

APPENDIX B: Statement of Community Involvement: Summary of consultation responses received

Respondent	Summary of comment	Council response	Recommended changes
Member of public 1	Respondents to planning applications should be anonymised once established as “real people”. There is the real risk of retaliatory behaviour (physical or verbal) from applicants or neighbours if personal information is disclosed.	With the introduction of data protection and GDPR, the Council endeavours to make ensure that personal details that can identify a person are not made available to the public.	No change.
Member of public 2	<p>This is an excellent document and I support its strategies.</p> <p>It is important that people know how their comments have been taken into account and so Clause 2.12 is important.</p>	Welcome support.	No change.
Gloucestershire Rural Community Council	<p>There is reference to NDP’s in the document but no other reference to other forms of community led planning such as Community Design Statements and how these will or won’t be considered as examples of community involvement in the planning process.</p> <p>3.5 – is it possible to state what a very large, large and small scale development is?</p>	<p>The SCI is about how the District Council will engage with communities on documents that it produces or those which other bodies produce to supplement the Local Plan. NDPs are produced by parish councils who are responsible under separate legislation for engaging and consulting with local communities. Nevertheless, the text could be amended to refer to the types of supplementary planning documents that the Statement of Community Involvement relates to.</p> <p>Unfortunately, as the scale, site area and nature of each planning application differs, it is not possible to further categorise or quantify very large/large scale</p>	Amend para. 2.1 to read: “Local authorities are required to produce a local plan which sets out the planning policies for their area. They may also produce supplementary planning documents (SPDs) such as development briefs or design statements, or adopt those produced by other bodies such as parish councils, which add further detail to policies or sites. Documents produced by other bodies will need to be subject to consultation which complies with this SCI before they can be adopted as SPD.”

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	<p>3.7 & 3.12 – Customer self-service – in terms of access/ equal opportunities it is imperative that paper copies are still used as not everyone has access to the internet or indeed linked to/ concerned with the planning system.</p> <p>The self service is a <i>re-active</i> process, residents will need to know of the existence of the planning application in the first place to respond! Please do not withdraw the neighbour notification letters as otherwise residents will not know of planning applications.</p>	<p>development.</p> <p>Copies of all applications can still be viewed at the Council Offices if individuals have no personal access to the internet.</p> <p>The Public Access system allows members of the public to create a search area of interest, be it a hamlet, village, town or the whole district. After this has been set up, they will then be notified of all applications in their chosen search area by email. The SCI states that the use of neighbour notification letters will remain for the present time.</p>	
Cainscross Parish Council	<p>The District Council should inform Parish Councils of pre-applications in their area. We understand at present that the onus is on the developer but as they are not required to consult with Parish and Town Councils we are often left out of the loop.</p>	<p>Notification of a pre-application enquiry to a Parish or Town Council is at the discretion of the applicant. The local planning authority is unable to require applicants to do this, but always seek to encourage applicants to consult with the local community.</p>	No change.
Member of public 3	<p>Embrace alternative ways to communicate - e.g. sending an email isn't the only way, what about drop in sessions? Typing an email may not be accessible to all. Use alternative advertisement methods for planning applications, e.g. facebook advertisements to target audiences. Newspaper articles and parish council meetings will not reach many people.</p> <p>Use less words - documents are typically so long and unappealing to the masses - take a look at Citizens.Is and the My Neighbourhood idea: https://citizens.is/portfolio_page/my-neighbourhood/</p>	<p>The SCI states that we intend to use a variety of methods and techniques to reach the intended audience. Some examples are given in para. 2.11. It is agreed that more could be done to utilise the power of social media and we would hope to move towards many more forums of communication when our ICT systems can support this.</p> <p>The SCI has been simplified and condensed to provide a clear and succinct statement of Council policy on consultation within the planning service.</p>	No change.

