

## Town and Parish Council consultation Feedback

### Initial Approach – Pre Application

What works well	Improvements
<b><i>Consultation, Information and Approach to Pre-Applications</i></b>	
<ul style="list-style-type: none"> <li>Pre application discussions with Town/Parish councils encourage the appropriate use of materials and good design</li> <li>Consulting with Towns/Parishes in advance</li> <li>Local knowledge is invaluable</li> <li>Parish Council welcomes pre-application discussions in draft proposals and are happy to provide direct verbal feedback</li> </ul>	<ul style="list-style-type: none"> <li>Advice to Town Councils where potential developments are likely even if this is a brief notice.</li> <li>Would be helpful to be advised and consulted on larger or innovative applications before formal submission particularly if likely to be contentious</li> <li>Parish Council would like to be informed</li> <li>Local Councils to be involved in pre-application discussions</li> <li>Would be useful to know if big projects were proposed for the area</li> <li>Helpful to see what developers are proposing for large scale projects - what areas of land may be affected. Whether residential or commercial it allows the towns to be kept up to date</li> <li>Parish Council could be asked to comments on pre-applications given their local knowledge</li> <li>District Council should indicate consultation with Parish Council is available to applicants as this is considered a practical step</li> </ul>
<ul style="list-style-type: none"> <li>Consultation with Planning Officers</li> <li>Free advice on planning issues and officers assistance</li> <li>Advice from Planning Officers</li> <li>Helpful to be able to discuss proposals with officers before submitting an application</li> <li>Continue as now with advice being provided by officers or parish councils as required by applicants</li> <li>Advice is given freely and usually indicative of outcome</li> <li>Pre-application support and guidance is offered to applicants which, if done within a sensible timescale, can reduce professional costs and save time whilst reducing risk of application being refused</li> </ul>	<ul style="list-style-type: none"> <li>Consistency of advice from individual officers</li> <li>Consistency of advice within a set time frame</li> <li>Everyone should be told the same thing</li> <li>Officers need to be more available</li> <li>Officers should act in 'helpful advisor' role pre-planning. It was commented that they offer little or no help in many cases and were sometimes perceived to be obstructive.</li> <li>It would be useful if the officers comments could be copied to the parish council for advice and information</li> <li>Not transparent- make very clear the reasons why some applicants are discouraged yet others are worked closely with.</li> <li>There should be frank disclosure of the content of pre-application discussions/the file should be available for inspection</li> </ul>
	<ul style="list-style-type: none"> <li>Guidelines needed for Town/Parish councils</li> <li>More general guidance as to what is considered acceptable</li> </ul>
Limited experience of pre-application consultation	
Current distribution satisfactory including website	
	Quality of submission plans and documents
	What development requires planning permission?
	Have a scheme and ensure it is implemented

## Submission of applications/Processing

What works well	Improvements
<b>Consultation, notification and determination process</b>	
	<ul style="list-style-type: none"> <li>• Consultation with parish councils on amended plans needed</li> <li>• Essential that parishes are asked to comment on all applications, including re-applications and amended apps</li> <li>• When applications are significantly amended sometimes there are sent out as new consultations but at other times plans are sent out for information only without giving consultees a chance to comments</li> <li>• Reserved matter applications should be referred to town/parish council before approval</li> <li>• If conditions are being removed, added or challenged, details of those conditions should be forwarded</li> <li>• Lack of notification of subsequent minor amendments</li> </ul>
	<ul style="list-style-type: none"> <li>• Listen to local councillors- they know the town</li> <li>• Much more notice needs to be taken of Parish Council observations which are based on many years local experience</li> <li>• Feedback when decisions contrary to Parish Council comments taken at District level</li> <li>• Parish Council views such be given more credence especially as they are not given lightly and take into account local plan</li> <li>• Parish Council comments to be noted</li> <li>• More notice taken of local views</li> <li>• Take a lot more notice of Village design statements. Demand that applicants take them into account- they are the will of the people</li> </ul>
<ul style="list-style-type: none"> <li>• Although timescales are tight there is often sufficient time available for members to make a response</li> <li>• Current timescale – existing arrangements for timing and comment</li> <li>• Good time for consideration</li> <li>• Ability to email Officers for a few extra days on response deadlines which allows for efficient grouping of items for one meeting</li> <li>• Email notification of applications pending and email reply with our comments</li> <li>• Sometimes we seek and are usually granted a short extension for the return of our comments</li> </ul>	<ul style="list-style-type: none"> <li>• To accommodate parish planning committee meetings officers should allow a few days grace for comments to be submitted, as they do in this district</li> <li>• Need as much time as possible to advertise and consider applications sometimes we have longer to deal with a hedge cutting application than a major application</li> <li>• The final date for making representations should not be put on the website until after the advertisements/statutory notices have been posted and then date accordingly</li> <li>• It should be made clear that late representations can be made</li> <li>• The Parish Council arranges planning committee meetings to consider applications received but turn around time imposed by District Council is tight especially considering these meetings are public and notice etc has</li> </ul>

