

Comment ID	Notes	Agent?	Objective ID (Agent)	Full Name (Agent)	Company / Organisation (Agent)	Objective ID (Consultee)	Full Name (Consultee)	Company / Organisation (Consultee)	Comments and proposed amendments	Comment summary	Summary statement	Response	Officer	Title
1		No				1002518	Martyn Dunn	South West Water	I refer to the above the content of which is noted and upon which South West Water has no specific comment.	No comment	Noted		Richard Grant	South West Water_Redacted.pdf
2		No				1237557	Dr Sarah Collinson	Inclusive Totnes	The Councils' entire approach to community engagement is inadequate, particularly as regards 'harder to reach' groups such as those with sensory impairments, limited literacy or mental health difficulties, those who are homeless and traveler families who may well be very directly (and potentially negatively) affected by planning issues and decisions. We would expect to see a far more robust and detailed explanation of how potentially excluded groups will be reached and forewarned and involved in planning-related processes and decision-making. Although the principles, including on equality and diversity, are adequate as stand-alone statements, there is no adequate detail provided to explain how these principles will be implemented in practice. We want to see a new section added to every sub-section of this document to explain how the Councils will ensure meaningful consultation with and participation of groups at high risk of exclusion. We want to see specific commitments to reaching: homeless people and traveler families, people with limited literacy (including a commitment to always producing easy-read versions of all documents), people with sensory impairments (including a commitment to always producing documents in accessible formats for sign-language users with limited literacy and for people blind people and people with visual impairments such as BSL video versions and use of large-font formats). As regards the specific types of planning documents referred to in the document, we want to see a requirement that these documents directly reference Councils' public sector equality duty and a commitment that this will be applied to all decision-making. As regards the potential equality impacts of planning decisions, we want to added to the document an acknowledgement of new evidence on the negative impacts of air pollution on vulnerable people with protected characteristics under the Equality Act 2010 and in particular children, the elderly and people with long-term heart and respiratory conditions. We want to see a clear commitment added to Councils gathering and using evidence on actual and potential air pollution impacts of planning strategies and decisions, including reference to Air Quality Management Areas, Air Quality Management Plans and clean air strategies. We also want to see a clear commitment to modelling and analysing the impacts of any proposed development and planning permissions on traffic, congestion and air quality.	The SCI should set out how the Councils will engage hard to reach groups and commit to producing documents and evidence base that commit to various elements of the Equalities Act.	No change needed	The SCI sets out the high level approach that the Councils will use when undertaking public consultations. It does not set out the detail - this is to be decided as the specific arrangements for consultations are being designed and will take into account the characteristics of the consultation required. The Councils will always ensure that the requirements of the Equalities Act are met. The SCI only covers consultation arrangements, and cannot be concerned with the	Richard Grant	
3		No				609794	Sharon Jenkins	Natural England	Please see PDF.	No comments made	No change needed		Richard Grant	Natural England (SCI).pdf
4		No				961935	Sally Parish	Highways England	Please see PDF for full set of comments. The SCI sets out the minimum requirements for consultation and involvement proposed by the local planning authorities (LPAs) of the Councils when preparing planning documents or consulting on planning applications. It sets out when, how and who the LPAs must consult, including the requirement for the LPAs to engage with neighbouring councils and statutory bodies under 'Duty to Cooperate'. We note that in section 1.13 reference is made to Highways England being a statutory body. We would suggest it may be useful to provide a list of all statutory consultees within the SCI for the ease of reference of those using the document.	Include a list of statutory consultees in the SCI	Change to be made	Statutory consultees for the purpose of the Duty to Cooperate are set out in Regulation 4 of the The Town and Country Planning (Local Planning) (England) Regulations 2012. It would not be helpful to repeat these in the SCI, as any change made by Government to the Regulations would make the SCI out of date. However, it may be helpful to include a link to the Regulations to assist people using the SCI to find a definition of statutory consultees.	Richard Grant	Highways England_Redacted.pdf
5		No				273925	Mr Richard Sroka	Plymouth Civic Society	Please see PDF.	Section 2 - replace "meaningful" with "clear" Section 3 - support Section 8 suggests: 1. developers are further encouraged to undertake pre application consultation 2. Relevant organisations should be recognised as non statutory consultees. 3. Applicants should submit a project statement of community involvement as part of larger planning applications	No change needed	Section 2 - the word "meaningful" does not simply relate to "jargon free" and therefore the word "clear" is not a reasonable substitute. Section 8 - A statement of Community Involvement is already a requirement for certain application types and developers are always encouraged to undertake consultation with relevant sections of the community prior to the submission of a planning application. The Council welcomes the Plymouth Civic Society's greater	Richard Grant	Plymouth Civic Society_Redacted.pdf

