## **INSPECTOR'S REPORT**

### **SELBY DISTRICT COUNCIL**

## STATEMENT OF COMMUNITY INVOLVEMENT

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

Date of Hearing: 6th June 2007

File Reference: PINS/N2739/429/2

#### <u>Selby District Council Statement of Community Involvement</u> (October 2006)

#### **INSPECTOR'S REPORT**

#### **Introduction**

- 1.1 An independent examination of Selby District Council's Statement of Community Involvement (SCI) has been carried out in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 (the Act), as applied by s18(4) of the Act.
- 1.2 Section 20(5) indicates the two purposes of the independent examination in parts (a) and (b). With regard to part (a) I am satisfied that the SCI satisfies the requirements of the relevant sections of the Act, in particular that its preparation has accorded with the Local Development Scheme as required by s19(1) of the Act.
- 1.3 Part (b) is whether the SCI is sound. 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.
- 1.4 A total of 25 representations were received, all of which have been considered. The Council proposed some minor amendments to the SCI in response to representations received and these have been taken into account in the preparation of this report. Following discussions at the Hearing further information was requested from the Council and this information is also taken into account in the preparation of this report.

#### Test 1

- 2.1 The Council has undertaken the consultation required under Regulations 25, 26 and 28 of the Town and Country Planning (Local Development) (England) Regulations 2004.
- 2.2 This test is met.

#### Test 2

- 3.1 Paragraph 7.1 acknowledges that the SCI has been designed to link with and complement the array of strategies and plans produced by the Council and Paragraph 7.2 states that wherever scheduling allows consultation will be co-ordinated between Local Development Framework (LDF) documents and other strategies.
- 3.2 The Selby District Community Strategy produced by the Selby Strategic Forum (the Local Strategic Partnership) is described in Paragraphs 7.4 -7.6. However, the SCI should explain more clearly how the process of community involvement in the LDF will be linked with the Community Strategy. I therefore have the following recommendation to make.
- **(R1)** Add the following to the end of Paragraph 7.4:

"By working closely with the Selby Strategic Forum and any other groups flowing from the Community Strategy the Council will ensure that the Local Development Framework is closely integrated with the Community Strategy."

- 3.3 The SCI also makes reference to other community strategies in Paragraphs 7.7 7.18 including North Yorkshire County Council's Community Strategy 'North Yorkshire Together' and the Selby District Communications Strategy.
- 3.4 Subject to the recommendation above, this test is met.

#### Test 3

- 4.1 The Council has set out in Paragraphs 4.30 4.36 and Appendix 2 of the SCI those groups which will be consulted. This list includes the statutory bodies from PPS12 Annex E, though I do have some minor amendments to this list which I detail below. It is stated at Paragraph 4.32 of the SCI that the Council holds a database of consultee details and information on how an individual or organisation can be added to the database are provided in Appendix 6. Furthermore, the Council states in Appendix 2 that it will consult with additional local stakeholders where appropriate.
- **(R2)** The amendments to the lists in Appendix 2 are as follows:

The Council should remove the Strategic Rail Authority from the list of Specific Consultation Bodies and replace it with Network Rail. As a consequence of this amendment remove Network Rail from the list of Other Consultees.

As the Planning Inspectorate is not listed in PPS12 as a Specific Consultation Body remove reference to the Inspectorate from the list.

Remove the reference to the Countryside Agency and English Nature from the list of Specific Consultation Bodies and replace with Natural England.

Finally, as the organisation no longer exists, remove reference to the Traveller Law Reform Coalition from the list of Other Consultees and replace with Friends, Families and Travellers.

- 4.2 The re-organisation of certain consultation bodies, such as the Strategic Rail Authority, should be acknowledged in the SCI and I recommend an additional sentence be added to this effect.
- (R3) Insert the following to the end of the preamble of Appendix 2:

"Please note, this list is not exhaustive and also relates to successor bodies where re-organisations occur."

