planning applications despite their size or complexity. This is undemocratic and unfair for the public to have a say	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
63	Individual (Anonymous)	Whilst I commend this initiative for more community involvement I remain sceptical. Central government dictates housing to each County which remains powerless to override the dictate even if there is less local demand for it. A recent example being the so called 'consultation' over the Trull / Comeytrowe proposed development. The result was the developers as usual won the case and we now have 2,000 homes being built on prime agricultural land when food security is moving up the agenda. I had correspondence with the local helpful liberal councillor who conceded far too many homes have been proposed for 2020 - 2030 in Taunton alone. Your consultation is not dissimilar to a Soviet election / Putin consultation - we have the right	Comment noted.

Report 2 Appendix 2

		to speak so long as the result is what Central Government wants. There is no power in local democracy any more than there is in a region of Russia I am afraid to say but welcome your further comments.	
64	trudoxhill parish council	The parish council believes that the role the council currently plays in planning is crucial and critical for planning policy to be connected to the people who live in the affected area. There is very rarely any other local representation within the group of statutory consultees and unless there is a concerted outreach effort, there is no mechanism by which the residents of the area are involved. The parish council therefore serves as an approachable sounding board, a conduit and a vital link to hyper-local knowledge that is regularly needed to put planning applications in context - a resource that there is no other way to guarantee is available to every officer.	Consultation is advertised as per the SCI allowing residents to comment if they so wish. The Council agree that local knowledge is important to the planning application process. All comments on relevant planning considerations will be taken into account. SCI to be updated to emphasise the importance of planning being informed by local knowledge through community engagement and consultation.
65	West Camel Parish Council	We understand the content of this draft document to be a continuation of the existing consultation and especially Statutory Consultee rights Parish Councils previously enjoyed under the former South Somerset District Council arrangements.	Comment noted.
66	Individual (Anonymous)	How will you actually engage with the community on all planning matters? Certain developments usually agricultural buildings suddenly spring up in the countryside seemingly without any notice being given and to the surprise of residents. How will you inform residents not just in the immediate area of the building but those who may be affected by this planning permission?	The process of notification is set out in the SCI. Important to be aware that some development (e.g. certain agricultural buildings) have permitted development rights through national legislation, meaning planning permission does not need to be applied for.
67	Individual (Anonymous)	Great idea	Comment noted.
68	Individual (Anonymous)	Where is the draft statement of community involvement?	The draft document was published on the consultation website.
69	Individual (Anonymous)	Whilst neighbourhood plans are a good idea, most Parish Councils will be unable to effectively complete one even with assistance. Parish Councillors are unpaid volunteers juggling families and work commitments alongside Parish duties. Many are struggling to fill spaces on Parish Councils. This is not an effective way to go about a robust Neighbourhood Plan. It should be the role of the main council planning to produce the plan itself with consultation with the Parish Council. Without the time and requisite skills being put into a neighbourhood plan, it is	Under current legislation it is a 'qualifying body' (e.g. parish council) that can produce a neighbourhood plan, not the LPA. The SCI does however set out how the LPA can support and assist. Please be aware there is grant funding available (e.g. via locality) to support parish councils.

		<p>worthless. All plans, local or neighbourhood should be the responsibility of the planning department only with an expectation of local PC involvement.</p> <p>Representations made- no identifying features of individual representations should be published. They should of course be provided to planning who would satisfy themselves it is a genuine representation. All personal identifying details should be redacted before placing on the website. I and others who have made representations have been 'doorstepped' by angry/irate applicants. A frightening and unsettling experience which leads to doubt as to the likelihood of making future representations against an application by the same applicant. If the council planning are satisfied the representation is correctly made, no personal details should be published.</p> <p>Where any representations are made regarding a site/address, any future applications regarding the same site/address should be notified directly to those who have made previous representation. In rural areas where neighbours are considerable distance away or the site of the application is not in plain view, then all neighbours affected should be notified of the plans, not just the nearest one. Where a notice is displayed in 'hidden' rural locations it is often missed which does not allow for effective representation by a community. Rural communities are more spread out, sharing limited services, small country lanes, diverse wildlife concerns. Local residents are often those who fully know the background of the area/buildings in great depth. Just because they are not right next door as in a town, they should not be overlooked by the planning department for notification of applications. A planning notice in a residential street is seen by many, a notice in a tucked away rural location is easily missed and it needs extra attention by the planning department to ensure all those locally are fully aware of applications.</p>	<p>The Council takes data protection requirements very seriously however a balance needs to be struck with ensuring the planning process is as transparent as possible and therefore anonymous comments cannot be accepted. Personal data will continue to be redacted from the public register in line with GDPR requirements.</p> <p>In accordance with the publicity requirements all adjoining neighbours would be notified in writing of an application. Officers seek to ensure site notices are displayed in a prominent position at or near the site to raise awareness of an application within a community.</p>
70	St Cuthbert (Out) Parish Council	<p>SOMERSET STATEMENT OF COMMUNITY INVOLVEMENT IN PLANNING</p> <p>Response from St Cuthbert (Out) Parish Council</p> <p>There are many points to commend in the draft SCI, but St Cuthbert (Out) Parish Council would like to highlight some key concerns in relation to Sections 4 & 5 of the draft.</p> <p>* Decision-Making & Accountability: The Council wish to emphasise that there are no specific details about how the planning decision process itself works – its mechanics and chain of decision-making.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements. It clarifies the arrangements for area based committees, following the geography of the former districts. It also</p>

	<p>It is realised that Somerset Council will have to concatenate the procedures of its predecessor County and 4 District Councils but until a system is proposed, no-one Statutory Consultees (eg Parish Councils) or members of the public could be said to have been properly consulted.</p> <p>The Parish Council are not yet aware of how localised planning decisions will be made: whether they will be centralised with the Unitary Authority or in a version of 'area boards', likely mirroring current LPAs. This uncertainty fuels the Council's concerns over the relationship between Planning Board, Ward Councillors Parish Council Planning Committee and Planning Officers. Parish Councillors need to carry equal weight to Unitary Councillors in the event of strong local feeling being challenged by non-elected Planning Officers and a decision moving to Planning Board. Where Officer decisions are detrimental to, and against a tide of, parish resident interests, intimate local knowledge and finely considered responses, Parish Councils should not be over-ruled.</p> <p>Under what conditions would a conflicting decision between Consultees and Planning Officers be referred upwards to what is currently a Planning Board? Planning Boards provide a check and balance to Planning Officers' autonomy currently – what would their composition be and what would be the process of referring a planning decision to the Planning Board?</p> <p>At present, for example, in Mendip District Council there is a reasonably well understood process whereby if the Parish Council Planning Committee and the Planning Officer have opposing recommendations, the Ward Councillor has the power to refer the decision to the MDC Planning board. This process was set up after the controversy that ensued after the successors to British Rail were given planning permission, under delegated authority, to fill in the underside of the railway bridge rather than strengthen the bridge which blocked any possibility of a multi-user path using the old railway going underneath the Old Frome Road near Masbury Castle.</p> <p>Summary: this consultation makes no reference to the decision-making process. Further detail is essential.</p> <p>2.Timings: the contentious proposal that public speaking time is 3 minutes overall has been criticised more widely. The Parish Council would like to reiterate their concerns that prepared and researched defences of a PC recommendation would require more speaking time (albeit with some time limit). Further, as a Consultee with the most local knowledge and previous detailed discussion time, parish councils should be afforded more time where needed than members of the public. The Council expect there to be a statutory requirement to consider written submissions in advance, from councillors or residents.</p> <p>Summary: the proposed speaking time is inadequate.</p>	<p>sets out the circumstances for where applications will be referred to committee where the officer recommendations is at odds with Parish Council comments.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements. Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
--	--	--

		<p>3.Consultees: it is positive that AONBs and National Parks are included in the 4 consultation categories, but further thought may be needed as to how the Council engage with harder-to-reach groups, who may not have or use digital technology or social media or access to printed media in rural areas. (The 'local newspaper' is increasingly digital). There should be a County-wide campaign early on to promote the registration to the Consultation Portal for residents.</p> <p>Because the decision-making route is unclear (see below), it is not clear how the needs of residents will be driven.</p> <p>Summary: acting on resident opinion would seem secondary to national legislative requirements, rather than a key priority.</p> <p>4.Decision Notices: It is also a further burden on Parish Council administration that Decision Notices will not be issued to Consultees but rather they have to seek them out. Whilst the LPA also currently follows this system and stopped issuing Decision Notices late in 2021, the responsibility for informing councillors of planning decisions made now falls to the Parish Council with far less resources to record, inform and challenge.</p> <p>Summary: Decision Notices as formal outcomes of applications should be issued by the highest planning authority.</p> <p>5.Neighbourhood Plans: it is not clear whether there will be more onus on Parish / Town Councils to produce Neighbourhood Plans, and within what timeframe. Resources, funds and possibly expertise should be available to support this, even moreso for very small parishes and parish meetings.</p> <p>Summary: there is not enough detail about how neighbourhood plans would be facilitated.</p> <p>* Commenting online on applications If comments are permitted after the Consultation Period ends, this creates a grey area for PCs and residents. Where it states "a decision can be made at any time after the expiry of the consultation period", comments made after may seem less meaningful. Residents are more likely to comment if there is a clear timeframe and knows the Case officer has all opinions before them before a decision is made.</p> <p>Summary: establish timeframes for online comments that are finite and available to Planning Officers before they begin the decision process.</p>	<p>Agree – There is a commitment to engagement with hard-to-reach groups through the SCI.</p> <p>A number of the planning areas already have systems that allow parishes and others to sign up to alerts of planning decisions of interest in a particular area. A council wide system of alerts/notifications will be a priority for service improvement moving forward.</p> <p>It is a 'qualifying body' (e.g. parish council) that can produce a neighbourhood plan. The SCI sets out how we will specifically support and assist. There is grant funding available (e.g. via locality) to support parish councils.</p> <p>By setting out the consultation period a clear timeframe is set out for residents to comment. Comments received after the consultation period expiry date are taken into account unless the application has already been decided. For applications that are referred to planning committee the planning committee documents set out when any final comments should be received by.</p>
--	--	--	--

Report 2 Appendix 2

71	Individual (Anonymous)	<p>The draft SCI mentions a consultation period of between 14 and 30 days, I think it should remain at a minimum of 21 day to allow everyone to be involved.</p> <p>There is no mention of 'enforcement' action in this document . At the moment in SWAT no enforcement action appears to be happening. No enforcement action allows people to build what they like, rather than what they have permission for, we have three incidents of this at the moment in our village.</p>	<p>The consultation periods in the SCI are set in legislation. For example applications for EIA development are subject to a longer 30 day period.</p> <p>Agree to include more detail on the enforcement process in the SCI and link to the new Council enforcement policy and how the public can report a breach.</p>
72	Individual (Anonymous)	Please ensure that local residents are sent letters of consultations for advertising billboards.	Comment noted.
73	Individual (Anonymous)	<p>As I Resident on the East Side, my Observations are apart from all the others to which I agree. That there is no planned access from East to west for Pedestrians, cyclist and mobility. The roads and paths etc are not fit for purpose now and adding more residents will compound access to the Town</p> <p>its not safe at the moment with crossing the very old metal bridge at Redgate with prams bikes and elderly as it's very Dangerous for cyclist etc over the very old Westonzoyland bridge full of cars and lorries and a narrow path pavement so I say Infrastructure first then look at more Residents here</p>	<p>Not a matter for the SCI. Detailed planning matters, including areas/opportunities for sustainable transport improvements are subjects that can be commented upon in future Local Plan consultation. Walking and cycling improvements are also addressed in the Council's Local Cycling and Walking Improvement Plans (LCWIP's).</p>
74	Shepton Mallet Town Council - Town Development and Planning Committee	<p>Overall this is a clear and useful document.</p> <p>In terms of consultation, there is a role for parish/ town councils to encourage engagement and publicise consultations via our websites and social media. It would therefore be useful to see sharing information about consultations with local councils made explicit in this statement.</p> <p>Under Conservation Area Appraisals - engagement with local groups, especially parish/ town councils should be routine and only by exception not consulted. We are aware of issues with conservation boundaries that have been defined inappropriately because of lack of local consultation. We appreciate there is no legal necessity for this.</p>	<p>Comment noted. In terms of sharing information local Councils are identified as a specific consultation body for plan making and a statutory consultee for applications.</p> <p>Agree – the SCI sets out the legal context in terms of consultation on conservation area appraisals, but wording could be more positively worded around engaging with local groups and town/parish councils as part of the process.</p>
75	Individual (Anonymous)	<i>blank comment field</i>	N/A

Report 2 Appendix 2

76	Individual (Anonymous)	<p>The use of the word 'may' is prevalent. This leaves too much room for interpretation so for the avoidance of doubt should be replaced with 'will'. If SCC isn't willing formally to commit to doing something every time, it shouldn't be mentioned in this document.</p> <p>The listing of consulted in the Appendix is overly reliant on site notices. Adjacent properties should always be consulted, as should those directly opposite the site of any application</p>	<p>Comment noted. Use of 'may' allows the council to chose when to use non-statutory consultation methods.</p> <p>The Appendix sets out the government's minimum publicity requirements. Whilst it will depend on the specific circumstances in many instances the council will use both site notices and neighbour notifications to appropriately publicise applications.</p>
77	Individual (Anonymous)	<p>My suggestions are:</p> <ol style="list-style-type: none"> 1. ALL planning applications must require a site notice and letter to neighbours. (This has been shown as vital with a recently passed application for a Massive Digital Billboard to be erected on Portway in Frome, this application fell under advertising but the impact on the community is massive and they needed to be ionformed.) 2. The current system of Delegation to Officers needs to be scrapped or totally changed. As it currently stands officers have the ability to unilaterally object or approve an application with no consideration of public opinion and no obligation to justify their unilateral decision which clearly is totally undemocratic. 3. There needs to be clear guidelines about when an application is to go to planning board. e.g. if there is public objection to the application. Simply leaving this decsion to a singular officer is undemocratic. The public then have the ability to voice their objections at the planning board meeting and proper discussion can be had with true democratic method. 	<p>The council will seek to ensure the applications are appropriately publicised based on the statutory requirements and site specific circumstances.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements.</p>
78	Individual (Anonymous)	<p>The community must be involved as much as possible. One of the main problems is normal people don't find out about a development until after the opportunity for objection has passed. Development plans should be made accessible to everyone. It seems the council often puts profit before other things, if this is not the case, the reasons why planning is approved for many developments is not always obvious.</p>	<p>Comment noted. Through the SCI arrangements it is the Council's intention that both the preparation of policy documents (e.g. Local Plan) and determination of planning applications is fully informed by local communities views in relation to the relevant planning considerations.</p>
79	North Wootton Parish Council	<p>Noted that that there will be no new Local Plan until 2028.</p> <p>The Council are happy that Parish Council are on the list as a mandatory consultee.</p>	<p>The consultation period for planning applications is set out in national legislation.</p>

Report 2 Appendix 2

		The Council would like to see a period of consultation for planning applications to be longer than 21 days councils such as North Wootton who only meet once every two months.	
80	Individual (Anonymous)	<p>The policy reflects the problem with the current District policies but is made worse by the creation of the Unitary Council.</p> <p>The role of the community is so far down the agenda as to be meaningless and the idea that community voices can be heard in three minutes for all individuals and three minutes for Parish Councils treats the community voice with contempt.</p> <p>I appreciate that the new council Planning Committee will have a huge workload but planning consents are of primary local concern and unless the community voice is at the top of the agenda the system will fall into disrepute. It will be a developers' charter.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>
81	Barton St David Parish Council	The sequence in which Planning Applications are considered is not clear in the Consultation Document. It is recommended that the next version of the Document includes the "route" which Applications will follow after consideration by Parish and Town Councils: do Planning Applications go straight to the Unitary Council level or the appropriate Local Community Network; and which body makes the final decision? Thank you.	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Application will be determined by the LPA. Regulatory functions such as planning and licensing are not part of the initial LCN development. We will however work towards making stronger links, particularly in relation to influencing place shaping, as we develop.</p>
82	Cannington Parish Council	Currently if a parish council's observation coincides with those of the 'Planning Manager' at the District Council, (in accordance with the delegation scheme) the parish council accepts the application will not be reported to the Development Committee. Hence, if the district council's view differs from the parish council, then the application is reported at Development Committee and discussed as appropriate. Will this still be part of the process under the new proposals?. This parish council values the opportunity for further recourse with parish applications	The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements. It also sets out the process for how applications will be referred to committee where the officer recommendations differs to Parish Council comments.
83	Long Sutton Parish Council	<p>The Parish Council met and discussed this consultation.</p> <p>Currently Parish and Town Councils have access to fee free pre planning application advice, in South Somerset District. There is no mention of this status continuing, in the Statement of</p>	The Council now have a separate document setting out planning fees and charges. This includes exclusions for parish councils for community led projects. The

Report 2 Appendix 2

		<p>Community Involvement. This is an important benefit of the current system, which needs to continue and be included in the Statement of Community Involvement.</p> <p>The platform that is currently in place for Parish and Town Councils responding to planning applications during the consultation process, as a statutory consultee, needs to be separate to that of the general public. Parish and Town Councils need to raise their points separately from the general public. Parish and Town Councils need to continue to be able to have an input.</p> <p>The current Scheme of Delegation in place means that if there is a contentious application, or if the Parish or Town council objects or a Unitary Councillor, the planning application can be/is referred to Committee. There is no mention of this in the Statement of Community Involvement.</p>	<p>SCI will be amended to include a cross-reference to this document in the pre-app section.</p> <p>Parish and Town Councils are welcome to make comments as outlined in the SCI.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements.</p>
84	Bruton Town Council	Currently Town and Parish Councils benefit from being able to access pre-planning application advice without paying a fee. There is no mention of fee free pre-planning application advice being available, in the Statement of Community Involvement. It is important that this concession is available for Town and Parish Councils.	The Council now have a separate document setting out planning fees and charges. This includes exclusions for parish councils for community led projects. The SCI will be amended to include a cross-reference to this document in the pre-app section.
85	Individual (Anonymous)	Consultation about planning applications is vital to engage with communities to have a say and garner opinion about new planning applications that may have an impact on a local area, due to size or purpose. Being able to voice an opinion about a proposal is crucial, and it is important that the opportunity to do so is accessible and local enough to all. Having a meeting with a public session, to discuss planning applications, which is likely to be held in an evening, and in a 'central' place such as Taunton or Yeovil, is not making the process accessible. Public transport is insufficient for people to travel from the far sides of Somerset - for example Wincanton, or Porlock, - to Taunton, there a few (if any) buses accessing rural communities later in the evening, and the chances are if you can get there, you won't be able to get home.	<p>In the circumstance that a public meeting is deemed necessary, this will be in a location appropriate for the application.</p> <p>Given the scale of the new unitary, at the moment the intention is to continue with area-based committees, matching the former district geographies and their respective Local Plans.</p>
86	Brompton Ralph Parish Council	It was agreed at a meeting of the Parish Council on 9th March that it wishes to continue to be consulted and informed of all planning applications by the new Somerset Council.	Comment noted.
87	Individual (Anonymous)	The massive decline in newspaper circulation has made the publicity of applications much less accessible than it once was and this, coupled with a dependence on web-based responses to applications has made it far more difficult for the public in general to be both aware of an application, but also to respond to it in a timely manner. It should therefore be made incumbent upon anyone making an application to contribute directly toward the printing and circulation of a	We encourage developers to engage and raise awareness in areas they are looking to apply for planning permission. There is not the legislation in place for us to be able

