

APPENDIX A

Representations received to the Consultation Draft Statement of Community Involvement 2024, and officer responses

Consultation on the draft Statement of Community Involvement was held between 14 August 2024 and 27 September 2024. The draft document is available at <https://www.bedford.gov.uk/sci>.

30 responses were received. The following provides a summary of each representation received and officer responses, including an outline of any changes proposed to the Statement of Community Involvement.

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
SCI 1 Historic England	Part 1	Welcome acknowledgement of Historic England as a statutory consultee for local plans and as a SEA consultation body. Would also expect to be consulted on relevant SPDs and other planning policy documents.	Noted. This is reflected in Appendix 1 which lists Historic England as a statutory consultation body for SPDs. No change.
SCI 1 Historic England	Part 2	Welcome reference to consultation with statutory consultation bodies as required. For listed building and conservation area consent we would expect to be consulted as required. We recommend that Table 5 is amended to indicate that Historic England should be consulted as required.	Noted. Agreed. For listed building / conservation area consent applications in Table 5 we have amended the publicity and consultation column text: “Site notice. Notify adjacent neighbours; advertise in the press; consult local councils, conservation officer and statutory consultation bodies as required” .

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SCI 1 Historic England	Part 3	<p>Would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected.</p> <p>Welcome reference to statutory consultees.</p> <p>Recommend that Appendix 1 is amended to make it clear that Historic England should be consulted on Neighbourhood Plans.</p> <p>We have guidance on neighbourhood planning, which can be found online.</p>	<p>Appendix 1 has been amended to confirm that we consult statutory bodies at the Regulation 16 stage. However, we do not advise statutory bodies regarding neighbourhood areas as there is no statutory requirement to do so but we do provide a consultation list to neighbourhood plan groups for if / when they start to work on a plan.</p> <p>Noted.</p> <p>Historic England is consulted by the local authority on the Regulation 16 consultation. Legislation requires statutory consultees (of which Historic England is one) to be consulted at the Regulation 14 consultation stage that is carried out by the neighbourhood plan group.</p> <p>Noted.</p>
SCI 1 Historic England	General comment	Would welcome informal consultation where issues may benefit from early involvement.	Noted.

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SCI 2 Natural England	General comment	<p>Natural England is a non-departmental public body. Supportive of the principle of meaningful and early engagement in planning matters, in terms of shaping policy and in determining planning applications.</p> <p>Information on the planning service we offer can be found online. We ask that all planning consultations are sent electronically to the central hub.</p>	<p>Noted.</p> <p>Noted.</p>
SCI 3 Canal & River Trust	General comment	<p>The Canal & River Trust do not own or manage any waterway within Bedford area. Generally supportive of any sustainable project seeking to expand or support the inland waterway network. The Canal & River Trust is a member of the Bedford & Milton Keynes Waterway partnership.</p> <p>Would wish to be engaged with the production of local plans or relevant neighbourhood plans and other policy guidance which might impact on the Bedford & Milton Keynes Waterway Park. There should be consultation with BBMK Waterway Trust on policies or proposals, particularly with regard to the technical details of any sections of the waterway to be delivered.</p>	<p>Noted.</p> <p>Noted. The Canal & River Trust are on our consultation database currently with a postal address only. We will add a generic email address to update this.</p>

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SCI 4 Central Bedfordshire Council	Paragraph 4.6	Whilst supportive of a more digitalised approach to planning, there is a need to ensure those who are less digitally able or do not have easy internet access are also represented and able to have their views heard. This is also relevant when engaging with residents and communities within and neighbouring Bedford Borough.	<p>Agreed. Paragraph 2.4 confirms that “whilst it is likely that digital forms of publicity and consultation will continue, we recognise that not all our communities will be able to readily access information digitally. In reviewing our SCI, we have sought to ensure there is equal opportunity for all to participate in the planning process”.</p> <p>An Equality Impact Assessment has been undertaken which found that the Statement of Community Involvement has taken all identified opportunities to advance equality of opportunity and foster good relations. The Statement of Community Involvement includes various ways the Council will ensure that there are no barriers to people having their say in the planning process. Where barriers to participation have been identified, the Council has put measures in place to mitigate against any negative effects.</p> <p>No change required.</p>

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SCI 4 Central Bedfordshire Council	Part 1, paragraphs 9.10-9.11	Paragraph 9.10 sets out under the Duty to Cooperate how you intend to work with neighbouring authorities. We emphasise the importance of engaging with us at relevant times and in relation to matters that would have an impact on Central Bedfordshire communities, residents and businesses. Welcome the inclusion of paragraph 9.11 and reference to the cross-boundary development at Wixams. Support the intention to engage with Town and Parish Councils within Central Bedfordshire that are adjacent to the borough boundary, particularly where proposed development might directly impact our communities.	Noted.
SCI 4 Central Bedfordshire Council	Part 1, Paragraph 9.13	It would be beneficial to clarify who the seldom heard groups are and how they will be engaged in the planning process.	The aim of the Statement of Community Involvement is to encourage community and stakeholder engagement in the planning process. Paragraphs 9.13-9.15 of the SCI make provision for engaging with seldom heard communities in the planning process. Paragraph 2.4 states: “in reviewing our SCI, we have sought to ensure there is equal opportunity for all to participate in the planning process”. Furthermore, an Equality Impact Assessment has been undertaken.