4.3 Subject to the recommendations above, this test is met.

#### Test 4

5.1 Figures 3 and 4 and Appendix 1 of the SCI show that the Council will involve and inform people from the early stages of Local

Development Document (LDD) preparation and Paragraphs 4.15 – 4.29 and Appendix 3 set out the range of methods the Council will employ to do this. The Council clarifies in Figures 3 and 4 and Appendix 1 the stages at which consultation will take place and Appendix 1 shows that consultation will take place with the key stakeholders during the issues and options stage of Development Plan Document (DPD) production in accordance with Regulation 25.

- 5.2 However, the SCI should explain certain aspects of the LDD production process more clearly and I therefore, have the following recommendations to make.
- (R4) Figure 3 omits a key stage in the DPD process, if a document is concerned with allocations of land, under regulation 32 of the Act. This stage of the process is alluded to in Appendix 1, but further clarification is required. The Council should therefore, replace the final sentence in the text box 'Preparation of submission Development Plan Document' in Appendix 1 with the following:
  - "Should alternative sites be promoted during the submission consultation, we will advertise these sites and invite comments for a further six week period."
  - Additionally, the Council should insert a text box in Figure 3, after the box 'Representations on Submitted DPD' that reads "Possible alternative site consultation"
- (R5) There is an error in Figure 2 of the SCI which details the process for SCI production in that Regulation 25 and Regulation 26 are shown to be one stage in the process whereas there are, in fact, two discrete stages. The Council should, therefore, remove the phrase 'Regulation 25' from its current position and replace it on the line above. Additionally, the Council should add the following to the first sentence of Paragraph 2.5:
  - "..and is the process that will be followed should a formal review of the document prove necessary."

The remainder of this paragraph should be deleted.

(R6) With regard to the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) process there are errors in Paragraph 4.10 and Appendix 1 that require correction. Development Plan Document s and Supplementary Planning Documents (SPDs) are always subject to the SA / SEA process. Therefore the Council should amend the opening sentence of Paragraph 4.10 as follows:

"Development Plan Documents and Supplementary Planning Documents will be subject to an SA and an SEA...."

Additionally, in Appendix 1 amend the last sentence in the Preferred Options text box to read:

"The Sustainability Appraisal and Strategic Environmental Assessment will also inform the DPD and will be subject to comment during the consultation period."

Also add the sentence given above after the first sentence in the previously amended text box 'Preparation of submission Development Plan Document' (see R4 above).

- 5.3 It is noted that in Paragraph 7.3 the Council refers to Village Design Statements and Parish Plans. The Council agrees with the view that such statements and plans would, in an ideal world, benefit from being accorded Supplementary Planning Document status. However, the Council has to take a realistic view of what is possible in resource terms. I am satisfied that the Council cannot, at this stage, allocate resources to enhancing the status of such documents without seriously harming the main development planning that they are undertaking. Understandably the priority for the Council is the Selby Core Strategy document. For these reasons I am unable to recommend a change to the provisions of Paragraph 7.3.
- 5.4 As a result of the amendments above I am satisfied that providing these stages are followed the consultation proposed will be undertaken in a timely and accessible manner.
- 5.5 Subject to the recommendations above, this test is met.

#### Test 5

- 6.1 Paragraphs 4.15 4.29 and Appendix 3 of the SCI set out the methods that the Council proposes to use to involve the community and stakeholders. These cover a variety of recognised consultation techniques that will present information via a range of different media. The Council acknowledges in Appendix 3 the benefits and disadvantages of the different methods and indicates in this appendix at what stages of LDD preparation the various methods might be employed.
- 6.2 The SCI acknowledges in Paragraphs 4.35 4.36 that the Council may have to provide extra support to facilitate consultation with certain groups or individuals and proposes (at Paragraph 4.36) how it might do this. Paragraph 4.13 explains how the Council will make its information accessible to all members of society thus meeting the requirements of the Race Relations Act 2000 and the Disability Discrimination Act 1995.
- 6.3 I do, however, have some minor changes to Paragraph 4.13 to make for the sake of clarity.
- **(R7)** Amend the second bullet point of Paragraph 4.13 to read:
  - "Copies of all consultation documents and the reports summarising the consultations undertaken will be available to view at local libraries."
  - Also amend the beginning of the third bullet point of this paragraph to read:
  - "All consultation documentation will be available .... "
- 6.4 I am, however, satisfied that the methods of consultation proposed in the SCI are suitable for the intended audiences and for the different stages in LDD preparation.

