

# REPORT FOR: **CABINET**

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| <b>Date of Meeting:</b>             | 14 March 2013  |
| <b>Subject:</b>                     | Adoption of Revised Statement of Community Involvement   |
| <b>Key Decision:</b>                | Yes  |
| <b>Responsible Officer:</b>         | Caroline Bruce, Corporate Director of Environment and Enterprise   |
| <b>Portfolio Holder:</b>            | Councillor Keith Ferry, Portfolio Holder for Planning and Regeneration   |
| <b>Exempt:</b>                      | No   |
| <b>Decision subject to Call-in:</b> | Yes  |
| <b>Enclosures:</b>                  | Appendix A – Representations made to the consultation draft Revised Statement of Community Involvement (arranged in document order)<br>Appendix B – Revised Statement of Community Involvement (incorporating track changes) |

## **Section 1 – Summary and Recommendations**

This report provides feedback from consultation on the draft revised Statement of Community Involvement (SCI) and recommends that the revised SCI be put forward for adoption, with modifications in response to representations received, to replace the existing SCI.

### **Recommendations:**

Cabinet is requested to:

1. Note the representations received, and the Council's response to them,

following consultation on the draft revised SCI (as set out at Appendix A);

2. Adopt the revised SCI attached at Appendix B;
3. Delegate authority to the Divisional Director of Planning, in consultation with the Portfolio Holder for Planning and Regeneration, to make any typographical corrections and any other non-material changes to the SCI that may become necessary prior to final publication of the SCI;
4. Note the intention (para 7) to produce a summary leaflet

**Reason: (For recommendation)**

To ensure that Harrow has an effective, flexible and up-to-date SCI, pursuant to section 18 of the Planning and Compulsory Purchase Act 2004 (as amended).

## **Section 2 – Report**

1. The Portfolio Holder for Planning and Regeneration presented a report to Cabinet at its meeting on 11<sup>th</sup> October 2012 setting out the case for a replacement Statement of Community Involvement (SCI), the existing SCI having been adopted in August 2006. The draft revised SCI was approved for consultation at that meeting. This report summarises the representations received as a result of that consultation and the Council's response. The representations, and the Council's response, are set out in detail at Appendix A. The revised SCI at Appendix B shows as ~~strike through~~ (for deleted text) and in **bold & underline** (for new text) the detailed changes to the SCI that are proposed in response to the representations.

### **Options considered**

2. As reported to Cabinet in October 2012, the Planning and Compulsory Purchase Act 2004 makes it a requirement to prepare an SCI. Having prepared and adopted an SCI in 2006 the Council has fulfilled this requirement. Therefore not updating the SCI, but instead continuing to rely on the 2006 version, was considered to be an option. However it was concluded that this would fail to ensure that Harrow's SCI properly reflects the development planning system as has evolved following the publication of the Planning Act (2008) and the Localism Act (2011), and new/consolidated changes embodied in the Town and Country Planning (Local Planning) (England) Regulations (2012).

3. An alternative option considered was to update the SCI but retain the existing level of prescription about the techniques to be employed when carrying out consultation in relation to future revisions or replacement development plan documents (DPDs) and supplementary planning

documents (SPDs). However it was found that this would fail to realise the opportunity provided by the SCI update to give the Council flexibility to select new or innovative methods of engagement as an alternative to traditional or existing consultation practices in the future.

## **Why a change is needed**

4. As reported to Cabinet in October 2012, SCIs continue to have a vital role in establishing the principles of public participation in the development management and plan preparation/revision processes, and it therefore remains important for Harrow to have an up-to-date SCI. The existing SCI contains content which is now out of date. This includes references to the Harrow Unitary Development Plan, references to the (now superseded) process and timetable for the production of an SCI, a summary of the DPDs/SPDs to be prepared based on the original Local Development Scheme (LDS), a summary of (now superseded) development control legislation and procedures, and a (now superseded) list of statutory consultation bodies. The revised SCI addresses these issues and ensures that it is focused and up-to-date. In connection with Development Management functions, the revision has also provided an opportunity to introduce greater flexibility over the use of neighbour notification letters and site notices.

