

Appendix 3: Schedule of Comments Received on the Consultation Draft Statement of Community Involvement 2023 and the Council's Response

Ref No:	Organisation	Document Section/ Paragraph	Comment	Change Request	Council Response
2023_SCI3	Cllr Bill Armer	2.38	There is a lack of clarity in the documentation, at para 2.38. This para refers to "more than 50% of voters", which could reasonably relate to either "50% of those registered to vote", or the very different "50% of those who do vote".	May I suggest that the precedent set in the final box of Table 3 is instead adopted - "a majority of [those] who vote"?	Agree. <u>Proposed change</u> Amend paragraph 2.38 to: “...The plan is made, and forms part of the DPD, within 8 weeks if more than 50% of <u>those who vote</u> voters <u>in support of</u> the Neighbourhood Plan.”
2023_SCI4	Barnsley MBC	Consultation Draft Statement of Community Involvement 2023	Thank you for consulting Barnsley MBC on Kirklees Council’s draft statement of community involvement. Whilst we welcome the consultation, we have no specific comments to make at this time.		Comment acknowledged, no change.
2023_SCI5	Natural England	Consultation Draft Statement of Community Involvement 2023	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. 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:		Comment acknowledged, no change.

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			https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice		
2023_SCI6	East Bierley Village Preservation Society	Consultation Draft Statement of Community Involvement 2023	<p>I have read the above statement and registered as an Agent for the East Bierley Village Preservation Society through the link in the paper. The Society is a voluntary organisation (formed in the early 1970's) with the following objectives set out in its Constitution:</p> <ul style="list-style-type: none"> • To preserve and improve the village of East Bierley. • To maintain the green belt area around the village. ensuring the continuance of the village identity • To create and maintain a representative committee of villagers to uphold objectives 1 & 2. <p>The Society, since its formation, has monitored planning applications, footpaths, the state of roads and publicly accessed areas in East Bierley. It has gained the accolade of Best Kept Village in 1994 and, since 2020 has been successfully awarded the nationally recognised Green Flag Award.</p> <p>We recognise the Council's aims to increase public awareness and to allow local organisations to help shape development plans and we are, obviously, interested, not just in East Bierley, but in any development that may impact upon the village.</p> <p>Unfortunately, I found some difficulty in understanding how you would communicate the relevant stages of the plan. I have registered as an Agent and I would be grateful if you could confirm that I will automatically be advised if information becomes available via your website?</p>		<p>To clarify, all individuals/organisations recorded on the planning consultation portal will be notified by their chosen method of contact (e-mail or letter) at key stages of the plan preparation. Details on how to register to be contacted as a consultee or agent are outlined at paragraph 1.13.</p> <p>Details on additional methods of raising awareness of consultation are outlined at paragraph 2.16.</p> <p>No change proposed.</p>

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2023_SCI7	Private Individual	Consultation Draft Statement of Community Involvement 2023	<p>I have browsed the Statement of Community Involvement (SCI) and strongly support the policy in principle. Seeing is believing.</p> <p>I have for over 40 years generally found the Council to be exclusive and inward looking, with a few exceptions, noting that the Biodiversity net gain guidance may have been influenced by dialogue with an officer and a councillor, but noting the huge resistance by KC to protecting mature trees in policy and their own developments, especially road schemes and town centre regeneration. I note the 3+ years to draft a Climate Emergency Action Plan (Community initiative) and long term failure to address environmental issues in relation to Syngenta when these raised by myself and others over 40+ years, several of these die quite young from rare conditions likely associated with emissions from the plant. I find these examples contrary to the policy and look forward to a better future of meaningful engagement.</p>		<p>Comment acknowledged, no change.</p> <p>Future planning policy consultations will be assessed against the council's Inclusive Community Framework set out at paragraph 2.3 of the Consultation Draft SCI in addition to the principles set out in the revised SCI.</p>
2023_SCI8	Private Individual	Consultation Draft Statement of Community Involvement 2023	<p>1. The paper comprehensively analyses the various methods of consultation currently in use. However, it is worth noting the different impact that passive methods - such as advertising on site and Kirklees Newsletters - compared to active forms of consultation such as workshops and discussion groups. For example, people's reactions to information and published news is mostly unrecorded and thus not measurable. For presentations and workshops etc, the presenter/facilitator and the articulacy of the audience are highly variable thus producing a biased result.</p>		<p>Point 1: Each consultation will use a variety of different consultation methods.</p> <p>Point 2: The move to more digital communications within Planning is a part of the Planning Reforms that have been introduced by the Levelling Up and Regeneration Act, so therefore the requirement is set out in legislation. However, Kirklees Council understands the need for a balance approached, and therefore sets out in the document a range of alternative consultation methods. The use of social media will largely focus on being a mechanism to raise awareness of consultation and signpost to the details of the consultation.</p>