6		No				1191222	Mr Graham Palmer		Please see PDF for full set of comments. 1.3 – It mentions the ‘minimum requirements’ for consultation and involvement.....in what circumstances will greater than ‘minimum’ come into play? 1.4 – this mentions the following - Planning and Compulsory Purchase Act 2004 - Planning Act 2008 - Neighbourhood Planning Act 2017 - Localism Act 2011 Without wishing to plough through all of these documents, I assume the SCI and SPD seamlessly complement all of these. One thing that concerns me greatly is the manifesto of the current government which indicates a ‘streamlining of the planning process’. Difficult to gauge the effect this may have, but one would hope it does not lead to the local planning systems and procedures being steamrollered by national edicts. 1.7 – this mentions the Local Validation List, firstly what is this? Secondly, it says developers should be aware of any requirements which are contained therein. That sounds a bit conditional – can it not stipulate developers MUST make themselves aware of any such requirements? 1.11 – this tends to rule out any involvement/reference to DCC and DNP. I suggest that both may well have an interest in certain larger scale developments as they may well affect such things as highways and traffic and a wider implication on the environment. Additionally, whilst DNP have their own LPA, it may well be affected by larger scale developments both visually and environmentally. 1.13 – mentions a Planning Inspector in the Technical point...is this an independent person?	Detailed points related to paragraphs	No change needed	The SCI sets out the minimum requirements for consultation. The details of a consultation, including any specific elements going beyond the minimums, will be decided as part of the consultation on a specific document or application - the SCI ensures that certain minimum standards must be met. The Local Validation list sets out requirements for all planning applications to meet before being accepted and processed. It is not considered that the wording here needs to be	Richard Grant	GPalmer (SCI)_Redacted.pdf
7		No				1191222	Mr Graham Palmer		Please see PDF for full set of comments. 2.9 - mentions Climate Emergency, whilst it states that the consultation process will consider this, of greater concern is the way the planning process considers applications and what guidelines/rules it will apply when reviewing the application. This may not be the most appropriate place to raise this particular issue, but we are already faced with new developments taking place where developers are not seriously considering the sustainable aspects. Houses being built which will need remedial work within the next 10 years this should be addressed if we as a council, government, nation are really serious about Climate Emergency! 2.10 – mentions .....whether inside or outside the Council.....how will the wider public be involved/informed if bodies outside the council become involved?	The SCI should set out how development proposals will be considered and how they will be required to take account of climate emergency.	No change needed	The SCI sets out the minimum standards the Councils will apply to consultation exercises. It cannot discuss how applications are processed. For more information on this see the JLP and the SPD, which contain the policies which are used to decide planning applications - several of which relate directly to the issues raised in the representation. Information on the decision making body will be included with information published on a proposal. If the body is not the Council, the SCI will	Richard Grant	GPalmer (SCI)_Redacted.pdf
8		No				1191222	Mr Graham Palmer		Please see PDF for full set of comments. 3.3 etc. When; Where; Who etc this indicates that different situations (potentially) need different approach to consultation. Where the need arises (and within reason) will the Council put forward the most appropriate type of consultation, with a timescale commensurate with the consultation scale/topic?	Will the Councils put forward the most appropriate type of consultation?	No change needed	The SCI sets out the minimum requirements for consultation. The Councils will design consultation processes for individual documents ensuring they are in line with the SCI, with regulations, and appropriate to specific circumstances.	Richard Grant	GPalmer (SCI)_Redacted.pdf
9		No				1191222	Mr Graham Palmer		Please see PDF for full set of comments. 4.1 – this mentions an independent examination.....who is this and how ‘independent’ are they? 4.1 – mentions 6 weeks minimum – is there any kind of maximum? It strikes me that with a larger scale development 6 weeks isn’t very long to consider, consult and co-ordinate responses, especially if anything changes during the process. 4.9 – mentions Pre-Submission – could this be defined in more detail? Does it mean that a potential developer has to submit pretty much a full application for wider consideration and comment before submitting the formal planning application? Earlier in the document one of the Top Tips is ‘the earlier you get involved in the planning process, the more influence you can have’. I absolutely agree with this, however, I would say that having got involved in a recent Environmental Impact Assessment and commented accordingly, I was told my comments would not formally be considered and I would have to re-submit them once the Planning Application had been submitted! Surely the sooner comments are submitted the sooner the Council can gauge community feelings? I’ve never come across the idea of a pre-submission – is this a new idea? 4.14 – if the Secretary of State overrules Council decisions, based on full consultation with the local community, what opportunities are there for appeal?	Comments on how section 4 affects planning applications	No change needed	Section 4 deals with the process to be followed by the Council when it produces Development Plan Documents such as the Plymouth and South West Devon Joint Local Plan. It does not apply to planning applications. More information on the DPD process can be found in the National Planning Policy Guidance and on the Planning Inspectorate website. The independent examination is held into development plan documents produced by a local planning authority by the	Richard Grant	GPalmer (SCI)_Redacted.pdf