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SCI 4 Central Bedfordshire Council	All tables and figures	<p>The figures and the tables are difficult to read due to the choice of grey background and black type face. It would be helpful to change these to make the document more accessible for all readers.</p> <p>Tables 1, 2 and 3 are very detailed with lots of information, with text presented vertically and horizontally making it difficult to read.</p>	<p>This is helpful feedback. The figures and tables will be clearer in the final graphically designed document.</p> <p>The final document will be made as accessible as possible when it is desktop published.</p>
SCI 5 National Highways	General comment	<p>National Highways is the highway authority, traffic authority and street authority for the Strategic Road Network.</p> <p>Wish to continue working with Bedford Borough Council and continue to be consulted when a document is published for consultation.</p> <p>Consider the SCI to represent a continuation of the communication lines previously established.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
SCI 6 CPRE Bedfordshire	Part 1	All sections of the plan making process and the CIL charging process are required to have a minimum consultation period of 6 weeks. The exception is SPDs which has a consultation period only 4 weeks. We suggest that this [SCI consultation] is extended to 6 weeks in line with other plan making consultations. CPRE needs time to communicate with its members (parish councils and others)	Minimum consultation periods are stipulated in the relevant regulations and are adhered to by the council. Of note, the regulations do not require any statutory public consultation on statements of community involvement No change.

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		regarding SPD consultations. 4 weeks is insufficient time for most PCs.	
SCI 6 CPRE Bedfordshire	Part 2, Table 5	<p>The consultation process described for reserved matters consent is currently not being followed by the Council. To evade democratic accountability, the Council uses the Scheme of Delegation to Officers and other policy instruments. Matters agreed at the reserved matters stage include:</p> <ul style="list-style-type: none"> • The number and type of affordable homes • Ownership of open green space • Design of houses and the design of development as a whole • Size and type of open green space to be incorporated into a development • S106 agreements between the applicant and the Council. <p>These important matters, which are of interest to Parish Councils and the public are considered and agreed in private by the Council and not subject to any form of wider public consultation. Unless the application is ‘called in’ to the Planning Committee for consideration by the local Borough Councillor and this rarely happens.</p> <p>This quite unacceptable loss of democratic accountability has resulted in:</p>	<p>Reserved matters applications are made available on the Council’s online planning register and follow the same consultation process as a full or outline planning application i.e. neighbour, local councils, statutory consultees and internal consultees are consulted and given at least the minimum 21 day time period to comment.</p> <p>Any material planning comments received are taken into account in the determination of the application.</p> <p>Decision making follows the procedures and consultation requirements as set out in the relevant planning legislation and regulations – most notably the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).</p> <p>Reserved matters applications are able to be ‘called in’ to the Planning Committee, in accordance with the adopted scheme of</p>

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		<ul style="list-style-type: none"> • The Council falling short of its target for affordable homes and homes for social rent • The privatisation of open green space within new housing developments, causing residents the pay much higher maintenance fees than if a Parish Council were to own and manage the land. <p>It is nothing short of a ‘leaseholder rip-off’ aided by the Borough Council with developers earning profits ‘in perpetuity’ from residents who were unaware of their status at the time of their house purchase. The Competitions and Markets Authority report of the housing market has agreed with CPRE Bedfordshire that this practice should stop. Bedford Borough Council should never have agreed to it in the first place. It is not in the best interests of the people of Bedford Borough, and it would never have happened had open consultation taken place as described in the proposed Statement of Community Involvement.</p>	<p>delegation – in these cases, the decision is made by Members of the planning committee. These are public meetings where members of the public, Town and Parish Council representatives and any other third parties or bodies can make representations to the Members before a decision is made, in accordance with the Council’s right to speak protocol (see paragraphs 16.2-16.3 of the SCI).</p> <p>The matter of open space management and maintenance is not within the scope of the SCI.</p>
SCI 6 CPRE Bedfordshire	Part 2, Section 14	The NPPF emphasises pre-application consultation as a means of speeding up the planning process by taking into consideration at an early stage the views of local people regarding planning applications in their area. The proposed Statement of Community Involvement gives only limited emphasis to the pre-application process. Would like	We offer a full planning enquiry service which is published on our website and which we actively promote when we are approached by developers. However, we are unable to require developers to engage in pre-application consultation with

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		to see the Council give far more emphasis to the pre-application process with strong encouragement to applicants to engage with local people and Town and Parish Councils prior to submitting an application to the Council. In particular, it should be a priority when applicants are making proposals for development in Parishes which have a 'made' neighbourhood plan. This is to ensure that developers have taken into account the neighbourhood plan policies which in some cases take precedent over Borough Council policies. We are aware of Parish Councils with neighbourhood plans who have voiced strong concerns to Bedford Borough Council that developers have refused to discuss their development plans with them, preferring instead to discuss their plans with Bedford Borough Council and this is not acceptable. Bedford Borough Council should actively discourage such action by developers.	local communities and Town or Parish Councils.
SCI 6 CPRE Bedfordshire	Part 3	Please see comments regarding neighbourhood plans and pre-application consultation.	See above.
SCI 6 CPRE Bedfordshire	General comment	Surprised and very concerned that a consultation of such significance has been started at the height of the holiday period, in the middle of August, when many will be on holiday. The timing gives the impression that the Council has something to hide	The currently adopted SCI sets out that the consultation should be for at least 4 weeks. In setting the consultation period we had regard to the Council's Consultation Strategy, which recommends