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			<ol style="list-style-type: none"> <li data-bbox="566 347 1229 443">2. Using social media as a method of consultation is, I suggest, inappropriate. It is not the media for complex issues nor for considered opinions. <li data-bbox="566 481 1229 609">3. Involving local interest groups in the consultation process can be useful. However, given the stated interest of these groups, all such responses need to be suitably weighted. <li data-bbox="566 647 1229 775">4. The use of exhibitions and displays gives the impression of decisions already made and, if responses are invited, they are usually either/or views on simplified aspects. <li data-bbox="566 813 1229 973">5. I wonder if our Local Councillors could be more active in the consultation process. It would be an excellent opportunity for them to familiarise themselves with their constituents as well as ensuring that they are up to date with strategic options. <li data-bbox="566 1011 1229 1171">6. Any energy expended on all forms of consultation needs to be supplemented by detailed analysis of the results and wide publication of the results. This part of the exercise needs not to be face-saving, but a genuine reflection on plans. <li data-bbox="566 1209 1229 1369">7. While tempting, the use of referenda should be avoided. Issues are far too varied and complex to be reduced to one single aspect for people to vote on. This means of 'consultation' only works for precise single issues. 		<p data-bbox="1453 331 2210 459">Point 3: In undertaking consultation, the council will seek to ensure that the methods chosen to allow for representative consultation and all comments received will have equal weight in the assessment of comments.</p> <p data-bbox="1453 481 2210 513">Point 4: Comment acknowledged.</p> <p data-bbox="1453 536 2210 695">Point 5: in the development of planning policy documents, members are involved in the process and briefed on documents particularly where documents affect their area of interest. Involving local councillors is considered an important part of the consultation process.</p> <p data-bbox="1453 718 2210 906">Point 6: All comments made on the SCI, and other planning documents, are considered and responded to, and if necessary, amendments will be made to the document as part of the consultation process. All comments, and the council's response and/or amendments, will be publicly available in the Consultation Statement which is a statutory requirement.</p> <p data-bbox="1453 928 2210 986">Point 7: Referendums are only used in Neighbourhood Planning, as per the Neighbourhood Planning regulations.</p> <p data-bbox="1453 1008 2210 1264">Point 8: Agree that early engagement is critical to the development of planning policy documents. In many cases, this is a statutory requirement which is set out in 2.2. Planning reforms are seeking to introduce further early engagement. Early engagement is referenced at 2.25 and 2.45. The use of the council's Inclusive Community Framework referenced at 2.3 is another mechanism for developing robust and effective early engagement.</p>

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			8. I suggest that the 'early engagement' part of the process is critical. Identifying key issues will focus attention on the planning objective and, make more efficient the work of Council Officers in developing the plan. This is where the iterative and active consultation energies are most effectively involved.		
2023_SCI9	Shared Agenda (On behalf of Kirklees Health & Care Partnership)	Consultation Draft Statement of Community Involvement 2023	Thank you for consulting Kirklees Health & Care Partnership on Kirklees Council's draft statement of community involvement. Whilst we welcome the consultation, we have no specific comments to make at this time.		Comment acknowledged, no change.
2023_SCI11	Historic England	Consultation Draft Statement of Community Involvement 2023	Thank you for consulting Historic England on the draft Statement of Community Involvement. On this occasion we have no comments to make on the content of the document.		Comment acknowledged, no change.
2023_SCI12	Environment Agency	Consultation Draft Statement of Community Involvement 2023	Environment Agency position We have no significant comments to make on the consultation draft document. Soundness A minor observation we would like to underline is related to the use of the term <i>soundness</i> . The use of jargon, without adequate explanation, may present an unintended obstacle to greater inclusivity. Indeed, the Council's community framework and place standard engagements signal a desire to remove unnecessary		Comment acknowledged: The glossary of the Draft Statement of Community Involvement contains the definition for 'Tests of Soundness', and also cross references where the tests of soundness can be found. However, for clarity, a footnote to the definition of soundness will be inserted at Paragraph 2.47. <u>Proposed change</u> <i><u>"Footnote 2: Test of soundness include whether the plan is positively prepared, justified, effective and consistent with national</u></i>

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			<p>barriers. You may wish to consider adding at all consultation set stages, a simple and consistent outline of the main tests of soundness. This might better help many consultees with their individual understanding of the wider aims that underpin the development of planning policy documents.</p> <p>As a statutory consultee for both planning policy and planning applications.</p>		<u>policy (National Planning Policy Framework paragraphs 35 & 36 – December 2023 revision)."</u>
2023_SCI13	The Coal Authority	Consultation Draft Statement of Community Involvement 2023	It is noted that this current consultation relates to a Statement of Community Involvement and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this document.		Comment acknowledged, no change.
2023_SCI14	Private Individual	Consultation Draft Statement of Community Involvement 2023	<p>I know that this consultation is a requirement for the Local Plan review; but feel that Kirklees has used it as a tick box exercise. I respectfully submit that no matter how many responses you receive, there will be no amendments whatsoever.</p> <p>All aspects have been covered, though at the end of the day there appears to be no commitment to do anything.</p> <p>Many people do not have access to the internet and should be given the opportunity to see hard copy in all the public buildings in Kirklees, not selected ones as arranged.</p> <p>Even those of us who are relatively computer literate have had difficulty with responding; so how can people less savvy take action?</p>		<p>All comments made on the SCI, and other planning documents, are considered and responded to, and if necessary, amendments will be made to the document as part of the consultation process. All comments, and the council's response and/or amendments, will be publicly available in the Consultation Statement.</p> <p>Proposed Change</p> <p>Amend paragraph 2.14 to:</p> <p>"However, to ensure all members of communities can access consultations, hard copies of documents will be made available at Huddersfield Civic Centre 3, Dewsbury Service Centre and other public buildings <u>customer service centres, and other deposit locations, as defined by the Local Plan regulations¹</u>, subject to the nature and scope of the consultation. We may publicise the</p>