6.5 Subject to the recommendation above, this test is met.

#### Test 6

- 7.1 Section 6 and Appendix 3 of the SCI explains how the Council will seek to ensure that sufficient resources are put in place to achieve the scale of consultation envisaged. I am satisfied that the Council is alert to the resource implications of the SCI.
- 7.2 This test is met.

#### Test 7

- 8.1 Paragraph 4.14 explains how the results of community involvement will be taken into account by the Council and used to inform decisions. The Council also proposes to prepare reports at the end of the consultation period explaining how views have been considered and documents changed in light of the community involvement. The SCI states in Paragraph 4.14 that these will be made publicly available on the Council's website.
- 8.2 However, this over reliance on electronic communication is potentially exclusive, therefore the Council should replace the final sentence of Paragraph 4.14 with the following:
- (R8) "The reports summarising the results of consultation will be made available on the Council's website and in hard copy at the deposit locations (libraries and Council Offices) listed in Appendix 6."
- 8.3 Subject to the recommendation above, this test is met.

#### Test 8

- 9.1 Paragraphs 6.6 6.9 explain that the Council continuously monitors and reviews all consultation documents and that the SCI will be formally reviewed as part of this process and reported on through the Annual Monitoring Report.
- 9.2 I am satisfied that the Council has mechanisms for reviewing the SCI and has identified potential triggers for the review of the SCI.
- 9.3 This test is met.

#### Test 9

- 10.1 Section 5 and Appendix 4 of the SCI describe the Council's policy for consultation on planning applications. Paragraphs 5.7 5.10 and Appendix 4 meet the minimum requirements and also provide information on additional methods of consultation. The SCI also distinguishes between procedures appropriate to different types and scale of application.
- 10.2 However, the SCI neither provides details on the length of time allowed for comment on planning applications nor gives any clear indication of how the results of consultations will inform decisions. Therefore I have the following recommendation to make.
- **(R9)** Add the following after the first sentence of Paragraph 5.20:

- "The normal period allowed for comment on planning applications is 21 days, however, bodies such as Natural England will be allowed a longer period of time to comment on applications where this is prescribed by legislation. The results of theses consultations will be reported and taken into account in decisions made by, and on behalf of, the Council."
- 10.3 Subject to the recommendation above, this test is met.

#### **Conclusions**

- 11.1 The Council has set out in Appendix C of its Regulation 31 Statement 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 they do improve the clarity and transparency of the submission SCI. These are given in Appendix B to this report and I agree below that they be included.
- **(R10)** Implement the changes proposed in Appendix B to this report.
- 11.2 The SCI contains text that would become redundant once the document is adopted, for example Page 1 and 2 of the submission document and also the footer information on each page. The Council should ensure that the document suitably reflects its adopted status and I therefore have the following recommendation.
- (R11) "The Council should remove all references to previous stages of this document."
- 11.3 In the event of any doubt, please note that I am content for such matters as any minor spelling, grammatical or factual matters to be amended by the Council, so long as this does not affect the substance of the SCI.
- 11.4 Subject to the implementation of the recommendations set out in this Report, Selby District Council's SCI (October 2006) is sound.

Inspector

Keith Holland

Keith Holland BA(Hons) DipTP MRTPI ARICS

# 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;<sup>1</sup>
  - 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

<sup>&</sup>lt;sup>1</sup> The Town and Country Planning (Local Development) (England) Regulations, 2004.