Report 2 Appendix 2

		frequently printed newsletter or similar that is freely distributed to all households within a pre-determined radius and which includes a non-web based form on which anyone concerned can respond. The scale of contribution to the newsletter could be graduated to reflect the scale of any development and consequently the number of households which could be directly affected. The frequency of publication could be controlled to reflect the timespan necessary for anyone to respond.	to require additional developer contributions towards publicity of applications.
88	West Hatch Parish Council	West Hatch Parish Council is content with the proposals set out in the Statement Of Community Involvement	Comment noted.
89	Cranmore Parish Council	Cranmore Parish Council would expect to be consulted on all applications from within the Parish as is currently the case. This should include notifying us of non material amendments. Many thanks	Comment noted. Given they are considered non-material, non-material amendment applications will usually not be subject to consultation.
90	Individual (Anonymous)	No questions	Comment noted.
91	Holcombe Parish Council	<p>Under section 5. Planning Proposals (Development Planning) there are four stages during the planning application process where the local community and stakeholders are consulted and/or notified about the proposals:</p> <p>1: Pre-Application stage – no comment.</p> <p>2: Application stage.</p> <p>Residents should be allowed to submit their comments by letter as well as online – there are some residents without access to the internet and they should not be denied the opportunity to comment.</p> <p>County Councillors for the area should be informed of all applications in their area. It is stated that “It is required under Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Council carries out consultation on applications.” At present (in Mendip) applications that are deemed a “non-material amendment” by the authority are not consulted upon and are decided without any reference to anyone. In the past this has included applications which residents did not consider “non-material” such as changing a condition on occupation for holiday purposes only in a development of more than 100 homes in a holiday retreat development.</p> <p>3: Planning Appeals – no comment</p>	<p>Comment regarding commenting on applications via letter is noted and this will be updated in the SCI.</p> <p>We can confirm relevant Councillors are informed of applications in their area.</p> <p>By their nature such proposals are non-material and therefore the usual guidance on consultation and publicity do not apply.</p> <p>Post – decision – compliance with conditions is a matter for enforcement officers and any infringements noted by members of the community and parish</p>

Report 2 Appendix 2

		<p>4: Post-Decision (There is no detail on this stage in the consultation document)</p> <p>When a planning condition that requires subsequent approval by the Local Planning Authority has been complied with a note to that effect should be added to the online planning documentation. In most cases applicants ensure that they comply with all conditions – but some simply ignore them. It is important that stakeholders know that all conditions have been complied with. The Parish Council and other stakeholders can monitor many of the conditions (e.g. “ ... entrance should be properly surfaced and consolidated with tarmac ..”) and can report any breeches to the County Council. However, many conditions have wordings similar to “ has been first submitted to and approved in writing by the Local Planning Authority ... “ and, apart from the applicant and the LPA, no one knows whether or not these have complied with. If this note is added to the planning documentation stakeholders will have confidence that conditions are not being ignored.</p>	councils should be reported to the Council so they can be checked. A cross reference to the Councils enforcement policy will be included in the SCI.
92	Individual (Anonymous)	Where does the Somerset Environmental Records Centre SERC fit into this ? No really obvious consideration of net biodiversity effect and how this might be measured.	The Council have a service level agreement for support from SERC for the planning service. Environmental organisations are referred in the document and this would include SERC.
93	Individual (Anonymous)	The consultation periods set are woefully too short	It is unclear which specific area of the SCI this is referring to, however in the majority of instances consultation periods set out reflect the requirements set out in legislation.
94	Individual (Anonymous)	<p>Section 5.2 - Pre-application stage: with regard to transparency of the planning process please make pre-application advice publicly available.</p> <p>Section 5.2 - Pre-application stage: please add an amendment to confirm that the PPA will not curtail the consultation process.</p> <p>Section 5.3 - Application stage: please add an amendment to confirm that major developments likely to raise multiple objections will be allowed a 30 day consultation period.</p> <p>Section 5.3 - Material planning issues: please add 1) loss of amenity and 2) loss of wildlife habitat.</p> <p>Section 5.3 - Material planning issues: please remove the contradiction "The Council can only consider comments which relate tothese matters but not limited to" and lower down the</p>	<p>Section 5.2 – comments noted. Pre-apps direct to the LPA are not required to be made publicly available. The SCI also encourages developers to engage with the local community.</p> <p>PPA does not affect the consultation process.</p> <p>Section 5.3 – consultation periods set out reflect requirements in legislation. The SCI provides examples of material planning issues but it is not exhaustive.</p>

Report 2 Appendix 2

		<p>page "If comments raise issues outside of the listed considerations, they cannot be taken into account"</p> <p>Section 5.4 - Planning appeals: 6 weeks are allowed for comments, but only up to 30 days for planning stage comments. Please address this unfair inconsistency.</p> <p>Appendix 1 - Consultation Bodies for Local Plans - Regional Agencies and Strategic Bodies: please add fire and rescue services</p>	<p>Section 5.3. – agree, contradiction will be removed</p> <p>Section 5.4. –the consultation periods are set out in legislation.</p> <p>Appendix – we will look to add fire and rescue services if appropriate.</p>
95	Quantock Hills AONB	<p>No mention of landscape, especially in the example list of material planning issues.</p> <p>Ensure that the AONB Management Plan is a material planning consideration.</p> <p>Although as yet AONBs are not Statutory Consultees, it would be very useful to be informed of all planning applications that fall within the AONB boundary or its setting. This could simply be achieved by providing the Council with a list of relevant parishes and would also help support the Council's Duty of Care for Protected Landscapes under section 85 of CROW Act 2000.</p> <p>Early involvement on matters such as Local Plans etc, would be more effective and allow the AONB to influence draft plans rather than simply comment on them.</p>	<p>Comment noted - whilst the SCI states the list is not exhaustive we agree that landscape can be listed as a material consideration.</p> <p>We can confirm that the same location/thresholds criteria for consultation with the AONB unit will continue to apply moving forward. These will only be amended in the future if mutually agreed with the AONB unit.</p>
96	Bawdrip Parish Council	<p>The Parish Council considers that the document should specify that in cases where the view of the Case Officer on a planning application differs from that of the Town/Parish Council or Ward Members there will be an automatic referral to Committee to determine the application. In addition a representative from each statutory consultee should have the option to address the Committee, each speaker having their own time limit (say 3 minutes) as is the custom adopted by Sedgemoor District Council.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements.</p>
97	Chilton Trinity Parish Council	<p>Chilton Trinity Parish Council considers that the Statement should include the procedure in dealing with responses to planning applications. In particular this should state that instances where the view of a Town or Parish Council or the respective Ward Members are different to that of the case officer the proposal should automatically be referred to Committee for determination. All statutory consultees should also have the opportunity for a representative to attend and address the meeting, each representative being allocated a standard time eg 3 minutes to speak.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee and delegation arrangements.</p>
98	Individual (Anonymous)	<p>I am concerned that no reference is made as to how one objects in person to a development proposal at a planning meeting. I am aware that there was a recommendation that a 3 minute time limit should be imposed on objections to a proposal in TOTAL. I am also aware this was</p>	<p>The document will be amended to cross-reference to the constitution which sets out</p>

Report 2 Appendix 2

		<p>subsequently amended to 15 minutes in TOTAL. I am not convinced this is sufficient where there are a variety of complex issues that need to be discussed. And why no reference made at all in the SCI?</p> <p>Many people are unable to attend a planning meeting for a variety of reasons - disability, infirmity, at work etc. The South Somerset approach of putting recordings on YouTube has worked well. Could this be adopted across the new unitary authority? Much better than audio only/recordings on the unitary authority website.</p>	<p>planning committee and delegation arrangements.</p> <p>Procedures have been amended to allow 15 minutes and up to a maximum of 5 public speakers in the finalised constitution for those speaking against an applications. Important to not this does not limit time for members to debate applications.</p> <p>There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Councillors no later than June 2024.</p> <p>We can confirm all committee meetings as 'hybrid' online/in person meetings to allow wider participation. We will seek to continue to make improvements in this regard as technology evolves.</p>
99	Stawley Parish Council	<p>Stawley Parish Council is concerned that there is no mention within the Statement that Parishes will be informed by e-mail of planning applications made in their area. We have had an unfortunate case recently of a contentious application being discovered through the local paper due to no notification being sent to the Council. Please can we be automatically informed about all applications. Decisions made would also be welcomed by e-mail.</p>	<p>Parish Councils are a statutory consultee which are referred to in the SCI in relation to consultation on planning applications. A number of the planning areas already have systems which allow parish councils and others to be automatically notified of decisions in their area of interest. Expanding this feature to the whole unitary area has been identified as a key area for service improvements.</p>
100	Individual (Anonymous)	<p>Although I am commenting in my individual capacity my comments are informed by many years experience commenting on behalf of Frome & District Chamber of Commerce.</p> <p>SCI</p>	

	<p>I have over the past 15 years read and commented on many planning application, and attended planning board meetings, primarily as representative of Frome & District Chamber of Commerce. We have proposed and assisted in the development of supplementary planning documents. I am a lawyer. I have had an article published in the Journal of Town & Country Planning.</p> <p>Although I am more than usually interested in planning issues I only became aware of this consultation yesterday when it was publicised on Facebook, not by SC or MDC but by a local individual who had come across it.</p> <p>p.5 General consultation Bodies</p> <p>See Appendix 1 below.</p> <p>p.5 Residents and others</p> <p>“Members of the public and/or other interested parties who have registered to be on the online Consultation Portal are also notified of any consultation.”</p> <p>Does this mean register in respect of an application, a property or all applications in the planning sub-region? As a user of the MDC planning portal for many years I am not aware that it is possible to do more than register against a single application. In many cases I have only become aware of a development by walking past a site and photographing the sign. I walk a lot; this doesn't work for people in cars. It would be helpful for people who do not regularly walk past sites (i.e., 99% of people).</p> <p>p.6 You say:-</p> <p>“The Council updates its Local Development Scheme, which is the programme for Plan production and review, from time to time. It will be published on the Council's website.”</p> <p>The Somerset website will now cover many more applications and a much larger area. The likelihood of interested parties logging on to and finding the specific page in time to respond is minimal. There must be a commitment to a wider communication strategy. Otherwise, this will only get response from professionals, who are often engaged by landowners and special interest groups seeking to reduce development control.</p> <p>p.9 You say:-</p>	<p>This is referring to plan making, rather than planning applications. This will be clarified in the documents. The Council are yet to set up a consultation portal for people to register for future planning policy consultations but this will be a key early task for the Local Plan.</p> <p>The Local Development Scheme is essentially the timetable for plan production. It is not a document that is consulted on, instead being agreed between officer and members based on resources.</p>
--	---	--

Report 2 Appendix 2

	<p>“The Council has an online consultation portal enabling individuals and organisations to register an interest in Council consultations, including planning policy consultations.”</p> <p>Where? No details are given.</p> <p>p.14 4.5 Conservation Areas are more likely than other elements to be informed by local knowledge and to engage local inhabitants, because they may affect them. It is inadequate to have no consultation. There should at least be commitment to:-</p> <ul style="list-style-type: none"> * Consult the local parish/town council/LCN. * Consult any civic society which is a recognised consultee for the area. * Consult any householders who properties may be added to or removed from the Conservation Area * Hold at least one consultation meeting in the Conservation Area <p>p.16 5.2 Pre-Application Stage</p> <p>The proposals are weak and vague. I have attended may such events. Too often they are PR exercise and the information provided is “aspirational” and bears little resemblance to the application finally submitted, especially the “benefits” or “commitments” in s.106 Agreements or planning conditions. There should be a more developed proposal of key features included in the consultation and that material should included in any final application.</p> <p>p.17 Publicity – There has been considerable concern in Frome in the past year about inadequate on/near site advertisements. Even as someone who walks around town I have failed to see notices (and in some cases do not think they were there). There should be a procedure to check that notices have been displayed for the statutory period.</p> <p>p.18 Comments – “Endeavouring” to upload comments withing 5 workings days is inadequate. As comments I have submitted have not been published until I have checked and reminded MDC weeks later I do not have confidence that any comment requiring approval will be published at all or in a timely manner.</p> <p>Some commenters are regarded as having greater authority than others, and have their comments or questions raised by councillors (including on whether an application should be referred to a full planning committee).</p> <p>If there is a 21 days consultation period that allows only 14 days for consultees to :-</p> <ul style="list-style-type: none"> * Become aware of the application. 	<p>Agree, this is yet to be setup. This will be clarified in the document.</p> <p>Agree, the SCI sets out legislative requirements but the Council would intend to do more in terms of consultation on conservations area changes and appraisals. This will be clarified in the document.</p> <p>The wording of this section of the SCI will be strengthened in terms of the Councils expectations, however under the NPPF the Council cannot require pre-application engagement by developers, or mandate a certain level of detail to be presented at the pre-application stage.</p> <p>The council aims to ensure that any site notices are displayed in a prominent position at or near the site. If site notices have been removed we aim to rectify this as soon as possible.</p> <p>The SCI needs to realistic over timescales given officer resources, particularly for large applications where significant number of comments are received.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements.</p>
--	--	--

Report 2 Appendix 2

		<ul style="list-style-type: none"> * Research it (often many hundreds of pages) * Compile a comment. * Post it. * Check it 5 days later. <p>If the planning authority cannot commit to a shorter and absolute period for posting comments the period for determination should be extended until all comments submitted within the statutory period have been posted publicly plus a period for them to be considered.</p> <p>p.20 5.4 Planning Appeals</p> <p>"Irrespective of the type of appeal, members of the public and other interested parties are notified by the Council".</p> <p>Which members of the public? Is this members who have submitted comments? Or only those tracking the application? Or how are they selected?</p> <p>Appendix 1</p> <p>Other planning authorities – no criteria are given for who and when they will be consulted. MDC has recently lost a JR for failing to consult a neighbouring aurous. There should be more specific criteria, which should be indicative but exclusive.</p> <p>The same applies to General Consultation Bodies. How and when will they be consulted? Can a body request that it consulted. Frome & District Chamber of Commerce always considered and commented on application to convert employment land to housing. But this was laborious as we had to review every application to identify these and were never notified on them. Our submissions were considered, adopted by councillors and sometimes by the council.</p>	<p>The timescales for receipt of comments on planning application consultations are set out in legislation for different application types.</p> <p>It is those who have submitted comments at the application stage. This will be clarified in the SCI document.</p> <p>The planning policy section of the SCI sets out the requirement under duty to cooperate to engage with the neighbouring authorities on plan making. Section has been clarified with regard to neighbouring local authorities.</p> <p>This section of the Appendix related to plan making (e.g. Local Plan), so consultation will be at each relevant stage of plan production. A general consultation body will be able to request to be consulted when the Council has established the consultation portal.</p>
101	Wedmore Parish Council	No Comment	Comment noted.
102	Individual (Anonymous)	More weight given to parish councils who know their area best, and the needs of the community they serve.	Comment noted.
103	Individual (Anonymous)	I feel it is important all members of the community have their day and are listened to	Agree – SCI sets out how communities can engage in the planning process for both planning applications and planning policy.

Report 2 Appendix 2

104	Individual (Anonymous)	<p>I recently signed up on your website to be kept informed of this type of thing and I received no notification of this SCI consultation at all.</p> <p>I think you need to re consult and include parish councils at least and extend the deadline for responses.</p>	<p>Parish Councils and other interest groups were sent direct notifications as part of the consultation process. A new consultation portal will be set up in due course for the new unitary for people to register their interest in planning policy consultations.</p>
105	Kingston St Mary Parish Council	<p>At its March meeting, Kingston St Mary Parish Council resolved to make the following comments concerning Somerset County Council's' Draft Statement of Community Involvement in Planning' (SCI) as follows:</p> <p>* Page 5 of the SCI states that: 'In respect of plan making, the Council is required to engage with some groups to meet the regulations. Specific consultation bodies - are agencies that must be consulted...'</p> <p>Although specific consultation bodies include Town, City and Parish Councils, page 9 of the SCI states that: 'The Council has an online consultation portal enabling individuals and organisations to register an interest in Council consultations, including planning policy consultations. The online consultation portal is the Council's preferred method for consultations...'</p> <p>From the above it's not clear if Town, City and Parish Councils, as specific consultation bodies, will be notified directly by the Council on planning policy consultations/matters, or will they have to register an interest on the consultation portal to be kept informed?</p> <p>As a specific consultation body Town, City and Parish Councils should be kept informed of all matters relating to plan making by the Council, without having to be users of the consultation portal. This includes but is not limited to:</p> <p>Call for Sites, Draft Local Plan, Submission Local Plan, Local Plan Public Hearing, Strategic Environmental Assessments and Sustainability Appraisals, Draft Supplementary Planning Documents, Neighbourhood Plans, Neighbourhood Development Orders and Community Right to Build Orders.</p> <p>* Page 14 of the SCI concerning Conservation Area Appraisals and Boundary Reviews states that: 'However, the Council may engage with local groups such as the Parish/Town Council to undertake a 'fact checking' exercise prior to adopting the appraisal or boundary review.'</p>	<p>As a specific consultation bodies towns, city and parish councils will always be consulted on relevant planning policy documents, they do not need to register via a consultation portal. This will be clarified in the document.</p> <p>The SCI sets out legislative requirements but the Council would intend to do more in terms of consultation on conservations area changes and appraisals. This will be clarified in the document.</p>

