

INSPECTOR'S REPORT
NORTHAMPTON BOROUGH COUNCIL
STATEMENT OF COMMUNITY INVOLVEMENT

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 12th January 2006

Northampton Borough Council - Statement of Community Involvement (June 2005)

INSPECTOR'S REPORT

Introduction

- 1.1 An independent examination of the Northampton Borough Council Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act. Following paragraph 3.10 of Planning Policy Statement 12: Local Development Frameworks, the examination has been based on the 9 tests set out (see Appendix A). The starting point for the assessment is that the SCI is sound. Accordingly changes are made in this binding report only where there is clear need in the light of tests in PPS12.
- 1.2 A total of 25 representations were received all of which have been considered. Clarification was sought from the Council in relation to Test iv and the response received has been taken into account in preparing this report (see Appendix B).

Test 1

- 2.1 The Council has undertaken the consultation required by under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004. This is confirmed in the Council's pre-submission consultations and representations statements.
- 2.2 This test is met.

Test 2

- 3.1 Paragraph 2.13 of the SCI acknowledges that the LDF is a way of delivering the aims of the Community Strategy, and recognises the links between the Community Strategy and the LDF. Reference is made at Paragraph 2.14 to the existing groups set up by the Local Strategic Partnership, and the SCI explains that these groups will be used during the preparation of the LDDs.
- 3.2 This test is met.

Test 3

- 4.1 The Council has set down in Appendix B of the SCI those groups which will be consulted in the preparation of the DPDs. This list includes the statutory bodies from PPS12 Annex E. The Council will consult with bodies where appropriate, and propose to keep a database of consultation bodies and stakeholders to be updated as new groups, organisations and individuals are identified.
- 4.2 This test is met.

Test 4

- 4.3 Paragraphs 2.23 to 2.25 of the SCI failed to set out clearly the early stages of DPD preparation, and the Council was asked clarify the consultation they propose to undertake during the preparation of the preferred options, in accordance with Regulation 25. Whilst the Council's reply (dated 6th January 2006) makes reference to the possibility of consultation at the issues and options stage, the Council goes on to say that the Regulations "do not require the inclusion of an issues and options stage", and that an issue and options stage will not be appropriate for all DPDs.
- 4.4 Whilst I accept that the Regulations do not make specific reference to an "issues and options stage", the term is used throughout PPS12 and the Companion Guide (ODPM, 2004). In particular, Figure 4.1 of PPS12 sets out clearly the need for consultation (described as "ongoing engagement") during the preparation of "issues and alternative options" in accordance with Regulation 25. This is a necessary part of the DPD preparation process and is distinct from the consultation required under Regulation 26 of the legislation. This is explained in Paragraph 4.3 of the PPS12 Companion Guide, and also in Paragraph 3 of the attached letter (see Appendix C of this report) from ODPM which relates specifically to SCIs but is equally relevant to all DPDs. By failing to distinguish between the consultation required under Regulation 25 and that required under Regulation 26, the approach proposed by the Council in their SCI and in their response to my letter of the 2nd December 2005, fails to accord with that set out in PPS12 and the Companion Guide (ODPM, 2004). Whilst I accept the Council's reply that Paragraph 2.26 makes reference to the consultation bodies listed under Regulation 25, this is in the context of the consultation required under Regulation 26 and not 25.
- 4.5 On this basis I am unable to conclude that the SCI meets Test iv. In order to meet this Test the SCI should be amended in accordance with recommendation R1 set out below.
- 4.6 In relation to Test iv, the Council was asked to revise the Diagrams in Appendices F and G to clarify the stages in DPD and SPD preparation. These were provided (Council's Letter 6th January 2006) and I recommend that the SCI be amended accordingly.

Recommendations

(R1) Delete paragraphs 2.24 and 2.25 and under the heading "Pre-submission Involvement" insert the following before Paragraph 2.26:

"Early community engagement will involve consultation bodies in identifying and considering the issues and options that a DPD will need to address prior to its formal submission to the Secretary of State. Decisions on which of the consultation bodies listed at Appendix B of the SCI are to be consulted at this stage will depend on the extent to which the DPD subject matter affects them or is relevant to them. There are a variety of ways in which this consultation can take place including through the publication and circulation of a formal Issues and Options document containing questions, informal round-table

workshops, and exhibitions. This will lead to the preparation of a preferred options document.”