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		<p>and is trying to limit the amount of time that people have to consider the proposals. The timing would also appear to conflict with paragraph 6.2 of the Council's Consultation Strategy 2021-2025.</p> <p>CPRE Bedfordshire has many Town and Parish Council members who do not normally have meetings during August. This means that at best they have around 3 weeks during September to consider the whole Statement of Community Involvement and comment. This is a wholly unsatisfactory situation in our view. The Council's Consultation Strategy also states, paragraph 6.1: "An appropriate amount of time will be given for people to submit their responses. We recognise that organisations may need to conduct secondary consultation with their members before submitting a response, and this can take time."</p> <p>CPRE Bedfordshire made these comments regarding timing directly to the Council and asked for an extension. We have been advised that the standard minimum consultation period for this consultation is 4 weeks. The Council said that the consultation was extended from 4 to 6 weeks because of the holiday period. We have evidence that Parish Councils did not have sufficient time to consider this important consultation in detail. CPRE</p>	<p>a consultation period should be extended if it runs in parallel with school holidays. This is why a 6 week consultation period rather than the minimum of 4 weeks was set. It is noteworthy that there is no statutory requirement to consult on a statement of community involvement. The Council does not consider the suggested additional consultation time (12 weeks in total) is reasonable or necessary.</p>

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		<p>Bedfordshire has been unable to advise its Town and Parish Council members of our views with regard to the consultation due to the holiday period which has given us just 3 weeks to consider the consultation.</p> <p>We suggest that the minimum time for a consultation such as this is extended to 6 weeks.</p> <p>We suggest that the Council reviews its procedures and policies to ensure that consultations are never started during principal holiday periods unless there are exceptional circumstances.</p> <p>The consultation does not follow best practice by including a synopsis of the changes that are proposed in the new SCI compared to the current version. The absence of a 1 or 2 page synopsis means that considerable time is lost reading both the current and proposed SCIs to determine the differences.</p>	<p>Minimum consultation periods are stipulated in the relevant regulations and are adhered to by the council. No change.</p> <p>The Council's adopted Consultation Strategy allows for the scenario of consultations occurring during holiday periods and ensures that additional time is provided. Where possible consultations take place outside school holiday periods but this is not always possible if deadlines are to be met.</p> <p>This is a helpful comment which is noted. A summary over and above the general paragraphs we provided in this instance would be difficult given the changes proposed however we will consider providing either a synopsis or a tracked changed version to help to highlight proposed changes in future consultations.</p>

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SCI 7 Hertfordshire County Council	General comment	As the minerals and waste planning authority for Hertfordshire County Council, we are happy to be consulted on the listed stages of the local plan process in Table 1, on plans and planning policy documents, on relevant planning applications, and neighbourhood plans.	Noted.
SCI 7 Hertfordshire County Council	Appendix 1	Pleased to see that adjoining authorities (Boroughs, Districts and Counties) are considered statutory consultees for local plans and CIL.	Noted.
SCI 8 The British Horse Society	General comment	Such consultations tend to have a Friday deadline for comments. As a volunteer, I would find a Sunday deadline most helpful. The same may apply to residents who work and are unable to deal with such matters except in the evenings and weekends.	The comments are noted and will be considered when undertaking future consultations.
SCI 8 The British Horse Society	Part 1	The British Horse Society wish to ensure that we are consulted on all plans and policy documents by email to bhs.beds@gmail.com and to access@bhs.org.uk . I think we have been consulted on most such documents to date.	The British Horse Society is included on our consultation database with the email address bhs.beds@gmail.com .
SCI 8 The British Horse Society	Part 1, paragraph 8.8	The intention to create Part 2 of the Brownfield Land Register could be of interest to us as such sites may create opportunities for access improvement.	Noted.

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SCI 8 The British Horse Society	Part 1, paragraph 9.4	Regarding stakeholder mapping, please be aware that our interests are in the protection of public rights of way and the enhancement of the equestrian rights of way network. We are also interested in matters that might affect road safety.	Noted.
SCI 8 The British Horse Society	Part 2, paragraph 14.2 and Table 5	<p>In seeking to improve the connectivity of the equestrian right of way network, the Society wish to be involved in large scale developments at an early stage (even pre-application) so that opportunities to create links within the existing network or to create new networks are identified and discussed. We would wish to be ‘on the list’ for potential major applications even if there is no bridleway or byway within the site at present. The same applies to major applications within Table 5.</p> <p>In short, please don’t exclude us just because there isn’t any current bridleway. Opportunities for community benefit may be lost (and of course cyclists use the equestrian network too).</p>	Noted. Third parties are not directly consulted on planning applications however information is published on our online planning register . Pre-applications are confidential and therefore details cannot be shared.
SCI 8 The British Horse Society	Part 3	Most neighbourhoods have a neighbourhood plan and sadly The British Horse Society was consulted on very few of them. It may be that the advice on the Council’s website could include us and other user groups? By the time the wider consultation happens, my experience is that the local NP team	The British Horse Society is included on our consultation database and will be advised of the consultation at Regulation 16 stage which is carried out by the Council.

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		just wants to get it done and is less open to input than it might have been at an earlier stage.	Information on Neighbourhood Plans that are being prepared in the borough is available on the Council's neighbourhood planning webpage . Neighbourhood plan groups undertake consultation before submitting their plan. We will update our Neighbourhood Plan guidance to state that organisations and groups whose interests may be affected should be consulted.
SCI 8 The British Horse Society	Part 4, paragraph 20.2	It would be helpful to acknowledge that impact on public rights of way is a valid planning issue.	The section is not intended to be inclusive and lists examples. However, we have added “ impact on the public rights of way network ” to the bullet list at paragraph 20.2.
SCI 9 Resident	Part 1	No comments.	Noted.
SCI 9 Resident	Part 2	No comments.	Noted.
SCI 9 Resident	Part 3	No comments	Noted.
SCI 9 Resident	Part 4	No comments.	Noted.
SCI 10 Resident	Part 1	Communities are comprehensively ignored as are Government guidelines. The very first sentence of	Noted.