	<p>To ensure Parish, Town and City Councils are kept informed and have a role to play in Conservation Area Appraisals and Boundary Reviews, this paragraph should read as follows:</p> <p>'However, the Council will engage with local groups such as the Parish, Town or City Council, prior to adopting the appraisal or boundary review.'</p> <p>* Page 16 section 5.2 of the SCI concerning the Pre-Application stage that: 'Applicants are also encouraged to undertake appropriate and effective pre-application consultation with local community and, where relevant, with statutory and non-statutory consultees prior to submitting an application.'</p> <p>To ensure that applicants are aware that they can approach their Parish, Town or City Council at the pre-application stage, this paragraph should read:</p> <p>'Applicants are also encouraged to undertake appropriate and effective pre-application consultation with the local community and, where relevant, with statutory (e.g. Parish, Town or City Councils) and non-statutory consultees prior to submitting an application.'</p> <p>* Page 17 section 5.3 paragraph 4 of the SCI states that Appendix 1 provides a list of statutory consultees. This should refer to Appendix 2.</p> <p>* Page 19 final paragraph of the SCI concerning Planning Application Decisions, reads: 'After a decision has been made, a copy of the decision notice will be made available to view on the Council's website by searching for the specific planning application.'</p> <p>The above makes no reference to, how and by whom decisions are made, Planning Officers delegated powers, the role of the Planning Committee, how the Planning Committee operates and the criteria for referring planning applications to the Planning Committee for a decision. All these points should be explained together with public participation in Planning Committee meetings and the basis on which Parish, Town and City Councils' objections result in a planning application being considered by the Planning Committee.</p> <p>* Page 19 second sentence of the SCI reads: 'Please ensure that you only provide information belonging to you and that you are happy will be made available to others.'</p> <p>This sentence should read: 'Please ensure that you only provide information belonging to you and that you are happy it will be made available to others.'</p> <p>* The SCI makes no reference to the 'Strategic Housing and Employment Land Availability Assessment'. The significance and role of this document in Plan Making is not explained. In</p>	<p>Parish and Town Councils are outlined as statutory consultees along with others in Appendix. However the wording will be amended to make specific reference to T & P Councils given the importance of developers engaging with the local community at the pre-application stage.</p> <p>We will update Page 17 section 5.3 paragraph 4 of the SCI. Currently states that Appendix 1 provides a list of statutory consultees. This should be corrected in final document..</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements.</p> <p>Agree to minor rewording on page 19.</p> <p>The land availability assessment work will be a key evidence base document alongside other evidence base to inform plan making. It will be a public document</p>
--	---	---

Report 2 Appendix 2

		<p>addition, the consultation process and the involvement of Parish, Town and City Council and other consultees in compiling this document is not disclosed.</p> <p>I hope you find the above helpful.</p>	that will be able to be commented on a referred to throughout plan production.
106	Individual (Anonymous)	<p>Whilst all of the emphasis is placed on the planning process I feel that enforcement is lacking in any structured way. It would appear to only apply to listed buildings. When conditional approval is given to an application it comes with a warning which states "for the avoidance of doubt and in the interests of proper planning" with reference to the drawings. Whilst I understand the logistics of checking that applicants have indeed followed the conditions, planning mostly rely on the public to inform them that there may be a breach and even then it is not always followed up. I would like to see more effort put into enforcement perhaps incorporating a fee in the application process to facilitate an inspection as part of the normal process before the application is signed off. This would make sure applicants do indeed follow the plans that have been approved and there would be no need for any further intervention .</p>	Agree to include more detail on the enforcement process in the SCI and link to the new Council enforcement policy and how the public can report a breach.
107	Individual (Anonymous)	<p>Whilst all of the emphasis is placed on the planning process I feel that enforcement is lacking in any structured way. It would appear to only apply to listed buildings. When conditional approval is given to an application it comes with a warning which states "for the avoidance of doubt and in the interests of proper planning" with reference to the drawings. Whilst I understand the logistics of checking that applicants have indeed followed the conditions, planning mostly rely on the public to inform them that there may be a breach and even then it is not always followed up. I would like to see more effort put into enforcement perhaps incorporating a fee in the application process to facilitate an inspection as part of the normal process before the application is signed off. This would make sure applicants do indeed follow the plans that have been approved and there would be no need for any further intervention .</p>	Agree to include more detail on the enforcement process in the SCI and link to the new Council enforcement policy and how the public can report a breach.
108	Individual (Anonymous)	<p>Notifications to all neighbors and site notice should be included for ALL applications.</p> <p>What is currently the process of delegation needs to be scrapped as it has been proven to disregard the clear objections</p>	<p>Publicising of different application types will be undertaken in accordance with regulations.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements.</p>
109	Blackdown Hills Area of Outstanding	<p>1. We welcome the inclusion of AONBs as Specific Consultation Bodies for local plans. I'm not convinced that it is necessary to include East Devon AONB in the list, as it is some distance from the Somerset boundary. If however there is a logic to its inclusion based on a buffer zone, I would suggest that Cotswold AONB should also be included.</p>	We will review which and where in the Appendix the AONB units should be identified.

Report 2 Appendix 2

Natural Beauty Partnership	<p>2. Noted that at the bottom of page 15 it states that there are four consultation/notification stages for planning applications, but then there are only 3 listed.</p> <p>3. Would like to see some further clarity, either in the SCI or through a separate agreement, regarding AONB involvement at pre-application stage. Sometimes comments have been sought by the councils, while at other times it seems that applicants have been advised to contact us. In this AONB, our preferred approach would be to engage through the Council rather than have direct approaches from developers/applicants. It is also worth considering an approach that is equitable, i.e. AONBs hosted by other authorities have the same access and expectations at the pre-application stage as the 'in-house' AONBs.</p> <p>4. Regarding 5.3 Application stage - who is consulted?;</p> <p>A) it is noted that the statement here, 'Other, non-statutory consultees may be consulted on an application if the Council considers that their professional advice is required. The requirement for this type of consultation is determined on a case-by-case basis and could occur after validation if the case officer considers it necessary.' leaves a lot to officer discretion and opens up the possibility of vastly different approaches across the Council. Previously AONB Partnership teams have to some extent had protocols/agreements with the local planning authorities setting out the nature and type of applications where consultation is desirable/helpful, and certainly from this AONB we would welcome the opportunity to work with the Council to agree an approach for consultation.</p> <p>B) The SCI states 'Adjoining owners or occupiers will also be notified where required'. From experience I don't believe that this is sufficiently robust in rural situations. I know of cases where 'neighbours' over the road or a short way along the lane have not been notified because they are not immediately adjoining, and further, a site notice may not be immediately apparent to them.</p> <p>5. Further to the point above, it would be helpful to publicise the Council's preferred approach to non-major publicity requirements, where the statutory requirement is for a site notice or neighbour notification letter.</p> <p>6. When it comes to commenting on applications, will statutory and non-statutory consultees continue to be able to reply to emails, or will online comments be the only method for all?</p>	<p>Comment noted, page 15 to be updated to reflect only 3 stages.</p> <p>We will continue to engage with AONB units through the new Council to ensure effective engagement, including the preferred model for engagement at the pre-app stage.</p> <p>Comments on section 5.3. These are agreed with. Wording will be amended to be clear that the Council has agreements with many non-statutory consultees to be consulted on different application types based on certain thresholds and location, that then it being left to just officer discretion.</p> <p>There would be cost implications and also an issue in terms of introducing a discretionary element if such an approach was taken in terms of wider area notification. E.g., Where do you stop and who do you include/not include. The Council will ensure applications are appropriately publicised in accordance with the regulations, including site notices in prominent locations.</p> <p>Whether site notices and/or neighbour notifications are used will vary depending on the nature/location of the application and</p>
----------------------------	---	---

Report 2 Appendix 2

			<p>how an application would be best publicised. In many instance both neighbour notifications and site notices are used.</p> <p>Yes, the ability to still submit comments via email will be clarified in the document.</p>
110	Castle Cary and Ansford Traffic Working Group	What is the point of this when the Neighbourhood Plan and the concerns of residents are just totally ignored?	Concerns received by residents are taken into account as part of the planning process. Neighbourhood Plans are part of the Development Plan and are therefore afforded weight consistent with Government policy.
111	Individual (Anonymous)	<p>The concerns of residents and the wellbeing of Castle Cary has been totally ignored. Development has been allowed contrary to the Neighbourhood Plan, no money, resources, infrastructure, jobs, or upgrades provided for the town to cope with additional population or vehicle traffic.</p> <p>The Local Authority quite frankly has taken the XXX out of Castle Cary for years.</p>	Concerns received by residents are taking into account as part of the planning process. Neighbourhood Plans are part of the Development Plan and are therefore afforded weight consistent with Government policy.
112	Kilmersdon Parish Council	<p>Kilmersdon Parish Council met on the 15th March 2023 & discussed the new guidelines. We believe there should be a set of parameters for planning consultation & decision making.</p> <p># Consultation should be wider than simply 'next door neighbours'. It should include those households that are close, in that they will be affected by 'sight & sound' of any development.</p> <p># Consultation & opportunity for comment should be a minimum of 30 days. This is to allow Parish Councils, who often meet on a monthly basis, to be able to comment.</p> <p># Decisions & progress should be published within 5 days.</p> <p># It should be clear how decisions are made, where they are delegated to officers, where decisions are made in conjunction with the chair &/or vice-chair of planning boards, what the criteria are for decisions to go to planning boards. In particular where objections to planning applications are made (on planning grounds) by local unitary ward councillors or Parish Councils these should be taken to planning boards.</p>	<p>There would be cost implications and also an issue in terms of introducing a discretionary element if such an approach was taken in terms of wider area notification. E.g. Where do you stop and who do you include/not include. The Council will ensure applications are appropriately publicised in accordance with the regulations, including notification of adjoining neighbours and site notices in prominent locations.</p> <p>The consultation period of 21 days is set in legislation. 30 days relates to EIA development. Extensions can however be agreed with Parish Councils given the challenges of timing with monthly meetings.</p>

Report 2 Appendix 2

		# While it is positive that there will be area planning boards, so there should be a degree of local knowledge & understanding, this principle should also apply to major &/or strategic planning applications as well.	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements.</p> <p>Major development proposals for non 'County Matters' will go to the area based committees when referred.</p>
113	Individual – William Roberts	<p>1. The Statement of Community Involvement should explain how a planning application will be determined, by planning officers under delegated powers or one by the planning committees and the circumstances in which each will apply. It should also set out how members of the public, parish and town councils and others can address meetings of the planning committees under public participation.</p> <p>2. In the interests of openness, transparency and accountability, meetings of the planning committees should be live streamed via YouTube and recordings made available after the meetings. Given the larger distances involved in Somerset Council's area, this would also help reduce carbon emissions in the interests of meeting net zero targets. At present planning committee meetings in South Somerset District Council's area are live streamed and recorded on YouTube. Somerset West and Taunton Council also has a very comprehensive service. By comparison, Somerset County Council Regulation Committee's 's use of 'Teams' is relatively 'clunky' and it only makes voice recordings available after meetings. Somerset Council should employ best practice in line with that of SSDC and SW&T.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p> <p>All the area planning committees are hybrid meetings (i.e. streamed online), but it is appreciated there is a need to ensure consistency and improve the offer across the Unitary as IT systems and aligned.</p>
114	Individual (Anonymous)	Does not bode well that a document detailing consultation is not more widely available. Just posting stuff on line and assuming everyone has access, or has read the online material is not good enough.	A communications plan was associated with the consultation, including press releases, direct notifications and a explanatory video.
115	Wabstrow Parish Council	This appears to be the absolute minimum specification. We would prefer much fuller arrangements as encouraged by the LGA, and at very minimum, the process at Mendip District Council.	Amendments have been made to the SCI to take into account feedback received where possible. There is however a need to balance the scale of engagement and ensure targeted engagement to make best use of available officer resource.
116	Stoke St Mary Parish Council	<p>This Consultation is headlined "Community Involvement", and on many occasions the introductory text refers to how you will engage with our communities on planning matters.</p> <p>The key issues are:</p>	The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.

Report 2 Appendix 2

		<ul style="list-style-type: none"> * Planning is the area of greatest concern in all Parish Councils / Town Council (PC/TC) areas. * The creation of the unitary has created a democratic deficit that makes it more difficult to engage with the primary authority. * Almost all planning applications are within a PC/TC area, with very few being genuinely strategic. * LCNs are to have no executive role in planning. * Statutory consultees have no community engagement whatsoever. * The community only has access to any planning representation via PC/TC. * The role of PC/TCs therefore needs to be front and centre in the planning process, with greater involvement in the planning process. <p>As a Parish Council our key recommendations are:</p> <ul style="list-style-type: none"> * Any application which has a PC/TC objection should be decided only by the planning committee, not just by individual planning officers. * Any application which attracts more than 10% of objections from households in the PC/TC area should only be decided by the planning committee. * As a PC/TC we have no access to discuss applications with the planning officer, hence our insistence that in these two cases the applications automatically move to the planning committee. 	
117	Ilton Parish Council	<p>Parish councils play an important part in representing their communities and are best placed to offer local knowledge, as such we would like to see that parish council comments are given sufficient consideration.</p> <p>With regards to the consultation period for applications, the 21 days given is often not sufficient for a council to meet. Many smaller parish councils meet bi-monthly and some less frequently. It can be difficult arranging additional council meetings due to availability and the councils also often incur additional costs through extra venue hire to hold the meetings. Flexibility in these deadlines is necessary to allow an opportunity for the councils to comment.</p>	<p>The Council agree that local knowledge is important to the planning application process. All comments on relevant planning considerations will be taken into account. SCI to be updated to emphasis the importance of planning being informed by local knowledge through community engagement and consultation.</p> <p>The 21 day consultation period is set in legislation. However areas are flexible in terms of agreeing extensions of time to align with parish meeting timescales.</p>
118	Donyatt Parish Council	<p>As a statutory consultee, councillors agreed that comments submitted in relation to applications should be considered with more weight. Parish councils represent their communities, and as a result, comments and recommendations are often put forward following feedback from the residents. In addition, parish councils have a wealth of in-depth knowledge</p>	<p>The Council agree that local knowledge is important to the planning application process. All comments on relevant planning considerations will be taken into account.</p>

Report 2 Appendix 2

		<p>of their area and local issues which could be affected by planning decisions. Councillors agreed that local knowledge was a key factor in the process and was necessary to facilitate appropriate decisions.</p> <p>Councillors additionally felt there was not sufficient attention to the environmental impact of development in the planning process and more consideration should be given to 'environmental' measures in applications, particularly when looking at new developments or property. Councillors recommend environmental criteria should include some or all of the following as a minimum prerequisite, especially for new-builds :- 'passive' housing, generation of electricity via photovoltaic panels (which would affect the on-site orientation of properties), air / ground source heat pumps, mechanical ventilation with heat recovery, underfloor heating, enhanced insulation, rainwater harvesting etc.</p> <p>A key item to note is that many of the residents in Somerset do not have the ability to access the online planning portal and as such there should be an easy way for those people to access the information in planning applications, allowing them to have their say as well, remembering that a number of these residents will also have limited mobility and could not attend local council offices to view plans.</p> <p>Deadlines for comments from small councils are often difficult to meet due to the frequency of council meetings which are often every other month or less frequent. Currently planning officers are very accommodating with granting extensions for comments in these cases, and we hope that this will continue under the new policy and infrastructure.</p>	<p>SCI to be updated to emphasis the importance of planning being informed by local knowledge through community engagement and consultation.</p> <p>Regarding environmental impact, the SCI is not the document to reflect this. The Local Plan will consult on matters of sustainable construction, energy efficiency and renewables.</p> <p>Comment noted regarding internet access and the SCI will be updated to reflect this.</p> <p>Officer will continue to be flexible in terms of agreeing extensions of time to align with parish meeting timescales.</p>
119	Isle Abbots Parish Council	<p>Councillors agreed that comments submitted in relation to applications should be considered with more weight. Parish councils are asked to represent their communities, and often make comments on the basis of feedback from the residents, some of whom may not have the means to utilise the online planning portal. In addition, parish councils have a wealth of in-depth knowledge of their area and local issues which could be affected by planning decisions and agreed that this knowledge was a key factor in the process and was necessary to facilitate appropriate decisions.</p>	<p>Agree the wealth of knowledge on local planning considerations and community concerns that parish councils have. For this reason the SCI identifies them as a key consultee for both policy development and decision making. SCI to be updated to emphasis the importance of planning being informed by local knowledge through community engagement and consultation.</p>
120	Cary Moor Parish Council	<p>The Statement of Community Involvement should explain how a planning application will be determined, by planning officers under delegated powers or one by the planning committees and the circumstances in which each will apply. It should also set out how members of the public, parish and town councils and others can address meetings of the planning committees under public participation.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p>

Report 2 Appendix 2

		<p>In the interest of openness, transparency and accountability, meetings of planning committees should be live streamed via you tube and recordings made available after the meetings. Given the larger distances involved in the Somerset Council's area, this would also help to reduce carbon emissions in the interest of meeting net zero targets. At present planning committee meetings in South Somerset District Council's area are live streamed and recorded on YouTube. Somerset West Taunton Council also has a very comprehensive service. By comparison, Somerset County Council Regulation Committee's use of 'Teams' is relatively clunky and it only makes voice recordings available after meetings. Somerset Council should employ best practice in line with that of SSDC and SW&T.</p> <p>Rebecca Carter Clerk to Cary Moor Parish Council</p>	<p>All the area planning committees are hybrid meetings (i.e. streamed online), but it is appreciated there is a need to ensure consistency and improve the offer across the Unitary as IT systems and aligned.</p>
121	North Cadbury and Yarlington Parish Council	<p>North Cadbury and Yarlington Parish Council wish to stress the importance of parish and town councils being involved in all matters relating to the planning process.</p> <p>Rebecca Carter Parish Clerk, North Cadbury & Yarlington Parish Council</p>	<p>Agree. The SCI identifies parish councils a key consultee for both policy development and decision making.</p>
122	Wells City Council Planning Committee	<p>Wells City Council Planning Committee request that parish and town councils are informed of differences in decisions taken by Somerset Council planning officers, to the recommendations of those planning committees, prior to such applications being referred to Somerset Planning Board.</p> <p>Wells City Council would like a better dialogue between planning officers and WCC Planning Committee.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p>
123	Individual (Anonymous)	<i>blank comment field</i>	N/A
124	Individual (Anonymous)	<p>The SCI is a very well written and on the whole very clear document. It explains the processes and requirements well.</p> <p>Planning policy:</p> <p>I would like to see more detail on the additional requirements that Strategic Environmental Assessment/Sustainability Appraisal requires of plan-making, including the preparation of and consultation on a Scoping Report, and what is required to be taken into account.</p> <p>Development Management:</p>	<p>Comment about Strategic Environmental Assessment/Sustainability Appraisal noted. The level of detail provided in the SCI on SA/SEA is considered appropriate in terms of explaining the principles.</p> <p>Comment about pre-application consultation and best practice noted. We will amend the SCI to set out some consultation methods applicants can use.</p>