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<p>Rodborough Parish Council</p>	<p>Council agreed to object to any possible cessation in notifying neighbours of new planning applications (item 3.7) as not everyone has access to online notifications.</p> <p>Even those that are online have to be proactive to sign up to email alerts (which you don't seem to be able to do at the moment, unlike under the previous online system when you could subscribe to alerts within 500m of your postcode).</p> <p>We have examples locally of households being unaware of a neighbour's application until the building starts and overlooks their property.</p>	<p>The SCI states that the use of neighbour notification letters will remain for the present time.</p> <p>Public access does require users to identify their area of interest and sign up for emails but after this, the system will provide notifications automatically. It also allows residents to extend their area of interest well beyond their postcode area.</p> <p>Site notices will continue to be posted. Legally, we are only required to provide a site notice or a neighbour letter. Stroud District Council will continue to do both.</p>	<p>No change.</p>
<p>North Nibley Parish Council</p>	<p><u>1. Planning Applications paras 3.7—3.13</u></p> <p>This appears out of date as we understand neighbour notification and site notices have already stopped without prior discussion with Parish Councils. This is despite the system operating successfully for a number of years. We strongly object to this cessation. This system ensured all affected parties were aware of proposals and given an opportunity to comment before decisions were made. The Parish Council is mindful that many people, especially the elderly, do not have the benefit of the internet or are computer literate so that these people are put at unnecessary disadvantage.</p> <p>The Parish Council considers that the administrative cost of operating this system should be funded from planning fees income. Such fees are intended to cover the cost of administrating planning applications and</p>	<p>Neighbour letters and site notices have not stopped. Legally, we are only required to use one of these methods of notification, but Stroud District Council will continue to use both.</p>	<p>No change.</p>

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	<p>not absorbed into general Council revenues.</p> <p>With respect to para 3.11 it is considered the period of 10 days is insufficient for proper assessment of changes to be considered by PC S and other bodies. This should at least 21 days as per para 3.10. This would not unduly delay the processing of applications.</p> <p><u>2. Appeals paras 3.16— 3.19</u> It is considered Parish Councils should be given an opportunity to comment on the Council’s final Statement of Case to enable additional relevant points to be raised to assist the Inspector decision. This could be enabled by the Council producing its Statement earlier and not on deadline day as at present.</p>	<p>The Council has statutory time limits in which to determine planning applications and this is the reason why amended plan consultation time is limited.</p> <p>The time limit for producing statements for appeals does not allow for a meaningful consultation period with Parish or Town Councils. There is unfortunately no capacity within the service to produce statements early when these have to be accommodated within an officer’s everyday planning application workload.</p>	
<p>Wotton-Under-Edge Town Council</p>	<p><u>Local Plan</u> Recognition of the importance of Town and Parish Councils in the consultation process (Para 2.8) is welcomed and we are pleased that an exhibition event has been organised in the Town Hall. It is, however, disappointing that no workshop with the Town Council is planned. This does not follow the spirit of Para 2.8 which emphasises the importance of the views of Town and Parish Councils.</p> <p><u>Planning Application Process</u> It is noted that Neighbour Notification Letters may cease in future (Para 3.7). Such a move would not be welcome since many members of the public can’t or don’t understand how to access the “Self-Service” “Public Access” system. Site notices are not always put</p>	<p>The SCI makes clear that we will utilise a variety of methods and techniques during Plan preparation. This may include workshops as well as exhibitions, correspondence and face to face meetings at different times, depending upon the nature of engagement required. Para. 2.8 emphasises that whatever method we use, the overall objective is to seek the views of parish councils.</p> <p>This is not proposed at present but should any change be suggested in the future this will be subject to further consultation. Site notices are displayed for each application with the three week consultation period extends from the time it is displayed.</p>	<p>No change.</p>