(R2) That the diagrams in Appendix F and Appendix G of the SCI be deleted and replaced with those at Appendix D of this report.

Test 5

6.1 In Appendix C of the SCI the Council usefully identify and define the different types of consultation and involvement methods that they may employ during DPD preparation. These cover a range of recognised techniques that will enable community consultation and involvement through a range of different media. The Consultation Matrix in Appendix D of the SCI sets out the methods appropriate for the different types of DPDs and the different groups to be consulted. The SCI acknowledges that consultation may have to be tailored to the needs of certain groups or individuals (Paragraph 2.19) and (Paragraph 2.7) explains how existing Forums covering such groups will be used.

6.2 This test is met

Test 6

7.1 Paragraph 2.44 acknowledges that the Local Authority’s resources are limited, but that the budget for the LDF contains resources to undertake community involvement.

7.2 This test is met.

Test 7

8.1 Paragraphs 2.45 to 2.48 explain how the results of community involvement will be taken into account by the Council and used to inform decisions. However, the Council were asked to clarify who makes up the Council’s Executive referred to at Paragraph 2.45. On the basis of the Council’s reply I recommend the SCI be amended accordingly.

8.2 Subject to the following recommendations, this test is met.

(R3) Amend Paragraph 2.45 in accordance with the following:

- delete the heading of this paragraph and replace with “Cabinet”.
- delete the word “Executive” in Paragraph 2.45 and replace with “Cabinet”.
- insert the following text after Paragraph 2.45, “The Cabinet takes executive decisions and provides political leadership for the implementation of the Council’s corporate strategy, other policies and budget. The Cabinet consists of the Leader of the Council together with 5 other Councillors appointed to the Cabinet by the Council. Each member of the Cabinet, including the Leader, has a portfolio of responsibilities. One of these portfolios is Economy and

Infrastructure, which includes planning policy. The Cabinet meets 6 times a year. Cabinet meeting papers are available on the Council's website or at the Council's offices."

Test 8

- 9.1 Paragraph 5.1 explains clearly the Council's proposals for monitoring and reviewing the success of community involvement techniques.
- 9.2 This test is met.

Test 9

- 10.1 The SCI at Section 3 clearly describes the Council's policy for consultation on planning applications.
- 10.2 This test is met.

Conclusions

- 10.3 The Council have set out in their Regulation 31 Representations Statement (October 2005) a number of proposed changes to the SCI in response to representations received on the submission document. These suggested amendments do not affect the substance of the SCI but (with the exception of the change proposed for Paragraph 5.5) they do improve the clarity and transparency of the submission SCI. I therefore recommend that they be included and I set out the recommendations below.
- 10.4 In addition, the Council proposed a number of amendments in response to further information submitted during the examination by the Government Office for the East Midlands which is provided as Appendix E of this report. I set out below a recommendation (R4) in relation to these amendments
- 10.5 Subject to amendments in accordance with the recommendations set out in this report, the Northampton Borough Council SCI (June 2005) is sound.

Recommendations

R4) That the SCI be modified in accordance with the amendments set out in Appendix E to this Report.

R5) Add to Appendix B1 Defence Estates, Department for Work and Pensions, Office of Government Commerce, Department of Constitutional Affairs; and other consultees not referred to in PPS12, including the Theatres Trust and Northampton Primary Care Trust.

R6) Amend Appendix B of the SCI to include "West Northamptonshire Development Corporation", and all Parish Councils that adjoin Northampton Borough Council.

R7) Include a new sentence after the first sentence of Paragraph 3.7 to read: "Parish Councils outside of the area in which the application is located may also be notified if, in the opinion of the case officer, the development is likely to have a wider impact."

R8) Include sentences at beginning of Paragraph 2.6 to read: "The Council has set up a number of Area Partnerships which are made up of ward councillors, plus other interested parties such as county or parish councillors, the Police etc. The Area Partnerships, which meet about 5 times a year, have a consultative role and provide an opportunity for local people to discuss issues and future plans for the area."