# INSPECTOR'S REPORT SELBY DISTRICT COUNCIL APPENDIX B – PROPOSED CHANGES

Test No	Rep'	Name/Organisation	Para	Summary	Attend Exam	Officer Comments
	21	Natural England		No additional comments to those previously made by The Countryside Agency.	N/A	Comments noted, and suggest that no change to SCI is necessary.
5	20	The Development Planning Partnership	5.21 to 5.26	SCI fails to mention the confidential nature of pre-submission consultations as suggested by DCLG. Good practice suggests inclusion of a reference to this.	No	Agree with these sentiments, and consider it would improve the document to add the word 'confidential' to para 5.11.
				In respect of developer consultation, would welcome advice in relation to the approach to take when consulting the Council at presubmission stage, and details of the proposed agent forums. Suggest the strengthening of advice on post-application stage, to include more specific advice on developer contributions.		A case-by-case approach is considered to be the most appropriate, and at the pre-application stage of a large scheme a development team is created, who will be happy to advise the developer. Please also note that 'Planning Guidance Note — Design and Access Statements' has been produced by the Planning Department, which contains several sections that refer to pre-application consultation. This is available from the Civic Centre and on the website.
						Agent Forums have been held on a one off basis on a particular subject, however the plan to set up regular meetings has been rolled over as an improvement for this year
						In terms of developer contribution advice, an SPD has recently been adopted for development control use, with regard to developer contributions, which will be published imminently and is available to view on the website.
	19	United Co-operatives Ltd	5.8	Welcome the opportunity to make representations. The SCI is considered to be well structured, and clearly explains the Councils approach to stakeholders. However	N/A	The Council is currently reviewing its system of maintaining and updating web pages, through which we aim to continually upgrade ease of use.

				careful consideration should be given to the website design, to ensure that documents can easily be located.  Paragraph 5.8 refers to the weekly list of planning application being available on the SDC website, which is supported. The Society would support an up to date search facility, as it would promote greater community involvement, and reduce the need to visit the office to view documents.		This information is available on the 'Public Access' search facility, which is an up to date product.
				Experienced personnel should always be available to respond to LDF queries in a timely fashion.  In addition, please keep The Society informed of SCI progress.		It is the practice of the department to always offer this service, and should a particular officer not be available a message will always be taken, and a return call made as soon as possible.  We will continue to keep the Society informed, as well as all those who have made representations.
	18	Government Office for Yorkshire and The Humber		No further representation to make, except to note that Natural England is not listed as a consultation body in the SCI. Natural England brings together English Nature, the Countryside Agency and the Rural Development Service.	N/A	Suggest that a change is made to reflect this change in Appendix 2 of the document.
9	17	Persimmon Homes	5.7	Para 5.7 states that in most cases consultation will usually involve letters being sent to residents who border the application land, or who are adjacent to it. Statement needs to be clarified in terms of what are 'most cases'.	No	The department makes best efforts to write to nearby residents, however the wording 'In most cases' is used, as it sometimes not possible to identify landowners, or property address details using Ordnance Survey information. Suggest the insertion of the phrase 'where practical using the information available' in para 5.7.
9	16	Persimmon Homes	5.17	Para 5.17does not clearly state what may constitute a major application to be controversial, sensitive or of interest to the	No	This section of the document has already been considered by Elected Members, and has been amended to reflect the fact that a professional

