

Summary of outcomes of consultation on temporary revisions to the Statement of Community Involvement (August 2020)

The council Statement of Community Involvement (SCI) sets out the ways in which partners, stakeholders and the community can be involved in the council's planning processes. This covers both the production of planning policy and decisions relating to planning applications.

The council's current SCI was adopted in March 2018 following consultation in October – December 2017 and can be viewed [here](#).

National Planning Practice Guidance (PPG) has been updated in light of the Covid-19 Pandemic and recommends that council's review their SCI and update it in light of the government's guidelines for helping prevent the spread of the disease¹. As a result the council is making some temporary amendments to the requirements set out in the adopted SCI. These are to protect the health of our communities and staff, while still ensuring that the council can continue to successfully conduct its planning functions in a manner which is underpinned by extensive and effective community engagement.

The council ran a consultation on the proposed revisions to the SCI for a four week period from Monday 6th July until Monday 3rd August 2020. The consultation documents were in the form of a track change version of the SCI (showing additions and removals in a red colour text) and an addendum note explaining the nature of the changes in detail and the reasons for these. Both documents can be viewed on the council's website [here](#).

The representations can be seen in full below, however an overall consultation summary is provided below:

The consultation for the proposed revisions to the draft SCI ran for 4 weeks between Monday 6th July until Monday 4th August 2020. A total of 8 consultees responded to the consultation on the proposed draft revisions to the SCI. These consultees consisted of statutory consultees and local residents. Of the responses received from statutory consultees no issues were raised, with no changes required to be made to the document. Of the responses from local people, these were more detailed and suggested a number of amendments. Changes have been made to the addendum note to reflect the revised changes to the site visit protocol published by the council in July 2020 and to also include a hyperlink as a footnote which was previously embedded in text. Other minor changes will be made to the document for clarity, for instance removing reference to the consultation and how to make comments.

¹ <https://www.gov.uk/guidance/plan-making# covid19>

Table 1: Representations received in response to the proposed draft revisions to the Statement of Community Involvement

Consultee	Section/ relevant paragraph of document	Full comment	Summary of comment	Council response/ proposed change to comment
Stafford Napier (on behalf of SWAG)	Para 6.5	<p>The provisions for applicants to consult with the local community are inadequate and do not sufficiently fulfil the requirements of Planning Practice Guidance Paragraph: 078 Reference ID: 61-078-201200513. Specifically the Guidance requires that "<i>Authorities will also need to take reasonable steps to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this. Authorities may wish to consider engaging sections of the community, that do not have internet access, through representative groups rather than directly, targeting only people in areas most affected by proposals, and allowing individuals to nominate an advocate to share views on their behalf. Consulting by telephone or in writing can also be used where this is feasible and alternatives can't be identified.</i>"</p> <p>The failure to insist that applicants of major developments should take steps further than simple online and virtual exhibitions has already materially and seriously compromised the community involvement for the pre-application consultation on the so-called Basingstoke Gateway proposal (ref 20/01497/ENS) where whole sections of the community that would be most impacted have received no notification or information. This failure jeopardises the community involvement process. No virtual MS Teams/Zoom consultations have taken place nor has printed material been delivered comprehensively in the immediate vicinity.</p> <p>This paragraph requires extensive re-writing with additional provisions.</p>	<p>The respondent notes that major developments at pre-application stage should be required to go further than the measures outlined in the SCI which recommends applicants or developers use the community engagement measures set out in paragraph 78 of the Planning Practice Guidance (PPG) to ensure community involvement is effective.</p> <p>The respondent then notes that he believes the applicants for 20/01497/ENS have not adequately undertaken pre-applications consultation in line with the PPG recommendations.</p>	<p>Para 6.5 of the SCI refers to pre-application advice, with the expectation for applicants and agents to consult with the local community.</p> <p>Pre-application engagement is strongly encouraged by the council. However, the NPPF (para 40) states that the council can only encourage applications to carry out such consultation as opposed to being able to impose specific requirements.</p> <p>No changes are proposed to be made to the existing text, as unfortunately the council is not able to go any further than has been stated in terms of encouraging further consultation by applicants.</p>
Richard Carr (Transport for London)	n/a	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the revisions to the SCI.	The respondent has no comments to make on the proposed draft revisions to the SCI.	Noted. No changes are proposed to be made to the existing text
Natural England	n/a	Natural England does not consider that these temporary revisions to your Statement of Community Involvement poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.	The respondent has no comments to make on the proposed draft revisions to the SCI.	Noted. No changes are proposed to be made to the existing text