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	<p>up in a timely fashion and neighbours may not notice them, so may not be aware of the application.</p> <p>The continuance of email notifications of planning applications (Para 3.8) is welcome. In view of past problems, such notifications should also be sent when applications are referred to the DCC.</p> <p>DCC site inspections do not include a representative of the parish or town council or the county councillor and the public are not permitted to speak or even to attend to observe the probity of the process. This unnecessary restriction should be reviewed.</p> <p>Press notification should also include applications in the AONB (Para 3.9).</p> <p>The opportunity for members of the public to speak at the DCC (Para 3.14) is welcomed but it should be made clear that this opportunity includes Town and Parish Councils. SDC should ensure that local councils are informed when application are referred to the DCC (see above comment) so that local members of the public can also be made aware. Also, there is no slot for the county councillor to speak, unlike County Council planning meetings where district councillors have their own speaking slot.</p> <p>It is not clear from Para 3.15 whether referral to the</p>	<p>There is often a significant time delay in the decision to take an application to DCC and it appearing as part of a Committee schedule. We will inform Town and Parish Councils of the decision to take an application to DCC but we ask that after this they be proactive in using the Public Access system to identify which meeting it will go to.</p> <p>Site Inspection Panel (SIP) visits are undertaken to allow Members of the determining Committee to see application sites and ask factual questions. They are not a forum for debate or to express opinions about an application. There is, therefore, no need for Parish Council representatives or others to attend.</p> <p>Our approach to press notification reflects national legislation.</p> <p>The ‘Procedure for Public Speaking’ is set out in every DCC schedule and clearly refers to Parish and Town Councils, who are offered an individual 3 minute slot to speak.</p> <p>There is no electronic mechanism for informing Town</p>	
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	<p>DCC is a “change in the application” which can be tracked, or if this just relates to “decisions”. If town and parish councils are required to use the tracking feature to find out when an application has been referred to the DCC then this should be made explicit.</p> <p>It is accepted that the document is about community involvement, but it would be helpful to include the role District Councillors play in the consultation process. It is noted that County Councillors are ignored in the process. Why?</p>	<p>and Parish Councils of an application’s date for DCC. Public Access can be used to track an application which will result in a Parish/Town Council being notified of a change in its status. Local Ward Members are notified of forthcoming DCC schedules as part of the SIP process.</p> <p>County Councillors are welcome to attend DCC meetings and ask to speak in one of the allocated public speaking slots but where the determination of planning applications lies with the District Council, they are not part of the decision making authority. District Councils are the determining authority for most applications not the County Council. Comments from the local County Councillors are welcomed and they are not excluded from the process. The document is not intended to address internal consultation within the Council.</p>	
Miserden Parish Council	<p>We are happy to trial responding to planning applications via the public access system and providing this does not increase our workload much can do this rather than email comments moving forwards</p> <p>Please can you confirm that when we give comments and responses to planning policies and applications, our comments are held in more weight than an individual as we are speaking on behalf of the Parish in its entirety via the elected councillors, rather than it being just one person's view?</p>	<p>Welcome support.</p> <p>Legally, Parish Council’s comments do not hold more weight than an individual’s comments, but it is fair to say that they are given much importance by officers and elected Members of the Council.</p>	No change.
Canal and River Trust	<p>The Trust should be consulted on applications in the vicinity of the Gloucester & Sharpness Canal in our role as a statutory consultee and adjacent landowner. Unfortunately in recent months this has not always</p>	<p>Thank you for drawing this to our attention as part of this process. We will investigate why this may have happened.</p>	No change.

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	<p>been the case and several applications have not been identified as requiring consultation with the Trust.</p> <p>We encourage pre-application consultation and do not charge for this. We would welcome the opportunity to be involved in pre-application discussions for proposals within the Trust's notifiable area.</p> <p>We welcome references to our role as a statutory consultee and an organisation to be consulted on plan making and new plan procedures. We welcome engagement in the early stages of NDP preparation and we have produced a document to help with this.</p>	<p>Noted but whilst the Council will encourage this, it is at the discretion of the developer.</p> <p>Welcome support.</p>	
<p>Hillesley and Tresham Parish Council</p>	<p>The council understands automatic email alert notifications for registered users have already stopped without prior discussion with Parish Councils whilst the system had operated successfully for a number of years. This system ensured all affected parties were aware of proposals and given opportunity to comment before decisions were made. The Parish Council therefore requests Stroud District Council reinstate this service.</p>	<p>Email notifications are available via the Public Access system. The Council held seminars to which all Parish and Town Councils were invited after Public Access was launched to show how to use the new system. The Parish Council is welcome to contact Council officers if further training is required.</p>	<p>No change.</p>
<p>Eastington Parish Council</p>	<p>We are concerned about the possibility of neighbourhood notification letters ceasing in the future, particularly those for with mobility issues / without internet that rely on postal communication.</p> <p>We are also concerned about the reliance on technology which does not take into account those without technology.</p>	<p>The Council will continue to use neighbour letters for the foreseeable future and will consult all Town and Parish Councils should this situation change.</p> <p>Paper copies of all Local Plan documents can be viewed at town and parish council offices open to the public, libraries and at Ebley Mill. Planning applications can also still be viewed at Ebley Mill for those without personal access to the internet. Formal Local Plan</p>	<p>Amend para. 2.9 to read: "We recognise that many members of the community are hard to reach or engage with, whether due to working hours, commitments,</p>