	<p>Pre-application consultation – I would like to see the SCI in 5.2 set out in outline what expectations of good practice the Council has of applicants. This should include methods of consultation, such as leafleting residents in an area where the environment may be affected by a proposal, online or in-person exhibitions of proposals, presentations at parish/town council public meetings, media and social media publicity, local stakeholder identification, and the preparation of a report of consultation to set out the responses and how views have been addressed in the final proposals where possible, with reference to published good practice guidelines. Perhaps a guidance note could be added later.</p> <p>Section 5.3 Application Stage, under ‘How we consult’, on page 18,</p> <p>‘The Council is required to publicise an application either by serving a written notice to neighbours or by displaying a site notice, depending on the type of application. Where neighbours are to be notified, as a minimum the Council will notify any adjoining owner or occupier. If a site notice is required, it will be displayed in a prominent position on or near to the site. Appendix 3 provides an extract from Government Guidance summarising these requirements.’</p> <p>How the Council notifies neighbours to a proposed development is possibly the most important stage, as if people are not aware of a planning application they cannot respond to it, leading to their disengagement and damage to the Council’s reputation. I have heard too many times where near neighbours to a development were not consulted because their property did not directly adjoin the application site, although they were close and their environment is affected and they would have had relevant comments. The SCI needs to be clear about the circumstances in which a site notice or neighbour notification letter will be required for major and non-major developments (as the legal requirement is for either but no further details are provided) and the process and criteria for deciding which it is.</p> <p>Also the SCI needs to be clear on the process and criteria for deciding which neighbours are notified, It only refers to the minimum of adjoining owner or occupier, so seems to imply that the minimum will be applied in most circumstances, to save money. The SCI should set out the circumstances in which it is appropriate to only notify the immediately adjoining neighbours (e.g. householder applications), and when a more extensive notification zone is more appropriate (e.g. for demolition, redevelopment or greenfield site development which could affect a wider area).</p> <p>I would welcome the opportunity to discuss these points, and clarity on when the revised SCI will come to a committee – perhaps Climate and Place Scrutiny, which I am down to Vice-Chair?</p>	<p>It is quite difficult to be explicit regarding in what situations a site notice, neighbour notification or both will be used for publicising the application. It does depend on the circumstances of the application in terms of type/scale and the location and environs on the application site. In many instances officers will use both methods. Ensuring consistency of publicising applications is also part of ongoing service improvement for the unitary wide planning service.</p>
--	---	---

Report 2 Appendix 2

		<p>I may also have further comments which I will email next week.</p> <p>Best wishes,</p> <p>Cllr Adam Boyden, Frome North division</p>	
125	Cllr LEE BAKER	Thanks as ever for your continued support which is much appreciated.	Comment noted.
126	South West Water	<p>Good morning,</p> <p>Thank you for informing South West Water. I would advise that we have no comment.</p>	Comment noted.
127	Clive Miller Planning	<p>Dear Planning Policy,</p> <p>Thanks for consulting us on this. We will look at it carefully and let you have any comments.</p> <p>But on a quick scan through I couldn't see anything under development management on a county wide 'scheme of delegation' or arrangements for public participation at committees when applications are determined? Can you tell us if this is something else being worked on to be published for consultation or will it be the case that the new planning authority will continued to work with the different schemes of delegation which currently apply across the existing planning authorities.</p> <p>Nor could I see anything about pre-application processes in terms of any commitment timescales for a response other than a note to say that it will be quicker if we enter into planning performance agreements.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p> <p>A link will be provided to the new pre-application guidance document. This sets out that a written response is to be provided in 20 working days.</p>
128	Individual – David Orr	<p>See:</p> <p>Somerset Live Website</p> <p>Re the above article, I have just been through the consultation on the planning process yet the planning committee arrangements to approval aren't included?</p> <p>Why doesn't the latest document (link below) cover the whole life cycle of planning through to the planning committee and approval processes (incl public time to speak, number of speakers etc)?</p> <p>SCI Consultation</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.</p>

Report 2 Appendix 2

		<p>Will the County Council take the 14th February policy proposal for public objectors etc through a full consultation process before incorporating into the Somerset Council constitution?</p> <p>Regards,</p>	
129	Individual – Natalie Nock	<p>I would just like to suggest that when you unite as one council, you need to make communication your key target. I submitted a planning application to Mendip Council which was validated on the 4th September 2020. Planning ref: 2020/1787/FUL</p> <p>I have received ONE email from the case officer dealing with this application & this email was received on the 28th January 2021, asking for an extension. I've had nothing since. I have no idea what is going on with my application, I have no idea if my application is going to be passed or rejected, because I can't speak to anyone about it. I have tried calling Mendip council & I have emailed my case officer and I get nothing back. I have had to place my life on hold as this application was going to be my first own home, allowing me to get out of the rental market. I have been stuck in limbo since 2020 & we are now in 2023. I am not a mass developer so finances are really stretched and it would just be nice to have an update from the council on why my application is taking so long to be reviewed. Just something from someone to reassure me that my application was still being reviewed. Instead of silence.</p>	<p>Comment noted. We are sorry that you have not had a good experience of the planning service in this instance. Achieving planning performance in terms of the both the speed and quality of decision making will be a key focus on the new service.</p>
130	Individual – Philippa Brett	<p>Please find below my response to the Somerset Statement of Community Involvement Consultation.</p> <ol style="list-style-type: none"> Many communities are not able to produce a Neighbourhood Plan but publish and maintain Community Plans. There is no statutory requirement for the Council to consider these plans, but our District Council (South Somerset) has supported these plans and given due consideration when making planning decisions. Could this be carried forward by Somerset Council? At present we have a system for signing up for email alerts for new applications or changes to applications. Could this facility be included on the new website? If there are material changes to an application, would it be possible to restart the consultation process, or in the least ensure it is publicised? The process for publicising planning applications is poor at present. In rural locations, where there are no immediate neighbours, it is common for no letters to be sent, and notices posted at the location are unlikely to be seen. Adverts in newspapers are seen by a very small minority as readership continues to decline. Some areas are not covered by Parish Councils either, so will receive no notification. Regular planning bulletins published on social media and 	<p>As a published document community plans will still be a material consideration where they are relevant to the application and consistent with wider Local Plan policies and the NPPF.</p> <p>Where this email alert feature previously existed it has been carried forward into the new Council for that planning area. Having a consistent and effect email notification/alert system has been identified as a priority as we review planning IT systems moving forward.</p> <p>The Council does seek to ensure the appropriate publicising of application, including notification of adjoining</p>

Report 2 Appendix 2

		<p>circulated to Parish Councils would be very useful. At present neighbouring Parish/Town Councils are often unaware of developments in neighbouring Parishes.</p> <p>4. Could the Planning Officer's summary of submitted comments be publicised? These summaries are often incomplete, and comments can be misinterpreted, omitting significant material considerations.</p> <p>5. There is no mention of public hearings? It is rumoured the Council will be adopting a policy of limiting verbal submissions to 3 minutes in total for each category of speaker, i.e. supporters, objectors, applicants. This is a ridiculous notion and totally undemocratic.</p> <p>The reliance on comments submitted online is insufficient, as explained in Para 4. Many applications evolve and material changes are made during the consultation process. Respondents should be given the opportunity to support/challenge these changes right up until the decision is made. On occasion, this can only be done at the public hearing.</p> <p>If the Council adopts this policy, with the ability to extend the time allowed for speakers on a discretionary basis, this would be easily abused and raise questions over transparency and fairness.</p>	<p>neighbours, ensuring site notices are in a prominent position and notifying relevant statutory consultees (including parish Councils).</p> <p>The officers delegated report or committee report will summarise the key material considerations relevant to an application.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p> <p>SCI will be updated to be clear that comments can be submitted via letter/email. Where there are amendments to application there is an opportunity to comment through another round of consultation.</p> <p>Extension of allowed time is in consultation with legal to ensure whatever the arrangements they are equitable to all parties.</p>
131	Individual – Steve Scott	<p>It seems that officers have more control over the planning process...this may well be that our councillors are basically lazy and don't care about matters outside of their particular areas .. who knows, those of us not politically minded are ignored.</p>	<p>Comment noted, not a matter for the SCI. The document will however be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements.</p>
132	Avon & Somerset Constabulary	<p>Dear Sir/Madam,</p> <p>Thank you for consulting Avon & Somerset Police regarding the above.</p> <p>I am the Designing Out Crime Officer (DOCO) currently responsible for commenting on planning applications and other planning policy documents on behalf of the police in the</p>	<p>Comments noted.</p>

		<p>Somerset County Council, Somerset West & Taunton District Council, Sedgemoor District Council and Exmoor National Park Authority areas.</p> <p>Working in partnership, the Police Service offers advice and guidance on how the built environment can influence crime and disorder to create safer communities addressing the potential of the fear of crime and anti-social behaviour.</p> <p>In this regard, Para's 92, 97 & 130 of the National Planning Policy Framework July 2021 refer to the importance of considering crime & disorder at the planning stage. Paragraph 130(f) states: -</p> <p><i>'Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder and the fear of crime do not undermine the quality of life or community cohesion and resilience.'</i></p> <p>Guidance is given considering 'Crime Prevention through Environmental Design', 'Secured by Design' principles and 'Safer Places 'Lite'.</p> <p>Following the establishment of the new Somerset Unitary Council, in respect of the above former Council areas, I would be pleased to continue to:-</p> <ul style="list-style-type: none"> • Provide written comments on planning applications/Pre-App's which have a significant crime and disorder implications, which in certain cases may include crime statistics for certain sites. • Advise on the use of planning conditions to minimise risk. • Provide an expert witness at planning enquiries where safety and security were a reason for refusal. • Advise on the Secured by Design scheme accreditation. • Provide input on planning policy documents and development briefs. <p>The categories of development I should be consulted on are as follows:-</p> <ul style="list-style-type: none"> • Housing developments comprising four or more units of accommodation. • Major commercial office, industrial, retail or leisure schemes. • New or enlarged schools. • Proposals that include areas of Public Open Space/landscaping as part of the development including parks, linkage footpaths/cycleways etc. • Development involving new neighbourhood or district community facilities e.g., new community hall, health centre etc. 	
--	--	---	--

		<ul style="list-style-type: none"> • Developments involving major sports stadiums or facilities e.g., Somerset County Cricket ground. • Developments involving communal off-street parking facilities, including Multi-Storey, Underground & Surface Car Parks. • Proposals involving transport interchanges or other highway infrastructure improvements such as Park & Rides, Bus/Train Stations etc. • Applications for new or refurbished licensed premises (Pubs/Clubs), Takeaways etc. • Public realm developments with a potential counter terrorism element. • Developments where the intended users/occupants are particularly vulnerable e.g., Hospital, Care Home, Sheltered Accommodation, Nursery etc. • ATM machines, particularly in 'out of town' sites. • Shopfront Improvement Schemes. • Change of Use to existing buildings e.g., Homes in Multiple Occupation (HMO), Betting Shops etc. • Any application (not included above) will be considered if deemed to be subject to a crime or anti-social behaviour risk issue. <p>Please advise me if you foresee any potential problems regarding the above following the establishment of the new unitary council.</p> <p>If I can be of any further assistance, please do not hesitate to contact me.</p>	
133	Wembdon Parish Council	<p>Wembdon Parish Council has no comments to make on the Planning Policy section.</p> <p>Within the Planning Proposals section, Wembdon Parish Council has identified a number of aspects which it considers should have been included, or where detail is missing. They are (in no particular order):</p> <ul style="list-style-type: none"> • no definition of a 'major application' • no provision for a weekly list of new applications, whether by email subscription, or as a list by Parish on the Council's website • no provision for personal inspection of applications at the Council's offices [thereby excluding people who don't have internet access] • no provision for comments on applications to be made by letter [thereby excluding people who don't have internet access] • nothing about re-consultation because of amendments during consideration of an application 	<p>Major development is defined in national policy.</p> <p>The weekly list function for the planning areas will remain similar to was the case with the district authorities.</p> <p>The equalities section is clear that arrangements can be made on request for those who cannot access or use the website.</p>

Report 2 Appendix 2

		<ul style="list-style-type: none"> • no information on delegation of decisions; no requirements as to when an application must be considered by Committee • no information on Public Speaking at Committee • no requirement to publish an Officer's report [required for openness] • nothing about the required resources • no requirement for an annual review and report as part of the monitoring process • no list of key contacts • no mention of Community Infrastructure Levy (CIL) [though this might not be the right place for it] • no provision for an application to be referred to Committee if the views of Planning Officer and Parish Council disagree. We have this currently in Sedgemoor, and consider it an important part of the process. <p>Agreed at a meeting of Wembdon Parish Council on 13th February 2023</p>	<p>Agree - SCI will be updated to refer to amendments.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p> <p>Agree – officer reports will be published on the website. Clarify in the SCI</p> <p>A section on monitoring and review of the SCI is included at the end of the document.</p> <p>The Council has decided not specifically refer to CIL given the amends proposed in Government bill.</p> <p>As above, more details and a link to the constitution will be included in the SCI.</p>
134	Cotford St Luke Parish Council	<p>I am emailing in the anticipation that you will be able to direct me to the relevant information please</p> <p>The PC has been lead to believe that this consultation outlines the processes to be followed when planning applications are considered, eg what are the triggers to send an application to committee, the process for representations to be made in person to committee etc but I cannot find reference to these matters in the document , draft SCI, linked on your website page. Please could you direct me to the information regarding the matters outlined above?</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p>
135	Individual – Laura Leaver	<p>I am writing to ask for it to be noted in writing that as a resident of Castle Cary, i object to any limitations on the ability for the community to comment or object to planning applications. I understand there is a plan to limit community response to 15 minutes?</p> <p>Multiple new developments have been given planning permission in our community, and continue to be applied for, despite weighty and sustained opposition and proof that the infrastructure of our town is unable to support new homes. Our community, transport, schools,</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee arrangements.</p> <p>Following debate at committee speaking procedures have been amended to allow 15 mins and up to a maximum of 5 public</p>

Report 2 Appendix 2

		doctors, dentists etc are unable to cope. Currently doctors and dentists are unable to take new patients and Cary Primary is severely oversubscribed and understaffed. Traffic (dangerous speeds and volumes, parking issues etc) continue to be left unchecked, and the current dangerous chaos at the station is ongoing with no one taking responsibility. Our town cannot cope with any new developments and we need to be able to present evidence to support this without limits, particularly given that currently the unlimited right to object appears to be roundly ignored.	speakers in the finalised constitution. There is a commitment to keep the committee and delegation arrangements set out in the constitution under review and report back to the Council no later than June 2024.
136	Dulverton Town Council	<p>Having viewed the document above members have requested that I forward their comments made at their meeting held on Monday 13th February 2023, as minuted as below:</p> <p>6894 Somerset Council Statement of Community Involvement- Consultation Response: Members expressed considerable concern that under the proposed new rules, objectors/supporters of a planning application would have to share three minutes between them, rather than having three minutes each as per the existing rules.</p> <p>Members consider that proposed planning can be very emotive issues, directly effecting the wellbeing of residents who should be given adequate time to express views and concerns. Failure to do this will appear undemocratic and the Council indifferent to the views of its own residents. Planning is one areas of responsibility where the Council directly engages with its residents, the process should therefore be seen to be open and transparent. The opportunity should be given to all to air opinions in a public forum.</p>	The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.
137	Individual – Martin Cooke	<p>Dear sirs</p> <p>I do hope the dialogue with parish councils, will improve</p> <p>As they will be the first democratic contact with the Unitary Authority</p>	Comment noted
138	Individual – John Solle	<p>Hi,</p> <p>Quite simply, in respect of current planning procedures, I find 2 issues very very concerning.</p> <p>1) Having been affected by a neighbouring application for a development up to our boundary, and enduring 2 1/2 yrs of ridiculous incompetence conveniently attributed to the 'sulphates issue', as recently as this week people are posting photos of water treatment companies pumping effluent run off onto the Somerset levels.</p> <p>As long as this issue continues, how the hell can you even consider asking developers to pay £5.5k per property for a 'phosphate credit'?</p> <p>Honestly, you must be joking, how the hell does this compensate for the damage caused industrially?</p>	Decisions are made on the merits of an application in relation the Development Plan and other relevant material considerations. Financial contributions can be sought where it is necessary to make a proposal acceptable in planning terms.

Report 2 Appendix 2

		<p>This should not be a convenient excuse to extort finances out of the house building process, each application should be agreed or denied solely on its merits, otherwise you place yourselves open to accusation.</p> <p>2) Community levy. Read1) Merits or detriments should dictate decision. Not financial incentive. Find some integrity and return to proper and correct process. Before it's far too late.</p>	
139	Old Cleeve Parish Council	<p>The Parish Council considered the Draft Statement of Community Involvement (SCI) at its meeting on 20 February 2023. It was resolved that individual Councillors with a particular interest in Planning matters should respond on a personal basis but that the Parish Council view should be summarised as follows:</p> <p>The Parish Council is a statutory consultee for all types of planning proposals and as that is set out in statute that should not change. We continue to expect to be consulted on any proposals that affect our Parish.</p> <p>Turning to specific points, with reference to your draft document:</p> <p>Page 2 – we strongly agree with the last sentence <i>“The views of both local communities and stakeholders should be considered through plan-making and the planning application processes to ensure the best decisions for the community”</i>. We would like to see more evidence that our comments are “considered”.</p> <p>Page 4 – in the first paragraph you state “We will also offer a clear and appropriate timescale for comments to be received to allow everyone the opportunity to participate.” We recognise statutory constraints but most Parish Councils like ours only meet only monthly, so a longer (than 14 or 21 days) period to respond would be welcomed.</p> <p>Page 4 – we strongly support the last paragraph where you confirm information will be made available in alternative formats for those unable or unwilling to use digital means. We wonder how this fits with <i>“How to comment on planning applications” on page 18 where it is stated “All comments should be submitted online...”</i>. The Equalities and Diversity pledge does not appear to be consistently applied throughout the draft document.</p> <p>Pages 7,8 – we often feel that our comments are not taken into account. Even when referred to in planning committee reports, these are not dealt with but are instead just repeated. Further</p>	<p>Whilst initially the Council has to set out the timescales in the legislation, officers will continue to agree extensions with Parish Councils where this is necessary to meet the Parish Council’s meeting cycles.</p> <p>Agree - We note the comment regarding commenting online and will update this section to make it clear letters and emailed comments are also accepted.</p> <p>Further clarification can be added. Processing comments is essentially referring to acknowledgement of comments</p>

