

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

Comment Number	Responder	Object/Support	Responder Comments	Officer Comments
1	Individual (1)	Object	<p>I think planners should be more transparent and give planning committee the full comments and not give a summary of the public observations. Providing full comments, rather than summarising comments will remove the bias that the planners have on any given project and, the planning committee will see a clearer picture of the whole scheme and give a better judgement on the application after picking up the details which might influence their views on the application.</p> <p>When contacting the planners, the people who have taken the trouble to write in about the application want to know they have been listened to concerning their comments and need a reply. When the person turns up at a council planning committee meeting they are dismayed that their comments have only been summarised and have not been seen by the planning committee. They therefore do not know if their own statement has been taken into account and feel their rights have been violated; therefore I'm saying not to have summaries in the first place. In turn this makes the public mistrust the council and that the council does not listen to the public regardless what he public say to them.</p> <p>If the council want the public to give their views, comments and engage with them via the councils website, the online forms need to be more user friendly, for example, Acrobat Viewer XI or above and provide a free link to download on the home page of the Council's website. Then people who want to be consulted can give their suggestions.</p>	<p>Representations are often summarised especially where there are a large number of respondents and where many letters repeat the same comments. It important that all the relevant points are set out in the report. The committee is aware that more detail / clarification can be sought upon any aspect of a scheme, and committee members are encouraged to do this prior to the meeting.</p> <p>The right to address the committee allows applicants / objectors to make or reinforce points.</p> <p>The Website is currently being reviewed.</p>

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

2	Network Rail	<p>Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.</p> <p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.</p> <p>In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway:</p> <ul style="list-style-type: none"> <li>○ <i>Schedule 5 (f)(ii) of the Town &amp; Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public</i></li> </ul>	<p>The statutory requirement to consult in such cases is enshrined in the Town and Country Planning (Development Management) (England) Order 2010</p>
---	--------------	--	---

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			<p><i>or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</i></p> <ul style="list-style-type: none"> <li>Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and</li> <li>The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.</li> </ul>	
3	Network Rail		We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).	Network Rail is normally consulted in such cases.
4	Thames Water	Support	Regulation 25 of the Town & Country Planning (Local Development) Regulations 2004 (as amended in May 2008) relates to pre-submission consultation. It states that Local Planning Authorities must consult "specific consultation bodies" prior to the publication of a first draft Development Plan Document (DPD). The interpretation in Part 1 of the Regulations states that sewerage and water undertakers constitute "specific consultation bodies" and we are therefore pleased that they are listed in paragraph 3.3 . However, we consider that Thames Water should be specifically listed as the water and sewerage undertaker in paragraph 3.3 so that it is clear who the utility providers are.	Point noted. <b>Reference to Thames Water will be added at paragraph 3.3</b>
5	Thames Water		When carrying out the necessary early consultations with Thames Water regarding the capacity of water and sewerage systems in accordance with the new Regulations, adequate time should be allowed to consider development options and	Consultation periods are in line with statutory requirements. However the Council will work closely with Thames Water in formulation of policy prior to

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			<p>proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (for example modelling of sewerage systems can be dependant on waiting for storm periods when the sewers are at peak flows).</p> <p>We also have to consult with the Environment Agency to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modelling from a treatment perspective. This process itself can take a considerable period of time especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.</p>	formal consultation.
6	Thames Water		<p>In relation to consultation on Planning Applications, Thames Water would expect to be consulted on most major planning applications. The adequacy of infrastructure can be a material consideration in deciding whether permission should be granted.</p> <p>Thames Water published and circulated in November 2010 to all LPAs in our area a "Water Services Infrastructure Guide for LPAs on Planning Application &amp; Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker". This will be of assistance to when determining which planning applications to consult Thames Water on.</p>	Noted Consultation on planning applications will take place as required by the Town and Country Planning (Development Management) (England) Order 2010 or other legislation and local protocol. In other cases consultations will be as considered appropriate. In addition, TW are provided with a weekly list of applications for information
7	Woodland Trust		We would like to see woodland trust included as a general consultation body	<b>Point noted. Reference to the Woodland Trust will be added at paragraph 3.5</b>

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

8	Woodland Trust	<p>The new National Policy Planning Framework clearly states: "...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss " (DCLG, March 2012, para 118).</p> <p>The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....'.</p> <p>The new Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England's Wildlife &amp; Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that – 'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'.</p> <p>Some local authorities have previously listed the Woodland Trust as a non-statutory consultee for planning applications in their adopted SCIs, such as Lichfield District Council, Bridgnorth District Council and North Warwickshire District Council.</p> <p>The Woodland Trust would therefore like to see a similar commitment in this draft Statement of Community Involvement in Planning that we will be consulted on all planning applications that threaten ancient woodland.</p> <p>The Woodland Trust would therefore like to see a similar commitment in this draft Statement of Community</p>	<b>Add suitable wording</b>
---	----------------	---	-----------------------------