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			<p>Consultations should be just that... Face to face opportunities by Kirklees residents to have their say; and be listened to in the true spirit of community involvement.</p>		<p>availability of documents using posters in local information centres/libraries. <i>Furthermore, hard copies of the consultation documents are available on request.</i></p> <p><i>Footnote 1: Regulation 35(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</i></p> <p>Amend penultimate bullet point of 'Our Principles' to:</p> <p>"Prepare questionnaires and leaflets which summarise the key issues to be addressed or seek views on specific questions. They could also be used to direct interested parties to more detailed documents, evidence, or details of events. The questionnaires and leaflets will be available to view online or paper copies will be made available at Huddersfield Civic Centre 3 and Dewsbury Service Centre <i>customer service centres, and</i> where practicable in other locations in the area where there is a high turnover of visitors. These locations may vary according to the nature and scope of the consultation and will be advertised on the council's website."</p>
2023_SCI15	Private Individual	Consultation Draft Statement of Community Involvement 2023	<p>I request that the Open Spaces Society (OSS) are recognised as Statutory Consultees. The OSS is Britain's oldest national conservation body, founded in 1865. We campaign for stronger protection and opportunities for everyone to enjoy commons, greens, and paths. We defend open spaces against loss and pressures from development.</p> <p>The local plan and neighbourhood plans should have appropriate policies to ensure any associated future development recognises and allows for the protection</p>		<p>Statutory consultees are set out in National Planning Policy Guidance; therefore, Kirklees Council is not able to recognise the Open Spaces Society as a Statutory Consultee. However, creating a consultation account for the Open Space Society on our Objective database would enable the Open Space Society to be notified when planning documents are being consulted on. The link to this is: Kirklees Council Planning Consultations - Keystone</p> <p>Further comments relating to common land and public rights of way are outside the remit of the SCI.</p>

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			<p>offered to Commons, Greens, and Public Rights of Way (PROW) by legislation.</p> <p>Time must be allowed in planning to ensure prescribed processes are fully implemented. Even the smallest amount of encroachment on Common Land requires the Secretary of State's consent under the Commons Act 2006 and in some cases replacement land to be offered in return.</p> <p>In relation to Common Land owned by Kirklees and any plans to dispose of such land, I have previously requested assurance from Kirklees that, if it does dispose of Common Land, Kirklees agrees to ensure that no development of the land takes place without consent under s.38 of the Commons Act 2006 and that in the absence of consent, confirmation that Kirklees will take enforcement action, resorting to s.41 of the Act if necessary.</p> <p>Similarly, and further to NPPF 2023, Para 104, Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.</p> <p>Again, I have previously asked Kirklees that time is allowed in planning to ensure compliance with the Path Order Processes and other matters as set out in Defra's Rights of Way Circular 1/09. It is not acceptable to allow works affecting PROW under Emergency Procedures when such work can be planned accordingly.</p>		<p>The Local Plan update will reconsider the spatial strategy for the district based on updated evidence including housing and employment demand. The Local Plan will be subject to consultation at key stages as the plan development progresses.</p> <p>No change.</p>

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			<p>Regarding matters affecting Greenbelt, the OSS would normally only become involved where public access and enjoyment are affected. This may include a view from public-access land and/or public paths.</p> <p>However, it is noted that the new wording, updating the NPPF, 2023, clarifies that there is no need to review the Green Belt when updating local plans. The previous wording only provided that the Green Belt could be altered if there were exceptional circumstances, which according to the consultation response did not provide the required level of clarity of the policy intent.</p> <p><i>“145. Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified,”</i></p> <p>It is also noted that case law has confirmed that housing need is not, of itself, an adequate reason to amend Greenbelt boundaries. For this to happen Kirklees would have to demonstrate that it has examined all other reasonable options for meeting its identified need for development. Kirklees Councillors have argued not all the 31,000 homes indicated in the current local plan are needed. Referring to slower than predicted growth with only 900 new homes needed each year. I request that the revised Local and Neighbourhood plans take account of this. If this is the case, it would seem that there should be no need to amend Greenbelt boundaries in the upcoming Local or Neighbourhood Plans.</p>		

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2023_SCI16	Private Individual	Consultation Draft Statement of Community Involvement 2023	<p>Introduction:</p> <p>The objectives in this document are laudable and well laid out but to be achievable it will be necessary to modify some of the strategies to do so.</p> <p>Working towards a consensus (para.1.5) is of course desirable in order to avoid delay at a later stage, but this can only be done by proper collaboration with local communities. In my view, failure to do so will inevitably result in a “publish and defend” scenario that benefits and pleases no-one and wastes time and effort. It is worth investing in time at the beginning of the process to avoid this and ultimately streamline the whole process.</p> <p>How to achieve this?</p> <ol style="list-style-type: none"> 1. Having more face-to-face collaborative engagement early in the process will build trust and relationships, which would be more useful and constructive rather than adversarial and frustrating. 2. Over reliance on digital communication is undesirable and not inclusive. Indeed, even making comments on this draft document one had to register to get the information! Those who haven’t registered on-line will not be fully aware of what is going on so: 3. Hard copies of documents (para 2.15) should be available in all areas of Kirklees and that in itself publicised. The document is a bit “woolly”. Change “we may publicise” to the affirmative “we will publicise”. What is the point of it otherwise? It makes the statement too vague. 		<p>Point 1: Comment acknowledged. Early engagement is an integral part of the statutory process for the Local Plan.</p> <p>Point 2: The move to more digital communications within Plan Making is a part of the Planning Reforms Consultation (July-October 2023) and an area that the government wishes to develop as part of the plan making process. However, Kirklees Council understands the need for a balance approach, and therefore sets out in the document a range of consultation methods which can be used alongside digital.</p> <p>Point 3: The Town and Country Planning (Local Planning) (England) Regulations 2012 section 35 states the availability of documents is taken to be made available by a local planning authority when – a) made available for inspection, at the principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and b) published on the local planning authority’s website.</p> <p>To ensure the efficient and effective use of resources, it is considered appropriate to assess the availability of hard copies in relation to the nature and scope of the issue to be consulted on. For example, consultation on a specific neighbourhood plan area may not be relevant for a district-wide coverage of information. It is therefore, considered that “may” is appropriate rather than “will” to allow the flexibility to consider the most appropriate method of document distribution. Statutory notices produced to publicise the Local Plan/Supplementary Planning Documents contain information on the locations where hard copies can be accessed.</p> <p><u>Proposed Change</u></p> <p>A Proposed Change has been made to paragraph 2.14 in relation to the response to 2023_SCI14 which reads as follows:</p>