R9) The following sentence should be inserted as the second sentence in Paragraph 2.41: "The draft SPD will be available for inspection at the Council's offices and other appropriate places as listed in Paragraph 2.9 of this SCI."

R10) The following text should be inserted after "available" and before "and" in the second sentence of Paragraph 2.42: "i.e. the Council's office and other appropriate places,".

R11) The third sentence of Paragraph 2.41 should be amended to read: "All those bodies referred to in Appendices B and B1 of the SCI which the Council considers will be affected by the SPD will be sent the SPD, the Consultation Statement, relevant supporting documents, the Notice of SPD matters, the Statement of main issues and a statement that the documents are available for inspection including the location and times."

R12) The second sentence of Paragraph 2.26 should be amended to read: "The pre-submission proposals document, the proposals matters and a statement that the documents are available for inspection including the location and times will be placed on the Council's website and will be made available for inspection at the Council's offices and local libraries."

R13) The last sentence of Paragraph 2.26 should be amended to read: "Copies of the draft DPD, the relevant supporting documents and a statement of locations and times for inspection will be sent to those bodies referred to in Appendices B and B1 of the SCI, which the local authority considers will be affected by the DPD."

R14) For clarity the following sentence should be included in Paragraph 2.28: "Copies of the DPD, the Sustainability Appraisal, Pre-Submission Consultation Statement, relevant supporting documents, the Notice of DPD matters and a statement of locations and times for inspection will be sent to those bodies referred to in Appendices B and B1 of the SCI, which the local authority considers will be affected by the DPD."

R15) For clarity an additional sentence should be added to the end of Paragraph 2.28 that states: "Notice will also be given to all persons who asked to be notified of the submission of the DPD to the Secretary of State."

R16) For clarity a new second sentence should be included in Paragraph 2.29 that reads: "As soon as possible after the consultation period the following information will be published on the Council's website: the representation/s, the period within which representations on the site allocation representation/s must be made, address and

person to whom written and electronic representations must be made, a statement of when and where the representation/s are available for inspection."

R17) For clarity a new third sentence, after the new second sentence, should be included in Paragraph 2.29 to read: "As soon as possible after the consultation period the Council will send to the DPD bodies the following information: the address of the site to which the representation/s relate, the period within which representations on the site allocation representation/s must be made, address and person to whom written and electronic representations must be made, a statement of when and where the representation/s is available for inspection."

R18) For clarity a new fourth sentence, after the new third sentence, should be included in Paragraph 2.29 to read: "As soon as possible after the consultation period the Council will advertise in the local press: the period within which representations on the site allocation representation/s must be made, address and person to whom written and electronic representations must be made, and a statement of when and where the representation is available for inspection."

R19) The following additional bullet point should be added to Paragraph 2.32: "the adoption statement will be published on the Council's website."

R20) Include new paragraph after 2.16 under heading 'Northamptonshire Compact' to read: "Developing relationships is fundamental to partnership working with the voluntary and community sector. Local compacts set out what the voluntary sector, local authorities and other local bodies can expect from each other. The Northamptonshire Compact, launched in December 2002, has been signed up to by the Borough Council. The Compact includes an undertaking for public bodies to provide mechanisms for the voluntary and community sectors to influence their objectives and the plans that emerge out of them."

R21) Add Human Health to the table entitled 'Effects of the proposed development on the surrounding area' on page 26 in Appendix E of the SCI.



K Holland BA (Hons) Dip TP MRTPI ARICS
Inspector

APPENDIX A
TESTS OF SOUNDNESS

Examination of the soundness of the statement of community involvement

3.10 The purpose of the examination is to consider the soundness of the statement of community involvement. The presumption will be that the statement of community involvement is sound unless it is shown to be otherwise as a result of evidence considered at the examination. A hearing will only be necessary where one or more of those making representations wish to be heard (see Annex D). In assessing whether the statement of community involvement is sound, the inspector will determine whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in Regulations;¹
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;
- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
- vi. resources are available to manage community involvement effectively;
- vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
- viii. authority has mechanisms for reviewing the statement of community involvement; and
- ix. statement clearly describes the planning authority's policy for consultation on planning applications.