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		the last Governments planning policy document clearly stated sustainability as the prime objective when planning housing, there is no evidence of sustainability in any of the rural planning decisions. During the neighbourhood referendums councillors told the electorate that if they were to reject the proposed developments in the neighbourhood plan something much worse would follow, Perhaps this account for the abysmal voter turn out and a complete lack of engagement by residents in the planning process. Even when a planning inspector rules against a development that ruling is overturned by a government minister on an unrelated technicality.	
SCI 10 Resident	Part 2	Reliance on a site notice to inform residents of planning matters is simply not good enough. It is not at all unusual for site notices to vanish. Without a local paper to carry the same notice many plans are not scrutinised by those affected which in turn brings the whole process into disrepute.	Section 15 of the SCI sets out the methods we use to publicise and consult on planning applications. Paragraph 15.3 states that this will meet the minimum requirements provided in legislation. Local councils are consulted on planning applications within their administrative area. In addition, third parties can monitor the online planning register and raise concerns with their local council who are able to raise objections and facilitate discussion at planning committee. The local press we use is also available online.

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		Transport surveys to back up developments are by and large a work of fiction as are the environmental surveys. Both are commissioned by the developer who will have a vested interest in the contents and conclusion of these reports.	This is not within the scope of the SCI.
SCI 10 Resident	Part 3	In rural areas the actual effect of a development on the existing community is never considered. Infrastructure, schools, healthcare are all factors which are comprehensively ignored.	As set out in section 15 of the SCI, a range of both internal and external consultees are notified and consulted on planning applications. Paragraph 16.1 states that “an officer will consider the development proposed against the policies in the development plan, taking account of any material considerations including consultation responses. Any determination must normally be made in accordance with the development plan unless other material planning considerations indicate otherwise”. Examples of valid planning matters are listed in paragraph 20.2 of the SCI.
SCI 10 Resident	Part 4	The communities are simply ignored.	Local councils are consulted on planning applications within their administrative area. They can raise concerns and

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			objections on behalf of their community and facilitate discussion at planning committee. See sections 15 and 16 of the SCI for further information.
SCI 11 Resident	Part 1	No comments.	Noted.
SCI 11 Resident	Part 2	No comments.	Noted.
SCI 11 Resident	Part 3	Sometimes the breadth of extent of neighbourhood planning consultation notices is very minimal. Lots of planning applications affect far more people than the immediate site red line neighbours and it is often hard to spread the publicity widely quickly enough to get true consultation. This is even more the case now that there are minimal local newspapers. Planning notices on lampposts are often so highly typed and official looking that the community walking by do not notice them. The first obvious indication that something might be happening is when people start to see it appearing.	Local councils are consulted on planning applications within their administrative area. In addition, third parties can monitor the online planning register and raise concerns with their local council who are able to raise objections and facilitate discussion at planning committee. The local press we use is also available online
SCI 11 Resident	Part 4	No comments.	Noted.
SCI 12 Resident	Part 1	No comments.	Noted.
SCI 12 Resident	Part 2	No comments.	Noted.

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SCI 12 Resident	Part 3	No comments.	Noted.
SCI 12 Resident	Part 4	We need more street cleaning and better use of speed cameras.	This is not within the scope of the SCI.
SCI 13 Resident	Part 1	No comments.	Noted.
SCI 13 Resident	Part 2	No comments.	Noted.
SCI 13 Resident	Part 3	No comments.	Noted.
SCI 13 Resident	Part 4	No comments.	Noted.
SCI 14 Resident	Part 1	No comments.	Noted.
SCI 14 Resident	Part 2	No comments.	Noted.
SCI 14 Resident	Part 3	No comments.	Noted.
SCI 14 Resident	Part 4	No comments.	Noted.
SCI 15 Resident	General comment	<p>Not sure which section this applies to but:</p> <p>1. Council MUST develop ALL brownfield land, especially the derelict acres of Twinwoods business park, before approving any farmland/greenfield developments.</p> <p>2. Glad of multicultural heritage and harmony but given the majority of our community are white I was</p>	<p>Noted. This is not within the scope of the SCI.</p> <p>Noted. The options are listed alphabetically.</p>

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		surprised to find that option way down the list of personal details. 3. Not sure why “European Directives” still need to guide anything in post-Brexit England.	Noted. This is not within the scope of the SCI.
SCI 15 Resident	Part 1	No comments.	Noted.
SCI 15 Resident	Part 2	No comments.	Noted.
SCI 15 Resident	Part 3	No comments.	Noted.
SCI 15 Resident	Part 4	No comments.	Noted.
SCI 16 Resident	Part 1	No comments.	Noted.
SCI 16 Resident	Part 2	No comments.	Noted.
SCI 16 Resident	Part 3	No comments.	Noted.
SCI 16 Resident	Part 4	No comments.	Noted.
SCI 17 Resident	General comment	This comment applies to the entire document. The whole thing is so large as to be indigestible. I want to comment but am baffled by the sheer amount of reading required. I know that you have to lay out the detail for the consultation to have the fullest possible meaning, but I feel I am being denied the right to comment (and you are denied the benefits	The introduction is restricted to one page setting out the scope of the document and the reasons for the update. The document includes a contents page to enable easy selection of the relevant section of interest. For the document to serve its purpose it needs to include sufficient detail

