

Peak District National Park Review of Statement of Community Involvement: Consultation Statement

1. Responses to preliminary consultation Nov-Dec 2011

Response from	Summary of comment	How comment was addressed in document
Barnsley MBC	Incorporate changes to reflect: <ul style="list-style-type: none"> abolition of regional planning tier and changes to central government department names; revised 2009 Regulations re amended process for approval of SCI ie no Examination; consider how economic climate has/could affect planning resource – human and financial, as could have impact on level of service & appropriate types of consultation methods; changes in Government policy, Regs and legislation ie not Issue & Options / Preferred Options but Reg 25 consultation / publication / submission / examination; difficult to anticipate language to follow from emerging localism context, which seems to favour terminology around Local Plans not LDF. 	<ul style="list-style-type: none"> Summary diagram amended. Appendix 1 updated. Introduction amended to reflect changes to SCI process. Resources section amended but NPA will retain high priority to community involvement in planning processes. Para 1.1 reflects uncertainty re future documents. Para 1.5 comments on changed process. Paras 1.11 & 1.12 describe new process. Para 1.1 as above.
	Consider: <ul style="list-style-type: none"> scope to tailor consultation procedures, methods & consultees appropriate to document being produced; removal of requirement for SA for SPDs; updating consultation lists to reflect specific/general bodies in Regs; include documents at Barnsley Council Civic Office as for other neighbouring LPAs, since NPA covers part of the area; increasing importance of email correspondence as environmental and cost saving benefit. 	<ul style="list-style-type: none"> Paras ix and 1.9 cover this. Para 1.13 amended re SA. Appendix 1 updated to reflect 2009 Regs. Limited number of authorities used as Deposit locations. Barnsley could offer the opportunity to view documents online. Table 1 shows benefits and resource implications. Email used whenever practicable.
	Include reference to how NPA is anticipating it will facilitate local planning	New para 1.7 added.

	under the Localism Bill and Neighbourhood Planning Regulations.	
Barnsley MBC (cont.)	<p>Development management: check legislation refs up to date. Consider:</p> <ul style="list-style-type: none"> • detail of pre-application procedures; • mention 13 week targets for major applications as well as 8 week target; • householder applications category as well as major/minor; • refer to advertisement consent. 	<ul style="list-style-type: none"> • Para 2.6 and Table 3 cover this. • Reference to major applications target added to 2.2. • New table in para 2.9. • Included in new table in para 2.9.
Peak Park Parishes Forum	Remove outdated references to LDF ie most of Part 1.	LDF processes updated.
	Would be helpful if subject matter of SPDs was displayed, together with ancillary consultations that will be sought to put meat on bones of Core Strategy.	Not appropriate for SCI – this is in Local Development Scheme.
Kirklees Council	Revised SCI should cover consultation with constituent local authorities on both plan preparation and planning applications.	See Appendices 1 & 3 – appendix 1 lists all constituent authorities.
Taddington & Priestcliffe Parish Council	Not sufficient weight is attached to importance of involving local people and communities in decision-making or the contribution they must make to sustainability (as described in 2010 National Parks Circular) of National Park Management Plan preparation.	Introduction paras amended.
	Local people are the biggest 'hard-to-reach group' – must explain clearly what policy changes are being made and what the implications will be.	Introduction paras amended to reflect importance of connecting with hard-to-reach groups, and potential for new methods of engagement.
	<p>Need to:</p> <ul style="list-style-type: none"> • better explain policy developments as they are open to discussion / consideration; • instruct and inform as a preliminary to meaningful consultation response; • aim positively to go out to local people rather than the public notice/PC letter approach. 	<ul style="list-style-type: none"> • Opportunities will be taken to improve explanation wherever possible. • 3rd bullet in para 1.4 amended. • 4th bullet in para 1.4 amended to “positively seek opportunities”; changes in Table 1.
	Peak Park Parishes Forum is not a substitute for proper engagement, but could be used more effectively eg annual Parish Councils Day.	NPA values improved involvement with PPPF and individual Parish Councils.