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			<p>4. Again, on Table, Page 9. Header of first column should read in the affirmative again. “we may” should be changed to “we will”. Especially in light of the “pros” comment on interactive workshops. However, I was not aware of these activities, which is a surprise.</p> <p>In Summary:</p> <p>To avoid a “publish and defend” situation, which seemed to be the case with the existing 2019 LP, the aim to be more collaborative is a good one. As we know from that Local Plan process the lack of this was an issue and was criticised. In any workshop scenario it will however be necessary to hear, but more importantly listen to the views of the communities you serve, not to just use it as a tick box exercise. In this way not only will you probably produce a better plan but one more acceptable to both the communities and to the Inspectorate.</p>		<p>“However, to ensure all members of communities can access consultations, hard copies of documents will be made available at Huddersfield Civic Centre 3, Dewsbury Service Centre and other public buildings <u>customer service centres, and other deposit locations, as defined by the Local Plan regulations¹</u>, subject to the nature and scope of the consultation. We may publicise the availability of documents using posters in local information centres/libraries. <u>Furthermore, hard copies of the consultation documents are available on request.</u>”</p> <p><u>Footnote 1: Regulation 35(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</u></p> <p>Amend penultimate bullet point of ‘Our Principles’ to:</p> <p>“Prepare questionnaires and leaflets which summarise the key issues to be addressed or seek views on specific questions. They could also be used to direct interested parties to more detailed documents, evidence, or details of events. The questionnaires and leaflets will be available to view online or paper copies will be made available at Huddersfield Civic Centre 3 and Dewsbury Service Centre <u>customer service centres, and</u> where practicable in other locations in the area where there is a high turnover of visitors. These locations may vary according to the nature and scope of the consultation and will be advertised on the council’s website.”</p> <p>Point 4: This table highlights a range of consultations methods, however, not all consultations will require each method, therefore some methods will not be used at times. It is therefore, considered</p>

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					that “may” reflects the ability to assess the most appropriate measures for the nature and scope of the consultation.
2023_SCI17	Private Individual	Consultation Draft Statement of Community Involvement 2023	Thank you for the opportunity to comment on the SCI. It is a very comprehensive document that covers many aspects of consultation. One aspect that I note is covered but I feel needs more emphasis is the issue around what aspects of any consultation that respondents can influence. In terms of the local plan, I recall a lot of effort being applied by local communities to try and influence outcomes and issues that statutorily they could not. If this had been made clear from the outset this would have reduced community frustration with the process and the community effort would not have been in vain nor wasted.		Agree that greater clarity in the nature and scope of consultation from the outset has the potential to deliver better outputs. All comments made on the SCI, and other planning documents, are considered and responded to, and if necessary, amendments will be made to the document as part of the consultation process. All comments, and the council’s response and/or amendments, will be publicly available in the Consultation Statement. No change.
2023_SCI18	Upper Dearne Valley Environmental Trust (UDVET)	Consultation Draft Statement of Community Involvement 2023	<p>Firstly, we would like to thank you for the opportunity to comment on the above at this stage in its development.</p> <p>We firmly believe a sincere and well-developed public communication strategy is essential if the new Local Plan is to achieve high levels of acceptance and buy-in from local communities. This is not easy, but if good sized, representative samples of both groups and individuals are genuinely engaged, re-engaged and listened to by the Policy Team, a valid, successful and achievable Local Plan is more likely to emerge.</p> <p>With reference to the contents of the current document, we would like to make some constructive comments which, we believe, could improve it considerably.</p>		<p>Support for a well-developed public communication strategy to support the Local Plan is acknowledged.</p> <p>Bullet Point 1: The production of a ‘Statement of Comment Involvement’ is a government requirement introduced by S.18 of the ‘Planning and Compulsory Purchase Act 2004’, and Section 10A (b) Town and Country Planning (Local Planning) (England) Regulations 2012 refer to this document as a Statement of Community Involvement.</p> <p>Bullet Point 2: Paragraph 2.13 states that all consultation, engagement and feedback documents will be placed on the council’s website, and other forms of social media. This is the fastest, most efficient, and cost-effective way of consulting. As part of the process of contacting consultees, details of how to access consultation will be provided and updates provided on feedback. The council also has a requirement to produce</p>

