

Appendix B

Statement of Community Involvement Representations

Represantor	Rep No	Organisation	Comment Received	Council's response
Helen Massey	1	Barnet Resident's Association	<p>The move to social media is very positive to attract younger residents. But could there be a bit more attention to the publicity you always gave to planning applications in the press? Partly as a matter of principle, not everybody is signed up to social media. There is also the mundane issue that the Press, where you always put your list, has either died or gone into deep hibernation. We have not seen it here in High Barnet/Underhill for many weeks. Several of our members who normally show an interest have asked where it is. Is there any chance that you put the stuff in the Times as well/instead as they do still seem to be alive? It is not a problem for us as a group, we just look at the weekly list, but Joe Public might be getting left out. Not sure that Barnet First can meet the need because of coming out quarterly, everybody will miss the deadlines for comment.</p>	<p>Barnet Press has a wider circulation than the Barnet Times, reaching considerably more households and therefore offers better value.</p> <p>The Council will continue to consider how planning applications are publicised and ensure value for money.</p>
Helen Massey	2	Barnet Resident's Association	<p>On planning policy stuff I'm well aware of the consultation pages on the website and using that is fine. The possible gap is knowing when something new is there. Not everybody looks every week. Most of us representing groups get the notifications via FORAB (Federation of Residents Associations in Barnet), but maybe there could be a notification to groups.</p>	<p>We will continue to use our extensive Local Plan Consultation Database to notify via e-mail, groups such as Barnet Residents Association, of new consultations on planning policy documents ensuring that such notifications provide direct web links to consultation documents. We endeavour to keep this database as up to date as possible, especially prior to significant planning consultations.</p> <p>A timetable for publication of planning policy documents is set out in the Authorities Monitoring Report which is published annually.</p> <p>The consultation database goes through a process of 'cleaning' each time we conduct a consultation. This occurs through receipt of returned emails, letters or updates received from residents and companies if a contact is no longer available at the address we have for them.</p>

Pickering	1	Society	The section about consultation (5.1.2) ignores the possibility of submitting comments and objections on-line, which I had hitherto believed was the Council's preferred method.	The ability to submit comments on-line is available for most planning policy consultations. This option has been available for the SCI consultation. Comments and objections to planning applications can be submitted online – this is stated in Table 1 of the SCI.
	2	The Finchley Society	The Finchley Society welcomes this rewriting of the Statement of Community Involvement (SCI). It is clear and helpful. It has however, raised several significant queries in our minds, and there are some other points where we wish to see expansion or amendment.	We welcome these positive comments from the Finchley Society.
3	Figure 2 - Web pages are regularly redesigned, while the SCI will, presumably, remain in force for many years. It might be better to avoid illustrations that may soon become out-of-date.		We recognise that websites will be redesigned. However we consider that illustrations are helpful in getting our message across.	
4	2.2.1 - there should be a reference to the Planning Portal here, and how it can be used by the community. It is mentioned later under appeals and enforcement, but an indication of how it can be used for applications would be helpful.		We recognise the importance of the Planning Portal as a planning aid and make reference to it elsewhere in the SCI. Section 2.2.1 of the SCI sets out the channels of communication that are used only by the Council to connect with the public.	
5	2.2.6 - the search facility is now quite good. The alert facility should be improved; it now relates only to a specific planning application, while a previous version related to the post code.		The Council are awaiting a software update to resolve this issue.	
6	2.2.10 - the SCI should explain how the invitation list for the Citizens Panel is initially drawn up. Is it random (by lot) or are nominations sought from local organisations or from Barnet residents generally?		With regard to composition of Citizens Panel we have revised paragraph 2.2.10 to state 'More information is available on the council website' and provide a direct link to the relevant page.	
7	2.2.11 - We have some doubts about workshops. Our experience is that they can be stereotyped, with 'facilitators' who know very little about the subject, and a reliance on post-it notes. The SCI should include a commitment to write up and publish the output of workshops.		We recognise the importance of early feedback and have valued the input gained from workshops during the production of the Core Strategy. We publish the results of consultations online, including workshops, feedback received and the Council's comments in a Consultation Statement and Representation Report. See section 7.10 of the SCI.	
8	2.3.1 Admirable sentiments, but there is no content in this paragraph. It should explain how the Council seeks to get this wide involvement.		We have revised paragraph 2.3.1 to state 'this is what the document aims to achieve'.	
Peter Pickering				

