

**Appendix 1: Table of comments on initial draft Addendum to SCI, officer response and proposed action**

<b>Respondent</b>	<b>Addendum para</b>	<b>Respondent comment</b>	<b>Officer response</b>	<b>Proposed Action</b>
South Bank and Waterloo Neighbours (SoWN)	A3.8 and A3.10	Since the timescales for responses are prescribed in planning guidance the council should make a more definitive statement about adhering to them – rather than ‘the council will aim to determine the application’, the council will determine the application’ is more appropriate.	The Council will always aim to determine applications within the statutory timescales and this is reflected in the wording of the addendum. However, there may be circumstances beyond the Council’s control that mean in rare cases this is not possible. The wording in the addendum is therefore considered appropriate.	No change
SoWN	A4.5	‘Officers can provide guidance if requested about the types of development plan policy that they consider to be strategic in nature’. This does not go far enough. The NPPF requires local authorities to identify the strategic policies in their local plans and this should be a readily available document.	The NPPF 2012 is the current document and states ‘Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible’. It is acknowledged that there is scope to clarify the wording of the initial draft addendum in relation to this point.	Replace the last sentence of para A4.5 with the following: ‘Officers can provide guidance if requested about the relationship between proposed neighbourhood development plan policies and strategic policies in development plans.’
SoWN	A6.1	The council should consider setting out basic timescales for responding to submitted plans.	There is no statutory requirement to do this. Every case will be different and it is not possible to set out timescales that would apply in all cases. Timescales would be expected to be addressed as part of discussion in relation to a particular proposal.	No change

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SoWN	A7.3	<p>According to this clause, the Council is able to decide not to send a plan to referendum against the recommendations of the examiner and although it must publish its reasons for doing so, the final decision on whether or not to send the plan to referendum rests with them. It would be clearer and more transparent to mention here that the Neighbourhood Forum has recourse to appeal to the Secretary of State in these circumstances (Para 13B of Schedule 4B of the Town and Country Planning Act 1990, inserted by Section 141 of Housing and Planning Act 2016), if within six weeks of the decision. This also applies to the Council making modifications to the plan (A9.1).</p>	<p>Noted and agreed. Neighbourhood forums are able to ask the Secretary of State to intervene should they disagree with certain of the Council's decisions at this stage, provided this is done in accordance with the relevant statutory requirements.</p>	<p>Add the following text to the end of para A7.3 and as a new para A9.2 in relation to modification of plans:</p> <p>'Neighbourhood forums are able to ask the Secretary of State to intervene, should they disagree with certain of the Council's decisions at this stage. Such a request would need to be made in accordance with the relevant statutory requirements. These are contained in paragraph 13B of Schedule 4B to the Town and Country Planning Act 1990 and include a time limit and format for making the request to the Secretary of State.'</p> <p>Renumber existing para A9.2 as A9.3</p>
SoWN	A8.1	<p>The Council should set out how it will manage cross borough referenda and indeed any other cross borough issues of relevance.</p>	<p>This is not a matter for the addendum which sets out how the Council will provide advice or assistance to the making of neighbourhood plans/orders or modification of neighbourhood plans. Paragraph A3.6 of the</p>	<p>No change</p>