From: Planning Policy Statement 12: Local Development Frameworks

¹ The Town and Country Planning (Local Development) (England) Regulations, 2004.

INSPECTOR'S REPORT
NORTHAMPTON BOROUGH COUNCIL
APPENDIX B – RESPONSE TO QUERIES

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 12th January 2006



The Planning Inspectorate

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Claire Eisley
Northampton Borough Council
Cliftonville House
Bedford Road
Northampton
NN4 7NR

Your Ref:

Our Ref: PINS/V2825/429/2

Date: 2nd December 2005

NORTHAMPTON BOROUGH COUNCIL STATEMENT OF COMMUNITY INVOLVEMENT

Dear Ms.Eisley

As the appointed Inspector for your Authority's Statement of Community Involvement I am requesting comments from the Council on the following point in order to assist in assessing the soundness of Northampton Borough Council Statement of Community Involvement.

- In order to comply fully with Tests iv and v please could the Council set out clearly the early stages of DPD preparation; Paragraphs 2.23 to 2.25 of the SCI are particularly unclear. The SCI should set out the consultation that the LPA proposes to undertake during the consideration of the "issues and options". This should include reference to specific and general consultation bodies (which you have listed in Appendix B of the SCI) in accordance with Regulation 25, and any other consultation that the Council propose to undertake beyond the minimum requirements.
- The diagrams in Appendices F and G are not particularly clear and I suggest that these be redrafted to more closely reflect Figures 4 and 4.2 of PPS12.
- Could the Council provide for insertion into Paragraph 2.45 an explanation of who makes up the "Council's Executive".

These answers are to assist in the production of a binding report. Once you have submitted your response to these questions, the report will be produced as quickly as possible. Please reply to Steve Carnaby whose details are given above. Thank you for your assistance in this matter.

Yours sincerely,

Keith Holland BA(Hons) Dip TP MRTPI ARICS

Northampton Development Framework – Statement of Community Involvement

Northampton Borough Council's Response to Mr K Holland's letter dated 2nd December 2005

Paragraphs 2.23 to 2.25

Northampton Borough Council does not accept that Paragraphs 2.23 and 2.24 are unclear. As Paragraph 2.25 of the SCI states the initial engagement stage is not prescribed in Regulations and it is for the local planning authority to determine the most appropriate means of community involvement. Different techniques will be employed and different groups targeted depending on the type of LDD document. An issues and options stage may not be always necessary or appropriate. Consequently the Borough Council considers it is too prescriptive to set out in the SCI the consultation that the LPA proposes to undertake during the consideration of "issues and options" of all DPDs. However, the Borough Council does accept that reference could be made in Paragraph 2.25 to issues and options. The Borough Council proposes that the following additional sentence is added to Paragraph 2.25:

"One technique is to include an issues and options stage in the DPD process. Such a stage involves stakeholders in identifying and considering the issues and options that a DPD will need to address prior to its formal submission to the Secretary of State. There are a variety of ways in which an issues and options stage can be undertaken including: the publication and circulation of a formal Issues and Options document containing questions; informal round-table workshops; and exhibitions. The Regulations do not require the inclusion of an issues and options stage, and indeed an issues and options stage will not be appropriate for all DPDs due to their nature."

Paragraph 2.26 of the SCI deals with Pre-Submission Involvement and, reflects Regulation 25 by including reference to specific and general consultation bodies (listed in Appendices B and B1 of the SCI).

Appendices F and G

Northampton Borough Council accepts that Appendices F and G of the Submission Draft SCI are not particularly clear. Therefore, both Appendices F and G have been redrafted to more closely reflect Figures 4.1 and 4.2 of PPS12. A copy of each Appendix is attached to this response.

Paragraph 2.45

Northampton Borough Council accepts that Paragraph 2.45 does not provide an explanation of the Council's Executive.

Furthermore, at its meeting on 29 September 2005 Northampton Borough Council approved amendments to its Constitution. One of these amendments was to replace the Executive with the Cabinet.