Pickering	9		2.3.2 - How does the council set about the difficult task of keeping databases up-to-date? Our experience is that the databases used are inconsistent, and have duplications.	Each consultation presents an opportunity for the Council to update the Local Plan Consultation Database. We will receive returned letters, email failures and other notifications, which are then used to 'clean' the database. We endeavour to keep this database as up to date as possible, especially prior to significant planning consultations.
Peter Pickering	10	The Finchley Society	4.1.2 - Surely consultations can also involve the use of electronic means - websites, emails, social media like Streetlife etc. - though ensure that some people are not left out there must always be letters, information in local libraries, and the like.	With complex development proposals developers will usually create a dedicated website. This has happened with the Brent Cross Cricklewood and the West Hendon regeneration schemes. The Council requires all large scale major planning applications to be accompanied by a Consultation Statement which demonstrates how a developer has collaborated/consulted with local residents and businesses, and identified key issues. The manner in which a developer conducts pre-application consultation with locals is beyond the control of the Council. However, planning officers will advise developers about this at pre-application meetings.
Peter Pickering	11	The Finchley Society	4.1.4 - Planning and development forums are a good idea, and are a step towards the Charette system of collaborative planning. But Barnet uses them very rarely, if at all; though they would have been appropriate for the series of major developments along the High Road in North Finchley and Whetstone. The SCI should admit this, say when they have actually been used, and explain the circumstances in which they would be appropriate.	Only where a major planning application is of significant local interest the Council will organise a Planning and Development Forum. Planning and Development Forums are therefore infrequent. An example would be the Planning and Development Forum held for a proposal at Land off High Road/Chandos Avenue, N20 in 2012 which was a proposal for 70 new dwellings and the provision of 512m ² D1 (non-residential institution) use.
	12		4.3.1 - How are people without internet access supposed to know this? Surely equalities policy does not permit discrimination against them? There should at the very least be clear information in local libraries.	All telephone planning queries received by the Council are directed to a dedicated planning service hub which has professional planners available to provide advice.
	13		4.3.2 - We assume that advice to the public, neighbours etc. is not charged for. This should be stated.	Agreed. The SCI has been revised to include a new paragraph at 4.3.3 'The pre-application charging scheme does not apply to informal initial discussions in connection with very small business premises, or very minor schemes or householder schemes (small extensions/alterations), certificates of lawfulness, enforcement or advice to any local resident affected by a development. Such verbal advice at this time will continue to be provided free of charge.'
Peter	14	The	5.1.1 - 3rd bullet point 'Local List' in the planning context means the list the Council publishes of buildings of architectural or other importance. Another term should be used here to avoid confusion.	Agreed. Paragraph 5.1.1, 3 rd bullet point has been amended to include 'national and local application requirements'.

	15		5.1.2 - 3rd bullet point. Avoid colloquialisms like 'advert' in a serious document; say 'advertisement'. The SCI should define 'neighbours', so that we all know whom the Council will notify of its own motion, and who will have to rely on the public announcements.	Point noted and agreed regarding 'advert'. 'Neighbour' in this instance refers to those residents living in close proximity to the proposed development with whom we intend to consult. Whom those 'neighbours' are for particular development proposals is set out in Barnet's Code of Practice on Planning Applications.
	16		5.1.3 - 2nd bullet point. As drafted it would appear that objectors have to consult specialists, Natural England etc. That cannot be what is meant, Probably this bullet point should be in 5.1.2, not 5.1.3.	Agreed. This bullet point has been moved to 5.1.2.
Peter Pickering	17	The Finchley Society	5.1.4 - It is very good to know this, Sometimes, through holidays etc, individuals are just not able to meet the deadlines. Representations from such people should not be discarded automatically, though of course it would not be fair on applicants if the Council deliberately delayed the decision process to wait for late objections. The deadlines should be extended as a matter of course over Christmas and the New Year, when many people are away, and Council offices are closed for several days.	We welcome the Finchley Society's support on this issue.
	18		5.2.1 - Sometimes applications for permitted development etc are published; the circumstances should be set out. A reference forward to 5.5.1 'Certificates of Lawfulness' would be helpful.	Certificate of Lawfulness applications are published online and can be viewed using the search facility. Paragraph 5.2.1 has been amended to reflect this.
	19		Table 1 - Fifth row. Weekly lists are also circulated by email; the Finchley Society finds these very useful. They are helpfully ordered by ward, and may thus be more convenient than alerts.	Weekly lists are available to those who request them. Also, the online application search/alert facility can produce weekly lists of applications by ward.
Peter Pickering	20	The Finchley Society	5.3.1 - first bullet point. For applications that affect the street scene or the character of an area contiguity is too restrictive. Those who live along the road on either side and opposite should also be notified.	Agreed. The bullet point at 5.3.1 has been amended to state '...we consider 'directly affected' to mean adjoining neighbouring properties which are contiguous to the application site and occupiers within the building to which the application site relates as a minimum. Barnet will consult in accordance with Barnet's adopted Code of Practice on Planning Consultations which goes beyond the minimal requirements as laid out in legislation.'
	21		5.3.2 - Regular weekly lists are better, since they are ordered by ward and do not depend on distance in metres, which may not be a good indicator of relevance.	Weekly lists are available to those who request them. Also, the online application search/alert facility can produce weekly lists of applications by ward.