	<p>to be given</p> <ul style="list-style-type: none"> <li>• More notice should be given- often only have ten day turnaround</li> <li>• Establish a timescale that allows Parish Councils to review plans at monthly meetings</li> </ul>
<ul style="list-style-type: none"> <li>• Online submission of applications</li> <li>• Able to email comments</li> <li>• Useful to be able to email observations</li> <li>• Online planning comments system is very good</li> <li>• The online system of applications is very helpful</li> </ul>	<ul style="list-style-type: none"> <li>• Easier access to application forms on website</li> <li>• How applications are passed to towns/parishes – better use of IT</li> <li>• Website does not always work</li> </ul>
<ul style="list-style-type: none"> <li>• Plans arrive on a regular basis</li> <li>• Full copies are seen – available to the general public who don't have to travel miles to view</li> <li>• Parish Council get copy of plans for consultation and comments</li> </ul>	<ul style="list-style-type: none"> <li>• Firm policy should be adopted and applications not validated unless they comply</li> <li>• Drawings should be checked before sending out for consultation</li> <li>• Incomplete or ambiguous applications often received despite requirements relating to submission of applications</li> <li>• Quality of drawings submitted with applications is variable</li> <li>• Good idea not to validate plans until they are complete</li> <li>• Applicants should be required to submit details of ancillary matters such as lighting/parking/building regulations requirements</li> <li>• Hard copy of plans still required for members of the public to look at</li> <li>• Highlight differences on amended plans – identify amendments</li> </ul>
<ul style="list-style-type: none"> <li>• Principle of design and access statements is excellent</li> <li>• The idea of design and access statements is good but they are of no use unless accurate and comply with new requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Information contained within design and access statements can be scant, should be more critically assessed on submission</li> <li>• Applicant or agent should be required to sign/submit a statement stating their belief in the accuracy/ truth of its contents</li> <li>• Could be made clearer in letter accompanying the application that the design and access statement does not form part of the application unless included in the permission</li> <li>• Design and access statements could be a very useful tool for town/parish council especially when properly constructed, they may even give the application a chance to justify the application and/or areas of difficulty.</li> <li>• As quality of design and access statements can vary we would like the Council to produce a clear pro forma or model of the subject matters to be addressed/supporting documentary evidence required and refuse to process an application which does not meet these requirements</li> <li>• The nature of design and access statements are not widely understood</li> <li>• The Planning Authority should be careful to ensure that the proposals set out in the and</li> </ul>