Consequently the Borough Council proposes the following changes to Paragraph 2.45:

Delete the heading of Paragraph 2.45 and replace with "Cabinet".

Delete the word "Executive" in Paragraph 2.45 and replace with "Cabinet".

Insert the following additional paragraph after Paragraph 2.45:

"The Cabinet takes executive decisions and provides political leadership for the implementation of the Council's corporate strategy, other policies and budget. The Cabinet consists of the Leader of the Council together with 5 other Councillors appointed to the Cabinet by the Council. Each member of the Cabinet, including the Leader, has a portfolio of responsibilities. One of these portfolios is Economy and Infrastructure, which includes planning policy. The Cabinet meets 6 times a year. Cabinet meeting papers are available on the Council's website or at the Council's offices."

Claire Berry,
Northampton Borough Council,
6th January 2006.

INSPECTOR'S REPORT
NORTHAMPTON BOROUGH COUNCIL
APPENDIX C – O.D.P.M. LETTER

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 12th January 2006

To: Chris Snarr

From: Alan Cornock
Senior Planning Officer
Plans International
Compensation and
Assessment

Location: Zone 3/J3
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Bressenden Place
London
SW1E 5DU

Tel: 020 7944 3563
Fax: 020 7944 3919
Ref:
(Paper)

Date: 30 August 2005
Copies: Rick Blyth
Patrick Akindude

Statements of community involvement - Regulations 25 and 26

1. Further to your email dated 26th August, 2005 I have set out the process for the preparation of a statement of community involvement.
2. Planning Policy Statement 12 (PPS12) at para 3.9 sets out that the pre-submission consultation process requires local planning authorities to involve the community and stakeholders during the preparation of the statement of community involvement. Community involvement on a draft allows them to influence the scope and form of community involvement that the local planning authority intends should take place when local development documents are prepared. Local planning authorities must ensure that all participants involved in the preparation process are able to make their views known and should therefore consult them in the preparation of the draft document in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations, 2004. Once this has been undertaken, the local planning authority should publish the draft statement of community involvement and invite representations over a period of six weeks in accordance with Regulation 26.
3. Although the diagram on page 17 of PPS12 shows them as one stage, in effect the local planning authority must comply with the requirements of Regulation 25 before it can proceed to Regulations 26. That means that the local planning authority should have consulted with the regional planning body or the Mayor of London (whichever is applicable), the Highways Agency and each relevant authority any part of whose area is in or adjoins the area of the authority.
4. As long as the authority had consulted with those bodies identified above prior to consulting on the draft in accordance with Regulation 26, then they will have complied with the requirements of the Regulations. If they had not then the authority has not complied with the minimum requirements for consultation and as required by Test 1 of the tests of soundness for statement of community involvement.

5. It would appear that both the authorities to which you refer would be in the later category and have not complied with the requirements of the Regulations.

6. Where the statement of community involvement differs from a DPD in its preparation is that at the Regulation 25 stage the authority can produce a draft statement of community involvement as opposed to issues and alternative options.

I hope this is of assistance.