## **Consultation on draft revised SCI**

5. Consultation on the draft revised SCI was carried out between 18<sup>th</sup> October and 29<sup>th</sup> November 2012. The same standard of consultation was carried out on the SCI as for development plan documents and supplementary planning documents; namely:

- a public notice was published in the Harrow Observer on 18<sup>th</sup> October 2012;
- just over 1,000 invitations to comment were sent by post or e-mail from the Council's planning policy consultation database;
- the draft revised SCI was made available both on the Council's own website and on Harrow's interactive consultation portal; and
- printed copies of the draft revised SCI were made available for public inspection at each of the Borough's libraries and at Harrow Civic Centre (duty planner office).

6. Seven responses were received, of which two (Hertsmere Borough Council and Natural England) make no comment on the SCI. The representations are reproduced in full at Appendix A. A summary of the main points raised and the Council's response is set out below:

- that residents are disadvantaged due to delays in receiving notification letters and the availability of documents in libraries;  
**Response:** it is proposed to amend the SCI to provide a commitment to dispatch letters and consultation material sufficiently in advance of the consultation period.
- that it is not unusual for consultations to be undertaken during public holiday periods, further disadvantaging residents;

**Response:** it is not possible to give an undertaking in the SCI to avoid the main winter and summer holiday periods although the Council does seek to avoid them.

- that adequate time and realistic consultation periods should be provided for external consultation bodies to comment on Local Plans and development proposals;

**Response:** it is proposed to amend the SCI to give a commitment to continuous engagement with relevant external bodies as part of the Local Plan preparation/review process and, where possible and relevant, to involve them in pre-application discussions.

- that the Council should also use leaflets and community notice boards, and provide special displays in libraries and other publicly accessible premises;

**Response:** the SCI would not preclude use of these and other appropriate measures. However, in revising the SCI, the Council has sought to remove prescription by specifying only the minimum consultation techniques to be used.

- that the SCI should include a reference to Committee disagreeing with officers' recommendations; and

**Response:** it is proposed to amend the SCI to explain that the Planning Committee is not bound by the officer's recommendation.

- that the SCI should include an introduction to further clarify the new subject of neighbourhood forums and neighbourhood plans.

**Response:** it is proposed to amend the introductory text on this subject to provide enhanced explanation and clarity.

7. In addition, representations received requested that a summary leaflet of the SCI be produced and expressed interest in the provision of workshops on the Localism Act (2011) and any Council plans for starting neighbourhood forums. It is recommended that these matters be considered, subject to resourcing pressures.

## **Adoption of Revised SCI**

8. Subject to the proposed modifications that respond to representations made during consultation (see Appendices A & B) it is recommended that the revised SCI be adopted. Upon adoption of the revised SCI, the existing 2006 SCI will be superseded.

## **Implications of the Recommendation**

### **Legal comments**

9. Under section 18 of the Planning and Compulsory Purchase Act (2004) local planning authorities must prepare a statement of community involvement (SCI). The SCI is a local development document for purposes of Part 2 of the Act and by virtue of section 26 (1), the Council may at any time prepare a revision of all local development documents including the SCI.

## **Financial Implications**

10. The SCI update and consultation on the revised document represents a relatively minor project, the costs of which have been adequately maintained within the existing LDF budget. Adoption of the SCI is also considered to involve minimal cost and can be contained within the existing LDF budget. It is not intended to produce hard copies of the revised SCI other than for general distribution to libraries.

## **Performance Issues**

11. There are no national or local performance indicators that deal specifically with the Statement of Community Involvement (SCI). Nevertheless, public participation remains an integral part of the production of effective development plan documents and supplementary planning documents as well as contributing to the Council Priority for United and Involved Communities. When examining development plan documents, part of the Planning Inspectorate's role is to ensure that the local planning authority has undertaken consultation in accordance with its adopted SCI.

12. In performance terms, therefore, the SCI is a vital tool in ensuring the soundness, and particularly the effectiveness, of planning documents through public participation in the preparation process.

## **Environmental Impact**

13. The SCI does not in itself contain any policies or proposals. It exists to secure appropriate methods and levels of public participation in the preparation of planning documents. The consideration and assessment of environmental impacts are comprehensively dealt with through the requirement to undertake Sustainability Appraisal, incorporating Strategic Environmental Assessment, in the course of preparing Development Plan Documents but are not relevant to the SCI.