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			<ol style="list-style-type: none"> 1. Firstly, we believe this particular document, for the sake of plain English, should be called a 'Public Consultation Strategy' – that is what it is. 'Statement of Community Involvement' implies a summary report of all the actual consultation activities that have taken place over the Local Plan development period – a document which describes what was done, when, where and the levels of engagement (numbers of participants) achieved. The latter should also contain links/references to actual, detailed Consultation Reports of each activity undertaken and changes subsequently made. This collection of documents would then serve as a comprehensive set of evidence for the Planning Inspector/Local Plan Hearing. 2. Para 2.46 - All Feedback/Consultation Reports should be automatically sent to all registered Consultees as well as generally advertised via a variety of media. 3. Overall, this document needs to be more definitive and detail a variety of specific consultation strategies and when and where they will be used. At present, it is very non-committal and simply reflects the rather 'arm's length approaches' adopted in 2015/2016 which were severely criticised by both members of the public and Councillors alike and which only just scraped through the Stage 1 LP Hearing. Given the new emphasis on public engagement in enacted/shortly to be enacted planning law, there is scope to improve on past practices and commit to a range of specific public engagement strategies now. 		<p>consultation statements that demonstrate the comments received and how they have been considered as part of the shaping and development of documents.</p> <p>Bullet Point 3: The SCI covers how the different planning documents (i.e., The Local Plan, Supplementary Plans, and Neighbourhood Plans etc) will be consulted on. It covers a range of methods, with different approaches being more appropriate for different documents.</p> <p>Bullet Point 4: As mentioned above, not every consultation method is appropriate for every document, therefore, not every method will be used for each consultation. The use of "may" allows flexibility to consider the most appropriate consultation methods for the specific consultation exercises relating to the nature and scope of the document.</p> <p>Bullet Point 5: Paragraph 2.7 seeks to cover all the relevant groups that would need to be consulted across all the different planning documents to accord with relevant statutory requirements. The list has been informed by the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended and the Neighbourhood Planning (General) Regulations 2012.</p> <p>Bullet Point 6: The opportunities for ward-based working will be considered as part of the council's detailed early engagement. Opportunities for workshops, discussion groups are currently referenced within the SCI following 2.19.</p> <p>Bullet Point 7: Comment acknowledged. Face to face meetings and opportunities for groups to meet with the Policy team as part of the production of the Local Plan. Opportunities for workshops, discussion groups are referenced within the SCI following 2.19.</p> <p>Bullet Point 8: See proposed amendments below. All planning documents during a public consultation are made available upon</p>

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			<p>4. Subsequently, this document needs to talk about ‘we will’ NOT ‘we may’ in regard to ‘Methods’ in Paras 2.18/2.19. Too much is undecided and being left to chance.</p> <p>5. Para 2.7: A Local Plan affects everyone throughout from strategy, policies as well a local allocation matters. Therefore, all LP documents should be made available to all groups/residents, not just the areas chosen by the Policy Team.</p> <p>6. Local groups/people should be directly involved in collaborative working with Policy Team members now via Ward-based working groups/focus group meetings. Local people in each Ward need to be involved from the start.</p> <p>7. Following on from the above, there is an over-emphasis and reliance on ‘publish and defend’ methods of consultation. These, on their own, are notoriously bad practice as the team developing a document have already achieved ‘buy in’ to their work and are less likely to make changes in the face of public criticism or calls for change. A greater transparent commitment to a variety of methodologies, including face to face meetings would vastly improve this document.</p> <p>8. Intended practice must match the ‘Principles’ outlined in Para 2.17. The latter set out the ‘golden threads’ for the detailed content later in the document and must obviously match to give the document greater integrity. An obvious current mismatch at present is</p>		<p>request. This can be done via email, telephone, and mail, where the council can mail the documents to those who request them.</p> <p><u>Proposed Change</u></p> <p>“However, to ensure all members of communities can access consultations, hard copies of documents will be made available at Huddersfield Civic Centre 3, Dewsbury Service Centre and other public buildings <u>customer service centres, and other deposit locations, as defined by the Local Plan regulations¹</u>, subject to the nature and scope of the consultation. We may publicise the availability of documents using posters in local information centres/libraries. <u>Furthermore, hard copies of the consultation documents are available on request.</u>”</p> <p><u>Footnote 1: Regulation 35(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</u></p> <p>Amend penultimate bullet point of ‘Our Principles’ to:</p> <p>“Prepare questionnaires and leaflets which summarise the key issues to be addressed or seek views on specific questions. They could also be used to direct interested parties to more detailed documents, evidence, or details of events. The questionnaires and leaflets will be available to view online or paper copies will be made available at Huddersfield Civic Centre 3 and Dewsbury Service Centre <u>customer service centres, and</u> where practicable in other locations in the area where there is a high turnover of visitors. These locations may vary according to the nature and scope of the consultation and will be advertised on the council’s website.”</p> <p><u>Proposed Change</u></p>

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			<p>the stated commitment to ensure rural communities have access to information, but in Para.2.14, the proposal concentrates on providing hard copies in Huddersfield Civic Centre and Dewsbury Service Centre. This is not good enough and does not meet the former undertaking. Hard copies must be available in all public libraries, community centres and local council offices, and particularly in Rural Kirklees. The document should state this definitively now.</p> <p>9. Para 2.12 – Training/Briefing sessions for Councillors need to be put in place on the LP processes, analysis and synthesis of information in order that they can make truly informed decisions and help others in their Wards. The last LP process and associated Hearings were notable for their lack of Councillor involvement.</p> <p>10. Para 2.13 – All registered Consultees must be informed by email when documents are posted on the LP web site. An accurate, easily accessible and up-to-date document library should be set up and maintained at all times.</p> <p>11. Para 2.16 – If respondents use on-line feedback mechanisms, it should be obviously and easily possible for individuals to both ‘print’ and ‘save’ their responses to the LP Policy Team on their own computer. Often with Kirklees web sites, this is not the case – text seems to irretrievably disappear into some ‘back office’ function. There must be very user-friendly systems throughout and versions and dates of documents clearly shown and listed in date order, showing latest version first.</p>		<p>Amend SCI to include a reference after paragraph 3.5, that the SCI will be reviewed subject to future legislation:</p> <p><i><u>“The SCI will be reviewed, and updated if needed, subject to future secondary legislation.”</u></i></p> <p>Bullet Point 9: Briefings with Councillors and officers will take place throughout the plan-making process, where the content of the documents will be explained and discussed if necessary.</p> <p>Bullet Point 10: All registered consultees on our Objective Consultation database are informed when a consultation, relating to a topic they have set as interested in, is being conducted. Everyone is able to sign up to this database. This is outlined in the SCI at paragraph 1.13.</p> <p>Bullet Point 11: Our consultation system allows you to create a PDF of each comment, which would be able to be saved and printed. The consultation system also provides an opportunity for preferred method of consultation which is email or letter.</p> <p>Bullet Point 12: Consultation documents, as well as supporting documents, are uploaded to our consultation website and council website in PDF format.</p> <p>Bullet Point 13: It is acknowledged that Paragraph 150 of the Levelling-up and Regeneration Bill: consultation on the implementation of plan making reforms refers to 8 weeks:</p> <p><i>“150. As set out in, we will be retaining two points of formal consultation within the 30-month plan-making timeframe. We propose to set out in regulations that planning authorities will be required to carry out two rounds of consultation: the first for a minimum of eight weeks after scoping following the first gateway</i></p>