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		of my wisdom!). It isn't that I cannot read, or cannot read official prose, or have difficulty in understanding your meaning - it is just that I have a life to lead, which precludes making the necessary time available. This must be a problem common to all official bodies. Perhaps the Plain English Campaign could help? Please come up with a more digestible presentation.	to provide certainty to all parties. This update has made the document more concise.
SCI 18 Resident	Part 1	The language used needs to be specific and accurate avoiding a lack of clarity. The lack of an effective local media needs to be compensated for. There is cynicism in the community as previously many do not feel that they have been consulted with eg Borough support for EWR.	Part 1 of the SCI sets out the Council's approach to publicity and consultation in the preparation of plans and planning policy documents. It sets out when, who and how we will consult and how to register on our consultation database. Social media is identified in the SCI as a publicity method that may be used. As set out in paragraph 15.4, it is possible to use the Council's online planning register to view all planning applications received and determined by week or month. The local press we use is also available online.
SCI 18 Resident	Part 2	The language used needs to be specific and accurate avoiding a lack of clarity. The lack of an effective local media needs to be compensated for. There needs to be consistency in planning	Social media is identified in the SCI as a publicity method that may be used. As set out in paragraph 15.4, it is possible to use the Council's online planning register to view all planning applications received and

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		decisions to allow the community to engage with the system.	determined by week or month. The local press we use is also available online. The Council's website includes a facility to sign up to receive Your Voice, Your Views bulletin and the online database of consultations being undertaken by the Council can also be viewed on the website (see paragraph 7.5 for details). Furthermore, paragraph 5.1 of the Council's adopted Consultation Strategy sets out a range of methods available to engage with our communities.
SCI 18 Resident	Part 3	Neighbourhood Plans are not accessible to poorer areas or where the community lacks the language skills to engage. More needs to be done to enable all communities to participate.	This is not within the scope of the SCI.
SCI 18 Resident	Part 4	No comments.	Noted.
SCI 19 Resident	Part 1	No comments.	Noted.
SCI 19 Resident	Part 2	No comments.	Noted.
SCI 19 Resident	Part 3	No comments.	Noted.
SCI 19 Resident	Part 4	No comments.	Noted.

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SCI 20 Resident	Part 1	No comments.	Noted.
SCI 20 Resident	Part 2	No comments.	Noted.
SCI 20 Resident	Part 3	No comments.	Noted.
SCI 20 Resident	Part 4	No comments.	Noted.
SCI 21 Resident	Part 1	It is all well and good collecting responses, but you need traceability on whether you act on the responses or whether they are just an expensive box ticking exercise.	Noted. This table summarises responses and explains if and how the SCI has been amended as a result. A tracked-changes version of the SCI has also been prepared to inform members of the Executive before they adopt the document. This is common practice when the council is preparing documents for adoption.
SCI 21 Resident	Part 2	Neighbourhood plans need to be respected otherwise they are pointless bureaucracy. Again, you need traceability so we can judge whether they have any reason to exist.	This is not within the scope of the SCI.
SCI 21 Resident	Part 3	No comments.	Noted.
SCI 21 Resident	Part 4	No comments.	Noted.
SCI 22 Resident	Part 1	No comments.	Noted.

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SCI 22 Resident	Part 2	No comments.	Noted.
SCI 22 Resident	Part 3	No comments.	Noted.
SCI 22 Resident	Part 4	No comments.	Noted.
SCI 23 Resident	Part 1	No comments.	Noted.
SCI 23 Resident	Part 2	No comments.	Noted.
SCI 23 Resident	Part 3	No comments.	Noted.
SCI 23 Resident	Part 4	No comments.	Noted.
SCI 24 Resident	Part 1	There is very little point in asking us about community involvement as the current Labour Govt. has decided to bulldozer through planning requests even if they interfere with the green belt and/or good agricultural land.	This is not within the scope of the SCI.
SCI 24 Resident	Part 2	There is very little point in asking us about community involvement as the current Labour Govt. has decided to bulldozer through planning requests even if they interfere with the green belt and/or good agricultural land.	This is not within the scope of the SCI.
SCI 24 Resident	Part 3	There is very little point in asking us about community involvement as the current Labour	This is not within the scope of the SCI.

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		Govt. has decided to bulldozer through planning requests even if they interfere with the green belt and/or good agricultural land.	
SCI 24 Resident	Part 4	There is very little point in asking us about community involvement as the current Labour Govt. has decided to bulldozer through planning requests even if they interfere with the green belt and/or good agricultural land.	This is not within the scope of the SCI.
SCI 25 Resident	Part 1	No comments.	Noted.
SCI 25 Resident	Part 2	No comments.	Noted.
SCI 25 Resident	Part 3	No comments.	Noted.
SCI 25 Resident	Part 4	No comments.	Noted.
SCI 26 Resident	Part 1	Much more use could be made of social media in involving the community. The Council uses Facebook well. It would be great to have a post twice a week giving links to planning applications that have come in that week. I haven't had a free newspaper in years and it is hard to work out what is being planned in my area - the parish council are all volunteers and do not publicise anything.	Social media is identified in the SCI as a publicity method that may be used. As set out in paragraph 15.4, it is possible to use the Council's online planning register to view all the planning applications received and determined by week or month. The local press we use is also available online. The Council's website includes a facility to sign up to receive 'Your Voice, Your Views' bulletin and the online database of

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			consultations being undertaken by the Council can also be viewed on the website (see paragraph 7.5 for details). Furthermore, paragraph 5.1 of the Council's adopted Consultation Strategy sets out a range of methods available to engage with our communities.
SCI 26 Resident	Part 2	No comments.	Noted.
SCI 26 Resident	Part 3	No comments.	Noted.
SCI 26 Resident	Part 4	No comments.	Noted.
SCI 27 Wilstead Primary School	Part 1	No comments.	Noted.
SCI 27 Wilstead Primary School	Part 2	No comments.	Noted.
SCI 27 Wilstead Primary School	Part 3	No comments.	Noted.
SCI 27 Wilstead Primary School	Part 4	No comments.	Noted.
SCI 28 Bromham	Part 1	No comments.	Noted.