## **Risk Management Implications**

14. Risk included on Directorate risk register? Yes

15. Effective engagement in preparation forms a part of the 'justified' test of soundness for a DPD. Updating the SCI ensures that a local, flexible framework is in place for engagement in the Local Plan preparation/revision process. Failure to update the SCI, but instead to continue to rely on the version adopted in 2006, carries the risk that future engagement is not considered to be effective for the task in hand and may therefore jeopardise soundness. In terms of Development Management, the revised SCI simply updates the document in relation to current requirements and local practice and so helps to avoid the potential for misguided attempts to challenge planning decisions.

## Equalities implications

16. Was an Equality Impact Assessment carried out? Yes

17. The EQIA found that the revised SCI would have a low or neutral impacts in relation to the nine equalities strands.

## Corporate Priorities

18. The adoption of the revised SCI will contribute to the delivery of the following corporate priority:

- United and involved communities – a council that listens and leads: The adoption of the revised SCI will encourage early engagement in the plan preparation/review process and by those proposing development to help ensure the widest possible participation in the plan making and decision taking processes.

## Section 3 - Statutory Officer Clearance

|                        |                                     |   |
|------------------------|-------------------------------------|---|
| Name: Kanta Hirani     | <input checked="" type="checkbox"/> | on behalf of the<br>Chief Financial Officer |
| Date: 12 February 2013 |                                     |   |
| Name: Abiodun Kolawole | <input checked="" type="checkbox"/> | on behalf of the<br>Monitoring Officer      |
| Date: 8 February 2013  |                                     |   |

## Section 4 – Performance Officer Clearance

|                       |                                     |   |
|-----------------------|-------------------------------------|---|
| Name: Martin Randall  | <input checked="" type="checkbox"/> | on behalf of the<br>Divisional Director<br>Strategic<br>Commissioning |
| Date: 8 February 2013 |                                     |   |

## **Section 5 – Environmental Impact Officer Clearance**

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| Name: Andrew Baker    | <input checked="" type="checkbox"/> | on behalf of the<br>Divisional Director<br>(Environmental<br>Services) |
| Date: 8 February 2013 |                                     |  |

## **Section 6 - Contact Details and Background Papers**

**Contact:** Matthew Paterson, Senior Professional Policy Planning, Development and Enterprise, phone 020 8736 6082

**Background Papers:** None

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| <b>Call-In Waived by the<br/>Chairman of Overview<br/>and Scrutiny<br/>Committee</b> | <b>NOT APPLICABLE</b><br><br><i>[Call-in applies]</i> |
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## Appendix A: Consultation Responses

| Respondents to the draft Revised Statement of Community Involvement consultation |   |   |                       |
|--|---|---|-----------------------|
| 1  | Campaign for a Better Harrow Environment  | 5 | Natural England       |
| 2  | CgMS Consulting (for Metropolitan Police) | 6 | Hatch End Association |
| 3  | English Heritage                          | 7 | Thames Water          |
| 4  | Hertsmere District Council                | - | -                     |

| Representations made to the draft Revised Statement of Community Involvement (arranged in document order) |     |         |  |   |   |
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| ID  | Rep | Section | Representation   | Summary   | Response  |
| 1   | SC1 | General | The booklet runs to 14 pages, not over long but it is still hard to imagine the average Harrow resident ploughing through even this. What about a simple leaflet describing the processes etc and cross referred to the Strategy and where it can be viewed/obtained?              | A summary leaflet should be produced alongside the SCI. | The Council may consider producing a summary leaflet. |
| 4   | SC2 | General | Thank you for consulting Hertsmere Borough Council on your draft revised Statement of Community Involvement. Hertsmere Borough Council notes the content of the draft revised Statement of Community Involvement and I can confirm that we do not have any comments at this stage. | No observations.  | Noted.  |

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| 5 | SC3 | General | We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at:<br><a href="http://www.naturalengland.org.uk/ourwork/planningdevelopment/default.aspx">http://www.naturalengland.org.uk/ourwork/planningdevelopment/default.aspx</a> .   | No observations.   | Noted.   |
| 6 | SC4 | General | Each of the six section headings on the opening page might usefully be added through the body of the text at appropriate points.  | Add six section headings to the body of the text.  | It is proposed to add headings as suggested to aid navigation of the document. |
| 7 | SC5 | General | Thank you for consulting Thames Water on the above. As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough (Veolia provide the water). A key sustainability objective for the preparation of the Local Plan/Local Development Framework should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the new National Planning Policy Framework (NPPF), March 2012, states:<br><br><b><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b><br><br>Paragraph 162 of the NPPF relates to infrastructure | The NPPF requires local planning authorities to set out strategic priorities and work with other providers over the provision of water and waste water infrastructure. | Noted.   |