<p>Taddington & Priestcliffe Parish Council (cont.)</p>	<p>Table 1 (numbering would be helpful):</p> <ul style="list-style-type: none"> • greater willingness to make paper copies freely available on request – too long and complex to read on screen. • media: take care to highlight issues that affect local people; • little attempt in later stages of CS to actively engage, only post/email; • officers should actively seek to go out to communities as well as being available at Aldern House, not just by request; • CS was not discussed at 2009 or 2010 annual PCs Day; consider additional parishes days for important issues; • if Parklife is to be effective as a tool for policy preparation, needs to spell out issues and consequences more clearly. 	<ul style="list-style-type: none"> • Large number of PCs means expensive to send all free copies. NPA make minimum reasonable charge for photocopies. • Consider more targeted media but resource issue. • Early stages are more crucial, so 12 wk consultation period proposed. Final stage is a more formal consultation. • Several public meetings arranged around NP, but resource issue and large area to cover with small team. Cannot cover all Parishes. • Annual meeting date may not coincide with appropriate stage in plan preparation. Will use whenever possible. • Will consider fuller use; again timing issue.
	<p>Development Control:</p> <ul style="list-style-type: none"> • site visits need to be as open as possible – public (applicant & anyone who has asked to speak at Committee meeting) should be allowed to hear what planning officer is saying. This will ensure process is fair and help restore public confidence in planning process; • public should be able to record proceedings of Committee meetings, provided they are not disrupting/distracting the meeting; • consultations must consistently cover all affected neighbours; • the report recommending planning decision or enforcement action should automatically be forwarded to PCs so that reasoning can be followed. 	<ul style="list-style-type: none"> • Purpose of site visits is to allow members to get a better understanding of the case by viewing the site at first hand. • Local Government Act 1972 does not require NPA to permit the recording of meetings. NPA permits a handwritten record, and will consider requests in advance for recording meetings in the interests of public understanding of decision-making. • Process explained in table para 2.9. • Table 3 indicates copy sent to those who commented.

Taddington & Priestcliffe Parish Council (cont.)	Timing of consultations must consider events eg Christmas period; consider using Parishes Days.	NPA tries to avoid August recess and public holidays. 12 week period allows greater opportunity.
Derbyshire County Council	Existing document needs updating re changes in legislation, circulars, guidance and regulations since 2006.	Amendments incorporated.
	re education: existing SCI policies work well, as does communication and consultation between DCC, DDDC, HPBC & PDNPA.	Comment welcomed. No change.
	DCC happy to discuss implications for minerals and waste planning of Localism Act 'duty to co-operate'. NPA should consider who will be included and how it will work in practice, and who may be involved at different stages of plan preparation.	New para 1.6 added.
	Under Localism Act/draft Neighbourhood Planning Regulations, need to emphasise simplicity. SCI part 2 could be expanded to include roles of the Authority and other consultees in planning applications. Make specific reference to consultation with Highway Authority at pre-application stage. DCC would welcome opportunity to be consulted on major applications, for policy opinion and potential Section 106 implications.	DCC is included in new list at Appendix 3 of consultees who may be relevant for applications.
	DCC would welcome opportunity to be consulted and involved in preparation of any CIL charging schedule being prepared by NPA, to build on excellent joint working to date.	Noted; detail not a matter for SCI.
	DCC as Highway Authority should be consulted as statutory consultee on all applications.	DCC is included in list at Appendix 3 of consultees who may be relevant for applications.
	SCI should consider how NPA will engage 'hard-to-reach' groups, such as using and promoting new communication and engagement methods.	Targeted meetings for hard to reach groups. Wording added to Introduction on involvement and stakeholder engagement.
Staffordshire County Council	With respect to the County Council's role as the Local Education Authority, it is noted that Education is not mentioned in Appendix 1. Education is important and a priority when considering future planning applications and Local Development Frameworks, and should be included in the list. County Councils have the statutory duty to ensure sufficient school places for pupils and should work closely with the NPA when determining planning applications within their boundary.	Appendix 1 amended to include a full list of constituent and adjoining authorities with reference to their responsibility for issues such as education, highways and housing provision.