				Also, no clear guidelines set out the form of consultation that would be required for a major proposal pre-application.		planning officer will make the judgement based on the individual proposal, local knowledge, experience and site history. This is considered to be a more responsive approach than a list.  A case-by-case approach is considered to be the most appropriate, and at the pre-application stage of a large scheme a development team is created, who will be happy to advise the developer. Please also note that 'Planning Guidance Note – Design and Access Statements' has been produced by the Planning Department, which contains steps 2, 3 & 4, which refer to pre-application consultation. This is available from the Civic Centre and on the
	15	Theatres Trust	Appendix 2	Welcome the opportunity to comment. Description of the function of the Trust. Disappointed not to be included in Appendix 2, but appreciates that Para's 4.17 and 4.32 explain that an LDF database is kept, to which anyone can request to be included.  Support the SCI and look forward to being consulted on relevant future LDF documents.	N/A	website.  The list in Appendix 2 is not designed to be exhaustive, but to name groups of consultees. As noted by the Trust, the LDF consultation database ensures that information is passed on to all relevant and interest bodies. The Council welcomes the Trusts understanding of the approach being used.  The Council will continue to inform the Trust.
	14	Campaign to Protect Rural England	Appendix 2	Point out that their organisation is no longer named 'Council for the Protection of Rural England'	N/A	This name change has already been applied to the submission draft document, therefore a change to the SCI is not considered to be necessary.
	13	Acaster Malbis Parish Council		No comments to make for consideration.	N/A	Comments noted, and suggest that no change to SCI is necessary.
6	12	Stillingfleet Parish Council	4.12 & 4.15	Para 4.12 makes reference to the vital role played by Parish Councils in community involvement, however para 4.15 states that different methods of engagement will be used subject to resources. The Council have admitted not having the resources to promote	Yes	The Council has a genuine appreciation of the importance of Parish Councils involvement in the planning process.  Please note that that Para 4.15 also states that different consultation methods will be used 'as

				adoption of Village Design Statements, despite their promotion by the Countryside Agency and PPG3. They need the resources to adopt VDS's.		appropriate to particular circumstances', therefore, in order to make best uses of the available resources a tailored approach to consultation methods will be employed.  In terms of the promotion of VDS's, the Council has identified the content of the LDS according to Council priorities.  It is considered that the SCI does not fail a Test of Soundness on account of these issues, as the SCI is concerned with processes, rather than the Planning Policy work programme.
2	11	Stillingfleet Parish Council	4.12 & 4.15	Para 4.12 makes reference to the vital role played by Parish Councils in community involvement, and para 4.16-4.29 to methods of consultation to be used, without mention of Village Design Statements (except in glossary under SPD's). The SCI must make specific reference to the value of the VDS as promoted by the Countryside Agency and PPG3.	Yes	The Council has a genuine appreciation of the importance of Parish Councils involvement in the planning process.  Please note that that Para 4.15 also states that different consultation methods will be used 'as appropriate to particular circumstances', therefore, in order to make best uses of the available resources a tailored approach to consultation methods will be employed.  In terms of the promotion of VDS's, the Council has identified the content of the LDS according to Council priorities.  It is considered that the SCI does not fail a Test of Soundness on account of these issues, as the SCI is concerned with processes, rather than the Planning Policy work programme
	10	Highways Agency		No comments further to those made to the draft SCI.	N/A	Comments noted, and suggest that no change to SCI is necessary.
	9	Home Builders	4.15 – 4.29	The significant number of consultation	No	The Council has no plans to abandon traditional

	Federation		methods applied by the Council is noted. Would like to emphasise the importance of traditional consultation techniques, such as letters and e-mails to inform stakeholders of documents or events. Documents being held on the website is only useful to those who make it a practice to regularly check the website for announcements.		methods. Consultation documents are always available free to anyone who requests one, in addition, copies of the consultation are available to view at deposit points at Council Offices and libraries and it is possible to view copies held by Parish Councils and Councillors. Information held on the website is additional to traditional methods.
 9A	Home Builders Federation	5.16 – 5.19	Welcomes the section that covers pre- application discussions in line with PPS1, and comments on the mutually beneficial results of this practice.	No	Comments noted, and suggest that no change to SCI is necessary.
 9B	Home Builders Federation	Chapter 6	Welcome that resources and monitoring implications of the process have been considered and acknowledged in this section.	No	Comments noted, and suggest that no change to SCI is necessary.
 9C	Home Builders Federation	Appendix 2	Welcome inclusion of the HBF in the appendix. HBF is the trade organisation representing the house building industry.	No	Comments noted, and suggest that no change to SCI is necessary.
 8	English Heritage		No comments at this stage.	N/A	Comments noted, and suggest that no change to SCI is necessary.
 7	Woodland Trust		No further comments to those made to earlier consultation. Request to be added to the LDF consultee list and to be consulted on planning applications that directly or indirectly affect ancient woodland.	N/A	The Trust has been added to the LDF database, and the Plans Processing Unit now hold the Trusts details and request to be consultation on relevant planning applications.
 6	Thorganby Parish Council		The Parish Council has considered the proposals for future consultation on development plans in the district. It is considered that the traditional process of democratic representation through the local government structure has served well in the past and should continue in the future. Other parties may be asked to comment generally, but the district and local council structure is the only democratic structure that can rightly take	N/A	The Council fully appreciates the Parish Council's continued involvement in the LDF process and their commitment and importance in the local democratic process. Planning Regulations, nevertheless, require the Council to carry out wide ranging consultation with many stakeholders, whose comments must always be considered and taken into account.