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			Involvement in Planning that we will be consulted on all planning applications that threaten ancient woodland.	
9	Liddington Parish Council		As the parish councils perform their role during their spare time as they have full-time jobs and work during the day, consequently meeting with planners or developers should be arranged for time that are convenient for them i.e. during the evening rather than during normal office hours.	Officers and Members attend many evening meetings.
10	Liddington Parish Council		For any development that affects the parish, 2 copies of the associated planning documentation and 2 copies of any CDs should be automatically sent to the Parish Council free of all associated charges. This would provide one copy for the Parish Council's consideration and one copy for local public review. These measures would enable the Borough Council to engage and consult with rural communities in a far better manner than currently proposed	In line with Government guidelines, the information is made available in the council offices and on-line. The Council can no longer justify the cost of printing plans and documents. Spare copies of documents / plans are provided to Parish Councils if available. Parish councils may approach the developer direct to request a set of documents.
11	Liddington Parish Council		The overall Statement of Community Involvement in Planning is considered to be good in principal but seems never to have been implemented effectively and, in the experience of the Parish Council, it seems that the Borough Council simply pays lip service to the concept of consulting with communities.	Noted
12	Individual (2)		In section 2.4 statement 5. ( Superb educational provision for all ages). I like to make the comment that is far I am concerned this is a far sweeping statement that in some part incorrect. Although there are undoubtedly considerable improvements to the education system in Swindon we still do not have a University Campus that Swindon can own. Yes I will agree that young people can take degrees in the further education Collages that are in the town and we do have an off shoot of Oxford Brooks but I still consider it to be an opportunity sorely missed when plans failed. Wiltshire as a	Noted. Section 2.4 repeats the Community Strategy themes. The issue raised is not an SCI matter

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			County does not have a university, so all the bright and high achievers go elsewhere and they are often forever lost to us. Added to this we fail to attract that same calibre of young and older persons to the town thus missing out on a wealth of untapped energy and intellect.	
13	Individual (2)		3.26 - Community Planning Forum, is this still active as it is included within the SCI but at the last meeting it was said that it was dispended	Officer Support is no longer able to be provided for The Community Planning Forum as Localities are the councils preferred method of engaging with local communities
14	Individual (2)		I just wondered if people living in Houses of Multiple Occupation had been considered as amongst those hard to reach. Many are people who have had difficult life changes and challenges and are they do not always on the internet, are hard to keep track of and are reluctant to be involved in community affairs but do however make up a substantial group in the town. I do realise that you have a grouping of less well-off but I read that to be more about those living on estates, whereas the people in H.M.O.s live an various and wise spreads parts of the town.	Yes, the list is not exhaustive
15	Queens park community council	Support	The document gives excellent cover to the process for involving the community, there is support to the councils concept to the town centre to allow the neighbourhood plan to develop.	Noted
16	Queens park community council		Locality forums will struggle to consider planning applications due to the timing of their meetings and therefore will depend on being informed of forthcoming applications	Immediate neighbours are consulted in accord with adopted local procedure. The list of applications received is published each week
17	Queens park community council		Queens park community council and other community groups should be made aware of applications within their area, as this does not currently happen.	Immediate neighbours are consulted in accord with adopted local procedure. The list of applications received is published each week

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

18	Health and Safety Executive		There are no comments to be made on the document	Noted
19	Shaw Resident Association	support	Para 7.17. - it would be helpful to provide a facility of post-code specific email alerts of planning applications so that interested groups/individuals could be alerted to applications in their local area.	This has been considered in the past but is not yet considered to be a foolproof method of notifying neighbours of proposals affecting them. If available in software updates it will be rolled out
20	Shaw Resident Association		Appendix 4: - suggest preparing a short, easy to understand summaries of main proposals in English and other main languages that could be circulated via email, placed on community notice boards. Current process is comprehensive but it is a barrier to involvement for many people, e.g. this consultation is 43 pages long, the documentation in the local plan 2026 runs to thousands of pages and there is no obvious "executive summary"	Point noted. For main planning documents summary leaflets will be provided. <b>Add to Appendix 4</b>
21	Shaw Resident Association		Allow on line completion of forms	On-going to resolve this issue
22	Individual (3)	Object	In para 3.14 it states that the councils development plans is determined by cabinet. I would beg to differ in this interpretation of the cabinets function. I was under the impression that The Full Council, as the duly elected body, was the legal body responsible for the "decision making" in order to ensure its policies were being carried out. In other words the cabinet is the "executive" of the full council.	Agreed. <b>Amend text</b>
23	Natural England	support	Natural England are unable to comment fully on the SCI but they are supportive of early community engagement, and natural England should continue to be consulted on as a statutory body	Noted



## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

24	Environment Agency		There are no comments	Noted
25	Wiltshire Fire and Rescue Service	support	<p>Wiltshire FRS has worked closely with Swindon Borough Council in many aspects of strategy and planning. One particular aspect of these has been the inclusion within the Core Strategy to ensure that any risk posed by future growth is mitigated through Wiltshire FRS infrastructure development and is funded with developer contributions, under Section 106 of the Town and Country Planning Act 1990 and the forthcoming adoption of the Community Infrastructure Levy.</p> <p>Wiltshire FRS currently receives no funding to mitigate risk posed by future growth and the organisation considers the safeguarding of the community, its economy and the environment with equal importance as Swindon Borough Council. We ask that we continue to work closely on all aspect of planning and community safety, including partnership working. This will ensure that Wiltshire FRS is in a position to fully support the vision of the Local Strategic Partnership and the Sustainable Community Strategy 2008-2030.</p>	When made, WFR comments are taken into account in planning decisions
26	Wiltshire Fire and Rescue Service		<p>I note in Section 3, “Development Plan Documents” &amp; “Consultation and Engagement”, that the document lists specific consultation bodies or organisations responsible for services to the Borough and major land owners.</p> <p>The list is not exhaustive but Wiltshire &amp; Swindon Fire Authority and Wiltshire FRS play a major role in developing plans within the Borough. They do this, in-terms of strategic planning for infrastructure planning &amp; development, prevention, protection and response activities, including</p>	Point noted. <b>Reference to Wiltshire Fire and Rescue Service will be added at paragraph 3.5</b>

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			<p>resilience planning for the community, infrastructure and economy safeguarding.</p> <p>In addition, as a public body, Wiltshire &amp; Swindon Fire Authority &amp; Wiltshire FRS is heavily influenced by the community, businesses and people of the Borough through public consultation, which feeds directly into the Integrated Risk Management Plan (IRMP), which sets the strategic direction and activities of Wiltshire Fire Authority &amp; Wiltshire FRS. This is produced every 3 years and reviewed annually. This links directly into the aforementioned sections and demonstrates that Wiltshire Fire Authority &amp; Wiltshire FRS is, “In the heart of the community for the community”.</p> <p>We would request respectfully that Wiltshire &amp; Swindon Fire Authority and Wiltshire FRS are added to this list of organisations to be consulted with, to represent the important role both the Wiltshire &amp; Swindon Fire Authority and Wiltshire FRS play, as a public service to the Swindon Borough Council.</p> <p>Add Swindon Wiltshire Fire Service to the list of consultees</p>	
27	Bishopstone Parish Council		<p>7.6 We note that pre-application consultations with the Parish Council are encouraged by SBC but they cannot insist that developers/applicants come and talk to Parish Councils. We request that there should be a requirement on SBC to at least advise the Parish Council as to when SBC receives a pre-application meeting request with a developer/applicant so that it can be invited to that meeting.</p>	Pre-application meetings between the Borough Council and Developers area at the request of the applicants, and unless indicated by them are confidential. However, applicants are encouraged to engage with Parish Councils at an early stage in the pre-application process/
28	Bishopstone Parish Council		<p>7.9 What is meant by “large scale” for Swindon is not necessarily the same for a small village like ours. We request that SBC should be insisting on pre-application discussions</p>	The LPA encourages applicants to undertake local consultation in pre application discussions. Para 7.9

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			with parish councils for developments involving ANY new building (but not extensions etc). It is worth noting that no "Statement of Community Involvement" was insisted on by SBC when the recent application to redevelop the True Heart came in, despite the Parish Council repeatedly pointing this out; if SBC are going to quote from the Localism Act (7.6 through to 7.11) then it should also enforce it.	repeats the NPPF wording
29	Bishopstone Parish Council	Object	7.14. It is not clear when the 21 day period for comments starts. We believe that it should be from receipt of notification by the Parish Council. There should also be provision for the Parish Council to be re-consulted when amendments are made to planning applications (as per 7.21 for neighbours) or when it is proposed that our comments / objections are going to be ignored.	The 21 day period starts from the day of the notification. This may be the day a letter or email is sent. A 14 day period is given when re-notification takes place
30	Bishopstone Parish Council	Object	7.14 and 7.15. We think that the whole section on Parish Councils (7.14 and 7.15) is much too brief. We need clarification on timings (as per the point above at 7.14) and we also need to see greater clarification and transparency from SBC on their delegated decision processes; i.e. we should be told which, if any, of our comments are being taken on board before decisions are taken so that we can, should we decide to, ask for applications to go forward to Committee.	The SCI deals with current local and statutory protocol / procedure. Changes to non statutory procedure should be made via the Parish and Town Council Charter / Planning Protocol
31	Bishopstone parish Council	Object	We request that SBC's Conservation Officers should be required to be consulted on every planning application within a Conservation Area. Planning Officers are not always qualified to the same degree and often (as we have seen to our detriment) seemingly innocuous decisions can have a very negative and permanent impact on a community if they are not given the necessary due care and attention at the decision-making stage.	The Conservation Officer will normally be involved in cases where there is likely to be a material impact upon the character, setting or appearance of a conservation area. The form of consultation will vary to suit the proposal.
32	Blunsdon parish Council	support	Paragraph 3.19. The statement that Localities should support Parish and Town Councils is fully supported (but in reality they often see them as competitors/opposition)	Point noted.