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	<p>The SCI recognises that there are those members of community who are harder to reach and so methods of communicating will be modified but the SCI does not appear to set out what measures SDC will take to ensure harder to reach groups will be consulted with in the future.</p> <p>Paragraph 2.4 puts the responsibility of community consultation for NDPs on parish and town councils, but does not recognise that the District Council also has a role to communicate and consult on NDPs at the later stages.</p>	<p>stages and many planning applications are advertised in the local press. Town and Parish Councils can also play a very useful role in disseminating information to local and hard to reach residents.</p> <p>The SCI recognises that there are hard to reach groups and that we will modify traditional consultation methods where appropriate. However, given the huge variety of types of hard to reach groups it is difficult to set out specific measures that will be inclusive to all in the SCI. However, we agree to amend the SCI to make reference to the need for each document to identify how the views of hard to reach groups have been sought through the consultation process.</p> <p>The District Council does have a role to communicate and consult on NDPs at the later stages. However, the nature and extent of this formal consultation is set out in regulation and the Council has no scope to vary from this.</p>	<p>personal circumstances or disabilities. We will try to modify traditional consultation methods where appropriate to engage with such groups and individuals and we will highlight in consultation reports how we have sought to capture their views.”</p>
<p>Gloucestershire County Council</p>	<p>Thank you for consulting us. We have no comments to make.</p>	<p>Note comments.</p>	<p>No change.</p>
<p>Natural England</p>	<p>Thank you for your consultation request. We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters.</p> <p>We regret we are unable to comment in detail on individual SCI but information on the planning service</p>	<p>Welcome support.</p>	<p>No change.</p>

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	we officer, including advice on how to consult us, can be found here .		
Environment Agency	<p>We welcome our inclusion in the list of specific consultation bodies. In terms of pre-application advice, we offer a two-tier service: free preliminary advice and a charged service where there are detailed issues to be resolved. As a result we no longer provide a response to pre-application requests from local planning authorities but will instead engage directly with developers. You may wish to mention this in the SCI and include our contact details for more information: SHWGplanning@environment-agency.gov.uk</p> <p>We note paragraphs 3.14 and 3.15 refer to decision notices. In accordance with PPG (Determining a Planning Application, paragraph 019) we request notification of decisions or applications withdrawn, where we have made representations and politely ask that this is done via email within two weeks. Furthermore we request a URL of the decision notice, or an electronic copy of the decision notice or outcome.</p>	<p>Welcome support.</p> <p>Our Public Access system allows any consultee to track an application and to be notified when there is a change in status. Public access does require users to identify their area of interest and sign up for emails but after this, the system will provide notifications automatically.</p>	No change.
Gloucestershire County Councillor and Vice Chairman Gloucestershire County Council Planning Committee	<p>3.7 Site notices are not always posted in a timely fashion. Neighbour notification letters do not always reach the appropriate people and in a timely manner. The intention is said to be to continue this process but that it may cease in the future with an expectation of customer “self-service” via the Council’s website. Such a future intention requires every member of the community to have access to the website and to frequently consult it “just in case” there is something there relevant to them.</p>	<p>Site notices always give the public a 21 day consultation period so even if they are not posted on the day the application is validated, the public is not prejudiced by this. However, site notices are normally all displayed within 5 days of an application going ‘live’.</p> <p>It is acknowledged that some members of the community do not have access to the internet and this is the reason the current methods of consultation (letter and site notice) remain in place at the present</p>	No change.