	the course of the application are set out in the consent
Neighbour notification by letter	<ul style="list-style-type: none"> <li>• Advise nearby properties of application. Some notices not clearly visible and not put up in time for consultation with the public</li> <li>• Notices not always displayed in appropriate place</li> <li>• Notify neighbours based on real geography (and even submitted plans) other than on outdated ordnance survey maps</li> <li>• Perhaps applicants should list neighbours</li> <li>• The local people should be listened to as they have to live with what is decided</li> <li>• Neighbour consultations are essential- neighbours should always be consulted</li> <li>• Who is notified by letter? Better local identification of affected properties</li> <li>• Duplication of notification to applicants and surrounding properties- Local Town Council better placed</li> </ul>
	<ul style="list-style-type: none"> <li>• Inconsistency over officer recommended decisions. Planning Officers should be assigned to an area to help improve consistency on decisions as they would then have a better working knowledge of particular area- even more important within a Unitary authority structure</li> <li>• There is a lack of transparency and openness in current process about the way in which decisions are taken</li> <li>• Some planning decisions appear inconsistent and seems more subjective than objective at times</li> <li>• Planning Officers are not always consistent as to whether applicant is given a chance to redesign scheme prior to refusal</li> <li>• Inconsistency over Conservation Areas. Have been advised that Conservation Area status has little weight and then the converse- used as a reason to reject an application. Are they significant in the planning process or not?</li> <li>• There should be a procedure in place and means of independent review of the handling of an application prior to decision/submission to committee where it is contended that there are errors/omissions in the application/officers report/recommendations</li> </ul>
	Some current procedures favour the applicant/developer
	Some larger important applications have been given an 8 week time slot and this should be 13 when the impact is huge on the town, resulting in the loss of employment space
Current process does not affect parish council	

<b>Advice and information</b>	
<ul style="list-style-type: none"> <li>• Access to information on the planning explore is frequently unavailable and known applications can be impossible to locate</li> <li>• Kennet website is good</li> </ul>	<ul style="list-style-type: none"> <li>• Need to be able to view planning decision conditions on line</li> <li>• Need to be able to view decisions or state of application on line</li> <li>• Improve speed on line</li> </ul>
<ul style="list-style-type: none"> <li>• Currently access to officers for advice/clarification is good and this should continue</li> <li>• Contact with planning officers</li> <li>• Easy to contact planning department by phone</li> </ul>	<ul style="list-style-type: none"> <li>• Improved communication with the District Council</li> <li>• Staffing- often difficult to contact appropriate officer as many on part time contracts. Some felt that more staff were needed particularly experienced ones</li> <li>• Responses from Planning on application queries from the Parish Council are not in the main forthcoming and some times do not happen</li> <li>• Sometimes getting a response is slow</li> </ul>
External bodies are often helpful with advice	Lack of consistency in responses from external bodies such as Area of Outstanding Natural Beauty and Environment Agency. Some applications seem to be permitted even though they appear to contravene regulations such as building next to a watercourse or being visible from footpaths
	<ul style="list-style-type: none"> <li>• Probably need more officers to ensure that the 8 week period can be met</li> <li>• It was felt that at times the need to meet the 8 week target date took precedence over considered decisions</li> <li>• When officers don't meet targets for decisions clarity is needed as to next steps for applicants and Parish Councils</li> </ul>
	<ul style="list-style-type: none"> <li>• From time to time it would be helpful to receive guidance on aspects of planning matters which should/should not be taken into account</li> <li>• Clearer advice on what is expected from the town council</li> </ul>
	<ul style="list-style-type: none"> <li>• Explain technical jargon – remove</li> <li>• Use more 'plain English'</li> </ul>
	The application form is less clear than the old one: the property is not detailed on the front page and the app no. should be stamped at the top of the form, not on a compliment slip (comment received twice)
	There should be better quality of consultation between Housing and Planning departments
	There should be a trigger to advise Parish Councils and applicants when officers are minded to refuse an application

### Delegation scheme and call ins

<b>What works well</b>	<b>Improvements</b>
Applications only go to committee if several objectors	<ul style="list-style-type: none"> <li>• Parish Councils cant currently ask for something to be called in- for more control in Parish</li> </ul>