10		No				1191222	Mr Graham Palmer		Please see PDF for full set of comments. Section 8 – the content of this section concerns me. It seems to rely on the developer ‘doing the right thing’ by engaging with the community affected by the application. I think that this should be a much stronger statement and consultation made mandatory, where reasonable. I also disagree with the threshold of 150 dwellings – to me this is a purely arbitrary number and will encourage developers to go just a little bit lower. Any development on a green field site of more than a handful of houses will, without question, effect those living nearby and the wider environment. Of equal concern is the table of timescales for consultation. Earlier in my comments I indicated that 6 weeks was, in some cases, not enough time to fully engage and comment. This table talks in terms of 21 days!.....surely this must be longer where the planning application is for anything other than very basic requests?	Concerns over detail of planning application consultation set out in Section 8	No change needed	The SCI specifies a minimum level of consultation and these are based on statutory requirements where legally the Councils cannot ask for further mandatory consultation. However certain planning applications rely on a Statement of Community Involvement where local communities can respond to an applicant's level of engagement with local communities.	Richard Grant	GPalmer (SCI)_Redacted.pdf
11		Yes	1238260	Ian Jewson	Walsingham Planning	1003640	Bovis Homes Limited		Please see PDF for full set of comments. We would suggest this section makes reference to the requirement for the initial stages of local plan production to comply with the specific requirements in regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. We suggest paragraph 4.2 is amended as follows: "4.2 All consultations on DPDs will comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 and achieve the following as a minimum."	Para 4.2 should make reference to the Local Planning Regulations	Change to be made	Add to para 4.2" 4.2 All consultations on DPDs will comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 by achieving the following as a minimum.	Richard Grant	Bovis Homes (SCI).pdf
12		Yes	1238260	Ian Jewson	Walsingham Planning	1003640	Bovis Homes Limited		Please see PDF for full set of comments. This section should make reference to any changes made to SPD documents once they have been adopted. In our view it will be important to undertake further consultations on any further changes to SPDs to ensure everyone has an opportunity to comment. It is appreciated that it may be possible to make minor changes to SPD documents without formal consultations but those who commented previously should be notified of any changes made to these documents. This should be clearly set out as follows: "5.6 Once adopted any changes to SPD's will be subject to formal consultation in accordance with the SCI before those changes are given weight in the decision making process."	SCI should say that any changes to an adopted SPD will be subject to consultation	No change needed	This suggestion is not necessary. Once an SPD has been adopted, it cannot be changed without following the process set out in regulations for producing an SPD - which includes consultation.	Richard Grant	Bovis Homes (SCI).pdf
13		Yes	1238260	Ian Jewson	Walsingham Planning	1003640	Bovis Homes Limited		Please see PDF for full set of comments. We would suggest paragraphs 8.1 and 8.2 are updated to be consistent with the NPPF. For instance it could make reference to Paragraph 40 in relation to LPAs encouraging applicants to consult the community: "They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community" Paragraph 8.3 lists particularly sensitive types of development which are also set out in the accompanying table on page 26 which sets out the LPAs requirements for publicity for each type of development. Reasoning should be provided relating to why these types of development are considered particularly sensitive with reference to the NPPF.	Community consultation requirements should be referenced against the NPPF	No change needed	The SCI is consistent with the provisions of the NPPF - no change required.	Richard Grant	Bovis Homes (SCI).pdf
14	Late comment	No				487799	Mr Dennis Silverwood	Tamerton Foliot Village Conservation Society	8.4 insert "The Council(s) will maintain a list of constituted societies and community interest groups and determine which are to be consulted as appropriate to the areas affected and to the nature of the applications." 8.5 What are the table headers? Add to rows "Departure from Development Plan and ProW" and " Affecting Conservation Areas" "e mail to constituted societies and community interest groups"	Further definition required on who is consulted for particular applications	No change needed	Community interest groups can register to receive the planning applications they wish to comment on through the PCC website. The Council welcomes the Plymouth Civic Society's greater involvement in the planning process and officers will meet with the Plymouth Civic Society to explore how this can be achieved in a practical way and how comments set out here can be accommodated.	Richard Grant	