Report 2 Appendix 2

		<p>explanation of what “process” means is needed when you say you will “<i>process the comments received</i>” or will “<i>process the representations received</i>”.</p> <p>Page 14 – we note your duty to produce Conservation Area Management Plans and would expect to contribute to this for the Conservation Area in our Parish. Additionally, we have one area within our Parish subject to an Article 4 direction and would like more recognition of this in any relevant plans so that the unique character of the area subject to the direction is maintained.</p> <p>Page 18 – “<i>What do we do with comments received</i>”. This section doesn’t actually say what you will do with comments received, it just refers to how you’ll publish them and what you will or will not accept. We would expect to see some confirmation that all comments received will be reviewed, responded to and where appropriate taken into account.</p> <p>Page 20 – in the last paragraph you refer to the Ombudsman in the event that a complaint is not resolved locally. This is misleading as the Ombudsman is unable to deal with complaints from Parish Councils, but can only deal with complaints from individuals who have suffered a personal injustice. We know this from a previous attempt to involve the Ombudsman in a planning issue.</p> <p>Finally, although not referenced in the draft SCI, an important part of our community involvement is the ability to attend a planning committee meeting to speak on planning applications where the Parish Council has a strong view. We have done this in the past. We have read in the local press that the total time for these representations may be limited to 3 minutes per application, rather than 3 minutes per speaker. If this is being considered, we strongly oppose this as that is effectively saying that you are not interested in any community involvement.</p> <p>Similarly, we would like guarantees that any Councillor applications or applications where the Parish Council objects, and this is contrary to the Planning Officer view, will continue to be considered by the planning committee. The ability to have applications ‘called in’ must remain if the planning process is truly going to take into account community views.</p>	<p>and collating them into a single database for review. The SCI will be amended to be clear all comments received are considered.</p> <p>Agree – the SCI sets out the legal context in terms of consultation on conservation area appraisals, but wording could be more positively worded around engaging with local groups and town/parish councils as part of the process, even though it isn’t a legal requirement.</p> <p>Page 18 – noted, add that comments will be considered by the case officer.</p> <p>We note the comment regarding the Ombudsman. The Ombudsman would be able to however, for example, consider a complaint from a parish councillor as an individual service user. We do not consider the SCI misleading as it is aimed at how individuals can complain.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p>
140	Canal & River Trust	<p>Thank you for your consultation on the Draft Somerset SCI.</p> <p>We are the charity who look after and bring to life 2000 miles of canal and rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue</p>	<p>Agree – The Canal and River Trust would be one of the groups identified in the SCI that would be consulted as a general consultation body on the Local Plan.</p>

Report 2 Appendix 2

		<p>infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.</p> <p>We note that the Canal and River Trust is correctly recognised as a Statutory Consultee for planning applications as set out in table 2, particularly as there have been occasions in the past where the trust has not been consulted.</p> <p>Whilst the trust is not a specific consultee on local plan documents we wish to be consulted as a general consultee due to the multifunctional nature of the reach of the Bridgwater and Taunton canal which provides an Active transport, ecological and heritage opportunities as well as being a free to use health and well-being asset. As a result we would welcome continued consultation on planning policy documents.</p>	
141	Yeovil Town Council	<p>Thank you for Consulting Yeovil Town Council on the new Statement of Community Involvement. I am an officer at Yeovil Town Council (YTC) and responsible for compiling the agenda for the Town Council's Planning Committee held on a monthly basis, and to which members of the public and the press frequently attend. I would therefore like to make a few comments on the Draft Statement from an operational point of view, and which relate to Section 5.2 under the headings 'How do we consult', 'How to comment on planning applications' and 'What do we do with comments received?'</p> <p>I recognise that the document deals with the issues in general terms, but I am concerned that there is no specific mention of retaining the service currently operated by South Somerset DC where all applications, including nearby applications, are notified to the Town and Parish Councils via email. I am unsure if this is a 'special' task just for YTC given the number of applications submitted within the town, but it is an essential service for YTC to ensure that all relevant applications are notified to the Council. There have been suggestions in the past that YTC should 'self-serve' this information from the SSDC website, but it was accepted by SSDC that this may well result in missed applications. On this basis, I would request that the Draft Statement include a sentence confirming that Somerset Council will notify town and parish councils of planning applications within and close to their boundaries?</p> <p>The notifications YTC receive state the deadlines for comments to be received which are based on the statutory consultation periods. I ask that the document states that these deadlines can be flexible under various circumstances. You will appreciate that it is not practical for YTC to hold more frequent Planning Committees (currently monthly), and yet many of the comments made on applications by YTC still miss the deadline stated on the notification email, not just because the committees are only held monthly, but also because of the lead time involved with legal requirements such as summoning Committee Members, publishing the agendas for public meetings, etc. Currently, YTC and SSDC work well together</p>	<p>The Council will continue to operate the same notification arrangements that previously existed under South Somerset for statutory consultees (including parish councils).</p> <p>Agree - extension of times for parish/town councils to comment will still be agreed where it is needed. This flexibility will be specified in SCI on page 18.</p>

Report 2 Appendix 2

		<p>and case officers will normally wait to receive the resolutions from the YTC Committees where possible, so it would be a shame to lose this. This is a particularly important point as the meetings are attended by members of the public, sometimes in significant numbers, wanting to have their say and influence the planning process in a proactive way. Perhaps this issue can be addressed under the heading 'Other Consultation Methods'?</p> <p>I am concerned about the sentence saying that 'All comments should be submitted online'. Again, I hope you will appreciate that this is time consuming exercise when there are numerous comments and applications to respond to, and Town and Parish Councils do not have the resources for this. Currently, YTC inputs the resolutions into a table which is emailed to SSDC which works well and therefore, again, it would be a shame to change it.</p> <p>The aim 'to upload comments within 5 working days of receipt' is a concern. This lag between making comments and them showing on the website can result in uncertainty for the public not knowing whether their comments have been received or not, and also can cause a problem for YTC as Members of the Planning Committee like to view the comments of the local people when considering applications at committee so that they can represent their views. Can I therefore respectfully suggest that this time scale is reduced to the minimum required to check and upload the comments?</p> <p>I hope the above comments are helpful in drafting the final statement.</p>	<p>Agree – SCI to be updated to allow letters/non-internet access methods and email.</p> <p>We note the comment regarding the time scale for comments to be uploaded. There is a large number of applications for teams to process comments for so the SCI sets a realistic time period.</p>
142	Individual – Edward Bond	<p>I would like to register my opposition to the proposed limits on public participation at planning meetings. The proposal, as I understand it, is that those speaking for or against a planning application should be limited to 15 minutes in total with each individual limited to 3 minutes which would give little opportunity to present arguments effectively on complex applications and would give equal weighting to each side regardless of merits. It would obscure strength of argument and feeling by allowing each side the same number of participators regardless. I appreciate that planning meetings can be contentious and that certain participators can ramble etc, but this inconvenience is part and parcel of an open and fair process. I have faith in the chairperson of these meetings to manage them appropriately as they have done to date. I hope the council will re-consider and decide not to proceed with this proposal.</p>	<p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p>
143	Individual – Martin Rossiter	<p>As I Resident on the East Side, my Observations are apart from all the others to which I agree. That there is no planned access from East to west for Pedestrians, cyclist and mobility. The roads and paths etc are not fit for purpose now and adding more residents will compound access to the Town</p> <p>its not safe at the moment with crossing the very old metal bridge at Redgate with prams bikes and elderly as it's very Dangerous for cyclist etc over the very old Westonzoyland bridge full of</p>	<p>Not a matter for the SCI. Detailed planning matters, including areas/opportunities for sustainable transport improvements are subjects that can be commented upon in future Local Plan consultation. Walking and cycling improvements are also addressed</p>

Report 2 Appendix 2

		cars and lorries and a narrow path pavement so I say Infrastructure first then look at more Residents here	in the Council's Local Cycling and Walking Improvement Plans (LCWIP's).
144	Individual – Anne Reed	<p>This document seems to be fine as far as it goes, but there seem to be some major omissions, which I will attempt to enumerate.</p> <p>You mention in the early paragraphs that consultation will be inclusive, and will enable written feedback as well as via email. However this provision is not mentioned on the planning section, which is a grave omission.</p> <p>There does not appear to be any mention of planning applications first being heard at Parish Council level, or what the procedure would be if the recommendation of the Parish Council is opposed to the decision of Somerset Councils planning officer.</p> <p>There is no definition of a “major development”.</p> <p>No arrangements for public speaking at committee (if there is to be one).</p> <p>There may be more detail to come, but this policy seems deficient in terms of the new planning arrangements,</p>	<p>Agree - Planning application section will be updated to be clear that representations can be made by letter as well as email.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking.</p> <p>Footnote to be added to refer to definition of major development as set out in NPPF.</p>
145	Individual – Catherine Roberts	<p>Please find below my comments on reading the above draft statement produced by Somerset Council.</p> <ol style="list-style-type: none"> 1. I would like to register an interest in Council consultations including planning policy consultations. Please would you inform me by email when any such consultations are open for public comment? Many thanks. 2. Please would you ensure that I get notified about consultations in the future about development of the new Local Plan for Somerset in a few years' time? 3. My other comment about the future County Local Plan would be to ensure that everyone who participated in the consultation process of the existing District Council Local Plans should be contacted to ask if they would like to participate in the development of the County Local Plan in future. If these participants took part by written comment and were contacted by the DC's via letter at that time, then they should be contacted by letter in future when applicable to see if they want to take part. I note your point on GDPR. Not everyone wishes to do things online and not everyone wants to set up an online account to submit comments. It would be a pity to lose these numbers of people who were motivated to contribute to the debate only a few years ago. 	<p>The Council are yet to set up a consultation portal for people to register for future planning policy consultations, but this will be a key early task for the Local Plan. This will be clarified in the SCI.</p> <p>The Council will explore whether it can notify people on previous district policy databases to re-register for the new consultation portal if they wish to be notified about future Somerset Local Plan consultation. However the Council does need to be mindful of GDPR requirements in respect of personal data.</p>

Report 2 Appendix 2

		<p>4. Important to notify local residents/neighbours when there is a new planning application near them. Also important to notify people who may not be nearest neighbours but who did make a comment on a previous occasion about a plan that has been resubmitted. I am glad that you state in your draft that the Council will still attach a written notice to the gateway or telegraph pole nearest to the site for planned development, in order to alert neighbours and interested people to the existence of a new application. Although 'old-fashioned,' this is often the only way people find out that plans have been submitted, and in the absence of such signage they may not find this out. When time lines for response are short, it is unfair not to let people know promptly.</p> <p>5. Am pleased to see the list of Statutory Consultees is extensive, including the Parish Councils. Glad that the LCN's are not to be required to decide on planning decisions. Much better (and less open to dispute) that planning decisions are to be made by planning professionals with a duty to follow current guidelines, rather than by lay people influenced by what they like, who their friends are and what they think is best.</p> <p>6. I think your draft SCI Community Involvement in Planning is comprehensive, clear, well-written and easy to understand. Of course I am just a member of the public and do not possess any specialist, professional knowledge in planning.</p> <p>Thank you for giving us the opportunity to give feedback to you re this draft.</p>	<p>The Council will continue to adequately publicise applications through neighbour notification and ensuring site notices are placed in prominent positions.</p> <p>Comments providing positive feedback noted. LCN's will be identified as a general consultation body.</p>
146	Quantock View Southside Residents Group	<p>We would like to provide direct feedback regarding our experiences over a 3 year period of having to deal with the Bishops Lydeard Parish Council in relation to their proposals to build an 18 space car park on a green, open space in our unadopted road (Quantock View TA4 3AW) using CIL funds.</p> <p>We made a Village Green application to preserve our Green after we were informed by the Chair and Vic Chair of the PC in February 2022 that they would proceed with their development plans without the need for formal planning permission!</p> <p>This was eventually confirmed as wrong and that planning permission was needed. The PC received incorrect information from their road traffic consultants and SWaT Planning took 2 months to confirm the need for planning permission.</p> <p>Over a 3 year period we have directly witnessed the problems of poor communication and coordination between the 3 tiers of LG in Somerset.</p>	<p>Comment noted. We understand the concerns raised relate to specific PC proposals for traffic management schemes at Bishops Lydeard and a planning application 06/22/0027 for parking spaces (yet to be determined).</p>

		<p>As a residents group we have been ignored by our district councillors when seeking their input in relation to our concerns about the Parish Council's planning proposals in our road.</p> <p>All a bit difficult when your district councillor (Rigby) is both your local Cllr and a member of the PC supporting the planning proposal !</p> <p>We have referenced the climate emergency, and SWaT policies re non disposal of council owned green spaces.</p> <p>We have been subject to disrespectful and bullying behaviour by the Chair and Vice Chair of the Bishops Lydeard PC in relation to our push back on his parking development proposals. Now subject of a standards complaint to the WS&T Monitoring Officer.</p> <p>We want to highlight our concerns about residents can deal with and would like to speak to an officer involved with this consultation process to share our experience and views.</p> <p>We welcome the new unitary authority and see it as an opportunity to reset our relationship with local government. We want to share our concerns about the capacity and competence of our Parish Council in relation to the management of the £500K CIL budget they are trying to spend in our village. We are specifically concerned about the lack of accountability and systems of redress in relation to their decision making and accountability to the communities they serve.</p> <p>We look forward to your response and for an opportunity to give you our detailed feedback.</p>	
147	Individual – P. A. Gannon	<p>I am making this response as an individual a resident of West Somerset and as a Parish Councillor. I do not have “on line” facility.</p> <p>Comments.</p> <p>Page 2.</p> <p>It is acknowledged that the Exmoor National Park Authority have their own SCI however, some Parishes within West Somerset have to consider both Planning statements (Local Plans) as “Planning Authority” boundaries do not follow Parish boundaries. As a result, inconsistency in interpretation can arise particularly for the lay resident. The current ENP document is considered to be superior in presentation to the current SWAT documentation.</p> <p>The local community often have good understanding and detailed knowledge of the issues in their area.</p>	

	<p>This consultation statement suggests that “one size fits all” approach this cannot apply across Somerset as a whole as each area has specific variations and issues. The views of both communities and stakeholders should be considered through planmaking and the planning processes to ensure the best decision for the community. Sadly previous experience and evidence suggests that these “views” including professional reports are not always considered resulting in poor decisions.</p> <p>It is noted that certain Planning “exemptions” as permitted developments are indicated, likewise “exemptions” also exist under the Building Regulations however these are not the same and causes much confusion to the majority of persons. Clear guidance is required, as regardless of any exemptions classes all developments must comply with constructional Regulations!</p> <p>Page 3. Equalities and Diversity I am pleased to note that this vital legislation is acknowledged. It must be recognised that “on line” only, access, responses or submission of documents is not available to all or ever will be countywide or the choice of every individual. At all times alternative methods must be available either, personal, local, postal or telephone.</p> <p>Page 4. Planning Policy It is noted that SC are to adopt a countywide Local Plan by 2028. In my view and experience this is either unlikely or at best a unwieldy mash up document as each of the existing Authorities have existing differing timeframes, agendas, commitments and criteria for the geographical areas.</p> <p>The Plan may well be over cumbersome, inconsistent or inappropriate for each area, in effect only some of the text would be consistent.</p> <p>Experience has shown that the allocation of sites is often poorly evaluated and biased by the selection panel comprising of individuals, estate owners, property agents whose motivation is purely financial. Some of the Planning Officers judgements are questionable and ratification by members likewise!</p> <p>Page 6.Evidence gathering and identification of issues for the Local Plans Somerset County has a rich and diverse landscape, geological history and considerable coastline.</p> <p>Before any “Local Plans” and sites are allocated, evidence of issues should be identified, for example, Coastal erosion, flooding, connectivity of highways, geology and faulting, historical mining, peat beds, greensands, topography stability, water table and drainage. There are</p>	<p>Comment noted regarding equalities and diversity, we will update to ensure those without internet access have the ability to comment.</p> <p>It will be ensured that a full suite for evidence base is prepared to inform the Local Plan its allocations, ensuring the planning issues are appropriately</p>
--	---	---

Report 2 Appendix 2

	<p>many other social issues and employment issues to be considered for sustainable developments.</p> <p>It is pointless allocating sites that have major issues or consume productive agricultural land just to make the numbers add up!</p> <p>Sustainability is the key issue and truly understanding the meaning of sustainable!</p> <p>Page 7. Production of Local Plan Workshops, presentations, forums, drop-in events must be local and accessible to all communities. The county is too large for only regional centre presentations, i.e. Bridgwater, Taunton, Yeovil, Wells.</p> <p>Page 14. Conservation Areas The Council has a duty from time to time, formulate and publicise proposals for the preservation and enhancement of our conservation areas.</p> <p>What is the frequency of these reviews? Is this the same time as reviewing the Local Plan, every five years?</p> <p>Historic structures deteriorate at differing rates and the erosion of a locality through lack of maintenance, unauthorised or inappropriate works can have an adverse effect if not monitored adequately.</p> <p>My local Parish, Old Cleeve, has both a conservation area and an Article 4 area (historic Gradel 1 Manor and surrounding parkland) for the last 10 years the Planning Authority have failed to control the deterioration and the understanding of the Article 4 designation and its purpose.</p> <p>Page 15. Planning Proposals Whilst it is stated what you can control by application, this is not what happens in reality in many cases. Many developments, usually minor schemes including fences are constructed without consent. Local Planning Authority failing to "observe" and request application in retrospect. Enforcement is poorly supported due to time and costs or carried out in a timely manner.</p> <p>Certain individuals / applicants aware of the Council shortcomings exploit the system regardless. Parish Councils or individuals often have to repeat reports of breaches that are ignored or at best approved by retrospective applications a legacy of poor management and decision making.</p>	<p>understood and can be weighed up as part of the decision making process.</p> <p>Noted – It is intended to tailor consultation methods to be most effective for different geographical areas.</p> <p>No timescales are set up the legislation.</p> <p>SCI will be amended to include a section on enforcement and link to the Councils latest enforcement policy.</p> <p>We would agree that the Building Control process is important as part of the overall</p>
--	---	---

Report 2 Appendix 2

	<p>Page 17, Application stage It is noted that other non-statutory bodies <u>may</u> be consulted.</p> <p>The failure to consult the Local Authority Building Control Partnership and the Approved Inspectorate has resulted in the deterioration of developments, poor developments or unauthorised works.</p> <p>From my personal L.A.experience when both Planning and Building Control functions were administered together it avoided, poor design problems, better cooperation with applicants and developers, earlier reporting of planning breaches or variations of approved plans and construction plans.</p> <p>Today certain applicants submit schemes to the Planning Authority to gain a “consent” but have no intention of following that scheme under the Building Regulation construction plans. As no formal consultation is required, each go their own way unless challenged.</p> <p>The situation is even worse with Approved Inspectors as their motivation is financial gain (paid by the applicant), any variations are not reported regardless of moral duty to do so. Any breaches that do occur that cannot be resolved amicably, should be referred back to the Council as under the legislation only a Local Authority can take enforcement action. Planning may be seen as the lead authority to development plans however compliance with Building Regulations is of equal importance. Perfect Planning does not ensure perfect developments, what is actually constructed is the true legacy, good or bad! Closer co-operation and consultation is required to all bodies that administer aspects of responsibility of developments if the repeat of Grenfell Tower disaster or similar is to be avoided.</p> <p>Page 19. Decisions As the majority of decisions are delegated to the Planning Officer it is most important that the qualification of the Officer is appropriate. Often minor approvals (and larger schemes) are given with numerous conditions, whilst conditions are inevitable too many indicate perhaps an inadequate application or the pressure to fast track as many applications as possible the end result can be a poor decision. The quality of a decision may be poor in either the case of approval or refusal. Equally those applications determined by committee may be subject to the same criteria, having witnessed poor presentations by Officers to committee and lack of understanding by committee members.</p> <p>Page 20. What we will do if you feel unfairly treated</p>	<p>development process. It is however not the role of the SCI to set out detailed information on Building Control processes.</p> <p>Any conditions on planning permissions should meet the relevant tests set out in the NPPG.</p> <p>Service standards for the service are published on the Council's website.</p>
--	--	---