	<ul style="list-style-type: none"> <li>• When Parish Councils have problems with an application it should automatically go before committee. Parish Councils should be treated differently to public response.</li> <li>• An objection by the Parish Council used to carry weight but now it is only considered to be one objection and there needs to be a total of 5 objections before plans can be referred to development committee. Plans for local devolution seem to deal with this</li> <li>• Greater weight placed on Town Council views on application</li> <li>• The objection or request for call in by Town or Parish Council should automatically lead to consideration by committee outside the scheme of delegation</li> </ul>
<ul style="list-style-type: none"> <li>• A delegation scheme is essential with the number of applications now received</li> <li>• Delegation to officers in the majority of cases</li> <li>• Delegation to officers- this must be encouraged as it saves time and maintains policy continuity with fewer renegade political decisions</li> </ul>	<ul style="list-style-type: none"> <li>• Delegation to officers seems to be given to readily</li> <li>• If the public had more confidence in the quality of planning staff they may feel happier about the delegation of certain planning decision</li> <li>• There should be an optimum size of development where delegated decisions cannot be made</li> <li>• Delegation rate of at least 80% to remove the political/nimby back scratching that is apparent within the planning process</li> <li>• Decisions in line with LDF and Planning Policy</li> </ul>
<ul style="list-style-type: none"> <li>• Ability to call in</li> <li>• District Councillors can call in an application in officer delegation</li> <li>• Scheme works very well and is invaluable</li> <li>• Scheme works well for small applications which are not controversial</li> </ul>	Longer period to be allowed for call in
	<ul style="list-style-type: none"> <li>• Where officers consider suitable, parish councils could make decisions on minor applications and TPOs etc</li> <li>• There has been a suggestion that under a new Unitary Authority planning applications could be devolved to Parish Councils. If this were the case extensive training would need to be provided to Councillors.</li> </ul>
	<ul style="list-style-type: none"> <li>• Misunderstood by Councillors and ward members</li> <li>• More liaison</li> <li>• When an application opposed by parish council is allowed under delegated powers, relay reasons back to the parish council</li> </ul>
	Where elected councillors are involved, or the council itself decisions should be delegated to another authority
	Seeking consistency in approach and decision making process under delegated authority – LBC in particular
	There should be a system by which applications can be referred to committee at short notice in cases of contention even where there are few objections

	There will need to be changes in the current process as at present 2 District Councillors, one from the appropriate ward can call in plans for discussion at committee and with a greatly reduced number of Councillors this needs to be reviewed
District Councillors supporting Parish Council	

## Committees

What works well	Improvements
<b><i>Speaking at committee</i></b>	
<ul style="list-style-type: none"> <li>Parish council allowed to speak</li> <li>Time limit of 3 minutes is inadequate when applicants have had months to prepare an application</li> <li>Notice to speak</li> <li>Applicants can speak</li> <li>Public participation (comment received twice)</li> <li>All councillors and the public should continue to have their right to attend to have their say</li> </ul>	<ul style="list-style-type: none"> <li>Would be useful to be notified and asked to attend</li> <li>Increase speaking time to 5 minutes</li> <li>Would be useful to be able to send a written statement rather than having to attend</li> <li>Time allowed for Parish comments is inadequate</li> <li>Too little time to speak</li> <li>Not long enough to speak</li> <li>Local Councillors should have longer to speak</li> </ul>
Seen to be transparent	<ul style="list-style-type: none"> <li>Party Political block votes should be abdicated where applicants are Councillors</li> <li>Planning Decisions should not be political. There have been times when voting at DC meetings has been along political lines</li> </ul>
<ul style="list-style-type: none"> <li>Good Chairmanship is crucial</li> <li>Strong leader or chair is required</li> </ul>	
Lack of repetition by Councillors	When speaking at a committee members should be required to identify themselves
Views of 'the opposing side' not always represented	
	Need consultation
<b><i>Presentation/consideration of applications</i></b>	
<ul style="list-style-type: none"> <li>Committees that support Officers recommendations</li> <li>Knowledge of development plan</li> <li>Knowledge of area</li> <li>Very helpful officers</li> </ul>	<ul style="list-style-type: none"> <li>Make sure committees understand the consequences of making decisions that do not conform to policy</li> <li>The reports to committees need to be accurate and Councillors given clear advice on applicable policy</li> </ul>
Better than 90% of our comments are accepted and acted on	5% of our comments are not accepted/acted on mainly because we are unaware of some planning rule 5% not accepted/acted on because we just disagree
Site visits are a useful part of the decision making process	<ul style="list-style-type: none"> <li>Committee site visits to see sites</li> <li>Onsite visits witnessed have been farcical</li> </ul>
Plans are reviewed in an open environment, encouraging the public to feel that the process is being followed and developers are not getting the 'nod' on applications	
	There is no time or facility for errors to be corrected (by either side)
<b><i>Membership of committee</i></b>	
Parish council planning committee structure to remain as it is now	