			decisions, due to having democratic accountability.		
4	5	Friends, Families and Travellers	 Pleased that the SCI commits the Council to improve on current methods of engagement with hard to reach groups, however Gypsies and Travellers are not detailed separately as recommended by the CRE report 'Common Ground'. Attention is drawn to circular 1/2006 through which the government shown concerns about communication between planning bodies and Gypsies and Travellers, and the overdue need to cater to their needs. Although organisations are listed who deal with Gypsy and Traveller issues, LA's should not overestimate the capacity of national and mainly voluntary organisations, and cannot be the sole means of communication. Viewed that LA's should reach out to Gypsies and Travellers on their own territory, so that views can be ascertained and fed into the plan process, through the direct contact that has been lacking in the past.	No	The Gypsy Council is mentioned in Appendix 2 of the document, and the Council is currently seeking a more local contact and their advice regarding tailored methods of consultation, in order to reach the Gypsy and Traveller population.  Suggest that no change is required to the SCI.
5	5	Friends, Families and Travellers	 Pleased that the SCI commits the Council to improve on current methods of engagement with hard to reach groups, however Gypsies and Travellers are not detailed separately as recommended by the CRE report 'Common Ground'. Attention is drawn to circular 1/2006 through which the government shown concerns about communication between planning bodies and Gypsies and Travellers, and the overdue need to cater to their needs. Although organisations are listed who deal with Gypsy and Traveller issues, LA's should not overestimate the capacity of national and	No	The Gypsy Council is mentioned in Appendix 2 of the document, and the Council is currently seeking a more local contact and their advice regarding tailored methods of consultation, in order to reach the Gypsy and Traveller population.  Suggest that no change is required to the SCI.

			mainly voluntary organisations, which cannot be the sole means of communication. Viewed that LA's should reach out to Gypsies and Travellers on their own territory, so that views can be ascertained and fed into the plan process, through the direct contact that has been lacking in the past.		
 4	Sport England (Yorkshire)	Appendix 2 and Para 3.4	Pleased to see reference to Sport England as an 'Other Consultee', and for the inclusion of an explanation of how DPD's and SPD's are drafted. Recommends the drafting of a number of sport and recreation documents, with details of assistance on their website.	N/A	Thanks given for the information regarding suggested documents, which is noted for future inclusion in the LDS where appropriate.
			Also noted that the document makes reference to a migrant workforce, yet the website version does not offer a multi lingual preamble to assist sections of the community who wish to participate in the plan making process.		The Council has recently adopted a 'Corporate Standards Guide' that provides a paragraph to be used on all public documents with reference to making a request for a document in another format. Comments passed on to the website officer. No change suggested to the SCI
 3	Yorkshire Forward		No further comments to make. Would welcome notification of the progress of the SCI, and opportunities for involvement in ongoing LDF preparation.	N/A	The authority will continue to notify the organisation.  No change suggested to the SCI
 2	Turley Associates		Welcome the commitment to the principle of early community involvement in the production of LDD's, increased pre-application consultation and the principle of front-loading.	N/A	Comments noted, and suggest that no change to SCI is necessary.
 1	Disability Rights Commission		Comments that the organisation does not have the resources to get involved with consultation documents unless it relates or involves the DDA or the Commission.	N/A	Comments noted, and suggest that no change to SCI is necessary.