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
Neighbourhood Plan Review Group			
SCI 28 Bromham Neighbourhood Plan Review Group	Part 2	No comments.	Noted.
SCI 28 Bromham Neighbourhood Plan Review Group	Part 3, section 19	Bromham Neighbourhood Plan Review Group (BNPRG) is concerned that the scope of section 19 does not extend to the process and consultation in respect of reviewing / updating made Neighbourhood Plans. BNPRG acknowledges that UK Government regulations and guidance for updating made NPs is less prescriptive than for the initial made NP, and that this will be a limitation on what can be included in the draft Statement. An aspect that BNPRG believes should be included is that the decision on whether or not a village referendum is required in respect of a review / update of a made NP is at the sole discretion of the Examining Inspector.	Agree it would be helpful to reflect the issue of neighbourhood plan modifications. In the Table titled Consultation and publicity in the neighbourhood planning process, under step 7 on page 65, add a second paragraph: “A referendum may not be considered necessary for plan modifications where the plan modifications do not change the nature of the plan”.

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
SCI 28 Bromham Neighbourhood Plan Review Group	Part 4	No comments.	Noted.
SCI 29 Oakley Neighbourhood Plan Group	General comment	Oakley NDP Group strongly objects to the timing of this consultation which started in the middle of the holiday period for 6 weeks from 14 August to 27 Sept. August is the principal holiday month when many people are away. The timing gives the impression (rightly or wrongly) that the Council has something to hide with the proposed "Statement of Community Involvement" and is trying to limit the amount of time that people will have to consider the proposals. The timing would also appear to conflict with Section 6 of the "Consultation Strategy 2021-2025". Most Town and Parish Councils (like Oakley) do not normally have meetings in August. This means, that at best, we have around 3 weeks during the month of September to consider the "Statement of Community Involvement" and make comments. This is wholly unsatisfactory not just for Town and Parish Councils, but for anyone who wishes to consider and comment on the consultation. The Bedford BC "Consultation Strategy" states, para 6.1: "An appropriate amount of time will be given for people to submit their	The currently adopted SCI sets out that the consultation should be for at least 4 weeks. In setting the consultation period we had regard to the Council's Consultation Strategy, which recommends a consultation period should be extended if it runs in parallel with school holidays. This is why a 6 week consultation period rather than the minimum of 4 weeks was set. It is noteworthy that there is no statutory requirement to consult on a statement of community involvement. The Council does not consider the suggested additional consultation time (12 weeks in total) is reasonable or necessary. The Parish Clerk has been contacted separately to see whether the Parish Council would like to make additional comments beyond the closing date. It was confirmed that the Parish Council had no further comments to make.

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
		<p>responses. We recognise that organisations may need to conduct secondary consultation with their members before submitting a response, and this can take time." The NDP Group requests that the current consultation be either abandoned and restarted in October for a 6 week period, or that the current consultation period be extended until the end of October.</p>	<p>The Parish Council did not request an extension to the consultation period.</p>
SCI 29 Oakley Neighbourhood Plan Group	Part 2, Section 14	<p>Pre-application consultation should be strongly recommended for developers submitting planning applications on land identified for development within Neighbourhood Development Plans. This to ensure that developer plans conform to NDP policies. The NPPF paras 39 to 46 encourage detailed pre-application consultation by developers with all interested parties. To date, Bedford BC has not required developers/ landowners who are looking to develop land identified for development in Neighbourhood Plans to engage with Parish Councils which have “made” Neighbourhood Plans. This situation needs to change.</p> <p>The “Statement of Community Engagement” should make clear the importance of developers engaging in pre-application discussions with Parish Councils to ensure their plans conform to local NDP policies.</p>	<p>We are unable to require developers to engage in pre-application consultation with local communities and Town or Parish Councils.</p>

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
		In the case of Oakley, Bedfordia should have had detailed discussions with Oakley PC before submitting its application for development of the Station Road site.	
SCI 29 Oakley Neighbourhood Plan Group	Part 2, Table 5	The process of “Reserved Matters” used by Bedford BC to decide major planning applications is undemocratic and needs to change. Under the “Reserved Matters” process described in the “Draft Statement of Community Engagement”, very important areas of a planning application e.g. number and type of affordable homes, ownership of open green space, transport infrastructure etc. are decided by the Borough Council in discussion with developers without any democratic oversight allowed by the public. This has resulted in the affordable homes target not being achieved and open green space on new developments being owned and managed by developers in a form of leasehold arrangement, at great disadvantage to residents of the new homes, who are charged high maintenance fees – 3 or 4 times higher than if managed by Parish Councils. There is no democratic means by which residents may challenge maintenance fees.	<p>Reserved matters applications are made available on the Council’s online planning register and follow the same consultation process as a full or outline planning application i.e. neighbour, local councils, statutory consultees and internal consultees are consulted and given at least the minimum 21 day time period to comment.</p> <p>Any material planning comments received are taken into account in the determination of the application.</p> <p>Decision making follows the procedures and consultation requirements as set out in the relevant planning legislation and regulations – most notably the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended).</p>