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			<p>12. All documents should be available in PDF format.</p> <p>13. Paras 2.26 and 2.45 may not accord with legislation/new Plan Making rules currently in the course of development at Central Government level e.g. there currently appears to be an initial 8 week consultation period in Plan Making proposals.</p> <p>14. Given our comments above, the Table in Para 2.45 omits columns detailed who will be involved and how (the methodology).</p> <p>15. Para 2.46 - We certainly agree with plans for an ‘audit trail’ of changes, but these must be easy to follow from one document to the next. What’s changed/added could be shown in red in an easily accessible ‘track changes’ version of one version to the next as well as summarised in individual Consultation Reports mentioned in the first bullet point above.</p>		<p><i>assessment; and the second for a minimum of six weeks shortly before the final gateway assessment, prior to submission of the plan for examination. This is longer than the current statutory minimum and is in addition to early participation that would be required during the scoping phase”.</i></p> <p>However, the outcomes of the consultation have yet to be published and the consultation draft SCI is based on current statutory prescribed consultation periods.</p> <p>Bullet Point 14: This table gives a brief timeline for all planning documents, and as mentioned above, not every consultation method is appropriate for every document, therefore, not every method will be used for each consultation. In regard to who will be consulted, this is subject to the stage of consultation, or what document is being consulted on. As this is a general timetable for different planning documents, detail on who will be consulted is not included as this is subject to the consultation.</p> <p>Bullet Point 15: Comment acknowledged.</p>
2023_SCI19	Holme Valley Vision	Consultation Draft Statement of Community Involvement 2023	<p>Thank you for the opportunity to comment in the draft statement and for extending the consultation period. However, even with the extra week, the time allowed has made it difficult to consult the community groups and individuals who make up the network. Nevertheless, we would like to make the following points using the Statement of Community Involvement’s headings:</p> <p>Keeping you informed</p> <p>How we will consult and communicate</p>		<p>Responses to ‘Our Principles’ Comments</p> <p>Comments on how user-friendly documents are to read and understand are noted. Some council documents are required to be presented in a prescribed way to demonstrate technical and legal requirements. It is acknowledged that there is a role for summary documents in addition. As part of the development of the previous local plan, summary documents were produced on a number of topics including sustainability appraisal to guide the reader through the process. This will be considered as part of the Local Plan update. Additionally, to support the reader, we will</p>

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			<p>Our principles</p> <p>Generally, the Council expects people to find information on its website and social media pages. Emails are sent to those who have signed up for them, but the onus is initially on the individual to request this.</p> <p>The local press is largely ineffective in the Holme Valley since the loss of the local newspaper. Apart from social media, we recognise how very hard it is now to distribute important messages. To counteract this, we are trying to install a TV screen to inform people and make use of the many less formal channels which let people know what is going on in the Valley.</p> <p>Putting posters and making documents available in central point's requires people to travel to Council premises. Getting around the Holme Valley without a car is not easy.</p> <p>Summary documents and leaflets will be essential. Most of the previous Local Plan documents were highly detailed, written in a bureaucratic fashion, with essential information buried by jargon. We understand the need for formality but there are ways of making critically important documents more accessible. We note you mention the importance of using plain English but do not see much evidence of this approach being used in many of the Council's documents. For example, the draft Statement of Community Involvement has a reading ease score of 34.9 and a reading level of 12.8 and contains 29% of passive sentences A reader requires a degree to be able to understand the document. (16% of this document's sentences are passive. It has a reading ease score of</p>		<p>include a Glossary at the end of our planning documents where appropriate.</p> <p>The council will follow the statutory stages of producing a Local Plan as set out in the regulations and consult at the appropriate times.</p> <p>Alongside the online consultation system, the council also accepts consultation representations made via email and mail.</p> <p>All comments made on the SCI, and other planning documents, are considered and responded to, and if necessary, amendments will be made to the document as part of the consultation process. All comments, and the council's response and/or amendments, will be publicly available in the Consultation Statement.</p> <p>Response to 'Inclusive Community Framework' Comments</p> <p>Comments acknowledged, no change.</p> <p>Response to 'Who will we consult' Comments.</p> <p>This paragraph has been included as different document consultations require consulting different groups of people. For example, for a Neighbourhood Plan consultation, the council would consult residents, businesses, and other stakeholders of the Neighbourhood Area, rather than consult the whole of Kirklees.</p> <p>Response to 'Methods' Comments</p> <p>Comments acknowledged. It is considered that the range of methods outlined and the recognition that digital is only one of a number of methods recognises the methods used must be</p>