		<p>It is noted that it is intended to set service standards, let us hope this is a vast improvement upon those standards operated by Somerset West and Taunton Council. From personal experience, whilst "standards" were required they were not adhered to. I am still awaiting a full response from the current Council after nearly two years! A partial response only triggered after intervention by the Member of Parliament. Ombudsman cases only apply in personal loss or injustice and not the incompetence of individual Officers or elected members.</p>	
148	This is Gravity Ltd	<p>Stantec is instructed by This Is Gravity Ltd to submit comments in relation to the draft Somerset Statement of Community Involvement in the context of the Gravity Local Development Order (LDO) that was adopted by Sedgemoor District Council in February 2022.</p> <p>An LDO is an order that is made by a Local Planning Authority (LPA) under the Town and Country Planning Act 1990 that grants planning permission for a specific development proposal or classes of development. Once an LDO has been adopted and the Secretary of State have been notified, the LDO must be placed on the Planning Register.</p> <p>The Gravity LDO consents up to 1.1 million square metres of commercial floorspace as part of a Smart Campus focused on advanced manufacturing and targeted at Gigafactory scale development, capable of supporting somewhere in the region of 7,500 high-value, high-skilled jobs, up to 750 units of associated residential accommodation and reinstatement of a rail line on site.</p> <p>The Gravity LDO's intent is to restructure the economy through regenerating a former industrial site to sustain economic activity in Somerset, and stimulate wider economic transformation across the South West region and UK, without negative effect on environmental quality. The LDO unlocks one of the largest brownfield sites in the UK, remediation and decontamination is complete, all supplemented by significant investment in re-imagining the economic potential of the site, accelerating climate change adaptation, specifically targeting the urgent need to decarbonise the transport system in the UK.</p> <p>Enterprise Zone (EZ) status was granted in 2017 and provides for a simplified planning regime to enable fast track responses to meet business need. This in the form of the LDO, is a tool to attract international business aligned with the clean growth ambition. The Enterprise Zone could generate in excess of c.£500 million in retained business rates over its lifetime, to be reinvested back into the site and local area, supporting further economic adaptation and transition towards a lower carbon economic model. This process has been agreed by the Council with Government through a joint Memorandum, of Understanding.</p> <p>The LDO will deliver an integrated smart campus to establish a new hub for high value advanced manufacturing activity in the South West, to the significant, transformational benefit</p>	

	<p>of the region, delivering a long-term pipeline of high-value, high-skilled jobs in Somerset. Gravity will provide a transitional opportunity beyond Hinkley Point C nuclear new build for both the workforce and the supply chain, and build on existing strengths in Somerset and the wider South West to catalyse new clean and sustainable economic growth through a proactive, market-led approach. It will attract international, large scale inward investment and support the growth of new sectors and businesses.</p> <p>LDO Stakeholder Engagement</p> <p>LDO Preparation Stage</p> <p>There is legislative context governing the LDO process. LDOs were introduced by the Planning and Compulsory Purchase Act 2004 and grant planning permission for the specific type of development detailed in the LDO. These primary powers were amended by the commencement of section 188 of the Planning Act 2008 in June 2009 and more detailed legislative provisions on LDOs are contained in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990 (as amended) and articles 38 and 41 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended (DMPO).</p> <p>For the Gravity LDO a bespoke approach to stakeholder and community engagement was taken which followed best practice. Open and ongoing engagement with the local community, businesses and other stakeholders took place in advance of and during the LDO process. The engagement was multi-faceted using different tools, methods and channels to involve as many people as possible. A Gravity LDO Delivery Group was set up to facilitate the delivery of the Gravity LDO and organisations (including key planning statutory and non-statutory consultees) from across several sectors signed a Memorandum of Understanding and Project Charter which sets out the project aims and methods of working collaboratively. The role of the Delivery Group was valuable as the preparation of the LDO progressed, ensuring co-operation around meeting market needs (commercial), planning, technical input, and support and to assist in delivering specific activities as appropriate and within the agreed areas of work. Community engagement both locally near the site, face to face, and via digital means during the pandemic was facilitated and there was an overriding support with feedback to deliver jobs and quickly.</p> <p>When considering this context and whilst this consultation response is in relation to the Gravity LDO, there are also two other existing LDOs that have been adopted in the new Somerset Council administrative area, one in relation to Small Scale Employment Space and another in relation to Nexus 25 Employment Site. We therefore consider that the Statement of Community Involvement for Somerset should refer to LDOs, acknowledge existing LDOs</p>	
--	---	--

	<p>within Somerset have undertaken comprehensive, bespoke stakeholder and community engagement through their preparation process, and set out a process for stakeholder and community engagement to ensure that is set within the context of a focus on delivery and a simplified planning regime through the LDO as an appropriate planning tool.</p> <p>We therefore recommend that a section should be added under part 4 Planning Policy and could read as follows:</p> <p><i>4.6 Local Development Orders</i> <i>Local Development Orders (LDOs) are positive planning tools which provide the opportunity to incentivise development in a particular location by simplifying the planning process and making investment more attractive. They support the delivery of a site by effectively granting consent for particular types of development that the Local Planning Authority wish to see come forward by setting development parameters or zoning. They are proactive in reducing uncertainty and acting as a marketing and delivery tool by offering a quicker and more agile planning process.</i></p> <p><i>LDOs can improve the speed of decision-making and improve certainty for landowners, communities and developers. They are flexible and can be used for different uses and types of development. LDOs are gaining increasing importance as the government encourages local authorities to streamline planning, increase certainty and reduce delays and costs in delivering sustainable development, such as encouraging reuse of brownfield land.</i></p> <p><i>LDOs represent a fundamental shift from the traditional planning approach. LPAs can initiate development activity by granting permission for the kind of development that they want to come forward as opposed to waiting for the market to bring forward proposals. With an LDO in place the planning process should be simplified, less risky and faster. For developers there is no need to prepare a planning application, establish the principle of development, pay fees or wait for a decision (though a prior approval process may remain to sign off necessary conditions). They can therefore play an important role in incentivising development by simplifying the planning process and making investment more attractive. An LPA using this pro-active approach can enhance the reputation of an area as an attractive place to do business, enabling faster and more flexible delivery of development priorities.</i></p> <p><i>It is a requirement that LDOs are the subject of statutory consultation by the LPA. LDO consultation procedures are set out in article 38 of the Town and Country Planning (Development Management Procedure) Order 2015 (DMPO 2015). However prior to the formal consultation process, an informal, non-statutory consultation is encouraged as LDOs should be prepared collaboratively and briefings should be provided to Members and the local</i></p>	
--	--	--

	<p><i>community. Mechanisms such as a Delivery Group, a Memorandum of Understanding and Project Charter should be used to engage stakeholders and encourage collaborative working.</i></p> <p>LDO Compliance Stage</p> <p>It is also noted that Appendix 3 – Statutory publicity requirements, does not mention LDOs, this section should reference LDOs in relation to compliance submissions, noting that there is no statutory requirement to undertake further engagement or consultation at that stage. However, each LDO will be bespoke and any engagement at that stage will be set out in the respective, adopted LDO.</p> <p>The bespoke approach that was taken in relation to the Gravity LDO through the preparation process followed best practice and achieved a positive outcome. A notification process is agreed at the compliance stage and through the governance and monitoring and evaluation processes associated with those, as set out in the Gravity LDO s.106 agreement. This builds on the community experience through the Hinkley development consent order implementation process. The Gravity LDO represents a robust example of an LDO successfully engaging with and involving key stakeholder and community. Lessons should be learnt from this success and applied to any future LDOs that may come forward within the administrative boundary of the new Somerset Council.</p> <p>Conclusion</p> <p>LDOs are an order that is made by a LPA under the Town and Country Planning Act 1990 that grants planning permission for a specific development proposal or classes of development. Once an LDO has been adopted and the Secretary of State have been notified, the LDO must be placed on the Planning Register.</p> <p>The Gravity LDO is on an Enterprise Zone which provides the simplified planning regime required to facilitate business rates retention locally. The LDO is a positive planning tool that will support the development of this large brownfield site as it consents up to 1.1 million square metres of commercial floorspace as part of a Smart Campus focused on advanced manufacturing and targeted at Gigafactory scale development, capable of supporting somewhere in the region of 7,500 high-value, high-skilled jobs, up to 750 units of associated residential accommodation and reinstatement of a rail line on site.</p> <p>For the Gravity LDO a bespoke approach to stakeholder and community engagement was taken which followed best practice. Open and ongoing engagement with the local community, businesses and other stakeholders took place in advance of and during the LDO process. The engagement was multi-faceted using different tools, methods and channels to involve as many</p>	
--	--	--

Report 2 Appendix 2

		<p>people as possible. The bespoke and best practice form of community and stakeholder engagement should be referenced in the Somerset Statement of Community Involvement to support any future LDOs and to ensure that is set within the context of a focus on delivery and a simplified planning regime through the LDO as an appropriate planning tool.</p> <p>Reference should be made to LDO Compliance Applications within Appendix 3 as each LDO will be bespoke and any engagement required at this stage will be set out in the respective, adopted LDO.</p> <p>We hope that these comments will be useful in finalising the Statement of Community Involvement to ensure that it recognises the positive contribution that LDOs make to the planning system, the economy, the environment and the community.</p>	<p>Comments noted. Given the consultation requirement of compliance submissions will be bespoke for each LDO it is not considered appropriate to put details in the appendix of the SCI in this regard.</p>
149	Mendip Hills AONB	<p>Thank you for giving the Mendip Hills AONB Unit the opportunity to comment on the above consultation.</p> <p>The Countryside and Rights of Way (CROW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. The Mendip Hills AONB Partnership produced the Mendip Hills AONB Management Plan 2019-2024 as required by the CROW Act on behalf of the joint local authorities (adopted by North Somerset Council, Bath & North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council) and is a material consideration. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity and these include retaining dark skies and a sense of tranquillity, views from the Mendip Hills AONB and a landscape enjoyed by people for a range of quieter activities due to the tranquillity of the area. Paragraph 3.8.13 within the Management Plan highlights that;</p> <p><i>'Noise and activity arising from developments together with lighting can have an adverse impact on the areas tranquillity and dark sky and protected species including bats. Mapping of light pollution has shown that the area of dark skies in the Mendips is shrinking. The AONB Partnership Position Statement on Dark Skies seeks local authorities and others to minimise the impact of lighting.'</i></p> <p>As set out in Natural England's National Character Area (NCA) profile for the Mendip Hills (141), the area is <i>'renowned for its tranquillity and inspirational qualities ...'</i> The NCA further recognises that <i>'Light pollution from development threatens the extent of the recognised dark skies and out-of-character development is a continuing risk to the essential nature of the area.'</i></p>	

	<p>Within the NCA Statement of Environmental Opportunity under SEO1 it sets out 'Safeguard inward and outward views and to the distinctive hill line and conserve and enhance the special qualities, tranquillity, sense of remoteness and naturalness of the area'.</p> <p>The National Planning Policy Framework 2021 (NPPF) highlights under paragraph 176 that <i>'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues... The scale and extent of development within these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid impacts on the designated areas'</i></p> <p>Furthermore paragraph 177 states; <i>'When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development 60 other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest...'</i></p> <p>Further considerations related to such applications are set out under paragraph 177 in full. Paragraph 185 of the NPPF further sets out that;</p> <p><i>'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:</i></p> <ul style="list-style-type: none"> <i>a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from the new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life 65;</i> <i>b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and</i> <i>c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation'.</i> <p>The recent DEFRA 25 Year Environment Plan sets out under paragraph 2.2.1 that <i>'Some of England's most beautiful landscapes and geodiversity are protected via a range of designations including National Parks and Areas of Outstanding Natural Beauty... Over the next 25 years we want to make sure they are not only conserved but enhanced.'</i></p> <p>Appendix 1 of the Statement of Community Involvement identifies the Mendip Hills AONB (National Landscape) Partnership as a 'Specific Consultation Bodies'. We wish it to be noted</p>	<p>We note that the governments landscapes review and Defra proposal to strengthen the powers of AONB, including making</p>
--	--	---

Report 2 Appendix 2

		<p>that from mid-2024 all National Landscapes will become statutory consultees, and therefore Mendip Hills AONB National Landscape should be listed under 'Duty to Cooperate Bodies'.</p> <p>SCI Chapter 5 Planning Proposals (Development Management), page 17, at present both Mendip and Sedgemoor LPAs notify the AONB Service concerning proposals in the relevant parishes/town council areas listed below, in line with the 'Duty of Regard';</p> <p>Mendip – St. Cuthbert Out, Rodney Stoke, Priddy, Westbury Sub Mendip, Wells Town Council Sedgemoor – Cheddar, Axbridge, Compton Bishop.</p> <p>We request that in line with the duty of regard that New Somerset Council notify us of development management (and policy consultations) proposals relating to the above parishes/town councils going forward.</p> <p>Page 19 lists material and other considerations in the determination of development proposals. We request that the addition of 'landscape' to the list, to highlight consideration of the highest status of protection afforded to AONBs/National Landscapes in NPPF Paragraph 176 (2021). Should you require any further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	<p>them a statutory consultee for planning applications. The SCI can be updated if and when this is implemented. We are not aware of proposals to identify AONB as a duty to cooperate body for plan making.</p> <p>The Council will continue to notify AONB units appropriately based on agreed protocols and thresholds.</p> <p>Agree, as a key consideration landscape should be listed on page 19.</p>
150	The Coal Authority	<p>Thank you for your notification received on the 1st February 2023 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the Somerset County area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These features pose a potential to surface stability and public safety.</p> <p>The Coal Authority's records indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning application process consideration should be given to such advice in respect of the indicated surface coal resource.</p>	Comments noted.

Report 2 Appendix 2

		It is noted however that this current consultation relates to a Statement of Community Involvement and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this consultation.	
151	Cranborne Chase AONB	<p>I have read your SCI document and see that Cranborne Chase [please spell the name correctly] AONB is only mentioned in Appendix 1 and that is in connection with consultations on Local Plan matters. That seems to be a significant reduction on the current consultation arrangements with Somerset County Council, South Somerset Council, and Mendip Council where the AONB Partnership is consulted on planning policy and development management matters as set out in the Planning Protocol incorporated in the AONB Management Plan 2019-24.</p> <p>Presumably Somerset Council will inherit all the commitments and roles in relation to all the AONBs within the Somerset County Council area, so this AONB Partnership would envisage at least a similar level of involvement. The current SC SCI does not seem to do that, so I trust the document will be modified to reflect that situation.</p>	<p>Comment noted, spelling of Cranborne Chase to be updated.</p> <p>Yes, the AONB will continue to be consulted on applications affecting there interests as previously. They are not listed in the Appendix in terms of statutory consultees for planning applications as they are not currently identified in legislation as a statutory consultee.</p> <p>Yes – the same involvement in AONB units will continue going forward, including previously agreed consultation thresholds and triggers. These would only be amended in the future with agreement from the relevant AONB units.</p>
152	Environment Agency	<p>Thank you for referring the above Statement of Community, which was received on 1 February 2023.</p> <p>I note that we are identified as a statutory consultee and look forward to working with you on the progress of the Local Development Framework.</p> <p>Should you require anything further of me at this stage then please let me know.</p> <p>Please quote the Agency's reference on any future correspondence regarding this matter.</p>	Comments noted.
153	Norton St Philip PC	<p>Norton St Philip Parish Council (the PC) welcomes the opportunity to comment on this document, which it regards as critical to the democratic future of the new unitary authority. Involving local communities should be an essential part of the planning process.</p> <p><u>4.1 The Local Plan</u></p>	<p>Comments are noted, specifically the below:</p> <p>"The PC requests that a commitment is made to:</p>

	<p>The PC has grave concerns about the mechanisms suggested for the involvement of PCs and the communities they represent during the Local Plan making process.</p> <p>The new Local Plan will have a huge affect on the new authority's Districts, Parish Councils and residents. It is critical that rural communities and their Parish Councils are fully consulted at each stage of the Plan making process. Parish Councils are the tier of Local Government closest to these communities and it is fundamentally important to involve them at the earliest opportunity.</p> <p>It is of great concern to the PC that although Parish Councils are listed as one of the "Specific Consultation Bodies" there is no more consultation proposed with them than other statutory bodies. This is surprising as the Local Plan Policies will be, as the NPPF states, <i>"a platform for local people to shape their surroundings."</i> The NPPF also makes it clear that Local Plans should <i>"be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees"</i> (§16c)</p> <p>Of particular concern to the PC is the apparent absence of informal consultation at a local level at an early stage in the Plan Making process. The PC suggests this should include an "Issues and Options" consultation as carried out by MDC during the preparation of LPP2. Such a consultation exercise would be the ideal forum to explore options and raise local issues.</p> <p>Instead of this, the proposals seem unclear. The summary box on page 6 states: <i>"Evidence gathering and identification of issues for the Local Plans:</i> • <i>The Council researches and gathers evidence to guide the content of the Local Plan. In this early stage of plan production, informal engagement can continue throughout this period and using a variety of formats.</i> <i>The Council may use methods such as workshops or surveys to ensure that the Council receives the relevant specialist and local opinions at an early stage. Where appropriate, individuals and parties on the Council's consultee database will be notified."</i></p> <p>There should be an unequivocal commitment to engage with communities and their elected representatives at an early stage; to put forward options for community involvement and discussion and for the result of this consultation to be appropriately considered. The Draft SCI merely says that Council will <i>"research and gather evidence"</i>; and that it <i>"may use methods such as workshops or surveys"</i>.</p> <p>The evidence gathering summary goes on to state: <i>"Dedicated briefings and workshops may be held for specific evidence base studies. Invitations to attend will depend upon the subject matter and targeted consultation may be</i></p>	<ol style="list-style-type: none"> 1) Engage with Parish Councils during the research stage of the Local Plan Making process 2) Share information relevant to the PC and local community 3) Discuss local issues and potential options 4) Consider and evaluate feedback from PCs and their communities 5) Ensure that the needs of the communities are addressed and wherever possible met" <p>Regarding Neighbourhood Planning, the SCI sets out the LPA's statutory duties but also sets out how the LPA will advise and assist qualifying bodies, including on advising on national and local policy, providing SEA reports, sharing related evidence base etc. There is also grant funding available (e.g. via locality) to support parish councils in the production of their Neighbourhood Plans.</p>
--	--	---