2. Responses to Draft SCI consultation Feb-Mar 2012

Response from	Summary of comment	How comment was addressed in document
Mrs Jean Howarth	<p>re para 1.4, documents to inform planning process but not subject to public participation (background survey & evidence reports & LDF Annual Monitoring Report):</p> <ul style="list-style-type: none"> • How will these documents be compiled? • Do they take account of background survey and evidence supplied by developers and trade bodies, are they totally independently produced from primary sources by impartial planning officers, or is it to be a mixture of the two? • What topics would they cover? • How is it decided which documents are 'background survey and evidence documents' (not subject to public participation) and which are 'supplementary planning documents' subject to public participation? <p>Fears developers might put forward evidence to inform policy-making which is 'cherry-picked' from a variety of possible evidential sources, yet the public would not be allowed to challenge this. Seeks reassurance or amendment to para 1.4 to allow public scrutiny.</p>	<p>Survey & evidence reports are prepared by NPA or commissioned by NPA and partners to provide background information to assist preparation of policy. AMR provides information on extent to which policies are being achieved and whether review needed. They can cover information from any source that would inform policy preparation. They do not contain policies so they are not offered for public consultation during their preparation, but once published they are publicly available on website. Information in them can be challenged during preparation of policy documents.</p> <p>Documents containing planning policies and guidance are always subject to public consultation during their preparation. LDS indicates other SPD topics to be brought forward. No change needed to SCI.</p>
Winster Parish Council	Parish Council has no comments to make.	No change.
Hope with Aston Parish Council	The 28 day turnaround for planning applications is too short and impossible for Parish Councils to work to.	Statutory requirement is for 21 days for most applications. The Authority gives Town and Parish Councils a longer period, but must strike a reasonable balance between consultation and speed of decision making. No change.
Peak Park Parishes Forum	Para vii refers to 5 yearly reviews of the SCI. It is regretted that the current document pays little obeisance to its predecessor, and fails to show how this earlier policy met its objectives. Without this important information, it is very difficult to assess how the current draft will fare.	SCI is a statement of practice to be followed from adoption until next review. Consultees are invited to help the Authority consider whether the methods are acceptable or can be improved. No change.

	<p>It would have been most helpful if the new draft showed what it was actually changing from its predecessor. Again it is virtually impossible to compare the two versions (a criticism also made of the various versions of the LDF published by the Park), and it is unfortunate that this silo management of information is still being perpetuated. This issue is very important as it is no good coming up with new/amended policies if the public is not fully informed both as to how the previous version has been assessed, and how the results of such assessments are being applied to update the succeeding version.</p>	<p>The consultation letter explained briefly that changes to the SCI aimed to improve the involvement of organisations and individuals in planning processes, and update SCI to take account of legislative and other changes. In particular, periods for consultation on planning policy documents have been extended and improved liaison with Parish Councils and Meetings has been incorporated. In future we will aim to explain key changes at any particular stage of consultation. Add section on leaflets & brochures to Table 1.</p>
	<p>Re para 2.14, it is believed that an explicit statement should be made which allows anybody to record a public meeting for their own use. The Authority needs to learn from the embarrassing experience of an earlier Planning Committee.</p>	<p>Add clarification following para 2.15 that if requested in advance, recording a meeting may be allowed at Chair's discretion.</p>
	<p>Re para 2.16, it is considered that anybody who has been listed to speak at a Planning Committee is given the option to "attend and listen only" at their relevant site meeting to be visited by the Committee. It is well known that inaccurate statements have been made at such site meetings in the past, and the opportunity should be given for spokespeople to rectify these when they speak to the Committee.</p>	<p>Add clarification at para 2.16 that other people may be permitted to attend site inspections at Committee Chair's discretion.</p>
	<p>Overall the draft SCI is considered to be too wordy a document to be most helpful, whilst too much credence is given to political niceties and not enough to reflect other policies of the Park to ensure there is a strong uniformity of address. A comparison with the Lake District NPA SCI (albeit the 2006 adopted policy) shows what can be succinctly incorporated in half the space used by PDNPA – is it too much to ask for this exemplary template to be followed? The reference to the Parish Accord (xii) and Enforcement (2.17) is welcomed but overall the Forum is very disappointed with this draft policy document.</p>	<p>Balance is taken between length/detail of content and accessibility to readers eg larger font size makes document longer but easier to read. Some sections removed or reduced in size to concentrate on issues relevant to involvement.</p>
	<p>Whilst the Forum supports the use of electronic data sharing, it very much regrets that a hard copy of the document was not sent to all parish clerks, not all of whom have computer access. The policy draft is a very complex document to view on-line, and the limited availability of paper sources in</p>	<p>At the last stages on LDF Core Strategy we contacted all parishes asking which ones would be happy to receive documents electronically and which ones needed hard</p>