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|   |     |           | and states:<br><br><b><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></b> |  |   |
| 6 | SC6 | Para 2.7  | In the blue panel the final line says " paper documents" can be seen at Civic Centre by appointment. This should be clarified to make clear this refers to any associated documents and not the plans (or electronic planning applications).   | The SCI should make clear that availability of paper documents includes all submitted documents and not just the drawings. | It is proposed to amend the last sentence in the blue box as suggested.   |
| 6 | SC7 | Section 3 | Should there be a reference to retrospective applications?   | Should make reference to retrospective applications.   | It is not considered necessary to make reference to retrospective applications in the SCI since there is no distinction in terms of consultation and process.   |
| 1 | SC8 | Para 3.2  | In our experience the period for making our representations is frequently eroded for one or more of the following reasons:<br><br>a) days may be lost at the outset because of delay in receiving the initial notification (for example the letter   | The effective consultation period is often eroded by delay in delivery of notifications, late deposit of                   | It is proposed to add a new heading and text after paragraph 3.3 to provide a commitment to dispatch letters and consultation material sufficiently in advance of the start of the consultation period. |

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|   |     |          | <p>dated 15<sup>th</sup> November on the current CIL consultation was received on 21<sup>st</sup> November)</p> <p>b) materials essential to making effective representations are usually late in reaching public libraries; similarly all relevant materials are not always made available on line from the outset of the consultation period</p> <p>c) the coincidence of a consultation period with a public holiday, which is by no means an unusual occurrence, can also make unwelcome inroads into consultation time.</p> <p>Despite the six week deadline, we understand from the Council that there is some scope for informal flexibility on consultation periods. It would be helpful to know what this amounts to. Further we wonder how many people, not being aware of this scope for flexibility, are put off by a stated deadline?</p> | <p>consultation material in libraries, and use of holiday periods for consultations. Any flexibility over consultation deadlines should be publicised.</p> | <p>Although the Council seeks to avoid undertaking consultation during main winter and summer holiday periods this is sometimes unavoidable and cannot be included as a formal commitment in the SCI. Similarly, the Council can exercise a degree discretion over the receipt of representations after the close of consultations but it would not be appropriate to formalise this within the SCI, as this would become a <i>de-facto</i> deadline for all consultations.</p> |
| 1 | SC9 | Para 3.4 | <p>We agree that it is very important that the consultation database is kept up to date. It is also important that those on the database routinely receive notification of planning issues of interest to them. Our experience is that sometimes someone in our group receives notification as an individual, rather than as a link in to the whole group. In other instances, eg the recent Fairview application for an extension of time to their Gayton Road planning permission, CBHE has not been notified at all and we</p>  | <p>The consultation database should be kept up to date and consistently used.</p>  | <p>For planning policy purposes the consultation database is consistently used. The example cited relates to a planning application where more targeted letters of notification to neighbouring owners /occupiers are sent out.</p>   |

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|   |      |          | have found out by chance from others.   |  |  |
| 6 | SC10 | Para 3.4 | I think the first mention of the LDF occurs here? I know interested readers will be familiar with it, but it should be spelled out in full here on first use, with the abbreviation in brackets (perhaps with an accompanying definition or explanation).   | 'LDF' should be spelled out on first use in the document.  | It is proposed to update this reference to state 'Local Plans Team'.   |
| 2 | SC11 | Para 3.5 | It is noted that the local policing bodies are included within the list of statutory consultees, The MOPAC/MPS [Mayor's Office for Policing and Crime/Metropolitan Police Service] support this and can confirm that all relevant correspondence should be sent to:<br>Metropolitan Police Service – Property Services Department, 12 <sup>th</sup> Floor West, Empress State Building, Empress Approach, Lillie Road, London, SW6 1TR;<br>and<br>CgMS Consulting – 140 London Wall, London, EC2Y 5DN<br>I trust the Council's records will be amended accordingly. | Support for inclusion of the police in the list of statutory consultees. Address for correspondence provided.    | Officers have updated the consultation database to include these contact details.  |
| 7 | SC12 | 3.5      | 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 " <b>specific consultation bodies</b> " 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". We are therefore consider that   | Water and sewerage companies should be specifically listed as specific consultation bodies.<br><br>Adequate time | It is proposed to amend this list to make reference to the relevant bodies.<br><br>In terms of plan preparation, it is proposed to incorporate a commitment (see paragraph 3.5) to continuous engagement with external bodies, consistent with the |