Peter Pickering	22	The Finchley Society	<p>5.4.4 - The first sentence should be altered to take 5.1.4 into account. Much more important is the omission here of commenting through the website, mentioned in Table 1. We thought it was the Council's preferred method of communication. There should be a whole paragraph in the SCI about it. In particular:-</p> <p>i) The documents on the website are often unhelpfully and inaccurately labelled (e.g. just 'site and other plans', even for a Design and Access Statement). When there are only one or two documents this is just a minor irritation, but when there are a lot it makes assessment of an application very difficult. The Council should ensure that documents are available in a user-friendly form before putting them on the website and starting the 28-day consultation period.</p> <p>li) Before accepting an application and putting it on the website Barnet Council should insist that the documentation provided by the applicant is presented to a professional standard and that wherever appropriate there should be a Design and Access Statement on which users of the web can rely.</p> <p>lii) The treatment of comments on the website is inconsistent and positively unhelpful. There is a box which purports to indicate how many comments have been received (important because five objections are needed to take an application to Committee) but recently it has often said 'none' when there have been objections; it must include objections made by email or letter as well as those made online. The SCI should state clearly what the Council's policy is in this respect, and it should then be adhered to.</p>
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Paragraph 5.1.4 has been amended to reflect that the Council will endeavour to consider late responses in exceptional circumstances.

Clear and accurate labelling of planning documents is helpful to both representors as well as Planning Officers. This is an issue that we are aware of and are working to resolve.

Planning officers will only accept drawings and information which are legible and clear. Where this is not the case, an applicant will risk their application resulting in a refusal.

We have recently started using new software within the department and this has caused some problems including the one mentioned here. This issue has now been fixed.

Peter Pickering	23	The Finchley Society	<p>iv) The old website gave a list of those neighbours etc. who had been notified. This is useful to groups like the Finchley Society, and should be reinstated. The SCI should indicate the Council's policy.</p> <p>V) Very recently, the documents on the website have included the texts of at least some public consultations. Some other London councils do this as a matter of course. Others feel that considerations of privacy and confidentiality inhibit this. There are arguments either way. But it is essential that Barnet should have a fixed and stated policy in the SCI, and should consistently adhere to it. It might be possible to indicate the substance of objections without identifying the objector, or to treat comments from organisations, like the Finchley Society, differently from those of private individuals. The SCI should also make clear whether, and in what form, objections can be seen by applicants.</p> <p>Vi) Officers' reports, especially ones for cases decided delegated, should be put as soon as possible on the website. They are very helpful in indicating the way in which cases are decided, and so make easier the assessment of other applications, either for the same or for other sites.</p>	<p>The software that we use in the planning department has been updated and the new Council website was launched recently. This has created some teething problems which we are working to resolve.</p> <p>Officer's (Delegated) Reports summarise objections received through consultation and are taken into consideration in all planning application decisions. Many individuals believe that their comments alone could reveal their identity. The Council believes that we receive more comments on planning applications because individuals are comfortable in the knowledge that these are made in private.</p> <p>Objections, however, can only be made available on request.</p> <p>Officer's Reports are published immediately at the point when a decision is made. This is an automated process.</p>
	24	The Finchley Society	<p>Bottom of page 12 - The word 'non-material' in 'These are non-material considerations' should be replaced by 'not material'; they are not immaterial considerations, but are not in the relevant sense considerations at all. The lists in the boxes on this page are very helpful.</p>	<p>Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications 'must be made in accordance with the [development] plan unless other material considerations indicate otherwise'. The terms material and non-material considerations are therefore town planning terminology laid out in planning legislation. (See Westminster City Council -v- Great Portland Estates plc.; HL 1985)</p>
	25		<p>5.5.1 - Listed Building Consent. We are pleased to see the sentence 'Where demolition is involved, we consult the National Amenity Societies'. That is indeed what the council should do, but very often fails to do so (examples can be provided).</p>	<p>New legislation came into force on 15 April 2015 called 'Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015'. The planning department will follow the rules laid out in this piece of legislation with regards to all heritage applications. Paragraph 5.5.1 has been amended to reflect this.</p>
26	<p>5.5.1 - Prior Approval - It would be helpful to spell out the grounds on which valid objections can be made. This will have to be kept under review; the government recently published new proposals, and no doubt there will be changes after the election.</p>		<p>Valid objections must be based on material considerations which are explained at page 12 of the SCI. There is more information available on the Planning Portal website http://www.planningportal.gov.uk/permission/commonprojects/extensions/#ncs</p>	