Members who have experience of planning	
	Regulatory Committees to be set up in each area/district and to be made up of local unitary, town and parish councillors
	<ul style="list-style-type: none"> <li>The town and parish councillors should be from the same area as the applications being table</li> <li>To achieve this a bank of councillors could be held from which the committee could be made up according to application</li> </ul>
<b>Time and location of committee</b>	
<ul style="list-style-type: none"> <li>Local Development Control</li> <li>Individual development control meetings</li> </ul>	<ul style="list-style-type: none"> <li>Retain Local Development Control Committee, based on Area Board. Concern – limited local representation</li> <li>Less applications to one District Council meeting- have them split into areas</li> </ul>
<b>Training Issues</b>	
	<ul style="list-style-type: none"> <li>More detailed planning training to town councils to ensure that their remarks are of value</li> <li>Too often officers do not understand that members are not trained to their standards. They are often critical and not always helpful</li> <li>Members are keen to keep their advisory status and welcome the opportunity to speak but understand there is a need to develop. They want to make an intelligent contribution</li> <li>Regular town/parish/member training on planning law and policies</li> <li>How well trained are members who serve on Planning Committees? Have seen some inexplicable decisions in the past</li> </ul>

## Enforcement

What works well	Improvements
<b>Approach to Enforcement</b>	
<ul style="list-style-type: none"> <li>All retrospective applications made to District Council are permitted</li> <li>Encourage retrospective applications where breach conforms with policy</li> </ul>	<ul style="list-style-type: none"> <li>Retrospective application should be at an enhanced cost and if not approved should be removed not negotiated upon until a plan is approved</li> <li>Retrospective applications are becoming more of a regular thing, action should be taken to stop this</li> <li>Retrospective applications flout planning laws and process and this goes unpunished</li> <li>Encourage retrospective applications where they comply with policy</li> </ul>
<ul style="list-style-type: none"> <li>Kennet act promptly on reports of infringements and take prompt effective action where justified</li> <li>Consistency of regulations</li> <li>Good scheme</li> <li>Enforcement officers attend promptly when notified of a potential irregularity</li> <li>Helpful officers</li> </ul>	<ul style="list-style-type: none"> <li>Rigorous enforcement against breaches which do not comply with policy</li> <li>Better timely enforcement</li> <li>Enforcement has on occasion taken a long time apparently due to resource shortfalls</li> <li>Enforcement not vigorous enough</li> <li>Not vigorous enough and this is due to insufficient officers</li> </ul>



	<ul style="list-style-type: none"> <li>• No evidence of enforcement taken by Local Planning Authority</li> <li>• Planning approval conditions do not appear to be regulated effectively</li> <li>• Follow up process to ensure compliance</li> <li>• Enforcement is seen as patchy and Parish Councils as a weak area by Principal Authorities</li> <li>• There appears to be reluctance by enforcement officers in taking action against breaches to planning or where no planning has been applied for</li> <li>• Actually start enforcing planning legislation</li> <li>• More robust action should be taken against developers who contravene conditions on developments including much stronger penalties and 'blacklisting'</li> <li>• Take enforcement action against development which does not have planning permission</li> <li>• Much flouting of the regulations goes on without any recourse to the owners of property and business</li> <li>• Council should adopt a procedure for signing off successful application and ensuring that any conditions are complied with</li> <li>• Needs more resources</li> </ul>
	Listed Building Conditions subjective
	Council allowed appellant considerable degree of flexibility in complying with enforcement notice – town/parish council would appreciate consultation if such changes are to be made
	Some issues seen as low priority are not low priority to parishes
<b>Information/ Communication</b>	
Local enforcement officer appointed per district to respond to reports and questions from the public and parish councils	<ul style="list-style-type: none"> <li>• More opportunity for officers to work with the towns that have a closer working knowledge of what is happening in their area</li> <li>• Much improved service but could be improved by working together</li> <li>• Need a local Conservation Officer to respond to reports and questions from the public and parish councils</li> </ul>
Notifying enforcement officer	<ul style="list-style-type: none"> <li>• Better updating communication</li> <li>• Parish Councils should be kept informed of enforcement progress</li> <li>• Town and Parish Councils to be provided with a quarterly report on enforcement taken and the results</li> </ul>
Consultation and explanation of relevant policies with landowner	
	<ul style="list-style-type: none"> <li>• Enforcement officer to keep records and check time limited temporary applications and take action at the renewal date</li> <li>• Proper records need to be kept</li> </ul>
	Timely exchange of information between Planning/Building Control
	Training for parish councils on enforcement for

