

## Draft Statement of Community Involvement 2024

### Consultation Response Form

The council has published a draft Statement of Community Involvement for public consultation and your comments are invited. It is a factual update and will replace the adopted Statement of Community Involvement 2019. The document can be found on our website [here](#), and is also available to view at borough libraries and the Bedford Borough Hub during normal opening hours.

Please complete the form below by **Friday 27<sup>th</sup> September at 5pm**. Please note that late representations will not be accepted.

#### GDPR and the Data Protection Act 2018.

Under Data Protection regulations (GDPR) Bedford Borough Council needs to inform you of the reasons why we are capturing your data and what we will do with your data. Any personal data collected and/or processed under this policy/ procedure will be dealt with in accordance with Data Protection Legislation and the Council's Data Protection Policy. Data is held securely and accessed by, and disclosed to, only individuals where relevant to this policy/procedure. To find out more information on this follow the link below. To view the council's current Privacy Notices visit [www.bedford.gov.uk/gdprprivacy](http://www.bedford.gov.uk/gdprprivacy)

Comments received will be published, but personal information will not be.

#### Personal Details

1. Are you making this representation? (Please  mark with x as appropriate)

a) Resident or member of the general public  or

b) Local Authority  or Town / Parish Council or

c) Landowner or

d) Agent / consultant (on behalf of)

Other organisation

**CPRE Bedfordshire – The Countryside Charity.**

**2.****3. Agent's details (if relevant)****Title****First****Last name****Street****Town****County****Postcode****Telephone  
number****E-mail address**

The Statement of Community Involvement is structured in four parts. These are:

**Part 1: Plan making** - Publicity and consultation on plans and planning policy documents

**Part 2: Development management** – Publicity and consultation in development management (dealing with planning and other related applications)

**Part 3: Publicity and consultation in the neighbourhood planning process**

**Part 4: General Information**

If you have any comments you would like to make in relation to the Statement of Community Involvement, please add them under the relevant sections below.

**General Comments regarding the Statement of Community Involvement (SCI) and the Consultation process used.**

**1. Unacceptable timing of the consultation**

CPRE Bedfordshire is surprised and very concerned that a Consultation of such significance has been started by the Borough Council at the height of the holiday period, in the middle of August, when many people will be on holiday.

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 be in conflict with Bedford Borough Council's own "Consultation Strategy 2021-2025", Section 6 "Timing of a Consultation", Para 6.2 states:

***"The time of year that the consultation takes place is also relevant. The consultation period should be extended if it runs over Christmas or other holiday periods."***

You will be aware, that CPRE Bedfordshire has many Town & Parish Councils members and that these organisations do not normally have meetings during August (the main holiday month).

This means, that at best, they will have around 3 weeks during the month of September to consider the "Statement of Community Involvement" and make reasoned comments.

This is a wholly unsatisfactory situation in our view.

Not just for Town and Parish Councils, but for anyone who wishes to consider and comment on the Consultation.

The BBC "Consultation Strategy" also states, Para 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."***

CPRE Bedfordshire has made these comments regarding timing directly to the Council and asked for an extension of the consultation period. We have been advised that the standard minimum consultation period for this consultation is 4 weeks.

The Council has said that the consultation was extended from 4 to 6 weeks because of the holiday period.

CPRE Bedfordshire has evidence that Parish Councils did not have sufficient time to consider this important consultation in detail.

CPRE Bedfordshire has been unable to advise its Town & PC 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.

**We suggest that the minimum time for a consultation such as this is extended to 6 weeks.**

**We suggest that the Council reviews its “procedures & policies” to ensure that Consultations are never started during the principal holiday periods unless there are exceptional circumstances.**

**2. 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 indicating, in brief, the proposed changes means that considerable time is lost reading both the current and proposed SCI's in order to determine the differences.

#### **Q1 Do you have any comments about Part 1 of the Statement of Community Involvement?**

**CPRE Bedfordshire would like to see consistency with regard to the consultation periods proposed for this important Plan Making section of the Statement of Community Involvement.**

From what we can see, 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 the important area of Supplementary Planning Documents (SPD) which for some reason has a consultation period only 4 weeks.

**We suggest that the Consultation period for SPD's is extended to 6 weeks in line with other Plan Making consultations.**

Much of CPRE Bedfordshire's work is associated with the Planning System and we work closely with Parish Councils, many of whom are members of CPRE Bedfordshire, advising them on a range of planning issues.