Peter Pickering	27	The Finchley Society	5.6.3 - Add here that Councillors may call up cases to be decided by the Area Planning Committee, that the applicant has a right of reply, and that there is a limit on the number of speakers and the time allowed. Occasionally recommendations for refusal go to Committee; the criteria for that could be spelled out. Sometimes decisions by an area committee are called up to the main one for what may seem political reasons; the SCI should clarify the rules on this.	A link is provided at paragraph 5.6.4 to the relevant section of the Council's Constitution, which sets out rules relating to the format and procedures of Planning Committee meetings.
	28		6.2 - It would be useful to add that although appeals are to the Secretary of State they are in practice almost always heard and decided by an inspector, either by written representations or some form of a public inquiry. Indicate briefly what rights there are for other parties to intervene at this stage - different for householder applications and others.	Agreed. The SCI has been amended at paragraph 6.2.1 to include 'Nearly all appeals are decided by an inspector'. However, the Inspectorate is an agency which has it's own set of rules and procedures which are explained fully on the Planning Portal website.
	29		6.2.3 - The Barnet website is inadequate here; it has a section called 'appeals', but that fails to give much information - especially that most useful for going to the Planning Portal - reference number the Planning Inspectorate have assigned the case.	The Planning Portal appeals webpage provides an excellent search facility capable of running searches by date and borough. Objectors to a planning application are informed by post if it results in an appeal.
	30		Figure 7 - DPD here is an error for SPD	Agreed. The title of Figure 7 has been amended.
Peter Pickering	1	Hendon and District Archaeological Society	Listed Buildings - We are pleased to see that the council consults with local amenity societies as appropriate; 'and archaeological' should be added after 'amenity'. We are also pleased to see the sentence 'Where demolition is involved, we consult the National Amenity Societies'. (The Council for British Archaeology is one of the National Amenity Societies). Experience is that Barnet frequently fails to carry out this consultation (examples can be provided). This section of the SCI should be drawn unequivocally to the attention of the Council's planning officers. Note that when this document appears the part of English Heritage concerned will have become Historic England.	The Council complies with the relevant legislation which in this instance is the Arrangements for Handling Heritage Applications – Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015, which came into force on 15 April 2015. Paragraph 5.5.1 has been amended to incorporate these changes.
	2		Archaeology is not mentioned in 5.5.1, but should be. Policy DM06e is the relevant item in the Local Plan. Development in Areas of Special Archaeological Significance, or sometimes elsewhere, may justify a condition on any planning approval - advice on these is provided to the Council by English Heritage/Historic England. The SCI should explain the procedure adopted by the Council and how HADAS, or any other community organisation is involved.	Agreed. A sentence has been added to paragraph 5.5.1 stating 'We will consult with Historic England on development sites within Areas of Archaeological Significance as set out in section 2.17 of Barnet's SPD on Sustainable Design and Construction.

John Gillett	1	Mill Hill Neighbourhood Forum	In the case of specific briefing(s) should be arranged for community groups and other interested parties. You should encourage applicants to engage with community groups pre-application, and because by definition many Major Developments can be very complex the Council should help said community groups understand the nuances of the plans, the implications thereof and the potential impact/interdependencies of proposed developments on the community and its integrated infrastructure. While Community Groups have usually offered their critique to developers on a free basis, it is probably that some fees will need to be levied in future, notably on the larger projects, where considerable effort is required to fully assess all aspects of the proposed development. We envisage situations where said community group may indeed have to employ expert staff to fully comment.	<p>We recognise the importance of community involvement in the planning process and encourage developers to conduct pre-application engagement with the local community on major applications. This is discussed at section 4.1.1 to 4.1.3 of the SCI.</p> <p>Almost all major applications go through pre-application consultation with the local community. A community involvement statement is a prerequisite for all major applications demonstrating how a developer has consulted with the local community prior to submitting an application. Failure to provide a community involvement statement will invalidate major applications. However, the planning department can only advise a developer how to conduct what it considers to be good pre-application engagement with the local community.</p> <p>Planning Aid also provides professional planning advice for those who cannot afford to pay professional fees – Planning Aid is mentioned at 8.1.5 of the SCI.</p>
	2		Pre-application advice given to applicants should be in the public domain and available to people who are reviewing planning submissions.	Information discussed at pre-application meetings are commercially sensitive and therefore cannot be publicly disclosed.
	3			<p>Planning law prescribes circumstances where consultation must take place between a local planning authority and certain organisations, prior to a decision being made on an application. The organisations in question are under a duty to respond to the local planning authority within a set deadline and must provide a substantive response to the application in question. These organisations are 'Statutory Consultees' and are set out at http://planningguidance.planningportal.gov.uk/blog/guidance/consultation-and-pre-decision-matters/table-2-statutory-consultees-on-applications-for-planning-permission-and-heritage-applications/</p>
	4		Statutory Consultees. Where a Neighbourhood Forum exists, it should be a statutory consultee.	'Neighbourhood Forums' have been added to the list of non-statutory consultees in Appendix A on page 29 of the SCI.
			The concept of local "Participation" in planning rather than purely "Consultation" is worthy of consideration within the Council's future policies for Community Involvement in Planning. Planning should be a Collaborative Activity as set out in the attached publication published by Civic Voice.	Like 'Collaborative Planning for All' the planning department aims to go further than just conducting 'consultation' by providing a flexible framework for consultation in the SCI in line with planning legislation whilst allowing engagement to be proportionate to the local significance of development proposals.