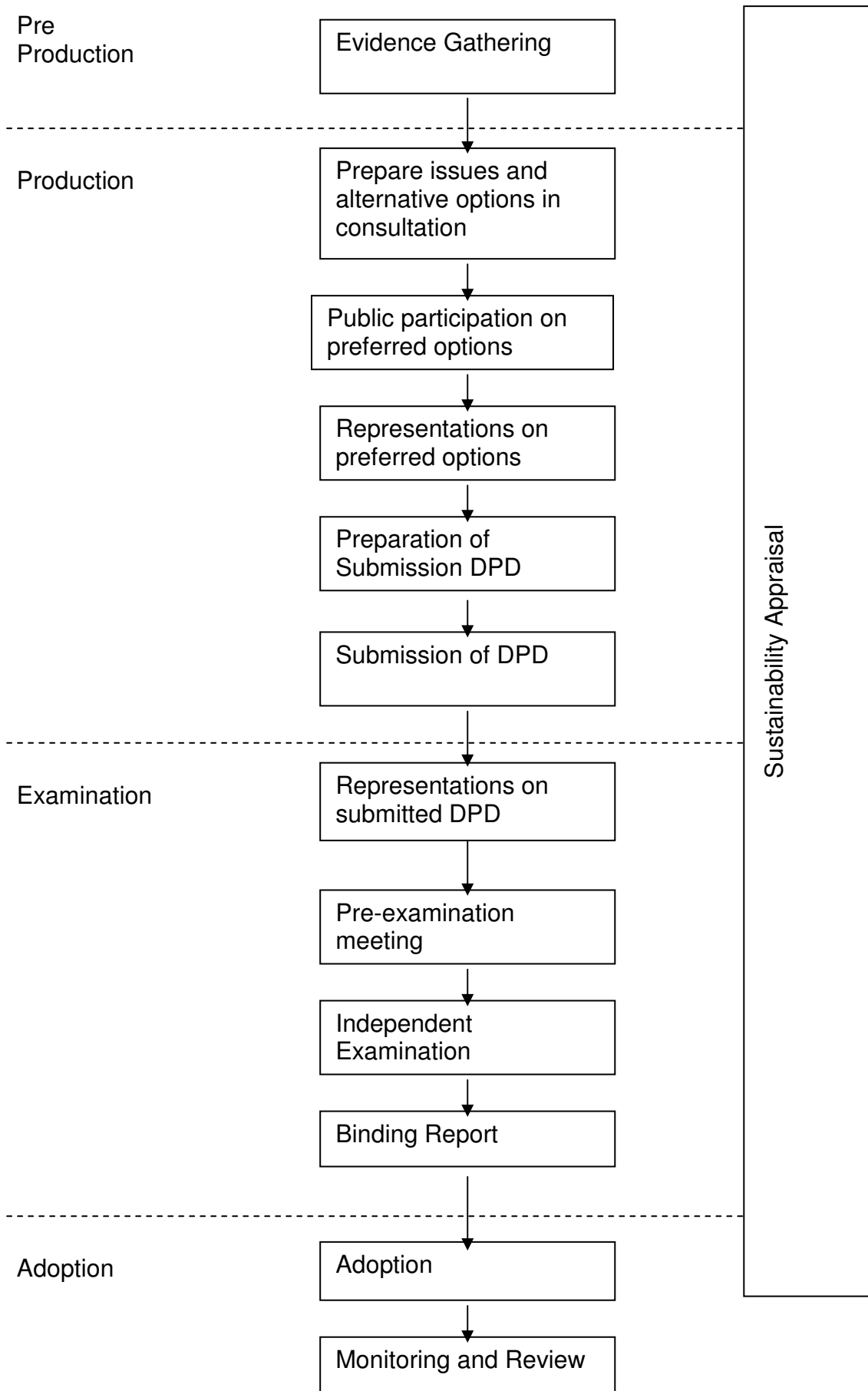
Alan Cornock

INSPECTOR'S REPORT
NORTHAMPTON BOROUGH COUNCIL
APPENDIX D – REPLACEMENT DIAGRAMS

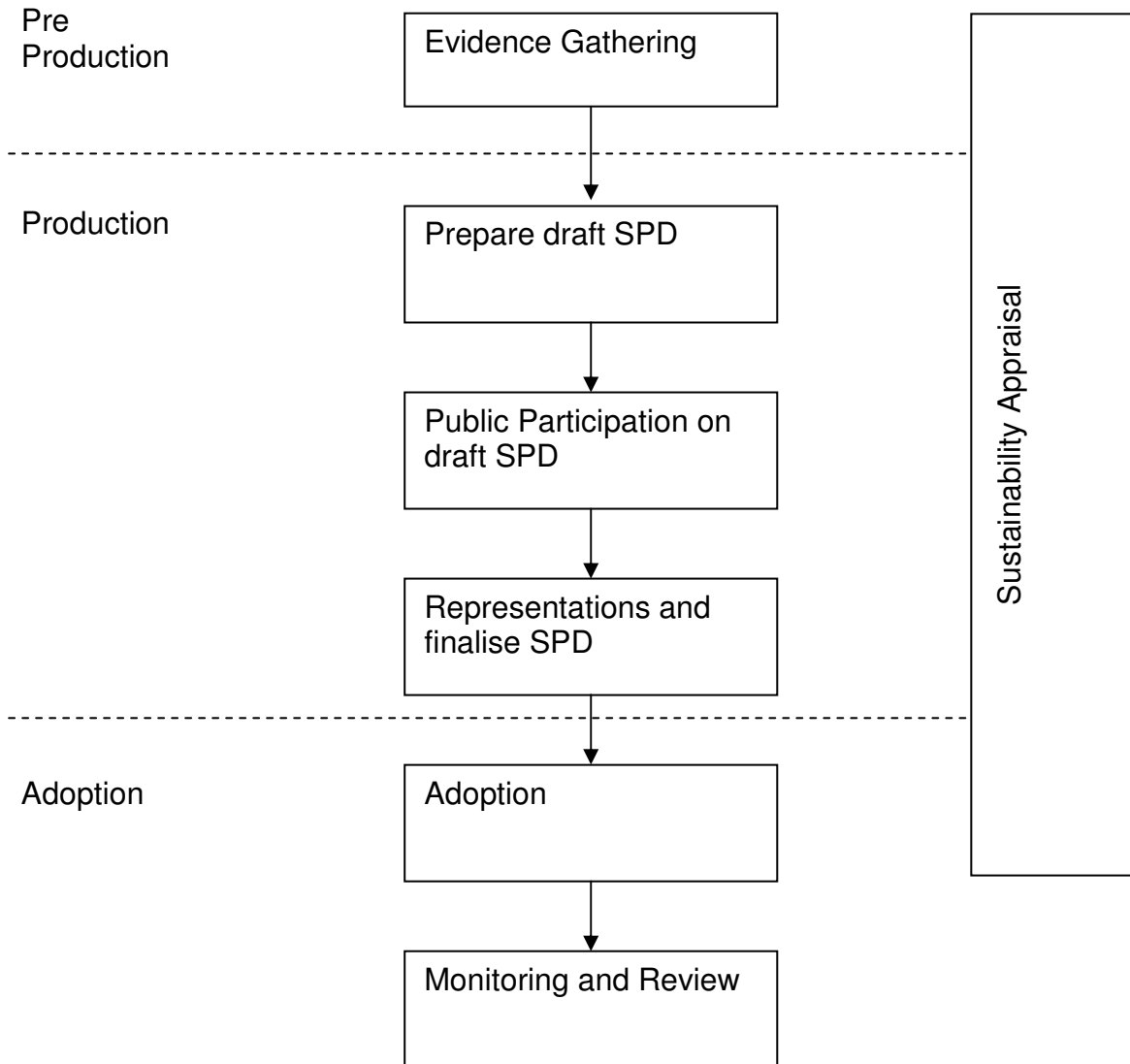
Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 12th January 2006

Proposed Changes to Statement of Community Involvement
APPENDIX F - DPD Process



**Proposed Changes to Statement of Community Involvement
APPENDIX G - SPD Process**



INSPECTOR'S REPORT
NORTHAMPTON BOROUGH COUNCIL
APPENDIX E – CORRESPONDENCE FROM G.O.E.M

Inspector: Keith Holland BA(Hons) Dip TP MRTPI ARICS

Date: 12th January 2006

Northampton Development Framework – Statement of Community Involvement

Northampton Borough Council's Response to Government Office for the East Midlands' letter dated 7th December 2005

New Paragraph

Northampton Borough Council accepts that it would be helpful to include an additional paragraph outlining that the Borough Council intends to optimise consultation exercises so that they help to inform the wider agenda wherever possible.

Therefore, the Borough Council proposes that the following paragraph be inserted after the existing Paragraph 2.44:

“In order to optimise scarce resources, reduce demands on consultation bodies and inform the wider agenda, opportunities will be taken to undertake joint consultation events with partners such as other Councils in West Northamptonshire, Northamptonshire County Council and West Northamptonshire Development Corporation, and other departments of Northampton Borough Council for similar documents or issues.”

Paragraph 2.46

Northampton Borough Council accepts that the SCI should include reference to how the WNDC will be consulted during early plan preparation.