Ref No:	Organisation	Document Section/ Paragraph	Comment	Change Request	Council Response
			<p>48.1% and a reading level of 11.2.) While nearly 42% of the Holme Valley South have qualifications of Level 4 and above, over half do not. We refer you to the Plain English Campaign. https://www.plainenglish.co.uk/ and will happily work with you to improve the ways in which you communicate.</p> <p>We urge you to make extra efforts to let people know what is happening at each stage of the process and actively encourage them to express their views. The way land is used, potentially more house building and increased traffic will affect us all and alter our way of life. People deserve the right and opportunity to be involved. The Council acknowledges its legal duty to consult and we expect this to be manifested in action.</p> <p>The use of the online system may make it easy for the Council to process responses, but it does not necessarily make it easy for the public to lodge their views. The system forces people to answer questions they may not recognise. It does not allow for broader or additional comments.</p> <p>We also appreciate your intent to use questionnaires and different ways of exploring specific questions. In the spirit of co-production, we will gladly work with officers to identify the issues that require more detailed exploration in our particular neighbourhoods.</p> <p>There also needs to be other ways of collecting opinions. These will vary according to the nature of a particular neighbourhood. Again, we offer our assistance.</p> <p>Consultation fatigue sets in when the same question is asked repeatedly without any sign of people's opinions</p>		<p>appropriate to the nature and scope of the consultation. No change.</p>

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			<p>being noticed. It is so important to demonstrate publicly where this has happened. We will give credit where it is due.</p> <p>If the Council really wanted to know what local people think it would go to where people normally meet and provide them information in forms, they can process and to which they can respond.</p> <p>The Council could also work in partnership with local groups and make use of their networks to distribute information more widely. This happens occasionally and only because of strong relationships with individual officers.</p> <p>Inclusive Community Framework</p> <p>We welcome this reference and recognise the Framework's providence: i.e. in the work of the Kirklees Democracy Commission and the Place Based Working Group. We strongly support the notion of 'active citizenship' and wholeheartedly agree with the beliefs set out in the Inclusive Community Framework. We have attempted on many occasions to develop a productive relationship with the Council and its officers to enact the principles of 'place-based working' but feel our attempts have been repeatedly rebutted. We therefore have little confidence, given the reduction in resources now available to the Council, there will be any change in the way in which the Council actively involves people in shaping their communities. We will be gladly proven wrong.</p> <p>Who will we consult?</p>		

Ref No:	Organisation	Document Section/ Paragraph	Comment	Change Request	Council Response
			<p>We welcome the commitment to consulting ‘the relevant groups where a proposal will directly affect them’ and would be interested to learn more about how the Council intends to conduct this consultation. We will work with officers to reach these groups and individuals, if allow to do so.</p> <p>Methods</p> <p>The communication methods should suit the people the communicator is trying to reach. Given the disparate nature of Kirklees’ communities and the Council’s commitment to recognising their individuality, it should be obvious a uniform approach to consultation will not be appropriate.</p> <p>Channels of communication that are not dependent on digital literacy must be found if the Council is serious about gathering the opinions of local people on issues as important as the use of land surrounding the places in which they live. About 6% of the population does not have access to the internet and these are often older people, the proportion of whom is higher in the Holme Valley than elsewhere in Kirklees.</p> <p>We reiterate the need to go to where people live, work, visit and meet. We will help the Council identify appropriate methods of reaching people in the Holme Valley.</p> <p>We hope our comments will be received in the spirit in which they have been sent.</p>		

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2023_SCI20	Holme Valley Parish Council	Consultation Draft Statement of Community Involvement 2023	<p>The Draft SCI statement includes the following statements and comments:-</p> <p>“Highlight the Council’s new Inclusive Community Framework”.</p> <p>“Provides an opportunity to help groups and individuals shape development plan, documents including the local plan and make representations on its contents”.</p> <p>“Ensure a transparent process based on consideration of a range of options and local priorities and concerns.”</p> <p>“The council’s Inclusive Community Framework (ICF) is a commitment to work better with communities and guides different parts of the council on how they can improve the way they work with communities. The information in this framework will help us improve how we consult on our planning documents, ensuring that the consultation methods used enable individuals/communities to engage in the planning process.”</p> <p>“Whenever possible, provide feedback to reflect how comments received have been incorporated into the process.”</p> <p><i>“Plans should: ...be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.</i></p> <p>We welcome all of the above and trust that greater use can be made of the resources available in Local organisations such as the Holme Valley Parish Council. We do not seek to impose greater workload on Kirklees</p>		<p>Comments acknowledged. Welcome support for sections and principles of the document as outlined in the Parish Council’s response.</p> <p>In relation to the on-line questionnaires comment, the council welcomes responses via email and mail, as well as the primary consultation comment method.</p> <p><u>Proposed Changes</u></p> <p>Amend paragraph 2.14 to:</p> <p>“However, to ensure all members of communities can access consultations, hard copies of documents will be made available at Huddersfield Civic Centre 3, Dewsbury Service Centre and other public buildings <u>customer service centres, and other deposit locations, as defined by the Local Plan regulations¹</u>, subject to the nature and scope of the consultation. We may publicise the availability of documents using posters in local information centres/libraries. <u>Furthermore, hard copies of the consultation documents are available on request.”</u></p> <p><u>Footnote 1: Regulation 35(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</u></p> <p>Amend penultimate bullet point of ‘Our Principles’ to:</p> <p>“Prepare questionnaires and leaflets which summarise the key issues to be addressed or seek views on specific questions. They could also be used to direct interested parties to more detailed documents, evidence, or details of events. The questionnaires and leaflets will be available to view online or paper copies will be made available at Huddersfield Civic Centre 3 and Dewsbury Service Centre <u>customer service centres, and</u> where practicable in</p>