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|  |  | <p>water and sewerage companies and Thames Water in particular should be specifically listed in paragraph 3.5 (rather than just utility providers) so that it is clear who the utility providers are.</p> <p>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 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> | <p>should be allocated for Thames Water to respond to consultations on development options and proposals.</p> <p>Realistic consultation periods with water and sewerage undertakers should be taken into account in the preparation of LDDs.</p> | <p>Government's principles for positive and co-operative preparation of local plans. This should avoid the need for substantial modelling work to be instigated and completed during formal consultation periods.</p> <p>In terms of planning applications, it is proposed to incorporate a commitment (see paragraph 3.19) to early engagement with relevant external bodies, consistent with the Government's principles for pre-application discussions and 'front loading'. However if applications are received without pre-application advice having been sought, the Council has limited flexibility due to prescribed periods for the determination of planning applications.</p> |
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| 1 | SC13 | Para 3.12 | <p>A lot of the means of communication are internet based and, as such, still closed to the many people who do not have access to the internet. And notices in newspapers are easily missed. We suggest the following additional outlets:-</p> <p>a) simple leaflets should be delivered to each household affected with an eye catching legend along the lines of: Please read – this concerns YOU!</p> <p>b) use could be made of the Community Notice boards for posters</p> <p>c) public libraries could carry special displays of relevant material.</p> <p>d) material could be displayed at doctors’/dentists’ surgeries, the Leisure Centre and other places where the public congregates.</p> | <p>Suggest additional methods of consultation:</p> <p>Leaflets to each household affected</p> <p>Notices in community notice boards</p> <p>Special displays in libraries</p> <p>Notices in doctors &amp; dental surgeries, the Leisure Centre, etc</p> | <p>The SCI would not preclude use of other appropriate techniques, such as those cited in this representation, but their use would depend in part on the availability of resources (for example leaflets to all households is likely to be resource intensive). The purpose of paragraph 3.12 and the subsequent blue box is to set out the minimum consultation requirements.</p> |
| 3 | SC14 | Para 3.12 | <p><i>How We Consult – Local Plans; External Consultation:</i></p> <p>We would suggest that the text should explicitly state a commitment to continuous engagement with External bodies, beyond the stated “six week period”. Experience has shown that we value having continued dialogue with the Council in resolving both plan and decision making issues.</p>   | <p>There should be commitment to continuous engagement with external bodies.</p>   | <p>It is proposed to incorporate a commitment (see paragraph 3.5) to continuous engagement with external bodies, consistent with the Government’s principles for positive and co-operative preparation of local plans.</p>   |
| 6 | SC15 | Para      | <p>Following the reference to the six week period for</p>  | <p>The document</p>  | <p>Although the Council seeks to avoid</p>   |

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|   |      | 3.12          | LDF consultations, add an undertaking that wherever possible this will avoid the main holiday periods in August and Christmas/New Year. (Might there be a cross-reference to consultation periods in para. 3.7, blue panel?)   | should contain a commitment to avoid consultations in main holiday periods (and include cross references). | undertaking consultation during main winter and summer holiday periods this is sometimes unavoidable and cannot be included as a formal commitment in the SCI.  |
| 7 | SC16 | Planning Apps | <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 <b>“Water Services Infrastructure Guide for LPAs on Planning Application &amp; Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker”</b>. This will be off assistance to when determining which planning applications to consult Thames Water on.</p> | Thames Water expects to be consulted on most major planning applications.                                  | Noted.  |
| 6 | SC17 | Para 3.18     | The term "weekly list" has a specific meaning, merely pointing where more detail can be found; it would be better to say that the Council publishes weekly information about applications received. But even this does not indicate whether the application will be dealt with by Committee or delegation. Finally, the list in the Harrow Observer appears to be a selection,   | The 'weekly list' should be explained and include information about the decision level.                    | It is proposed to amend paragraph 3.18 to better explain the information published weekly and a link to the relevant page of the Council's website. The list does already include the recommendation (i.e. decision) level as 'Del' for delegated |