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	<p>3.8: “An email will be sent to the relevant parish council clerk for the area where the development proposal is situated making them aware of the application”. It has been the practice previously to also notify the neighbouring parish council(s) where an application relates to a site close to a parish boundary or would impact on that parish. I would hope this is to continue.</p> <p>3.10: “Notification period of at least 21 days on all applications”. Many parish councils meet monthly and some less often and therefore have to invent systems of delegation to comment on applications if a time extension is not granted.</p> <p>3.12 Sometimes, responses made online even when clearly including the words “I object” are labelled on the website merely as comments.</p> <p>There is no mention of district council site inspections which are now restricted to members of the SDC Planning Committee and therefore have no community involvement. Until some years ago representatives of the relevant parish councils were invited. (I believe this was stopped because of the fear that they might influence the committee members.) This can mean that valuable information is not</p>	<p>time. The Council will continue to use neighbour letters for the foreseeable future and will consult all Town and Parish Councils should this situation change.</p> <p>The Public Access system allows adjoining Parish Councils to create email alerts for adjoining parishes.</p> <p>The statutory timescales for determining applications restricts the time available for consultation. However, where this can be extended, it is.</p> <p>We do not label third party representations. All representations are read in detail by the case officer. Submitting comments via the Public Access will allow the author to label their comment as an objection (or other).</p> <p>Site Inspection Panel visits exist to allow Members of DCC to see application sites before committee. They are not public meetings and are not a forum for debate or discussion. There is, therefore, no need for anyone else to attend these meetings, although Ward Members are invited. The public and others are excluded to ensure probity in this context.</p>	
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	<p>captured. This contrasts with the County Council Planning Committee Members' Site Visits which are held in public. They follow the procedure of the Planning Inspectorate and ensure probity. The local district councillors and parish council representatives can attend and speak in addition to the local county councillor(s). Members of the public can attend, (subject to any safety restrictions that may exist on the site which could, for example, be an operating quarry). They can speak if invited to do so by the committee chair. All such addresses can refer only to site-specific matters. Debate or argument on the merits of the proposal are not permitted and anyone attempting to do so (including in questions from members of the committee) will be stopped. Lobbying of committee members is not permitted. The officers' written report of this meeting is subject to approval at the Planning Committee meeting and forms part of the committee report. I am not aware that such a report is produced for SDC DC committee meetings following site visits or that, if it is, it is a publicly available document and posted on the council's website.</p> <p>3.14 There is no timed speaking slot allocated at DC committee meetings to the local county councillor. This is unlike planning applications determined by the County Council's Planning Committee where the local district councillors have a 5-minute slot as does the applicant or their agent, in addition to the parish council representatives in the area of application (5 minutes) and members of the public (a maximum of 20 minutes for supporters and 20 minutes for</p>	<p>While there is no specific time slot made available for County Councillors to speak at DCC, they can still speak using other available slots or make written representations on an application which will be reported to Committee.</p>	
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	<p>objectors). The County Councillor can speak without a time limit.</p>		
<p>Persimmon Homes Severn Valley</p>	<p>Persimmon Homes Severn Valley consider the consultation process in Stroud is generally operated fairly and efficiently. Therefore we only have one comment on one matter where improvements would be helpful and that is in respect of the consultation process for Neighbourhood Development Plans.</p> <p>Whilst we appreciate the comment in paragraph 2.4 of the Draft SCI that <i>'neighbourhood plans are produced by Parish and Town Councils who are responsible for engaging and consulting with local communities'</i> this needs to be extended. At the very least the document should add and <i>'other consultation bodies and consultees'</i> to encourage neighbourhood planning groups to engage and consult beyond the confines of their local community. We have on a number of occasions only found out about neighbourhood plan consultations after the event and we find neighbourhood planning groups are reluctant to consult with landowners and developers until the final version of the plan, despite the availability of the very helpful Planning Aid guidance which is also prominently displayed on the Stroud District Council website. Early consultation is important because like the District Council's own Local Plan, Neighbourhood Development Plans are also a key part of the Development Plan for the area and so deserve to be subject to the same wide scrutiny by the full range of consultees.</p> <p>We therefore think it could be helpful if the District</p>	<p>Welcome support.</p> <p>In terms of NDPs the SCI makes clear that we will publish information on progress with NDPs on an annual basis. We are also responsible for carrying out formal consultation on draft NDPs and we consult widely in accordance with statutory regulations.</p> <p>However, it is the responsibility of parish councils to undertake consultation on NDPs and if parties feel aggrieved they are able to make representations at the formal stage and, if necessary, undertake legal challenge.</p> <p>The District Council is not always made aware of initial NDP consultations undertaken by parish councils and so it would not be practically possible for the District Council to inform all people on the Local Plan consultation database before the consultation commences.</p> <p>However, it is agreed that changes could be made to the text to recognise these concerns.</p>	<p>Amend para. 2.4 to read:</p> <p>"Neighbourhood plans are produced by parish and town councils who are responsible for engaging and consulting with local communities, other consultation bodies and consultees. The District Council encourages parish and town councils to consult widely with local residents, local businesses and other interested parties through the initial engagement process. The District Council has a role to consult during the latter formal stages and will do so in accordance with the relevant regulations. We will publish information on progress with neighbourhood plans on an annual basis."</p>