	public libraries etc does not encourage a wide public reaction. This is an important matter if the Authority is serious about reaching a wider public and it is hoped that future consultations will bear this request in mind.	copies. We updated this list for the SCI, so that for this consultation we sent out 25 hard copies of the SCI to those parishes that had requested this approach. We are happy to send out paper copies on request. No change.
Saddleworth Parish Council	The Parish Council has considered the document, they agreed that it was a well thought out document and that the Parish Council will play its part in the procedures.	Support welcomed. No change.
Kirklees Council	Welcome the acknowledgement of Kirklees as a statutory consultee to be consulted in the course of preparing planning policy documents and on planning applications.	No change.
High Peak Access	Can you confirm about the accessibility of the Policy for members of the public i.e. Disabled People, elderly people, and those who do not have access to a computer? It states that a charge will be made for people requesting a copy, I am not sure if this is legal i.e. Disabled People should not be penalised for requesting literature that is made available to the public, or indeed, if people do not have access to a computer. Please remember that not all people have access to a public library, etc.	The Statement of Community Involvement will be available on request at no charge.
	Page 24. Access and the disabled! What does this mean? If referring to disabled people, please write disabled people and not THE DISABLED, as this is seen as a derogatory term. Please restructure the phrase.	Apologies for any offence caused by choice of words. Sub-heading changed to "Access and disabled people".
Taddington & Priestcliffe Parish Council	A simple factual summary of key changes from previous SCI would have aided response to consultation. SCI should include commitment to summarise and highlight significant changes being proposed by policy reviews and what they are intended to achieve. This should be objective and informative, not in the manner of PR materials/press releases as issued when Core Strategy was published.	The consultation letter explained briefly what changes were proposed in the revised SCI. In future we will aim to explain key changes at any particular stage of consultation. Add section on leaflets & brochures to Table 1.
	No assessment of whether consultation arrangements to date have been successful or otherwise, and measurements for future monitoring or targets are not proposed. Para x suggests certain groups are underrepresented in the process, implying that responses are satisfactory from mainstream groups such as local residents and parish councils. Local people generally do not respond to consultations, or are aware that the process is going on. SCI should include proposals for measuring success of consultation arrangements, and Parish Councils should be consulted on these.	Experience gained from previous consultations leads us to seek better methods (see below re public meetings). SCI is the starting point for methods of consultation which will be evaluated when the document is reviewed. We are always open to considering new styles of consultation. No change to SCI.