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
		The Draft Statement of Community Engagement should be modified and the process of reserved matters decision making explained in more detail to clarify the situation and ensure that: there is a requirement that for all Major Planning Applications (10 homes and above), a Full Planning Application should be submitted for public consultation once the reserved matters process has been completed. This is to ensure full democratic accountability of reserved matters decisions made between Bedford BC and developers.	Reserved matters applications are able to be 'called in' to the Planning Committee, in accordance with the adopted scheme of delegation – in these cases, the decision is made by Members of the planning committee. These are public meetings where members of the public, Town and Parish Council representatives and any other third parties or bodies can make representations to the Members before a decision is made, in accordance with the Council's right to speak protocol (see paragraphs 16.2-16.3 of the SCI). The matter of open space management and maintenance is not within the scope of the SCI.
SCI 29 Oakley Neighbourhood Plan Group	Part 3	See previous comments.	See above.
SCI 29 Oakley Neighbourhood Plan Group	Part 4	See previous comments.	See above.
SCI 30 Accessibility Bedford	Part 1	The term Consultation as applied by BBC needs defining as how appears to currently being defined does not appear to comply with the modern practices now being applied by the forward-thinking	Individuals or organisations who are interested in the production of planning policy documents can sign up to receive notifications from us. Details about how to

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		<p>organisations. Who will be involved seems to rely on actually being aware that a ‘consultation’ is in progress, which means discovering yourself by constant monitoring of websites.</p> <p>It is stated the proposal is being prepared with respect to the NPPF. Is that the current version or that recently issued for consultation by the Government?</p> <p>The SCI refers to the Corporate Plan but fails to meet two of its goals. Happy to discuss this. The Plan for 2024-27 has been out for consultation and closed 23/06/24 without our awareness. Which you could say is our fault but for something so important to the community it could be reasonably expected that an Equality Impact Assessment would be conducted and that it if had it would be noticed that a major protected group had not been involved.</p> <p>The need for early and meaningful engagement and consultation is recognised as vital for</p>	<p>register on the planning policy consultation database are set out in paragraph 9.2. The Council’s website includes a facility to sign up to receive ‘Your Voice, Your Views’ bulletin and the online database of consultations being undertaken by the Council can also be viewed on the website (see paragraph 7.5 for details).</p> <p>The SCI has been drafted to be compliant with the current version of the NPPF. In any case the proposed / consultation version if implemented would not require any substantive change to the SCI.</p> <p>An Equality Impact Assessment has been prepared for the SCI in consultation with the Council’s Equalities Officer.</p> <p>The Council supports early engagement as set out in the SCI at paragraphs 3.2</p>

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		<p>community involvement, but would appear not as if no comment made by a group fact not even noted and raised.</p> <p>Would also suggest that an EqlA has not been undertaken in this case. Is there not a requirement for when all such documents such as the Corporate Plan are reviewed for adoption at Council level that an EqlA is checked for its existence and correctness.</p> <p>Development of an accessibility / inclusivity plan should be included in the suites of documents considered for the development of plans.</p> <p>You state that you use direct notification for organisations on your consultation database, so how is inclusion on that achieved? And why is the Access group not one of the consultees. After all the creation of the Group was initiated by the Council, back in 1991.</p> <p>Your website is far from being accessible</p>	<p>and 6.1, which is consistent with paragraphs 16 and 39 of the NPPF and is supported by the Council's adopted Consultation Strategy (paragraph 5.4). An Equality Impact Assessment has been undertaken to support the review of the SCI. It forms Appendix C to the committee report.</p> <p>This matter is being considered corporately as part of the preparation of the Council's Community Engagement Strategy.</p> <p>Details about how to register on the planning policy consultation database are set out in paragraph 9.2. Accessibility Bedford are included on our database and will be informed about consultations – though this is a postal address. We will source a generic email address to add to our database.</p>

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		<p>All consultation processes are front loaded and then closed, however RIBA and BS recommend a dialogue continuing throughout the development of any plans, processes or procedures. Notification is provided to those on your consultation database, how does a group or organisation get onto this database. Are there criteria required to gain acceptance?</p> <p>The entry on making of local plans process raises the same issues of who consulted. Locally there might not be any accessibility expertise, or other specific issues, in which case to ensure addressed needs to be notified further afield. Also implies that what constitutes an accessible environment needs to be established universally so that can be referred to by those drafting the local plan in the absence of a dialogue.</p> <p>States many times about meetings or sessions being held in public places which means that the location and any communication media must be accessible.</p>	<p>The Council is procuring accessibility software to make the website usable by people of all abilities and disabilities.</p> <p>See above.</p> <p>The planning policy consultation database includes contact details for a range of disability networks / organisations who will be notified of any consultations. We have asked Accessibility Bedford for their suggestions of who we might approach to ask if they would like to sign up for notifications.</p> <p>Paragraph 7.12 explains that where we use face to face engagement methods, we will choose accessible venues and an induction hearing loop system can be provided upon request.</p>

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		<p>The drafting of SPDs has similar comments to above.</p> <p>Are there registers of all relevant stakeholders for different plans and is it ensured that all protected groups are represented. Drafting of an EqlA should help ensure that.</p>	<p>When the Council makes decisions that will impact our communities, the potential impact of the activity (e.g. a policy, service or decision) on different groups of people is scoped regarding the need for an Equalities Analysis as required by the Council's statutory Equality Duty.</p>
SCI 30 Accessibility Bedford	Part 1, paragraph 9.4	It is stated that a stakeholder mapping exercise to identify groups etc. This is a process that doesn't appear to have worked historically.	In relation to planning policy consultations, the stakeholder mapping process is set out in paragraph 9.4 of the SCI. The process is in accordance with the Council's adopted Consultation Strategy (paragraphs 4.2-2.4). We understand that direct communication with Accessibility Bedford is being undertaken in this regard.
SCI 30 Accessibility Bedford	Part 1, paragraph 9.13	Some groups are underrepresented and that you will try to reach these groups, has that exercise started?	Yes. This is being undertaken as part of the preparation of the Council's Community Engagement Strategy which proposes to monitor the success of our community engagement so that the findings can shape future engagement.