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			<p>Officers but rather use local resources to assist the various planning processes in place.</p> <p>Positives</p> <p>We welcome the opportunity to comment on the consultation draft.</p> <p>We applaud the aim of helping to “<i>create a sense of ownership on planning issues.</i>” (Section 2.1)</p> <p>We are pleased to note the inclusion of parish / town councils in Section 2.7, as examples of the bodies or individuals whose views will be sought.</p> <p>After a discussion of the increasing use of on-line methods, we welcome the final sentence “<i>However, a balance with more traditional forms of consultation needs to be found to ensure that everyone can be included.</i>”</p> <p>The Holme Valley is the only area in Kirklees with a fully made Neighbourhood Development Plan. This being so, we were particularly pleased to see that, under the <i>Levelling Up and Regeneration Act, 2023</i>, (LURA), NDPs will be given greater weight.</p> <p>Some issues</p> <p>In general, we feel that Kirklees Council could make more use of the wealth of local knowledge. We are keen to help!</p> <p>In Table 1: <i>Methods of consultation</i>, there could be a row for parish / town councils. Working in partnership with</p>		<p>other locations in the area where there is a high turnover of visitors. These locations may vary according to the nature and scope of the consultation and will be advertised on the council’s website.”</p> <p>Amend Table 1 to include a new consultation method with parish / town councils:</p> <table border="1" data-bbox="1469 619 2210 1015"> <thead> <tr> <th data-bbox="1469 619 1608 671">We May:</th> <th data-bbox="1608 619 1794 671">Pros:</th> <th data-bbox="1794 619 1980 671">Cons:</th> <th data-bbox="1980 619 2210 671">Things to Consider</th> </tr> </thead> <tbody> <tr> <td data-bbox="1469 671 1608 1015"><u>“Work with parish / town councils</u></td> <td data-bbox="1608 671 1794 1015"><u>The parish / town councils can help arrange meetings for consultations, which could lead to better community engagement.</u></td> <td data-bbox="1794 671 1980 1015"><u>Not every area has a parish / town council so this could lead to areas being less represented.</u></td> <td data-bbox="1980 671 2210 1015"><u>Communication with parish / town councils would be key for this method to be successful</u></td> </tr> </tbody> </table>	We May:	Pros:	Cons:	Things to Consider	<u>“Work with parish / town councils</u>	<u>The parish / town councils can help arrange meetings for consultations, which could lead to better community engagement.</u>	<u>Not every area has a parish / town council so this could lead to areas being less represented.</u>	<u>Communication with parish / town councils would be key for this method to be successful</u>
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			<p>Kirklees Council, we can support local consultations, arrange meetings etc. (Page 13)</p> <p>Longer should have been allowed for this consultation, as it falls over a holiday period. This seems to contradict the statement, in Section 2.17, that you will avoid consultation over holiday periods and lengthen the time allowed if this is not possible.</p> <p>A standard six week consultation period poses problems for many organisations that meet, at the most, monthly.</p> <p>It is noted that the planned consultation period on the Local Plan is for a minimum of six weeks. We suggest that it should be much longer.</p> <p><i>(Table 2: Stages in local plan.)</i></p> <p>On-line questionnaires / consultations are, obviously, much easier to collate than submitted documents. However on-line consultations are not suitable for responses by organisations. We hope that written responses are welcome, nevertheless.</p> <p>Why is greater use not going to be made of local information centres / libraries? (Section 2.14)</p> <p>We regret that Supplementary Planning Documents (SPDs) are being replaced by Supplementary Plans. We have found the SPDs accessible and helpful, when considering planning applications. (Section 2.29/30)</p>		
2023_SCI21	Cllr Harry McCarthy	Consultation Draft Statement of Community	<p>A few points on the SCI consultation:</p> <p>Inclusion of place standard is very welcome, but it would be good to see a bit more detail on how this would influence planning issues. We have run two place</p>		The detail on how Place Standard information has shaped the production of a document or used as evidence to support objectives/policy approach will be outlined as part of the consultation of the specific document as well as over evidence sources and consultation undertaken relating to the specific topic.

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		Involvement 2023	<p>standard engagements in my ward, and both have created a detailed evidence base of what our residents' priorities are that can be used to inform the local plan and masterplanning exercises, specifically the Marsden Master Plan.</p> <p>I would suggest that for large consultations, for example the local plan consultation, leaflets and questionnaires are left at all Kirklees libraries in the district.</p> <p>It would be positive step if the council took a more pro-active approach in working with local community groups – often these groups have a range of expertise and local knowledge which planners can tap into to improve decision making.</p>		<p>The SCI is about the principles of undertaking consultation and proposed methods. The value of the place standard is set out at 2.5 which refers to evidence to shape documents and opportunities to learn about place-based consultation. 2.17 principles refer to Involve which is a council system that records consultation across the council. By utilising existing consultation where it is relevant to the document, the council can seek to avoid consultation fatigue and avoid unnecessary expenditure consulting on issues where it has already gathered information.</p> <p>For the previous Local Plan consultation, leaflets, questionnaires, and documents were placed in all libraries and packs provided to councillors so that they had the materials to speak to communities. This approach will be considered as part of the development of the Local Plan update and detailed consultation plan produced.</p> <p><u>Proposed Change</u></p> <p>Amend paragraph 2.14 to:</p> <p>“However, to ensure all members of communities can access consultations, hard copies of documents will be made available at Huddersfield Civic Centre 3, Dewsbury Service Centre and other public buildings <i>customer service centres, and other deposit locations, as defined by the Local Plan regulations¹</i>, subject to the nature and scope of the consultation. We may publicise the availability of documents using posters in local information centres/libraries. <i>Furthermore, hard copies of the consultation documents are available on request.</i>”</p>

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