<p>Taddington & Priestcliffe Parish Council - continued</p>	<p>Paras i, ix and 1.9 do not recognise importance of local people in plan-making. SCI should recognise that gaining local people's acceptance of NP policy is crucial to a successful sustainability policy. Partners and stakeholders are supported by professional advisers or committed people who analyse policy and prepare submissions, but parish councils, local groups and local people are left behind. SCI should start with a much clearer commitment to engaging with PCs and local people, and take steps to ensure they are fully involved.</p>	<p>It is very difficult to engage with residents over such wide area and with more than 120 parish councils. We have previously tried a spread of public meetings around the NP, but these are not generally successful and can be wasteful of our limited resources. Para 1.9 & Table 1 indicates opportunities to talk and meet under 'availability of officers', 'workshops etc', and 'contact with Parish councils'. We will always meet and talk to people and groups if requested. The word "stakeholders" has been replaced or supplemented by "local community".</p>
	<p>Would be clearer if some material was in appendices rather than text eg Parish Accord and standards for customer service.</p>	<p>Parish Accord is appropriate in main text but Customer Service standards moved to Appendix 4.</p>
	<p>Support the commitment to Plain English, but question whether is being achieved in practice; equally important to explain and present policy in a way that implications are clear</p>	<p>Planning policy documents need careful and precise language. We will aim to provide easy to understand information at early consultation or in leaflets – section added to Table 1.</p>
	<p>Consultation on later stages of Core Strategy was weak, not clear whether proposals in SCI will significantly improve this. Should be a process of discussion and education to aid proper understanding, rather than sending out a document and saying "respond in 8 weeks".</p>	<p>By definition in the Regulations, the final stage is a formal consultation and representation stage. It is important to get people involved early in process, so we now give 12 wks at Issues and Preferred Options, and commit to trying to engage with more people.</p>
	<p>Para 1.9 too woolly eg does 4th bullet mean public meetings? Will Parishes Forum be used better to inform parishes about issues? What does last bullet point mean in practice – how has it been achieved in this consultation?</p>	<p>These are principles – detail is given later in paras 1.11-14 and Table 1. Add to para 1.9 first line "...following these principles:" A summary of responses to consultation on SCI, and how the comments have been addressed by the Authority, will be publicly available on adoption. No change to SCI.</p>

Taddington & Priestcliffe Parish Council - continued	Para 1.11 needs a clearer commitment to trying to involve local people, particularly at preferred options stage. Local people should be included in consultation email/letter if they ask for it.	Individuals can be included on request as stated in 1 st para Appendix 1. Make clearer by amending to add "individuals" to 3 rd sentence para 1.10 re planning policy consultation list. Add "local communities" to para 1.11 2 nd box.
	Table 1 – paper copies should be available free to parish councillors and the public on request. It is wholly unreasonable to expect people to read and respond to lengthy and complex documents, often with cross-references to other documents, on screen or in a public library. Additional cost to Authority will be insignificant and benefits to local people significant.	In view of limited resources, we have asked Parish Councils if they are happy to be consulted by email, and amended our consultation accordingly. We have supplied limited numbers of free copies to PCs on request. No change to SCI.
	Table 2 – Authority should commit to publication of leaflets and brochures for Development Management Policies.	Leaflets and brochures added to Table 1.
	Public should be able to record quietly, and without nuisance, any proceedings of Planning Committee held in public.	Add clarification following para 2.15 that if requested in advance, recording a meeting may be allowed at Chair's discretion.
	Applicant and/or agent and any person who has asked to speak at Planning Committee should be allowed to listen to advice of the planning officer at site meetings, in the interests of openness and accountability.	Add clarification at para 2.16 that other people may be permitted to attend site inspections at Committee Chair's discretion.
	Authority should review what is going wrong with neighbour consultations. In two recent cases neighbours most immediately affected have not been notified and have found out about the application only because they were on the Parish Council.	Code of practice (para 2.9) is always adhered to. Not aware of the problem referred to. No change to SCI.
English Heritage	Look forward to continued consultation on relevant planning policy and planning application matters.	No change.
Beeley Parish Council	If you can keep to this process and especially the timescales, there should be a better planning system, although the 28 days for Parish Council responses could be difficult for those that do not use electronic means.	The Authority gives Town and Parish Councils a longer period than the statutory requirement of 21 days, but must strike a reasonable balance between consultation and speed of decision making. No change.
	Concern that detail on delegated powers is not included, but presume that will be part of the next stage of consultation.	Delegated powers are mentioned in para 2.6 'making a decision' box, and para 2.13. Full detail not appropriate in SCI and is available elsewhere. No change.