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			addendum sets out how officers will respond in the case of cross-border applications.	
SoWN	general	We would also suggest that the Council should be transparent about the decision making process for determining the defrayal of CIL (both the strategic and neighbourhood element), setting out the ways it will involve the community in the decision-making process.	This is not a matter for the addendum which sets out how the Council will provide advice or assistance to the making of neighbourhood plans/orders or modification of neighbourhood plans.	No change
Kennington Oval Vauxhall Neighbourhood Forum (KOV)	A3.8/A3.10	As timescales for responses are prescribed in planning guidance the Council must make a clear, unequivocal statement in compliance with statutory guidance.	The Council will always aim to determine applications within the statutory timescales and this is reflected in the wording of the addendum. However, there may be circumstances beyond the Council's control that mean in rare cases this is not possible. The wording in the initial draft addendum is therefore considered appropriate.	No change
Kennington Oval Vauxhall Neighbourhood Forum (KOV)	A4.5	The National Planning Policy Framework requires local authorities to identify the strategic policies in the local plan. In previous correspondence the Council has stated that all policies are strategic. However, in the SCI consultation material the statement is made that: <i>Officers can provide guidance if requested about the types of development plan policy that they consider to be strategic in nature</i>	The NPPF 2012 is the current document and states 'Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible'. It is acknowledged that there is scope to clarify the	Replace the last sentence of para A4.5 with the following: 'Officers can provide guidance if requested about the relationship between proposed neighbourhood development plan policies and strategic policies in development plans.'

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		If it is now the case that the Council no longer insists that all Local Plan policies are strategic, then the NPPF requires the Council formally and transparently to identify for public information the policies considered to be strategic. Guidance from individual officers on the types of policy <i>they</i> consider to be strategic in no way meets this requirement.	wording of the initial draft addendum in relation to this point.	
Kennington Oval Vauxhall Neighbourhood Forum (KOV)	A6.1	Publication of appropriate timescales for responding to submitted plans should be incorporated in the SCI	There is no statutory requirement to do this. Every case will be different and it is not possible to set out timescales that would apply in all cases. Timescales would be expected to be addressed as part of discussion in relation to a particular proposal.	No change
Kennington Oval Vauxhall Neighbourhood Forum (KOV)	A7.3	<p>It is not in the spirit of the Localism Act that the Council finds it necessary or appropriate to include in its Statement of Community Involvement that it intends to exercise the final decision on whether or not to send a plan to referendum even against the recommendations of the examiner.</p> <p>The Council may wish to include in the SCI at this point information to the effect that a Neighbourhood Forum can appeal to the Secretary of State in these circumstances (Para 13B of Schedule 4B of the Town and</p>	The addendum sets out the Council's approach to providing advice and assistance in the neighbourhood planning process. For this reason the various stages of the process are set out in the addendum, reflecting the summary of the neighbourhood planning process contained in the Planning Practice Guidance. The purpose of including this description is only to give an overview of the steps in the process, not to anticipate the outcome of the various steps in any particular case.	<p>Add the following text to the end of para A7.3 and as a new para 9.2 in relation to modification of plans:</p> <p>'Neighbourhood forums are able to ask the Secretary of State to intervene, should they disagree with certain of the Council's decisions at this stage. Such a request would need to be made in accordance with the relevant statutory requirements. These are contained in paragraph 13B</p>

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		Country Planning Act 1990, inserted by Section 141 of Housing and Planning Act 2016), if within six weeks of the decision. Plus that recourse to the SoS also applies to the situation of the Council making modifications to a NP (A9.1).	It is acknowledged that. neighbourhood forums are able to ask the Secretary of State to intervene should they disagree with certain of the Council's decisions at this stage, provided this is done in accordance with the relevant statutory requirements.	of Schedule 4B to the Town and Country Planning Act 1990 and include a time limit and format for making the request to the Secretary of State.'  Renumber existing para A9.2 as A9.3.
Kennington Oval Vauxhall Neighbourhood Forum (KOV)	General comment	The Council must ensure the local community is fully involved in the consultation and decision making process in relation to the allocation of CIL, including both the strategic and neighbourhood element. Public consultation and close involvement in allocation of CIL must be undertaken on a regular basis to take account of the rapidly changing situation in this Borough particularly in areas subject to unprecedented development pressure. Local residents wish to be properly involved in expenditure of CIL for the protection and enhancement of the area in which they live.	The purpose of the addendum to the SCI is to set out how the Council will provide advice and assistance as part of the neighbourhood planning process. This response raises points that fall outside the scope of the addendum.	No change