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	<p>Council could assist Neighbourhood Plan Groups to ensure all those people and bodies both within and outside the local community who might have an interest in the plan are given the opportunity to participate and comment as early as possible in the process. In order not to contravene the GDPR regulations, we suggest that at the start of the preparation and consultation on each Neighbourhood Plan the District Council should inform everybody on its own Local Plan consultation database at the start of the process, so those consultees that do wish to be involved can inform the Neighbourhood Plan Group accordingly, who can then use the responses to set up its own database. This process should be set out in paragraph 2.4 of the SCI.</p>		
<p>Member of public 4</p>	<p>The key missing component is any mechanism to ensure compliance by setting measurable aims and monitoring the result.</p> <p>The document has nothing new to offer compared to the current SCI that resulted in just 149 individuals responding to the Local Plan Review Issues and Options Consultation.</p> <p>In Berkeley, where I am a resident, virtually no one had heard of the Local Plan Review Emerging Strategy consultation, that is just closing, until early in January. No steps were taken to ensure that a wide sector of</p>	<p>The SCI contains clear commitments and the robustness of the relevant planning process will depend on whether the Council has complied with the requirements set out in the SCI. The SCI includes a review mechanism which will include an assessment of whether the SCI remains fit for purpose.</p> <p>The SCI has been rewritten to reflect modern methods of engagement. Many hundreds of people attended the Local Plan exhibitions but did not respond formally by writing in. This does not invalidate or undermine the wider engagement process.</p> <p>Many Berkeley residents are aware of the Local Plan proposals and an extensive consultation process included press releases, newspaper and online press articles, website material, social media messages before</p>	<p>No change.</p>

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	<p>the population were aware of the consultation and the plans content. There are plenty of means in Berkeley to achieve this but none were attempted. The present draft SCI proposal was discovered by accident a few days before the closing date.</p> <p>2.2 <i>“we publicise this on our website.”</i> Do you really think that the public at large regularly look at your website? Furthermore although many households have internet access it does not mean that they use it to follow what Stroud DC is up to.</p> <p>2.6, 2.7 and 2.8. Consulting with bodies, most of whom represent special interest groups, is not engaging the general public. Town and Parish Councils do not necessarily consult with the public. In Berkeley Councillors are almost always co-opted to fill vacancies so are not representative. The office is manned by one part time person and is only open for 8 hours on Monday, Wednesday and Thursday.</p>	<p>each exhibition, posters for parish and town councils to put up, material in libraries and town council offices as well as emails to hundreds of people on the Council’s consultation database. The draft SCI was also sent to all local people on our database as well as being available to view on our website, at libraries and at town council offices.</p> <p>We know that the public do seek information from the Council’s website and we feel it is an important resource for local residents.</p> <p>The SCI sets out how we will engage with communities which include a range of groups as well as the general public. It is important that we reach as many different types of groups and individuals as possible.</p>	
Woodchester Parish Council	Query raised at Town and Parish Council Forum whether the Council is following the agreed protocol with parish councils regarding the planning application process.	The SCI refers to the Parish and Town Council Protocol in para. 1.2. However, the protocol makes clear that it does not apply to statutory planning processes and so it is necessary for the SCI to establish the planning processes for engaging with these councils.	No change.