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Michael Bell	Section 1 c) Meetings, workshops and focus groups and	<p>Section 1 c) – Use of telephone calls. <i>Where online platforms are not suitable or cannot be used by specific groups, the council will use other approaches including telephone calls to engage with stakeholders.</i></p> <p>Comment – Phone calls to engage with stakeholders should be subject to requirements to provide a copy of the council’s summary of the call to the stakeholder for confirmation. The comments should not be counted unless they are accepted and confirmed by post or email.</p> <p>Reason : I in East Woodhay and apparently part of my property has been added to a list of community facilities in the Neighbourhood plan. I do not know how much land as I was only told at the tail end of a conversation with a Parish Councillor about a different topic (a re-vote on a planning application where the Chairman of the Parish Council declared a conflict of interest he had not declared before.) I have no record of what was said, I had no notification of what the call was really about and I do not know which of my comments were recorded, if any, or if that record is accurate. (This PC has a poor record on providing accurate information.) I immediately wrote and asked for information and a formal consultation. I have not had any reply. A Freedom of Information response from Basingstoke shows that the designation was not in place in 2018 and that there is a more concerning policy obligation included in the section, not referred to by the Councillor, that “<i>Proposals to improve the viability of an established community use of the buildings and ancillary land by way of its extension or partial redevelopment will be supported...</i>”. If stakeholders are consulted by phone, the Parish Council should send a copy of the NP to the stakeholder by post, drawing attention to specific proposals that affect them. Stakeholders should be given time to consider the document before the call. In any event, the caller will have to keep a record of the call. They should send this to the stakeholder with instructions on how to respond if they do not agree with the record and no consultation should be accepted as made until the stakeholder has confirmed they agree with the record.</p>	<p>The respondent notes that the council should provide a summary of the phone call to the stakeholder for confirmation. The respondent notes that comments should not be counted unless they are accepted and confirmed by post or writing. The respondent suggests this requirement should also be applicable to parish councils at regulation 14 (pre-submission) if consultation is undertaken by phone with sufficient information provided to consider the documents before any phone call is recorded.</p> <p>The respondent notes that part of his property has been added to a list of community facilities in a draft neighbourhood plan, without engagement.</p>	<p>The draft revisions note that the council will use the telephone to liaise with stakeholders and where possible will record notes of any discussions or conversations. However, for a representation (for any development plan document) to be valid it will need to be submitted formally in writing (via post or email) as the respondent suggests.</p> <p>The concerns raised by the applicant in relation to a specific neighbourhood plan and the inclusion of his land are noted.</p> <p>In light of the above, no changes are proposed to be made to the existing text.</p>
Michael Bell	d) Neighbourh ood Planning and	<p>Section 1 d) Neighbourhood Planning and Referendums <i>For Regulation 14 consultations, among other mechanisms to support neighbourhood planning, the council will:</i></p>	<p>The respondent notes that the council should ensure that neighbourhood plans are publicised in a number of ways and should publish in detail its</p>	<p>In terms of neighbourhood planning, the council have a requirement in line with the relevant legislation to publicise the regulation 16 (submission)</p>

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	Referendums	<p><i>o Work with the parish council as the qualifying body to ensure the pre-submission consultation is publicised appropriately including on the parish council website.</i></p> <p><i>o Work with parish councils to ensure documents and consultation forms are available to a wide range of interested parties including those who do not have internet access.</i></p> <p><i>o Advise parish councils on appropriate methods of engagement in light of Covid-19 and its implications for consultation exercises.</i></p> <p><i>o Advise parish council's to consider extending consultation periods to provide time for accessing documents and responding, if relevant.</i></p> <p>Comment:</p> <ol style="list-style-type: none"> 1.-The Council should publish in detail its advice on appropriate methods of engagement by Parish Councils. As well as websites, information that the plan is being publicized should be presented in Parish Magazines and on all Parish Noticeboards. 2. When working with the Parish Council on the wide range of stakeholders and interested parties it should agree, and publicise in general format (e.g. "owner of"; "residents of") which have been agreed. Local residents will be able to spot if any person or group is missing better than the Council and the PC may not want to contact certain groups or individuals. 3. Where NPs have been prepared over many years with no public meetings, without publishing minutes etc. appropriate engagement should include publishing NP team meeting minutes and the advice of any consultants. This will give residents an opportunity to see the evolution of the plan and the arguments raised for and against proposals. Otherwise they have no concept of how the plan reached its final format, what issues were raised, dismissed or changed over time. 4. There needs to be a different approach to NPs where there has been full public involvement in preparation before any consultation during COVID-19 restrictions and NPS where the first and only public consultation will be Regulation 14 during COVID-19. Where there has been no information published or public meetings held before the Regulation 14 consultation then the consultation should be deferred until after COVID-19 restrictions have been lifted. 	<p>advice on appropriate methods of engagement by parish councils.</p> <p>The respondent cites that a list of stakeholders and interested parties should be publicised for local residents to comment on and identify if any key consultees are missing.</p> <p>The respondent notes that parish council should be required to publicise records of minutes to ensure communities are engaged in the whole process and can track changes.</p> <p>The respondent also notes that there should be a different approach to neighbourhood planning with regulation 14 (pre-submission) consultations deferred to post COVID..</p>	<p>consultation in a manner which reaches people who live and work locally. The council recognise that there are a number of additional mechanisms vis-a-vis those outlined in the SCI and would encourage town and parish councils to use engagement methods suitable for ensuring maximum engagement with their parishioners, including more than identified in the scope of the SCI.</p> <p>Neighbourhood Planning Steering Groups who produce neighbourhood plans with the Parish or Town Council as relevant qualifying body are required to draft Terms of Reference which should include publicising any records of meetings and minutes.</p> <p>Moreover, the level of consultation carried out as part of the neighbourhood planning process needs to be justified by the qualifying body in their Consultation Statement, which is assessed as part of the Independent Examination of the Neighbourhood Plan.</p> <p>The Government have been clear that plan making should still proceed in light of COVID-</p>