John Gillett	5	Mill Hill Neighbourhood Forum	We suggest there is a need for a tighter "feed-back" loop on planning matters, as two-way communication is vital in ensuring trust in the system.	The SCI sets out the council's commitment to engagement on all planning matters. It provides a level of flexibility that allows us to take a proportionate approach to engagement on individual planning consultations. Where there is significant public interest in a particular matter the SCI's flexibility enables us to engage more fully with those who have a shared interest.
	6		We also suggest that the principle of a Community Right of Appeal, as recently set out by Campaign to Protect Rural England (CPRE), Civic Voice and the National Association of Local Councils (NALC), has much merit and we would like to see it implemented. It could be triggered when a high threshold of community opposition has been reached. Grounds for appeal could include insufficient infrastructure, non-compliance with government guidance and non-compliance with a local Neighbourhood Plan.	At paragraph 6.2.2 in the SCI it is explained that there is no right of appeal for third parties. This is a statutory rule http://planningguidance.planningportal.gov.uk/blog/guidance/appeals/planning-appeals-general/#paragraph_008 . A Community Right of Appeal would need to be made at a national level within the relevant legislation.
Jeremy Charles	1	Resident	Thank you for asking me to comment on the above and congratulations on the Draft. It is definitely a good step in the right direction in helping Barnet's residents become more involved in planning issues that affect their community. The Draft is also clear, in plain English and gives useful advice. Clearly, we should recognise that a resident's property is probably their most significant asset and if well protected a source of wealth for later life. Residents should be interested in being involved in shaping plans and making planning decisions, as the Draft indicates in its introduction.	We welcome your support.

Jeremy Charles	2	Resident Eyes and ears - I sincerely believe that to get residents' fully involved with their hearts and minds, you must start with their eyes and ears. Dare I say that currently the relationship between residents and the Council is not good in respect of planning matters? There is very much an "us and them" perception generally across Barnet. To win trust you have to have to be credible and engender an experience which reinforces the relationship we both want...a good experience leads to an improvement in trust, while we should take it as read that the Planning personnel are experts and should be credible. Therefore, might I suggest that you ASK residents to be involved; you don't just stick something on a website. Within Barnet you have many more people who are both capable of helping and want to help, than you employ. Ask residents to make positive suggestions; seek their feedback; use their eyes and ears to report what is going on. Residents are your customers, but can you actually demonstrate you put them first and that you are focused on them? I think the "channels of communication" you list are exactly that...channels of communication, but to what extent are the channels open for feedback and thoughts? And do the residents know you want this? If indeed you do! Of course cost is a challenge (Section 13), but then the Council should charge properly in the first place, per my comment below. Perhaps some form of campaign accompanying the launch of this paper could be envisaged?	Community engagement is subject to continuous improvement; we endeavour to engage in a way that is both practical and practicable and learn from best practice elsewhere. One of these ways is through our work with the Federation of Residents Associations in Barnet (FORAB).
Jeremy Charles	3	Resident Key Performance Indicators - it is interesting to note that you handled 6,000 planning applications last year, but involved residents would like to see more information...how these split between big and small per your definitions? How many succeed or are rejected? How many return on appeal or are resubmitted? Commercial vs. residential? I'm sure you have these statistics as the Council probably uses them to measure the productivity and manpower requirements of the Planning function. So please consider being transparent and therefore win over the residents. They can see the enormity of the challenge you face rather than feel they are battling planning bureaucracy!	Information on planning performance is published by the Department for Communities and Local Government https://www.gov.uk/government/collections/planning-applications-statistics

