

A Draft Policy Statement on “Commenting”

- The legislation makes it clear that the primary decision to be made by the CNPA is whether or not to call an application in, based on an assessment as to whether or not the application "raises a planning issue of general significance to the Park aims". There is no mention of commenting in the legislation or the Planning Protocol.
- It is inevitable, however, that there will be some applications that raise issues that are neither general nor all that significant, but still of legitimate interest to the CNPA. It is entirely proper, therefore, that the CNPA may wish on occasions to make comment to the LA that is to determine an application, just as the views of the LAs are expected and welcomed on applications to be determined by the CNPA. These may be formal comments, but as often as not they may be more effective through informal channels between respective officers.
- If comments made by the CNPA are to be effective, then it is important that they are only made when it is really considered to be necessary, and that care is taken not to restate points that are already obvious to experienced LA Members and professional officers. CNPA planning staff are probably the people best placed to secure this difficult balance. It is also of relevance that comments made by LAs on applications being determined by the CNPA almost always come from LA officers, not from Members sitting in Committee. These comments are often through informal dialogue between CNPA and LA officers. In cases where formal comment is made it still comes from a LA officer who is delegated to submit views on behalf of that authority. It is important to try and maintain balance and parallels in the way in which CNPA and the LAs comment to each other in order to avoid potential misunderstanding and to maintain common practices.
- It is concluded from this that the best policy for the CNPA would be to delegate commenting to planning officers just as the LAs do, but to find some way in which Members can have input into the thinking of planning officers. It is crucial, however, that the decision on whether and how to comment is delegated as it is your professional officers, with a detailed understanding of the context, who are perhaps best placed to judge whether a comment will be effective and how best to make it so.

- It is suggested, therefore, that immediately following the call in list we continue to have an agenda item called "comments on applications not called in". It is proposed, however, that this item should simply invite Members to note issues to their officers on any applications where they think issues are raised on which comment to their LA counterparts may be relevant. These will be noted in the minutes but it will then be for officers at their discretion to decide how best to address them, either through formal comment to the LA or informal discussion with LA officers with a view to securing the most effective means of conveying the CNPA comments and concerns on a particular case.
- Finally, Members are also encouraged to speak informally with their officers outside the Committee meetings if they require clarification or want to highlight potential issues relevant to any application. Formal expression of views must of course still be within the context of the Committee meeting.

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