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|   |      |                  | and not necessarily "major" ones.   | The published lists in the Observer appear to be a selection not just majors. | and 'Com' for committee. Additional text has been added to provide a contact e-mail address to subscribe to the weekly list.<br><br>The statutory public notices in the Harrow Observer include major applications and others that need to be advertised (such as certain developments in conservation areas). The Harrow Observer also publishes its own list of applications under the heading 'What's being built near you' but this is a matter for the newspaper Editor. |
| 3 | SC18 | Para 3.19        | <i>How We Consult – Planning Applications; Pre-application Advice:</i> We welcome the Council's commitment to early engagement with applicants. However in line with paragraph 192 of the NPPF, we would suggest that this approach should be expanded to include early discussions with "expert bodies" such as English Heritage, as when appropriate. | There should be a commitment to include early discussions with expert bodies. | It is proposed to incorporate a commitment (see paragraph 3.19( to early engagement with relevant external bodies, consistent with the Government's principles for pre-application discussions and 'front loading'.   |
| 6 | SC19 | Paras 3.32/ 3.33 | Should there be a reference to occasions where the Committee disagree with officer recommendations?   | Should make reference to Committee overturning officer recommendations.       | It is proposed to amend this paragraph to explain that the Committee is not bound the officer's recommendation.   |
| 1 | SC20 | Para 4.1         | This section offers no words to introduce what will be  | This section needs  | It is proposed to amend paragraph   |

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|   |      |          | <p>new and, for many, unfamiliar legislation. It jumps straight in with neighbourhood forums and referenda and is therefore confusing. We suggest this section needs further clarification, something along the lines of:</p> <p>The Localism Act 2011 provides new freedoms and flexibilities for local government. Amongst other things it also provides for the setting up by local authorities like Harrow (ie without a parish council) of neighbourhood forums composed of local community groups. These forums have the power to create neighbourhood development plans. So long as these conform to national policies, they can be put to a local referendum, with the local authority being required to bring into force the decision of the majority.</p> <p>In our opinion the best link for information on the Act is:<br/> <a href="https://www.gov.uk/government/publications/localism-act-2011-overview">https://www.gov.uk/government/publications/localism-act-2011-overview</a>.</p> <p>We would suggest that the full implications of the Localism Act 2011 for local groups would be a useful subject for a borough-wide workshop for such groups. CBHE is particularly interested to know what plans the Council has to get the neighbourhood forum process started with the various organisations who may be interested to put themselves forward.</p> | <p>introductory text and a link to an explanatory website (suggested).</p> <p>It is considered that the Localism Act would be a useful subject for borough-wide workshops.</p> | <p>4.1 to expand the introductory explanation of localism and neighbourhood planning, and to add the suggested website link.</p> <p>Interest in workshops on the subject neighbourhood forums is noted and will be considered by the Council.</p> |
| 6 | SC21 | Para 4.1 | The third sentence might read more easily by amending the closing phrase to read "in areas, such   | Re-word third sentence to  | It is proposed to amend this paragraph to improve readability.  |

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|   |      |          | as Harrow, without parishes" or "in areas without parishes (e.g. Harrow)".   | improve readability.                          |   |
| 6 | SC22 | Para 4.2 | What is "the project"? Suggest amending to "any neighbourhood forum and plan".   | Clarify what is meant by 'the project'.       | It is proposed to amend this paragraph to make clear what the steering group is intended to do. |
| 6 | SC23 | Para 4.3 | Who are "we" in first sentence? Suggest amending to "...Council, where it will be checked to ensure..."  | Change 'we' to 'the Council'.                 | It is proposed to amend this paragraph to improve readability.                                  |
| 6 | SC24 | Para 4.4 | The syntax of the blue panel is mixed. One possible improvement might be to add "arrange or ensure (that)" after "will" in opening line. Alternative changes are possible. | Need to improve the syntax of the blue boxes. | It is proposed to amend the blue box to improve readability.                                    |
| 6 | SC25 | Page 16  | Page 16. The page (table) needs a heading, such as "Categories of planning applications".  | Need to add headings to the table.            | It is proposed to amend this table to provide a title and improve legibility.                   |