Jeremy Charles	4	Resident	<p>Charging and value for money - There is brief mention made that pre planning advice carries a fee, but how much is this? Indeed what is the charging structure in its entirety, nothing else is mentioned? Is there discretion to charge what you wish, or a published tariff, or indeed is it all free? Do residents get involved in setting any fees or charges, perhaps through the Councillors? You could explain all this. So residents can then judge whether those who keep submitting planning applications and tying up the Council's time pay accordingly as otherwise, ultimately, the residents pay - which is clearly unfair. Related to this is whether the planning process is value for money. There is no information as to how much resource and at what cost the planning process is managed. Section 13 is very opaque and greater transparency will help win hearts and minds and involvement.</p>	<p>As charges for pre-application advice are likely to change, the SCI is not the most appropriate document to publicise this price list. A link to our current charging schedule for pre-application advice is provided at 4.2.1 of the SCI.</p>
Jeremy Charles	5	Resident	<p>Local Government Ombudsman - For the record, the LGO has discretion to review what it sees fit. It does not have to wait till reviews, investigations and formal procedures at a Council are ended. It is more guided as to when the cause of the complaint occurred in the first case and whether they should have been involved within 12 months of that. The 12 month rule is of greater standing than the Council still continuing to investigate. Obviously this does introduce a degree of difficulty in a resident knowing when to go to the LGO, but your current wording is not correct and residents should be warned of the 12 month rule.</p>	<p>The Local Government Ombudsman will generally expect all Council processes to have been exhausted before seeking their intervention.</p>

Jeremy Charles	6	Resident	<p>Neighbourhood Planning - I guess this is why you asked me to comment on the Draft, given my desire to know more about the Neighbourhood Planning process. However, I'm still befuddled by how a resident can instigate a local forum. Yes your draft has much in terms of process but there is little help to someone wanting to start. For instance, what is the size of a "local neighbourhood"? There is no definition, other than parish or town council, but what is it in a borough like Barnet? Two roads joined together? Or is all Golders Green the minimum size? This is highly important to win hearts and minds as clearly the bigger a neighbourhood is required to be, the more the whole process becomes difficult and bureaucratic. Who sets the size of what a neighbourhood should be? Are there not case studies and proforma plans available to the Council and residents? The government web site said that 12 months ago 1000 communities "took the first steps" and that now 13 plans are approved. Clearly not a simple process, and you should advise this, but it would be good for you to publish what is happening elsewhere. The government web site also says that the Council should receive £30,000 for each approved plan, and that there is money available to help residents formulate their plan (perhaps from the local council). But this is not in your draft. How many plans and forums are now operational in Barnet? You should provide this transparency. I think this whole area needs much more work in your draft to be truly helpful, but I fully understand that the concept is new and there is not much help from elsewhere!</p>	<p>The Council has a duty to support with Neighbourhood Plans. It is the role of the community through Forums to produce Plans. The Council will ensure that Forums engage with their communities and that they meet their legal requirements. The SCI has no remit to instruct Forums on how they must engage</p> <p>A link to the neighbourhood planning webpage is included in the SCI. The webpage provides a signpost to other organisations that are helping groups produce plans.</p>
David English	1	Historic England	<p>In relation to consultations on the Local Plan, Historic England notes paragraph 7.2.2 including figure 6, which clearly highlights the requirement to notify consultation bodies, of which Historic England is one. For the avoidance of doubt, please consider us a specific consultation body what does have an interest in the development of the borough's Local Plan in accordance with Regulation 18(2)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>	<p>Historic England has been listed as a Statutory Consultee in Appendix A of the SCI.</p>

David English	2	Historic England	<p>Paragraph 5.3.1 sets out that statutory bodies should be consulted for certain types of planning applications. Although not referenced explicitly in this paragraph, this reference includes Historic England for works affecting the historic environment. As your paragraph only refers to Schedule 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2010, and is therefore not complete, we would advise you to consult the National Planning Policy Guidance for more detailed information on the full range of applications that Historic England should be consulted on: http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/consultation-and-notification-requirements-for-heritage-related-applications/#paragraph_057</p> <p>Clarifying this point should, in our view, assist applicants and ensure that they are not surprised by the need to involve statutory bodies for particular planning applications.</p>	The list of Statutory Consultees is subject to change and therefore Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 has been referred to at 5.3.1, second bullet point.
	3		Historic England welcomes the reference to consulting us on listed building consents where necessary (para 5.5.1), Neighbourhood Plans (8.3.1 and 8.4.1) and Conservation Area Character Appraisal and Management Proposals (para 10.1.5).	We welcome Historic England's support.
	4		On an editorial note we can advise you that as of 1st April 2015, all references to English Heritage (paras 5.5.1, 10.1.5 and Appendices A and B) should be replaced by Historic England, which is the new body advising on planning and the historic environment for the Historic Buildings and Monuments Commission for England.	Agreed. All references to English Heritage have been updated to Historic England in the SCI.
Tony Ferris	1	Highways Agency	We have reviewed the available documentation and confirm that the Highways Agency has no comment to make.	No response required