	awareness
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## Appeals

What works well	Improvements
<b>General</b>	
<ul style="list-style-type: none"> <li>There is an appeals system which is helpful and seems to work well</li> <li>Have only had one appeal but dealt with efficiently and satisfactorily</li> </ul>	There does not seem to be a meaningful appeals process for those effected by controversial applications
<ul style="list-style-type: none"> <li>Continue to conduct appeals as now ensuring that parish councils are given the opportunity to comment and in certain cases attend hearing and site visits.</li> <li>Parish Council gets involved at an immediate level</li> </ul>	<ul style="list-style-type: none"> <li>Parish Councils should be given the opportunity to attend and speak at site visits</li> <li>Parish council involvement but could be improved by working together</li> <li>Involve Parish Councils</li> <li>Local Councillor should be able to attend and have an input due to local knowledge</li> </ul>
<ul style="list-style-type: none"> <li>Receiving information by email</li> <li>Notification by email and chance to make further comments if applicable</li> <li>Town and Parish Councils receive copies of decisions</li> <li>Parish Council kept up to date with progress through input of a pro-active Councillor</li> </ul>	
	<ul style="list-style-type: none"> <li>Training for parish councils on appeals for awareness</li> <li>Support for Councillors when/if needing to speak at appeals</li> </ul>
	A strict delegation scheme based on LDF's and PPS's will result in less appeals as there will be fewer nimby refusals which are vulnerable on appeal
	More opportunity to be given to officers and members to negotiate with developers before an appeal becomes necessary
	Approvals should not be final. The right to appeal should apply as much as it does after a refusal, if neighbours are affected. No appeals are allowed for neighbours who are badly affected by developments
	A weak area which needs more resources and expertise. Applicants or defendants seem to have the upper hand with the local authority losing out

## Other

What works well	Improvements
<ul style="list-style-type: none"> <li>The offer of training to Parish Councillor in development control services</li> <li>Asked regularly to participate in improving the system by the District Council</li> </ul>	<ul style="list-style-type: none"> <li>Planning briefing and training</li> <li>To continue, especially in the areas of LDF, RSS Statement of Community Involvement and the preparation of various documents for the LDS Section 106 or Planning Obligation needs to be explained and procedure known by parish councils.</li> </ul>
	<ul style="list-style-type: none"> <li>General opinion was that the planning</li> </ul>

	<p>process was more about reaching Government targets than the process of planning</p> <ul style="list-style-type: none"> <li>• Planning rules seem to be designed for urban area or true Areas of Outstanding Natural Beauty</li> </ul>
	<p>Town/Parish Councils should be recognised as part of the planning process and not simply as an add on. This would improve public concern on applications and would become more efficient and democratic as the towns/parishes are the elective representatives and, they are the front face to the public.</p>
	<p>Concerns at length of time some planning applications have been with District Council without a decision being made</p>
	<p>Town Council members to sit on any board which is constituted by the Unitary authority to deal with planning matters in the area</p>
	<p>There needs to be more dialogue with Parish Councils- start using local Council expertise e.g. flooding issues and history of sites</p>
	<ul style="list-style-type: none"> <li>• Approach to Area of Outstanding Natural Beauty is not consistent</li> <li>• Inconsistent approach to small agricultural land vs. larger packages</li> </ul>