		<p><i>undertaken with specific interest groups to check the findings or look at information in more detail.”</i></p> <p>The PC considers that this statement gives no assurance whatsoever that communities will be involved at the evidence gathering stage. Again, there is no commitment to local engagement here; simply a woolly statement that the Council “<i>may</i>” choose to involve “<i>specific interest groups</i>”.</p> <p>The PC requests that a commitment is made to:</p> <ol style="list-style-type: none"> 1) Engage with Parish Councils during the research stage of the Local Plan Making process 2) Share information relevant to the PC and local community 3) Discuss local issues and potential options 4) Consider and evaluate feedback from PCs and their communities 5) Ensure that the needs of the communities are addressed and wherever possible met <p>The PC suggests that without these commitments the Local Plan process will not be a democratic one.</p> <p><u>4.3 Neighbourhood Development Plans</u></p> <p>The PC is concerned that there is no statement of support for the principle of Neighbourhood Plans; neither is there any commitment to:</p> <ol style="list-style-type: none"> 1) Nominate a Council Planning Policy Officer as the point of contact. 2) if considered appropriate and constructive, attend meetings where such attendance by the nominated Officer would assist the Neighbourhood Planning Group. 3) be actively and constructively engaged during the Neighbourhood Plan making process including the requirements for community engagement and the statutory periods of consultation (S14 & S16). 4) respond as quickly as possible to requests for assistance from the designated body. <p>The Draft SCI goes no further than committing the Council to the statutory requirements. Much more than the minimum is needed from the Council in assisting Neighbourhood Planning groups.</p> <p><u>Summary</u></p> <p>Adopting a SCI is likely to be a priority for the new Somerset authority. NSP PC recognises the urgent need to have a SCI in place. Nevertheless, the aim of achieving a high level of accessibility and community involvement is not addressed in the current Draft. The PC would like to see greater detail of how the authority will encourage and facilitate community</p>	
--	--	--	--

Report 2 Appendix 2

		involvement from the earliest stages of the making of Planning Policy. This involvement should be open, transparent and easily accessible.	
154	Fivehead PC	<p>Fivehead Parish – suggestions for improved working</p> <p>Communication Provide a direct line of communication between the Parish Council and the Case Officer, this would assist in discussing technicalities and deadlines etc. Parish Council meetings are usually held monthly; allowing at least 4 weeks for response would remove the need for extensions or special meetings, especially as it takes an average of 6 months to determine an application. Publish extensions to the determination deadlines. Provide a facility for the public to submit photos.</p> <p>Scrutiny Improve the scrutiny between the application forms and the supporting documents; the information quite often contradicts, particularly on measurements and environmental details. This scrutiny would be assisted if the 'planning constraints' section were completed on the website. Include the size of the development, numbers of parking spaces (based on SCC Parking Standards) and classification of development (major/minor etc) on the 'further details' page on the website. Ensure the design plans submitted include meaningful measurements, i.e., heights and distances from boundaries etc. Include key issues and reports in pre-determination assessment. Communities are excluded from expressing an opinion when areas such as design, drainage and access are finalised post determination. Arrange documents on the website under topic headings (Highways, Environment, Drainage etc) for ease of navigation. Publish documents separately that arrive attached to emails. When published as a single document, the attachments are not visible. (Reported many times).</p> <p>Officer's Report Explain the reasons for not following the SCC Parking standards and consultees recommendations in the Officer's Report.</p> <p>Post-determination Publish the Planning Conditions with a schedule of when they should be completed (pre-commencement, groundworks, construction, pre-occupation). Email all commenters and neighbours details of determination and planning conditions schedule. Publish pre-discharge reports with an opportunity for the Parish Council to respond Publish follow up work checking compliance with planning conditions.</p>	<p>Response in relation to communication:</p> <p>The time period for planning applications consultations are set out in legislation.</p> <p>We can confirm notification letters include case officer contact details.</p> <p>Officers will continue to be flexible regarding agreeing extensions of time (beyond 21 days) so Parish councils can consider applications at parish meetings. This will be updated in the SCI (page 18).</p> <p>Where new timescales are agreed these are reflected on the planning portal.</p> <p>Whilst some of the planning areas have the ability to upload photos through planning online where this is not available respondents can email these in for consideration. This facility will be considered as part of service improvement.</p> <p>Response in relation to Scrutiny:</p> <p>Submitted material and plans are reviewed in detail against national and local validation requirements.</p> <p>Communities can comment on matters of design, drainage and access. Submitted documents including any supporting technical reports are made available on the website.</p>

Report 2 Appendix 2

	<p>Enforcement</p> <p>Provide an effective reporting tool for breaches with the ability to submit further evidence after initial submission, rather than having to start a new form and ending up with multiple reference numbers for one issue.</p> <p>Provide updates on the investigations regarding breaches (updates not always received, apart from the initial acknowledgement email).</p> <p>IT</p> <p>Provide a facility to report IT issues on the Council website, via an online form. This would remove 100s of phone calls per annum, reporting these issues. Updates to repairs could be published, removing yet more calls.</p>	<p>Points regarding availability of documents and improvements sought on how information is displayed on the website noted. These will be shared with the somerset south area.</p> <p>Regarding Officer reports these should explain the reasons why there are departures from relevant policy criteria (e.g. parking standards) when other material considerations are taken in to account.</p> <p>Response in relation to post-determination:</p> <p>Condition schedules on decision notices will need clear triggers are part of the condition wording.</p> <p>Planning online provides the ability to track when decision notices etc are issued on applications.</p> <p>When discharging planning conditions the Council will contact relevant consultees who have a role in agreeing the adequacy of the information provided or requested the condition at the planning application stage.</p> <p>Feedback on improving enforcement processes noted. We will include more detail on the enforcement process in the SCI and link to the new Council enforcement policy and how the public can report a breach.</p> <p>In relation to IT this facility exists on the new website, with a link on each page for reporting an issue.</p>
--	--	---

Report 2 Appendix 2

155	Individual – Richard Mawer	<p>In the New Planning Constitution and committee document, it says:</p> <p>3.1 All of the functions set out in Para 1.1 above, will be delegated to the relevant area based (these will be known as North, East, South and West) Planning Committees save for the following: • Waste and Minerals planning applications where the proposed decision is to overturn the Officer recommendation. Such applications will be automatically referred up to the Strategic Planning Committee who will determine the matter at resolution stage in place of the area-based Planning Committees.</p> <p>One simple question... how can we know a proposed decision if it has not been to a planning committee, heard the objector views, had cttee members discuss the issues etc? Seems a strange change to current SCC policy?</p> <p>I look forward to hearing from you,</p>	Committee reports are published on the Councils website prior to the committee meeting. If it a delegated decision by an officer then the decision notice will be made available publically on planning online.
156	Frome Civic Society	<p>Frome Civic Society reviews and responds to all planning and listed building applications submitted within the Frome area: some 300 per annum. We are incorporated with the Frome Society for Local Study, a charity, and also a member of Civic Voice, the national charity for the civic movement.</p> <p>With a population of 28,559 (2021 census), Frome is the largest settlement in the present Mendip District (Somerset Planning East) and the fifth largest in the new Somerset Council area. It is situated at the extreme east of the region and arguably has a greater affinity with the East Wiltshire towns of Trowbridge, Warminster and Westbury, and indeed with Bath and towns in the BANES area, than with the rest of Somerset. The average journey time from Frome to Taunton is 1.5 hours by car and over two hours by rail. It is perhaps telling that none of the main community groups in Frome received direct notification of the present consultation.</p> <p>We find the draft SCI to be very much a standardized, 'follow for style' document and pinned to minimum requirements rather than seeking to identify and follow national best practice. It would be fair to say that we have, for various reasons, suffered a deficit of local democracy under Mendip District Council. We fear that this will be replicated if the proposed Area-based planning structure adheres to embedded practices and protocols. We cannot speak for other Districts joining the new authority but none are particularly large and all have probably suffered from shortages of resource which may have held back the adoption or implementation of best</p>	

	<p>practice. The new unitary authority should be able to command the enhanced resources and efficiencies to develop first-rate communications with all its constituents.</p> <p>Our comments below will, hopefully, suggest ways in which local community involvement can be energised to overcome the prospective problems of such a dispersed (and, for us, remote) LPA. Somerset Council has one opportunity to set itself up as an exemplar in local democratic consultation - that should be embraced to the full.</p> <p>4.1 and Appendix 1. The Local Plan: who we will notify, consult and involve in plan making.</p> <p>The community of Frome has been severely impacted by the catastrophic failure of Mendip District Council to update or review its local plan, which has all but destroyed the town's ability to manage its growth, correct its housing/employment imbalance or maintain its sustainability. It has left us prey to high levels of inappropriate speculative development. We are therefore looking to Somerset Council to ensure that genuine local engagement in a new Local Plan is timely and thorough. It is entirely insufficient to publish information on the Council website and there should be a much more proactive stance in reaching constituents.</p> <p>Duty to Co-operate bodies. Given Frome's location on the boundary of two other Local Planning Authorities, it is important that Somerset Council sets out specific criteria as to which authorities are to be consulted at each stage in plan-making. Major developments in the former Mendip District clearly interact with those on the other side of county boundaries. For example, Frome has a chronic employment deficit resulting in unsustainable out-commuting across LPA boundaries. Cross-boundary cumulative impacts need to be a fundamental element in evidence gathering and identification of issues for the Local Plan.</p> <p>General consultation bodies. How will these be identified? When, how and by whom will this exercise be carried out? Who will maintain and update the list? As a Civic Society we are not included at all in the standardised list at Appendix 1. Why? Civic Societies, Civic Trusts, Improvement or Preservation Societies and so forth are the country's most numerous participants in the land use planning system. We are independent, voluntary guardians and promoters of good placemaking. We cover all aspects of planning - housing, employment, environment, heritage, transport, public services, residential amenity, design and the public realm. Please will Somerset Council be brave enough to step outside the standard anodyne guidelines from the start and allocate a specific category to civic and amenity organisations which represent whole communities and places, and not just 'special interest' groups.</p>	<p>The SCI sets out that a variety of consultation methods will be used. Preparation of the Local Plan will not be limited to just publishing the documents on the website.</p> <p>Preparation of the next Local Plan will need to comply with relevant duty to cooperate requirements, including statements of common ground in relation to cross-boundary matters and preparation of a duty to cooperate statement for plan submission.</p> <p>Agree – civic societies, civic trusts and preservation societies will be included as examples of general consultation bodies in Appendix 1.</p> <p>As well as publicity online registration will be actively promoted. Individual postal notification of residents may be justified in certain instances for a specific geographic area.</p> <p>Whilst not a matter for the SCI SPD's inherited from the previous districts will</p>
--	--	---

	<p>Residents and others with an interest: the commitment to inform at every stage of the planmaking process must be as robust as possible and should include individual communication with council tax and ratepayers and not just 'general publicity campaigns'. We would hope to see active promotion of online registration and postal address lists.</p> <p>4.2 Supplementary Planning Documents</p> <p>Somerset Council will inherit a large number of existing SPDs from its four constituent parts. Will these all be automatically adopted and what will happen in the future? Just as examples, will guidance for shopfronts or green spaces be amalgamated into 'one-size-fits all' SPDs or will local identities be respected?</p> <p>4.5 Conservation Area Appraisals and boundary reviews</p> <p>Conservation Areas are designated heritage assets. Much of Somerset depends for its tourist and leisure economy on the quality and character of its built heritage, so the county cannot afford to neglect such a vital asset. Regardless of legal requirements, we are shocked by the wholly inadequate proposal to 'consider how best to inform local people' of appraisals and boundary reviews. There should be effective consultation procedures involving, as a minimum, the town or parish council, local civic, heritage and amenity societies, and directly or indirectly affected residents, all of whom can contribute vital local knowledge and understanding.</p> <p>Conservation Teams. The failure to protect Conservation Areas has been exacerbated in the Mendip area by the extreme shortage of conservation resource within MDC, which does not even have enough officers properly to review LBC applications, let alone planning applications involving Conservation Areas, the setting of listed buildings or buildings of local importance. Given that Frome, Wells and Shepton Mallett rank as the first, third and fourth settlements in the country for the number of listed buildings (all Taunton wards together only rank second), we call on Somerset Council to establish a strong, independent local Conservation team for the Planning (East) area without delay.</p> <p>Local Listing. We also need to see as a matter of urgency the establishment of a formal Local Listing process, informed by Somerset HER, local heritage interest groups and property owners.</p> <p>There is at present an almost complete disregard of the status of non-designated heritage</p>	<p>continue to have the same weight as before in planning decision for their relevant geographic area. Going forward they may be examples where amalgamating SPD is beneficial to ensure a consistent approach on a particular topic across the Council.</p> <p>With regard to conservation areas the SCI sets out the legal context in terms of consultation on conservation area appraisals, but wording could be more positively worded around engaging with local groups and town/parish councils as part of the process. This will be updated in the SCI.</p> <p>The Council is aware of the resource pressures in relation to conservation officer as well as the wider planning function. Adequate resourcing across the unitary area and the recruitment of staff will be being considered in detail as part of the ongoing restructure.</p> <p>There is ongoing dialogue between the conservation officers and Somerset HER regarding the local listing process. The NPPF is clear regarding the weight to give non-designated assets in the decision-making process based on their significance.</p> <p>Comment noted.</p> <p>SCI can set out some examples of methods that applicants can use to engage with the</p>
--	---	---

	<p>assets which include buildings rated as Positive within the Conservation areas.</p> <p>5.2. Planning Proposals: pre-application stage</p> <p>Pre-application advice. Officers providing pre-application advice must be fully familiar with the relevant area. Even within Mendip District, we have seen officers steering applicants in directions that are inconsistent with local priorities on matters such as design, transport or sustainability. This only becomes apparent when the application is submitted and we are left in the invidious position of trying to reverse inappropriate and potentially harmful advice.</p> <p>Pre-application consultation with the local community. We would welcome strong and specific guidance from the council to applicants on what form this should take. We all know that these 'consultations' are frequently peremptory or simplistic, poorly advertised or plain misleading. They often overstate the benefits and understate the harms. Commitments made in consultations should be specific and applicants held to account if promises made to secure 'community support' do not appear in the final application.</p> <p>5.3 Planning proposals - application stage</p> <p>Proportionality. What does 'consultation will be proportionate to the application being considered' mean? Will the case officer decide who to consult on the basis of their belief in what they consider 'proportionate'? in practice this would be extremely opaque and entirely rely on the understanding and judgement of an officer who may have limited or no awareness of the detailed physical context of an application, or the cumulative impact of a number of applications. A precautionary principle should be that all applications are notified to neighbours.</p> <p>Non-statutory consultees. This again is left for the officer to decide 'on a case-by-case basis'. Given the limited period of 21 days to be notified and respond to consultations, a clear direct method of alerting interested parties and bodies to a particular application within their geographical sphere of interest must be established. Merely having an 'online consultation portal' is inadequate. Weekly lists of validations (and decisions) should be available and also the facility for people to register for alerts within defined areas.</p> <p>Conservation Area applications. Interested bodies, and all neighbours, not just immediate neighbours, must be properly consulted on individual Conservation Area applications, as local knowledge and historic context are fundamental factors in their determination.</p>	<p>local community. The LPA can however only encourage pre-app engagement, not require it, or require that it must follow a set process.</p> <p>Neighbours are notified in accordance with statutory publicity requirements (appendix 3 of SCI). With regard to consultation with non-statutory bodies as element of judgement will always be needed, taking into account the scale and nature of development.</p> <p>This will be amended in the SCI to flag that non-statutory consultees will be consulted in line with agreed thresholds and triggers. Planning online website have the ability to view weekly lists and sign up to alerts.</p> <p>The Council will ensure the appropriate publicity of applications. Often officers will go above the minimum requirements in terms of site notices and notifications to publicise applications.</p>
--	--	---

Report 2 Appendix 2

		<p>Publicity. The 'Statutory Publicity Requirements' at Appendix 3 are the legal minimum and fall well short of best practice. The distinction between various applications and levels of consultation required is prejudicial to certain types of application. For example, applications that do not conform to the Local Plan or those that affect the setting of a listed building or Conservation Area appear exempt from the requirement to notify neighbours or other interested parties other than statutory consultees. These types of development are some of the most contentious and require public scrutiny. In our view ALL applications require a Site Notice, and all should have consultation letters sent to neighbours and those nearby an application site. There is no mention of Advertisement consent applications. These often have a disproportionate visual impact. These should also be accompanied by site notices and neighbour notifications.</p> <p>Planning Portal. Our expectation is that Somerset Council will introduce a planning portal that is fit for purpose, as the existing MDC portal is not. Applicants' documents are sometimes not put on the Portal at all, which is negligent on the part of the LPA. Comments are often uploaded very late or not at all. Some comments are misdirected to a different application. It is therefore not encouraging to read that Somerset Council 'will endeavour' to upload comments within 5 working days of receipt. All comments should be online as quickly as possible, given the very short consultation period of 21 days. This is important for both transparency and democracy.</p> <p>Submitting comments. The proposal to restrict comments to online submission discriminates against a significant minority who do not have online access. Other options must be available. On behalf of civic societies such as ourselves and other constituted groups we ask that the 'commenter type' should not follow the MDC model which forces us to register as a 'member of the public' but should adopt the model (e.g. as used in Bristol) which includes the category 'amenity-residents group'.</p> <p>Publication of comments. On the MDC portal, all comments appear on the documents list. This makes major applications, which may involve hundreds of responses and application documents, impossible to navigate. Comments should be in the comments section unless they are submitted as documents (usually because they include supporting images) and cannot be contained there. Ideally the Comments section itself should permit images to be uploaded.</p> <p>S106 agreements. In the interests of transparency and accountability, Section 106 agreements should be published on the planning portal with the other case documents. These have</p>	<p>We note the comment regarding the time scale for comments to be uploaded. Where there are a large number of applications for teams to process comments for the SCI sets a realistic time period.</p> <p>Agree – the SCI will be amended to be clear that comments can be submitted via email and post, as well as online.</p> <p>This will be fed back to the planning east team as an area of potential service improvement.</p> <p>S106 agreements are published as public documents on the planning online website when the decision is issued.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking. There are agreement in place that the committee arrangements (including referral processes) will be kept under review.</p>
--	--	---	--

		<p>traditionally been opaque agreements between the District Council and applicant. The impact of works undertaken as a consequence of these agreements may have a significant impact on residents and the quality of the environment.</p> <p>Planning Committee terms of reference</p> <p>Although this is not included in the SCI consultation, we would like to take the opportunity to comment on the proposed arrangements for public involvement at Planning Committees, and refer to the present version of Part D of the constitution, Planning Committee Procedure Rules (Terms of Reference).</p> <p>(7.21). We welcome the proposal that a total of 15 minutes be allowed to members of the public to speak in objection or support. This is a great improvement on the brutal practice in MDC of permitting only 3 minutes on each side in total, which has not infrequently led to a significant democratic deficit, especially when a 'first come, first served' supporter or objector, often politically motivated, takes the only available slot.</p> <p>(8.6d, 8.7d, 8.8d.) We are very concerned about the proposal that the Chair and/or Vice chair of an Area-based Committee will decide whether a non-major development is allowed. This does not represent normal practice and indeed seems open to conflicts of interest. It plainly should not be the responsibility of any Member to determine whether an application is referred to their own committee. In a recent high-profile case in Frome, a decision was made by the Planning Board Chair and Vice-chair to agree with the Officer's recommendation rather than allow it to go to the Board. This was despite the fact that there were 27 objectors, none in favour, further objections from all ward councillors, Frome Town Council, and Frome Civic Society. This is extremely disempowering for local democracy. We are not suggesting that all call-in requests should be automatically granted but a system should be established whereby this will be the case if certain conditions are fulfilled - for example, if both the Town Council and the Ward Councillors wish to call in, or if there are a certain number of objectors.</p> <p>We hope that our comments above will be taken into account and will of course be happy to clarify any points.</p>	
157	Natural England	<p>Thank you for your consultation request on the above dated and received by Natural England on 1st February 2023.</p>	Comments noted.