June Gibson	1	Resident	I confirm that I think that the 21 days allowance for objections is too short. These days people are away from London some of the time. And there are holidays of perhaps 14 days. Re my estate of many flats there are many absentee landlords, who have agents acting for rentals to pass on news by post and so on. Not everyone is on line. If they are not on line and check planning applications affecting them you can see that it is towards the end of the 21 days before they even know about it. I suspect that planning applications are submitted at a time when maximum opposition is likely. I think it is unfair that developers of one sort or another can hone their plans, maybe even have discussions with you, be all ready for the Council's consideration yet the members of the public have such a short time in which to object by the time they have received (or not if they are absent) your written communication.	The statutory requirement for consultation on householder, minor planning applications and prior approvals is 21 days. At Barnet we consult on householder and minor applications for 28 days and 23 days for prior approvals. This helps provide a greater window of opportunity for individuals to submit their comments.
Andrew Reid	1	Land Owner	At no time have you ever made any attempt to discuss with [our client] the problems associated with having farm land in the London Borough of Barnet and the need for a sensible plan to be made, taking into account the needs of modern farming and as usual there is no mention of this in your plan. Our client instructs us that this letter will no doubt be ignored, in the usual way in which Barnet Council behaves towards its residents.	The Council has not ignored your client's letter. The role of the Statement of Community Involvement is to set how residents, businesses, community groups and landowners can be involved in the preparation of planning documents and consideration of planning applications. The SCI does not set out policy or allocate land. It's relationship with the Local Plan is clearly set out in Figure 5.
The Barnet Society	1	The Barnet Society	The Barnet Society regards the draft Statement as good on aspiration to engage with the community, and in detailed description of planning processes.	We welcome the Barnet Society's support.
	2		However, it has significant gaps – There is a lack of information about the role of Highways. In practice, this is often a significant part of planning proposals, but the least publicly accountable and contactable.	The SCI relates to consultation and engagement with respect to all planning related matters in Barnet only. Highways consultation is not within the remit of the SCI. However, Council services such as Environmental Health and Highways are consulted as specialists on some applications. A new bullet point has been added to paragraph 5.1.2 of the SCI stating that we consult internal services such as, Highways on related planning matters.
	3		There is insufficient information about responsibilities and processes for protection of trees and the natural environment. The section on TPOs is adequate, but listed trees are only a small part of resident's ecological concerns. The current division of responsibilities between Streetscene, Conservation Areas and Arboricultural/Planning Officers is confusing, and it is unclear whether there is communication between them.	We recognise the need to protect trees in Barnet and follow national legislation. A reference and link to the National Planning Policy Guidance has been added to paragraph 12.1.1. Paragraph 12.1.4 has been amended to identify and link to the relevant legislation regarding the protection of trees in conservation areas. Various internal Council services are consulted on planning applications where this is necessary. This includes Conservation Area Advisory Committees, Green Spaces and others. A bullet point has been added to paragraph 5.1.2 to reflect this.