Most PC's have monthly, and some bi-monthly meetings and additionally as a rule, items can only be discussed at PC meetings if they are identified on the meeting Agenda published a week/10days in advance of the meeting. This to allow residents to attend the meeting and make their views known on issues of interest to them.

4 weeks is therefore insufficient time for most PC's.

As recognised in Para 6.1 of the Council's current "Consultation Strategy":

*"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."*

CPRE Bedfordshire also needs the time to communicate with its members (PC's and others) regarding SPD Consultations.

## Q2 Do you have any comments about Part 2 of the Statement of Community Involvement?

### 1. Planning Applications - Reserved Matters Process.

**CPRE Bedfordshire has very serious concerns regarding the manner in which the "Reserved Matters Process" is currently being operated by the Council.**

**Table 5 on pages 49 & 50 of the proposed Statement of Community Involvement** identifies the 2 principle types of planning application used for major planning applications (10 homes and more) – Outline Consent and Reserved Matters Consent (sometimes called Full Consent).

The "Reserved Matters" consultation process is described as follows:

***"Reserved matters consent:***

*This type of application follows on from an outline planning permission and considers the full details of the scheme, for example the house design and landscaping.*

***Publicity & Consultation:***

*Notify adjacent neighbours, may need site and press notices. Consult local councils and statutory consultation bodies as required."*

**However, the consultation process described, which encourages full consultation of the Reserved Matters agreements made between the Council and the applicant (developers/landowners), is currently not being followed by the Council.**

Instead, in order to evade the democratic accountability required by the current and proposed "Statement of Community Involvement", the Council uses the "Scheme of Delegation To Officers" and other policy instruments.

Agreements reached at the "Reserved Matters" stage include matters such as:

- 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

These very important matters, which are of great interest to Parish Councils and the general public, are now considered and agreed in private by the Council and not subject to any form of wider public consultation, despite their importance.

Unless the Application is “called-in” to the Planning Committee for consideration by the local Borough Councillor and this rarely happens.

This quite unacceptable loss of democratic accountability has resulted in , amongst other things:

- 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 local residents to pay much higher maintenance fees than if a Parish Council were to own and manage the land. Residents have no democratic accountability to challenge the fees.

It is nothing short of a “Leaseholder rip-off” aided by the Borough Council. With developers earning profits “in perpetuity” from residents who were totally unaware of their status regarding this issue at the time of their house purchase.

The “**Competitions & Markets Authority**” **Report on the Housing Market** has recently 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 at all in the best interests of the people of Bedford Borough, and it would never have happened had open Consultation taken place as described by the proposed “Statement of Community Involvement”.

**CPRE Bedfordshire strongly advocates the consultation process described in the proposed “Statement of Community Involvement” when considering “Reserved Matters Consent” and urges the Council to reject the use of the “Scheme of Delegation to Officers” or other policy measures as a means of avoiding the SCI approved consultation process.**

## **2. Planning Applications - Pre-Application Consultation**

The Governments National Planning Policy Framework (NPPF) Paras 39 to 46 gives very considerable emphasis to 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 with regard to planning applications in their area.

The proposed Statement of Community Involvement gives only limited emphasis to the pre-application process in para 14.2.

**CPRE Bedfordshire would like to see the Council giving far more emphasis to the pre-application process with strong encouragement to applicants to engage with local people and in particular Town & Parish Councils, prior to applications being submitted to the Council.**

**In particular, it should be a priority when applicants are making proposals for development in Parishes which have a “made” Neighbourhood Development Plan.**

**This to ensure that developers have taken into account the NDP policies which in some cases e.g. the design of houses, take precedent over Borough Council policies.**

**We are aware of Parish Councils with NDP’s 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 BBC and this is not acceptable.  
BBC should actively discourage such action by developers**

**Q3 Do you have any comments about Part 3 of the Statement of Community Involvement?**

Please see our comments regarding Neighbourhood Development Plans and Pre- application consultation.

**Q4 Do you have any comments about Part 4 of the Statement of Community Involvement?**

No

**Please email your completed form to:**  
[planningpolicy@bedford.gov.uk](mailto:planningpolicy@bedford.gov.uk)

Or send a copy of your completed form by post, with a stamp, to:

Planning Policy Team, Bedford Borough Council  
Room 415, Borough Hall  
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