Report 2 Appendix 2

		<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. 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</p> <p>This system enables us to deliver the most efficient and effective service to our customers.</p>	
158	Individual – K. Viney	<p>It has been suggested that the new unitary authority is, in planning terms, going to spend its initial period of time reviewing and reaffirming the planning applications already resolved previously under the two-tier system.</p> <p>Given the huge impact of the Natural England / Phosphates situation right across southern England but especially in Somerset this seems odd.</p> <p>If it is true that 200,000 houses approved for planning and development (Source: Savills) are already in the system and presumably in the allocations and wider planning across the County and are now only being held up by the Phosphates fiasco it seems extraordinary and frankly self-indulgent for the new authority to revisit these decisions. One might, if one were of a cynical frame of mind, think this is politically driven rather than out of any planning need or necessity.</p> <p>I am sure that is not the case but I think such action does need some accountable and logical explanation given the ongoing impact on housing and other developmental provision this is likely to involve across the county in the coming months and years</p> <p>Surely a more sensible use of Unitary time would be discussing with the Water Companies the now clear and explicit need for them to upgrade their Water Treatment Works to remove the Phosphates from all residential sources and clear the way for new housing across Somerset and indeed now most of southern England?</p>	The Council will ensure all legal requirements and due process is followed with regard to applications where there has previously been resolution.

159	Individual – Cllr Helen Kay	<p>Thank you for the opportunity to comment on the SCI up to 31st March 2023. My apologies for this 11th hour submission but I am not officially ‘at work’ for a few weeks but am trying to keep up. Overall the document appears to take a no frills approach that does not go above and beyond the basics.</p> <p>Re page numbers:</p> <p>Re Page 6: “• The Council develops a draft Local Plan (or partial review of the plan) containing proposed policy approaches. The Draft Local Plan undergoes a formal consultation period under Regulation 18 ...”</p> <p>I am concerned about HOW and WHO puts together these initial policy proposals? They should reflect our values but could pull us in opposite directions eg the ‘need’ for new roads in order to facilitate economic development versus the ‘need’ for green infrastructure and wildlife corridors. Will these be addressed in different sections or will the trade-offs be made explicit? Will there be ‘options’ as in old Structure Plans? Will this draft Local Plan be debated by cllrs before going out to the public and if so, will it in reality be fixed by then?</p> <p>Might the info on page 13 about NDO and CRTBO proposals apply here ie. “Whilst proposals are subject to formal consultation, it is really important to engage with <i>councillors</i> (<i>substitute for ‘communities and stakeholders’</i>) from the beginning of the process. This helps to ensure that <i>councillors</i> are aware of emerging proposals, well before the formal consultation stage. Importantly, early engagement means that the knowledge and views of a wider range of people inform the content (of the NDO or CRTBO). This means that <i>councillors</i> (<i>people</i>) can influence the fundamentals (of NDOs or CRTBO), rather than being limited to tweaking matters of detail.(For CRTBOs,) the outcomes of early engagement can inform the development brief.</p> <p>Re page 6: “Other methods that may be used to involve people in the consultation include videos, quick polls, workshops, presentations, surveys, newsletters, forums, or drop-in events.”</p> <p>I welcome the inclusion of presentations and workshops which should include Local Community Networks.</p> <p>I think there should be a cross party and cross Somerset representative group of cllrs working alongside officers to manage (or failing that to scrutinise) this process and the consultation materials going out, in order to facilitate a balanced approach, balanced questions and emphasis.</p> <p>Re page 9: Anyone on a Local Plans postal database with one of the former District or County Councils in Somerset will need to re-provide us with postal details due to the General Data Protection Regulation (GDPR).</p> <p>The onus should be on the new Unitary authority to write to the former district Local Plan consultees inviting them to re register</p> <p>Re page 16: Section 5.2:</p>	<p>The purpose of the SCI is set out how the Council will engage in plan making. The SCI simply sets out the stages of plan production in relation to this, including regulation 18. The various planning considerations and how these should be balanced in deciding on development and infrastructure requirements will be a key aspect of Local Plan consultation and debate between Councillors on the various committees and working groups right through the plan production process.</p> <p>Agree – there will be a need to establish a cross party and cross Somerset group of members to scrutinise the Local Plan process and make recommendations at key stages of consultation. Local Community Networks will be included in the SCI under general consultation bodies.</p>
-----	--------------------------------	--	---

Report 2 Appendix 2

	<p>I am not sure if it should go here, but at Mendip we have a very good application check-list that developers are asked to fill in that covers Environmental Sustainability. Will that be carried over? If not, this sets rock bottom expectations of our developers.</p> <p>Page 21: Monitoring and Review Legislation requires the SCI to be updated every five years. It will be reviewed to ensure it meets any national regulations, the needs of the community and our <u>corporate objectives</u>.</p> <p>I believe this SCI draft was written before the new Council Plan was agreed by Full Council. Assuming you will update this draft to take account of comments received could there be some way of integrating our new values as expressed in our new Corporate Objectives?</p> <p>Page 23. Infrastructure providers (consultees for Local Plan)</p> <p>I think that in the old Mendip area, Bristol Water are responsible for providing clean water and that Scottish and Southern Electric provide electricity to Frome. I know the latter (and probably the former also) have grid capacity issues which means we can't have too many Air Source Heat pumps in new estates even though on many occasions the Mendip Planning Board wanted them and the developers were willing</p> <p>Page 23. "General Consultation Bodies" to be consulted as the local planning authority consider appropriate as set out in Regulation 2(1).....</p> <p>This list appears to be optional. Maybe instead of saying "These could include" at bottom of page 23 before the list, it should say "These should include the following where appropriate" and someone with a brain should make the judgement as to whether to inform the organisations on the list.</p> <p>I think Civic Societies are a special case. In Mendip I believe the Frome Civic Soc is consulted as a matter of course. I would hope that this would continue as both myself and Frome Town council usually take note of their comments. Although we don't always agree, their input has helped improve a number of new estates in my ward.</p> <p>Also the Frome Chamber of Commerce often make sensible comments regarding major applications on mixed use sites. I would hope they would be automatically consulted on such applications.</p> <p>Page 26 re Statutory Consultees for Planning apps:</p> <p>I don't know why the Greater London Authority is on here. Maybe this section is copied and pasted, possibly from Gov.Uk website?</p> <p>Pages 29 and 30 re Publicity Requirements:</p> <p>I think it would be good practice to inform neighbours of major applications requiring an EIA, plus those not in accordance with Development plan, plus those which might effect footpaths running next door to them, plus those effecting setting of listed buildings next door etc. It may be necessary to tell more than just the immediate neighbours and there should be some judgment attached to this and a real person looking at a map, rather than just doing the minimum (from the electoral roll?). For example in Mendip currently the neighbours directly across the road from a minor application are not informed, which isn't good enough IMHO. For example, in my ward even if its demolition of a large building and 8 houses being proposed on</p>	<p>The Council will seek to re-engage with those who have previously been involved in plan production, but the council must abide by GDPR requirements in relation to personal data and postal addresses.</p> <p>A number of the former planning areas had climate change and sustainability checklist requirements. Work is ongoing to ensure consistency on validation requirements as we move forward with the new unitary.</p> <p>Agree – the final draft of the SCI will be reviewed to ensure it aligns with the Council's agreed corporate objectives.</p> <p>Page 23 – noted, this list will be updated to list relevant infrastructure providers as appropriate.</p> <p>Page 23 General Consultation Bodies. Wording is used as the list is not exhaustive and new groups/organisations may be formed. Civic societies will be included in the list as an example of general consultation bodies. The SCI sets out that these will be consulted when considered appropriate, in line with the regulation on general consultation bodies.</p> <p>Chamber of commerce are listed as a general consultation body.</p> <p>Page 26 – noted, this has been extracted from national pages and therefore Greater</p>
--	---	---

Report 2 Appendix 2

		<p>that site instead. Also in my ward a garage conversion on the corner of a road only sent a neighbour notification to the main house, ie. The applicant!</p> <p>Again this appears to be copied and pasted from Gov.Uk website to do the absolute minimum only.</p>	<p>London Authority will be removed in the final document.</p> <p>The Council will ensure applications are adequately publicised based on their type and location, including through neighbour notifications and site notices in prominent positions. In many instances officers go above the minimum requirements in terms of using both methods to publicise an application.</p>
160	Frome Town Council	<p>Section 4 – Planning Policy</p> <p>Evidence gathering and Identification of issues for the Local Plans</p> <p>Parish Council must be contacted/invited to provide evidence and inform Policy. In the existing Mendip District Council Local Plan, Core Policy 6 includes a Vision for Frome, Frome Town Council had no input into this vision or the Frome Town Strategy, other than being consulted on it once it had been written. Parishes should also be asked to identify specific interest groups for the dedicated workshops. Consultation on draft plans must include drop-in events where questions can be asked, to help people understand what is in the plan, Frome Town Council would be happy to assist with this.</p> <p>We note that the document states that “Council Officers are always willing to offer advice and explanations”, this has not always been our experience in the past, it would be helpful if the relevant officers contact details are published.</p> <p>Any plans that accompany the Draft Local Plan should be interactive plans, previously we have only had A4 PDF plans to look at, this makes it hard to look at the detail or clearly see boundaries. You also have to scroll back up the plan to see the key and understand what the various annotations mean.</p> <p>Register online to ensure you are consulted</p> <p>How to register needs to be made much clearer, it was not obvious how to register.</p> <p>Supplementary Planning Documents</p> <p>Parish Councils should be invited to take part in any workshops, and should be directly consulted rather than relying on seeing it on the website/social media. Contacting only those registered on the consultation portal should not be relied on.</p> <p>Planning Proposals: pre-application stage</p> <p>We acknowledge that applicants are not required to carry out pre-application consultation. However when they do it would be helpful to issue some best practice guidance on how to do this. We have seen examples of good and bad practice; we would want to avoid an on-line only consultation with a survey attached that asks questions in such a way that anyone</p>	<p>The SCI outlines that there will be engagement with specific bodies and groups during the evidence gathering and identification of issues of plan making. This is likely to include parish councils for key evidence documents where local input is needed.</p> <p>Contact details of officers will not be shared in the SCI. This will ensure that the SCI does not have to be updated every time staffing changes. Specific officer details will however be shared as necessary when the Council is engaging with Town and Parish Councils.</p> <p>The Council are yet to set up a consultation portal for people to register for future planning policy consultations, but this will be a key early task for the Local Plan. This will be clarified in the SCI.</p> <p>SPDs – the SCI outlines that specific groups and organisations may be invited to participate which may include parish councils if these are deemed relevant. This will be dependent on the content/topic of the SPD being prepared.</p>

Report 2 Appendix 2

		<p>responding may inadvertently be giving neutral response or supporting. There is currently an example of such a consultation in Frome.</p> <p>We have also seen pre-application consultation summaries attached to a full application, setting out our support for applications where support was not given. It should not just be a tick-box exercise but genuine consultation where responses are accurately reported.</p> <p>Frome Town Council would be happy to advise/assist applicants with any pre-application consultations.</p> <p>Application stage</p> <p>Who is consulted?</p> <p>We would like to see Local Civic Societies added to the list of consultees, while we appreciate they are not statutory consultees, but the Frome Civic Society does comment on all planning applications. They are particularly focused on safeguarding buildings and areas of historic interest, with a wealth of knowledge on the local area.</p> <p>One of the complaints we hear most often from neighbours is “why wasn’t I consulted”. The requirement to either or serve written notice or erect a site notice is not sufficient. May application have the potential to impact a wider area of people that just the neighbouring properties. By not consulting widely enough I the first instance, that can cause further delays on an application where additional consultation has to be sent out. We would want to see both written notices served and a site notice. The danger of site notice only is that site notices have a tendency to disappear, causing even more anger amongst local residents.</p> <p>The addresses consulted are based on the properties shown to be adjoining the development on the map base. It is not always possible to tell if those properties have been split into separate accommodation/flats, or to really understand those who could be affected by the development from a map. The Case Officer should take additional consultation letters with them when making their site visit, where they can more accurately assess who should be consulted and deliver those letters at the time of their visit.</p> <p>We appreciate that this would potentially extend the consultation period depending on when the additional letters are delivered, but to ensure that appropriate consultation is carried out we believe this is necessary.</p> <p>We would welcome the opportunity to discuss with you directly how Frome town Council can help with the planning process to ensure the is appropriate consultation and engagement with the planning team. We would also be happy to provide desk space or our facilities for any officer whilst in Frome.</p>	<p>Regarding pre-app the SCI can set out some examples of methods that applicants can use to engage with the local community effectively. These changes will be made.</p> <p>Noted regarding civic societies. This will be added to a list of non-statutory consultees</p> <p>The Council will ensure applications are adequately publicised based on their type and location. Often officer will go above minimum requirements and utilise both notifications and site notices.</p> <p>The Council use address data so each individual address within a building is notified accordingly.</p>
161	Somerset West and Taunton DM – Julie Harcombe	<p>We assume the no consultations on Pre Appc is a change the new Council intends to make – at Officers discretion we do sometimes need to do consultations to inform the Pre Appc so we have always done so on occasion, normally to people like Highways for example – just wanted to make sure you are aware of that.</p> <p><u>Comments</u></p> <p>Just noticed a few things when reading this for the DM side –</p>	<p>SCI will be amended to reflect this.</p>

		<p><i>There are <u>four stages</u> during the planning application process where the local community and stakeholders are consulted and/or notified about the proposals:</i></p> <p><i>Pre-application stage: undertaken by the applicant once or a number of times. The scale and extent of consultation is dependent on scope and scale of proposal and whilst encouraged is not a requirement prior to submission of a planning application for the majority of applications. Application stage: formal consultation on the application undertaken by the Council. Appeal consideration: consultation is undertaken by the Council on behalf of the Planning Inspectorate (PINS); additional formal comments may be submitted to the Inspector prior to the determination of the appeal.</i></p> <p>Should this say three not four?</p> <p><i>The Council does not consult neighbours or parish councils on applications for Pre-application advice and advice given is not publicly available.</i></p> <p>We do sometimes consult with Parish Councils (and others too) on Pre Apps currently? Maybe we no longer will but just wanted to check that?</p> <p><i>There are three types of appeal: Written Representations, Hearing, or Inquiry. There are also fast track householder appeals which are considered and determined based on the officer's report.</i></p> <p><i>Most appeals are considered via written representations. More complex or controversial appeals are usually considered via a Hearing or Inquiry. Irrespective of the type of appeal, members of the public and other interested parties are notified by the Council on behalf of PINS and have the opportunity to forward any additional comments to the Planning Inspectorate. Comments originally submitted on the application that was refused planning permission are forwarded to PINS for consideration when the appeal is registered. Unless a new issue has emerged, there is no need for members of the public and interested parties to re-submit their original comments.</i></p> <p>This does not make clear there is no opportunity to make further comments on a fast-track householder.</p>	<p>Appeals – fast-track householder – we will make this clearer that further comments cannot be made.</p>
162	South Somerset DC Regulation Committee	<p>The South Somerset District Council Regulation Committee considered the Statement of Community Involvement report prepared for consideration by the Somerset councils at its meeting on 14th February 2023.</p>	

Report 2 Appendix 2

		<p>The Chairman explained to members the purpose of the report and invited comments from members on the draft Statement of Community Involvement (SCI) for the new Somerset Council.</p> <p>Following a short discussion, members comments included:</p> <p>Did not consider the document to be well structured, as it does not contain all matters that should be included within a Statement of Community Involvement. Felt the document was not set out in a user-friendly way so confusing for the public. No mention of the weekly list and the ability to subscribe to the validation phase of planning applications. This is valued highly by town and parish councils and should be secured. Document should noticeably contain airfield safeguarding guidelines and that the military airfield list should be part of the safeguarding process. Felt the new authority should consider the way SSDC operates, as the new proposed constitution does not meet the needs of local community engagement.</p> <p>In conclusion the Chairman felt that members should look to provide individual comments direct to the new Somerset Council as he believed this would be a much better way to provide a more detailed response.</p> <p>The Lead Specialist, Planning noted the comments raised and would deliver this feedback to the Somerset Council.</p>	<p>Comments noted. A number of additions and clarifications will be made to the SCI based on consultation feedback.</p> <p>The use of weekly lists and the ability to subscribe will continue as before.</p> <p>Reference to aerodrome safeguarding added.</p> <p>The document will be amended to cross-reference to the constitution which sets out planning committee referral and delegation arrangements, and public speaking. There is agreement in place that the committee arrangements (including referral processes) will be kept under review.</p>
163	Mendip Planning Board	<p>Mr Nick Hall had requested to speak on Agenda Item 9 – the Draft Somerset Statement of Community Involvement (included on the Board agenda)</p> <p>He said the document only provided minimum levels of community involvement compared to Mendip District Council's 2013 statement. He said that Somerset Council's draft statement could be greatly improved by including</p> <ol style="list-style-type: none"> 1. encouragement and incentives for developers to follow best practice rather than minimum standards laid out in NPPF; and 2. ensuring community involvement exercises are proportionate to the scale and importance of the issue/matter. <p>He concluded it was an important consultation and hoped his comments would help crystallise Councillor's thoughts</p>	<p>Point 1. Noted. The SCI will be amended to strengthen expectations on applicants in relation to pre-application engagement.</p> <p>Point 2. Agree. Comment to be included to ensure that engagement is proportionate in terms of the development/proposal.</p>
164	Cllr Bob Filmer	A couple of issues.	

Report 2 Appendix 2

	<p>It would be helpful for section 5.2 relating to Rural Exception sites to be more robust as community engagement particularly with the Parish council should be meaningful and spelt out more explicitly. This has proved to be an issue in Sedgemoor and needs more teeth as some developers merely pay lip service to community engagement and consultation.</p> <p>Section 5.3 I am worried that we state, "All comments should be submitted online". We must cater for those who do not have internet access or prefer to correspond in hard copy.</p> <p>Appendix 1 General Consultation Bodies. Can we ensure Internal Drainage Boards are included as these are extremely important bodies in the low-lying areas of the County.</p>	<p>Comment noted. Wording will be made more robust in relation to rural exception sites and pre-application engagement overall.</p> <p>Agree amendment will be made to be clear that comments will also be accepted via email and post.</p> <p>Agree – Internal Drainage Boards to be added.</p>
--	---	--