The Barnet Society	4	The Barnet Society There is insufficient weight and clarity given to the roles of Area Residents Forums and Town Teams. These (or improved versions of them) should be key parts of local democracy. In practice they suffer from inconsistent Council and Officer support, lack of publicity and poor website sign-posting – and a widespread sense among residents that they are largely ignored by Cabinet and Committee decision-takers.	Annex A of Barnet Council’s Constitution sets out the responsibilities and functions of Resident Forums and states that they are for discussing local matters. It is made clear that ‘Matters must not relate to Planning or Licensing Issues’ and specific planning applications cannot be discussed at these meetings. Town Teams are operating successfully in Chipping Barnet, Cricklewood, Edgware and North Finchley and form a key role in revitalising Barnet’s town centres through partnership working between residents, businesses and public sector partners. Town Teams have been added to the list of non-statutory consultees in Appendix A on page 29 of the SCI.
David Farbey	1	Mill Hill Preservation Society a) Consultees Appendix A together with Section 5.1.3 and 5.3.2 indicate who are to be consulted. We note that the Appendix indicates a list of bodies the Council will consult “where appropriate”. This includes local historic, environmental and amenity groups and societies. We feel that the term “as appropriate” needs to be more firmly defined. We consider that in matters of planning and development policy and any significant new initiatives bearing on areas such as our own, local preservation or conservation societies should be involved as of right.	Appendix A of the SCI lists consultees for the purposes of Local Plan documents and is not used for planning application consultations (although there may be some overlap). The expression “as appropriate” refers to a selection of groups who may share an interest in the planning document being consulted upon. For example, for the purposes of the Supplementary Planning Document on Sustainable Design and Construction we would consult with those groups who have an interest in environmental issues amongst others. Where selection is difficult we will normally consult more widely - this can usually result in communication with all groups, by email.
	2	Mill Hill Preservation Society b) Planning Consultation Database 2.3.1 This is at the heart of the consultation process. It is not clear as to how precisely this is to be used, who decides on which names to contact on which occasion and how the database is to be maintained. We suggest that all these points be clarified.	We consider that paragraph 2.3.2 is quite clear in stating that individuals and organisations can request to be added to the Local Plan Consultation Database in order to be notified of all Local Plan consultations. We publish the results of consultations on major documents (DPDs) in a Consultation Statement and Representation Report. See section 7.10 of the SCI. This enables stakeholders to gauge the extent of consultation.
David Farbey	3	Mill Hill Preservation Society c) Green Belt There is little reference in the Statement to Green Belt, either in terms of Statutory requirements of local planning guidelines. After Section 5.4 it lists the material considerations that are to be considered in determining planning applications. One effect listed is “Effect on nature conservation” and “effect on a conservation area”. But there is no mention of Green Belt as such in any of these material considerations. We believe it important to add a further effect-effect on areas of Green Belt. This is vital in view of the extent of Green Belt areas within the borough and the pressures brought to bear on them.	There is a clear and consistent national, regional and local policy framework on Green Belt. The policies which protect Green Belt are material considerations. Under Section 38 of the Planning and Compulsory Purchase Act 2004, decisions on planning applications 'must be made in accordance with the [development] plan unless other material considerations indicate otherwise'. The terms material and non-material considerations are therefore town planning terminology laid out in planning legislation. (See Westminster City Council -v- Great Portland Estates plc.; HL 1985) A bullet point has been added to ‘Material Considerations’ on page 12, listing national, regional and local planning policy. This will encompass policy regarding Green Belt.

	4		<p>d) Regulations for consulting on DPDs Figure 6 shows the steps to be taken over consulting on Development Plan Documents. Regulation 16 on preparation of a plan states “notify specific consultation bodies who have an interest in the subject of the proposed plan, appropriate general consultation bodies”. We would like assurance that conservation bodies such as our own are included in this category as a standard consultee.</p>	<p>Conservation bodies like the Mill Hill Preservation Society will be consulted during the preparation of DPDs. A reference to Appendix A and the Local Plan Consultation Database have been added to Figure 6.</p>
David Farbey	5	Mill Hill Preservation Society	<p>e) Email alert facility In Section 5.3.2 and elsewhere emphasis is put on the use by community groups of the email alert facility on the Barnet website. This is seen as a key component of community engagement. We doubt how far this facility is known among community groups and believe it should be publicised more widely. Its design should concentrate on ease of use.</p>	<p>The SCI promotes the use of the email alert facility and as part of the consultation exercise this has been widely publicised</p>
	6		<p>f) Conservation Area Character Appraisals Section 10 covers CACA’s. 10.1.5 States that the Council will engage with various specified parties, including amenity societies and local heritage associations. We take it that preservation and conservation societies are covered under this heading.</p>	<p>Mill Hill Preservation Society is regarded as a local heritage association. English Heritage has now become Historic England and the amenity societies refer to the National Amenity Societies. These have been included in Appendix A of the SCI.</p>
	7		<p>g) Enforcement Section 6.4 covers enforcement issues. We note the references to complaints procedure. However, we observe a level of uncertainty among our members as to how to proceed. The document says that the council encourages members of the community to report cases of abuse. We suggest that the procedures for reporting such cases be clarified and publicised more widely. In particular, the public should know more precisely who they should contact.</p>	<p>Agreed, paragraph 6.4.1 has been revised to include ‘Breaches of planning control should be reported to the planning department either by phone or email (phone number and email at paragraph 6.3.2).’</p>
David Farbey	8	Mill Hill Preservation Society	<p>We also observe a trend among more aggressive developers of intermediate scale projects to develop first and seek planning consent retrospectively if and when they are discovered. We suggest that Section 6 be strengthened to make it clear that the council will take a strong line against deliberate flouting of planning procedures and the practice of seeking planning consent retrospectively.</p>	<p>Barnet’s Planning Enforcement team operates within the legislative framework set out in the Town and Country Planning Act 1990 (as amended) and all of its subordinate and associated legislation. The enforcement team acts proportionately in responding to suspected breaches of planning control.</p>