The National Trust	Generally, consider that the Draft Revised SCI is well written, provides relevant guidance and advice, and is 'fit for purpose'. We also believe that it has been suitably up-dated from the current SCI having regard to relevant changes since that time.	No change.
	Part One – Planning Policy: overall provides appropriate advice and guidance. As a major landowner, partner and employer, the National Trust wishes to continue to take an active role in future plans for the National Park. Given its interests the Trust considers that it is a “relevant stakeholder” and, as set out at paras 1.10 and 1.11 of the Draft Revised SCI, wishes to be consulted at all stages in the preparation of all DPDs and other planning documents. The Trust is already on the Authority’s consultation database and looks forward to receiving notifications accordingly.	Support welcomed. Desire to be consulted on all planning policy documents noted. No change to SCI.
	The approach set out in Table 1 on methods of engagement is appropriate, proportionate and supported. Since increasingly greater reliance is placed upon web sites for the availability of information, especially consultation documents and related evidence, current consultation documents must be readily accessible from the ‘home page’, as opposed to being buried many pages into a site as happens with some local planning authorities.	Support welcomed. Authority will continue to use ‘Consultation’ links from home page for all future planning policy document consultations. No change.
	Part Two – Planning Applications: approach to development management processes and notification is noted and generally supported. Trust is keen to ensure that it is advised of relevant development proposals that might impact upon its portfolio of property interests, a large proportion of interests relate to land rather than buildings. Concerned that notification of applications (para 2.9) is directed in the main at owners of nearby buildings rather than, say, owners of adjoining land. Would be interested in exploring if there are other ways of addressing the question of notifications where its interests may be affected, e.g. by providing up to date plans showing extent of Trust ownership, in GIS formats giving the potential for automatic e-mail notifications to be issued when relevant new applications are registered.	As a general principle the Authority does not notify landowners since information is not generally available. Difficult to justify making an exclusive arrangement for National Trust. No change.
The Coal Authority	As a specific consultee under the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, The Coal Authority is pleased to note that it is listed within Appendix 1. Look forward to receiving emerging planning policy related documents, preferably in an electronic format.	Consultation database includes Coal Authority generic email address for all future consultations. No change.

Natural England	Can see nothing within the document that is likely to affect any of Natural England's concerns and therefore make a return of 'no comment'.	No change.
Youlgrave Parish Council	<ul style="list-style-type: none"> • para vi - Would be useful to know whether new version is any different to 2006 version, what has been updated or improved. • para ix - Stakeholders = real people, so why not call them that? • para x - what is meant by "sectors of the community who are under-represented in the planning process"? Local communities per se have not been properly engaged in the planning process until now, certainly not parish councils who until recently were paid lip service by planners. • 	<ul style="list-style-type: none"> • Consultation letter explained briefly that changes to SCI aimed to improve the involvement of organisations and individuals in planning processes, and update the previous document to take account of legislative and other changes, including extending the periods for consultation on planning policy documents and improving liaison with Parish Councils and Meetings. Previous version of the SCI is available on the website. • The word "stakeholders" has been replaced or supplemented by "local community". • Authority is keen to improve engagement and will respond to all requests from Parish Councils and communities.
	<p>paras xii and 2.6 – Parish Council is frustrated that its formal comments on planning consultations do not seem to be taken into account in any clear and evident way. Despite letter to parishes Dec 2011 re improving customer service and communication, have not detected any significant change in how Planning Service deals with us – one of the NP's larger and busier villages. Hear too many examples from local residents of inconsistent advice and seemingly irrational decisions, and see little evidence that PC contributions count for anything or are even considered in decision making process. Still a feeling among too many in community that Planning Service arbitrarily refuses perfectly reasonable applications; junior officers in particular take a high handed approach with residents; internal decision making is not transparent enough; and it does not have best interests of residents at heart.</p>	<p>The Parish Accord (para xii) sets out Authority commitment to informing and working with Parish Councils. Planning Officer's report is sent with decision notice when decisions are contrary to PC recommendations. Authority will continue to seek to improve its relationship with Town and Parish Councils. No change to SCI.</p>