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SCI 30 Accessibility Bedford	Part 1, paragraph 10.6	Such an approach has been voiced re certain 'works' in the past four years by some representative groups and ignored.	The SCI promotes the use of a range of engagement methods in order to reach local residents, local businesses, stakeholders, staff and partners. Where the publicity and consultation methods set out in the SCI could act as a barrier to participation for some groups, the Council have put measures in place to mitigate against any negative effects, with the aim of advancing equality of opportunity for all. Paragraph 10.6 sets out that we will consider requests for in-person meetings where online communication would not be effective.
SCI 30 Accessibility Bedford	Part 1, paragraph 11.2	When publishing the consultation report on the Council's website will/shouldn't all groups / individuals commenting be notified and a link to where published be provided. The BBC website is not the most navigable.	<p>Following any formal Council decision we will publish a consultation report on the relevant webpage. All individuals and groups that have contributed to a consultation are sent a copy of the Adoption Statement upon adoption and a direct link / url will be provided in the letter or email we send.</p> <p>The Council is procuring accessibility software to make the website usable by people of all abilities and disabilities.</p>

Comment ID name / organisation	Section of document / paragraph	Comment summary	Bedford Borough Council – officer response
SCI 30 Accessibility Bedford	Part 2	<p>The approach of notification of publication by inclusion in local press needs to be reconsidered. The local press doesn't reach many people these days. Shouldn't works affecting footways / pavements or anything affecting protected groups be included in this listing? Publication of major planning applications – shouldn't other relevant community groups and those representing protected groups be included in the listing of those notified. Shouldn't the details for small scale planning applications for non-residential commercial extensions be informed to representatives of all groups who could be affected not just local properties. This should be applied to all applications that similarly could affect protected groups.</p>	<p>Social media is identified in the SCI as a publicity method that may be used. As set out in paragraph 15.4, it is possible to use the Council's online planning register to view all the planning applications received and determined by week or month. The local press we use is also available online.</p> <p>Works to footways and pavements are not within the scope of the SCI.</p>
SCI 30 Accessibility Bedford	Part 3	<p>Is the responsibility for highlighting what is being proposed being notified to protected groups as identified above passed to the relevant Neighbourhood Group or will you be undertaking the responsibility to notify such groups? If delegated to the neighbourhood group will you be ensuring that they have complied with the full requirement. (19.9 might apply). Is this addressed in Table 5 where the Council will alert all relevant non neighbourhood groups. This would apply to the Neighbourhood Forum as well.</p>	<p>Legislation requires statutory consultees to be consulted at the Regulation 14 consultation stage which is carried out by the neighbourhood plan group. We provide a consultation list of statutory bodies to neighbourhood plan groups and advise them of the regulations regarding consultation for if / when they start to work on a plan. As local planning authority, we carry out the Regulation 16 consultation.</p>

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		<p>If a Neighbourhood Forum is agreed then will all appropriate bodies/groups be informed or is it just left to luck?</p> <p>For something proposed by a neighbourhood forum are all appropriate bodies alerted to it or is it only publicised locally? If an EqlA is produced, then presumably all affected protected groups will be identified and consulted with.</p> <p>What is the criteria for the examiner?</p> <p>Who participates in any referendum implemented?</p>	<p>It is the responsibility of the neighbourhood plan group or forum to identify relevant consultees and prepare a consultation statement. This is submitted and is considered through the examination process.</p> <p>It is the responsibility of the neighbourhood plan group or forum to identify relevant consultees and prepare a consultation statement. An Equality Impact Assessment is undertaken which ensures the needs of protected groups are considered.</p> <p>This is outlined in the Neighbourhood Planning (General) Regulations 2012 and the basic conditions which are set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. Further information is available in Planning Practice Guidance.</p> <p>All those on the electoral roll within the neighbourhood plan area are eligible to vote in the referendum.</p>

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SCI 30 Accessibility Bedford	Part 4, paragraph 20.3	Presumably if comments are made on behalf of an organisation, then that is who the comments are recorded against.	Yes.
SCI 30 Accessibility Bedford	Part 4, paragraph 21.4	The NPPF noted is the current one however there is a new one out for consultation by the Government with a number of differences to the current one. Are these being taken into account for this proposal? If not, how is it to be incorporated?	No proposals have been identified which would have any substantial effect on the SCI.
SCI 30 Accessibility Bedford	Part 4, paragraph 22.2	With respect to effective engagement wouldn't this be best achieved by establishing an Access Advisory Panel and adopting a co-design / production approach?	This and other relevant matters are being considered corporately as part of the preparation of the Council's Community Engagement Strategy. The strategy says the Council will monitor the success of our community engagement and seek to implement changes to shape engagement in the future.
SCI 30 Accessibility Bedford	Appendix 1	States that Local Plans, SPDs & CILs are consulted with Disability Groups, can you provide details of who these are.	Accessibility Bedford and Borough of Bedford Local Access Forum are included on the planning policy consultation database.