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		<p>Reasons- Neighbourhood Plan policies will become local plan policies because the Council assumes that these plans have consulted with residents and come up with a plan which reflects what local residents want for their community. There are PCs, such as East Woodhay, where the first time residents will get to see the plan and be consulted is the Regulation 14 stage. In the case of East Woodhay, to reach the point where, seven years after the application was accepted by the Council, local people have still never seen the plan or had a public meeting, and where no NP team minutes are published shows an unhealthy unwillingness to engage with their residents. These temporary provisions could allow a council of co-opted and “elected unopposed” councillors to force through unpopular policies which will become part of the local Plan without proper consultation. The Council can avoid the potential for harm to local communities and time and money being wasted on legal challenges by recognizing that in certain extreme cases, such as East Woodhay, it is in the public interest to postpone any official Regulation 14 and 16 Consultations until after the restrictions are lifted or new permanent rules adopted.</p> <p>In East Woodhay the Parish Councillors are either co-opted or elected unopposed due to insufficient numbers standing. At the 2018 APM, local councillors outnumbered residents 2:1. Local residents are indifferent to the Parish Council and most of the time it does not have a full complement of councillors.</p> <p>The local Neighbourhood Plan has been running for seven years since adoption and nine since it was first discussed. The only public survey was in 2014/15 and was extremely general. A cash prize was offered after many months showed little interest. Feedback on general issues was gathered from three stalls at church and school fetes in 2015, often from people who did not live in the Parish. Local involvement since then has been by email in 2018, targeted to a few individuals within a small group (“EWS”) associated with the PC.</p> <p>In recent PC meeting minutes the PC has promoted the plan as supporting retention of community facilities. That does not reflect the PC’s actions. In July 2020 it allowed Asset of Community Value (ACV) status for assets to lapse, at least one of which has been for sale for some time. It has refused requests to add as an ACV land owned by East Woodhay Charities</p>		<p>19, with a number of measures introduced to ensure that engagement reaches the local community. It is at the discretion of the qualifying body as to when they hold their regulation 14 (pre-submission) consultation and the council are not able to influence this. The council is aware of the respondents specific concerns in relation to the progression of the draft Neighbourhood Plan.</p> <p>In light of the above, no changes are proposed to be made to the existing text.</p>