<p>Youlgrave Parish Council - continued</p>	<p>Does the document need to be so long? Sections on preparation of planning documents in particular are lengthy, repetitive and include too many tables. Comes across as a dry, bureaucratic paper that few parish councillors will relish reading, let alone ordinary residents. May be worthy sentiments but do not come across with much warmth or conviction, and will be judged by communities on what happens on the ground.</p>	<p>Table 2 reduced in size. Various other sentences /paras deleted to concentrate on relevance to community involvement. SCI is a formal statement of processes which will be followed.</p>
<p>Derbyshire County Council</p>	<p>Major omission is lack of reference to neighbourhood planning under Localism Act 2011. Suggest SCI will need to set out the process of neighbourhood planning and how people might be engaged in it, including 'community right to build'. Should indicate how parish/town councils or neighbourhood forums can put forward neighbourhood development orders to secure planning permission for developments they support, and will need to show how local neighbourhood plans relate to the Authority's Plan.</p>	<p>Amend para 1.7 to include brief description of neighbourhood planning process and the role of Parish Councils or community bodies and the National Park Authority.</p>
<p>para 1.4 - under Localism Act is no longer a duty to produce 'annual' Monitoring Report, but rather to "prepare reports containing..." If NPA intends to produce an 'annual' report, this distinction should be made clear. Local Planning Regulations 2012 also say that "A local planning authority must make any up-to-date information, which they have collected for monitoring purposes, available in accordance with regulation 35 as soon as possible after the information becomes available." This, and the means by which it will be done, should be added to text.</p>	<p>The Authority has decided to produce an annual Monitoring Report, but this does not relate to the former requirement. Replace "LDF" with "planning policy". Add comment in para 1.4 that documents in both bullets will be available on the website.</p>	
<p>para 1.11 - Section on plan-making process is helpful, but text on 'public examination' and 'adoption', and the following process diagram, may be incorrect. There is confusion over binding nature of Inspector's reports, and a possible drafting error in the Localism Act 2011 relating to the test of soundness. Suggest check legal position with Planning Inspectorate and amend document accordingly.</p>	<p>Delete "...which will be binding upon the Authority" in 'Public Examination' box para 1.11, and "binding" in penultimate box para 1.12.</p>	
<p>Appendix 1, Constituent & adjoining local authorities - add "and transport" after "highways", to reflect fact that County Council is the transport authority with responsibility for public transport covering the NP.</p>	<p>Amend to read "highways and transport".</p>	
<p>para 2.18: Would be helpful if could explain that sometimes other parties eg the County Council may need to be signatories to planning obligations and/or recipients of funding, and will therefore need to be involved in the process.</p>	<p>SCI is intended to explain public involvement rather than describe technical process. Separate discussions are taking place with DCC on s.106 protocol. No change to SCI.</p>	

	<p>Table 3, Pre-application, "Who is involved and how?" - would be helpful to have more explicit reference to County Council involvement in applications as set out in forthcoming Derbyshire Developer Contributions Protocol. Suggest replace sentence "Authority encourages involvement..." by "The PDNPA will ensure interested parties, including Derbyshire County Council and other relevant infrastructure providers, are invited to participate in discussions with the developer/agent in line with the Derbyshire Developer Contributions Protocol."</p>	<p>Add to Table 3, pre-application: "Statutory agencies and constituent authorities will be involved where appropriate."</p>
--	---	--