At its meeting on 5 December 2005 the Borough Council's Cabinet approved proposals for the development of the Local Development Document Steering Group into a broader Planning Advisory Panel to ensure dialogue between the WNDC, the Borough Council and Northamptonshire County Council in the light of the future transfer of development control responsibilities to WNDC and to enable the three organisations to jointly assist in the development of local planning documents.

Therefore, the Borough Council proposes the deletion of existing Paragraph 2.46, including its heading, and its replacement with the following:

Insert the following heading: “Planning Advisory Panel”

Insert the following paragraph:

“The Borough Council has established a Planning Advisory Panel. The Panel has no decision-making powers, reporting directly to the Council's Cabinet. The role of the Panel is to ensure dialogue between the West Northamptonshire Development Corporation, the Borough Council and Northamptonshire County Council in the light of the future transfer of development control responsibilities to the West Northamptonshire Development Corporation and to enable the three organisations to jointly assist in the development of local planning

documents. The Panel will meet periodically as and when different stages of LDD preparation are reached. The Panel includes the Borough Council Portfolio Holder for Economy and Infrastructure, a representative of the Borough Council's Overview and Scrutiny Committee, a representative of the Borough Council's Planning Committee, a representative of the West Northamptonshire Development Corporation and a representative of Northamptonshire County Council."

As its meeting on 18 July 2005 the Borough Council's Executive endorsed the establishment of a Town Centre Commission to oversee the development of the Central Area Action Plan LDD. At its meeting on 5 December 2005 the Borough Council's Cabinet noted the development of the Town Centre Commission Steering Group.

The Borough Council considers it appropriate to include reference to the Town Centre Commission and the Town Centre Commission Steering Group in the Statement of Community Involvement.

Therefore, the Borough Council proposes the inclusion of the following new paragraph after Paragraph 2.46:

Insert the following heading: "Town Centre Commission and Town Centre Commission Steering Group"

Insert the following paragraph:

"The Borough Council has established the Town Centre Commission to oversee the production of the Central Area Action Plan Local Development Document. The Commission is time-limited. The Commission consists of up to 150 people drawn from a wide range of organisations and bodies as well as individuals. A Town Centre Commission Steering Group has also been established with responsibility for commissioning, planning and actioning research, and compiling the Action Plan on behalf of the Commission. The Steering Group has 15 members including representatives of the Borough Council, the West Northamptonshire Development Corporation, Northamptonshire County Council, Northampton Local Strategic Partnership and a range of other stakeholders."

Northampton Borough Council accepts that an additional paragraph should be included in the SCI explaining how the SCI links with the Regeneration Framework being produced by the WNDC.

Therefore, the Borough Council proposes the inclusion of the following new paragraph after the new paragraph set out above:

Insert the following heading: "West Northamptonshire Development Corporation's Regeneration Framework"

Insert the following paragraph:

“West Northamptonshire Development Corporation is developing a Regeneration Framework that will set out how the regeneration of West Northamptonshire will be achieved. The Regeneration Framework is being developed in two stages. The first stage is a Prospectus which sets the scene for regeneration and growth activities over the next ten years and beyond. The second stage is the preparation of a Growth Delivery Plan. This will set out what needs to be done, who does it, how it will be done and how much it will cost. The nature of community involvement in the development of the Regeneration Framework is a matter for the West Northamptonshire Development Corporation but the Borough Council encourages the West Northamptonshire Development Corporation to follow the principles of community involvement set out in this Statement of Community Involvement. The Planning Advisory Panel provides a mechanism for discussing the content and preparation processes of both the Local Development Framework and the Regeneration Framework.”

Appendix D

Northampton Borough Council does not accept that WNDC should be listed in Appendix D of the Statement of Community Involvement. Specific consultation bodies are not listed in Appendix D, instead consultation bodies are grouped together as Target Groups. To name just one consultation body and list it, such as WNDC, and not to similarly list all others would create an inconsistent approach. Furthermore, to list all consultation bodies separately in Appendix D would increase the length and complexity of the SCI unnecessarily.

Claire Berry,
Northampton Borough Council,
6th January 2006.