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

33	Blunsdon Parish Council	support	Paragraph 4.4. The statement that it is essential that the views of the community are taken into account should always be applied.	Point noted.
34	Blunsdon Parish Council	Support	Paragraph 7.9. The pre-application consultation called for appears to be applied (through reactions to responses have yet to be tested)	Point noted
35	Wroughton Parish Council	Support	Support the document	Noted
36	Bourton Parish Council Clerk		Bourton Parish Council welcomes the fact that all adjoining parish councils and local planning authorities will be consulted on strategic planning matters within Swindon Borough Council but we request that the consultation takes place in a timely manner (ie not for the minimum time and certainly not during Christmas holidays or the main summer break when parish councils do not meet). This is especially important when that adjoining parish council is likely to be very badly affected by the development.	Point noted. The Council endeavours to avoid holiday periods when consulting upon planning documents. However, in order to progress plans and guidance documents in a timely fashion, the Council sometimes has to consult during periods including public holidays. In these cases the consultation period will be extended to allow for holiday days.
37	Burton Parish Council Clerk		Request that officers undertake a public exhibition in the village of Bourton during the public consultation for the Eastern villages development.	Point noted.
38	South Marston Parish Council	Support	We welcome the specific mention of how the Borough engages with Parish Councils. There would need to be a clear responsibility and service standards within the Borough for community Involvement to thrive and be sustainable. The document may not be understood by newly elected members. In particular, the document refers to the 'Council' and its elected members to reflect Borough Council and Borough Councillors (see in particular 3.11-3.13). For an elected parish councillor, this is confusing and perhaps the words 'Borough Council' could be used in the more obvious places where such confusion might happen.	Point noted. <b>For clarity the references to 'Elected Members' in paragraphs 3.11 to 3.13 will be replaced with 'Swindon Borough Councillors'</b>

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

39	South Marston Parish Council		Paragraphs 4.18 to 4.27 identifies specifically the measures to ensure that hard to reach groups are engaged by SBC consultation. However the hard to reach groups listed at 3.26 include those located in rural areas yet no specific provision is made to ensure that they are reached. Information should be provided in local newspapers or with direct contact to local clubs, schools. Some people may not be able to take advantage of the special measures made in 4.19 and 4.22 if there is no suitable transport that could be used to travel to central locations.	Point noted. <b>Add suitable wording to this section</b>
40	South Marston parish Council		Page 27: Paragraph 7.24 states that the Borough Council will take written comments on planning applications into consideration, but will not enter into individual correspondence on specific applications. It is important that Borough Officers do not refuse to discuss a specific planning application with the relevant parish council. If the parish Council has asked questions about a planning application, it is reasonable to expect both answers and dialogue before the planning officer reaches a decision. This has been normal practice and we would not want to see it disappear because it has been omitted from this statement of Community Involvement. Perhaps the sentence can be amended to reflect that the Council does not acknowledge or enter into individual correspondence on specific applications except with statutory consulters.	The LPA does 'not normally' enter into negotiations in respect of comments. However it does acknowledge that there may be instances when it is reasonable to do so. <b>Add wording to this effect.</b>  A LPA also has a duty to make timely decisions and cannot reasonably delay doing so when sufficient information is available to enable proposals to be determined.
41	South Marston parish Council		There are a number of typographical errors that need review: Page 8: Paragraph 3.7: second line – should be 'how the council has been undertaking this duty.....' Page 39: table – remove apostrophe from 'CD's'	<b>Point noted, paragraph 3.7 will be reworded to improve clarity. Reference to 'CD's' will be replaced with 'CDs'.</b>
42	South Marston		Insert new 3.45 ' The Council recognises that in order to maintain community involvement it is necessary to provide a clear link into the process, and to promote prompt and relevant feedback to questions raised. To this end it will	Point noted. The planning department is working closely with locality leads.  Response to questions are subject to

## Appendix 2 - A summary of comments and Officer responses to the Draft Revised Statement of Community Involvement

			designate the Locality Lead or some other named person to facilitate community involvement initiatives in each Locality. The Council will require that officers provide answers to questions raised within 21 days (or as otherwise agreed), or provide a reason for delay and a date for the delayed response.	the councils normal performance measuring target of 10 working days
--	--	--	---	---