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		<p>(formerly a 1818 Enclosure Act "Allotment for the Poor"). That land is for sale and is likely to be sold before any NP consultation starts. Ahead of the NP Regulation 14 consultation, the first time the community would see this NP, in June 2020, the PC set up an Amenities Committee to decide the future of community owned land at the centre of Woolton Hill, the Parish Field. The committee's conclusion was reached in July 2020 without any information on issues discussed being disclosed in the Amenities Committee Minutes. The decision was reached without general public consultation of the options, which the PC officially promised in 2012. Any consultation was with residents (including councillors) who live on or near the Parish Field.</p> <p>In seven years, no drafts of the plan have ever been published, nor any proposals put to local residents generally. A 2019 FOI Request Response from the Council refused to disclose any copies of the plan. There are no published NP team minutes. An attempt to get some through a Freedom of Information request got the reply that was that the local PC does not hold minutes of the Neighbourhood Plan team, as it is a separate entity. PC internal emails confirm the team was deliberately set up so as not to have to have public meetings or publish minutes. Further, a sub-committee of the PC ("EW2020") was set up in 2016, met until 2017 when it fed into the Neighbourhood Plan. In response to direct PC requests, it looked at using the Neighbourhood Plan as a vehicle for acquiring privately owned land on which to develop a regionally significant c.16 acre multi-sport facility (8 acres of football, seven of cricket one of tennis) on over ten sites in open countryside in this rural parish of 3,000 residents. The PC denied EW2020 was a sub-committee and denied there were minutes. When eventually the minutes were disclosed they showed EW2020 was a sub-committee, meaning that in two separate written responses over a year apart, two PC clerks had given directly inaccurate information.</p> <p>I hope East Woodhay's approach has not been true of other Parish Councils, but I've given the example as it shows that there needs to be a two-tier proposal that responds to circumstances where there has been full public consultation before COVID-19 restrictions and circumstances where that has not been public consultation.</p>		

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Glen Strognotharm (on behalf of Highways England)	n/a	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3, A34 and A303.</p> <p>We have reviewed the consultation and have no comments.</p>	The respondent has no comments to make on the proposed draft revisions to the SCI.	<p>Noted.</p> <p>No changes are proposed to be made to the existing text</p>
Environment Agency	n/a	<p>Thank you for consulting us on this Statement of Community Involvement. We do not normally comment on these documents, as such we have no comments to make. However, please do continue to engage with us throughout your local plan process and consult us with your regulation 18 and regulation 19 local plan consultations, and local plan evidence based documents where necessary.</p>	The respondent has no comments to make on the proposed draft revisions to the SCI.	<p>Noted.</p> <p>No changes are proposed to be made to the existing text.</p>
Edward Winter (on behalf of Historic England)	n/a	<p>Thank you for consulting Historic England on the above. We do not wish to make any comment.</p>	The respondent has no comments to make on the proposed draft revisions to the SCI.	<p>Noted.</p> <p>No changes are proposed to be made to the existing text</p>
David Ensom	Paragraph 6.9	<p>Duty planning service - temporary solution: Customers will need to provide "an explanation of the proposal"; this will be difficult for some customers to explain over the phone (and will no doubt lead to lengthy calls) so you should say "customers will advised what information to send via email for the duty planning officer to understand the proposal and provide advice."</p>	The respondent notes that in relation to the duty planning service it may be difficult to verbally provide a description of the proposal and the text should be amended ensure customers can provide information via email.	<p>Noted – the only change to this service is that it is not face to face. The duty planning officer will contact the respondent prior to the telephone appointment if sufficient information has not been provided.</p> <p>Alternatively, if proposals are particularly detailed the written</p>

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				submission may be a better route to provide detailed information.
	Addendum note: Virtual Planning Committee meetings, third bullet point	Virtual Planning committee meetings Link missing at end of 3rd bullet point.	The respondent notes that a link is missing on the addendum note.	The respondents concerns are noted, the link is a click style link embedded within the document, the webpage link is: https://democracy.basingstoke.gov.uk/ieListMeetings.aspx?Committeed=134 . The council will add this link in as a footnote for clarity.
	Addendum note: Site visits, bullet point 4.	Site visits - temporary solution Bullet point 4: first, there is no reason why applications involving empty or otherwise unoccupied buildings cannot be inspected internally, subject of course to general health and safety measures that always apply.	The respondent notes that where buildings are empty or unoccupied they should be able to viewed internally subject to appropriate health and safety measures.	The council recognise that site visits are necessary. A revised site visit protocol was released in July 2020 in response to changes to government guidance. The revised guidance note is available via the same link in the document and details three scenarios for undertaking site visits, the preferred approach is to undertake from the public realm but approach 2 notes that if a site cannot be viewed sufficiently from the public realm, the case officer will arrange an internal inspection with the applicant /agent. The council will revise the addendum note to include reference to the new guidance note published in July 2020 and remove bullet point five which

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				notes that where internal access to a building is required no site visits will be undertaken.
	General comment	Second, your protocol appears out of step with the gradual lifting of the lockdown, and it clearly involves a lot of administration to update this document, so the wording should not be so restrictive. Wording should be amended to, for example: "where site visits require internal access such visits will only be made where it is possible to comply with government Covid-19 guidance at the proposed time of the visit".	The respondent notes that the protocol should be more flexible in order to respond to changing government restrictions, particularly in relation to site visits.	The respondent's concerns are noted. The council consider the proposed changes are suitably flexible to enable officers to respond to the latest government guidance.