

Swindon Borough/Parish & Town Council Charter 2015

(Incorporating the Planning Protocol)

Swindon Borough / Parish and Town Council Charter

Introduction

1. The local councils (Swindon's parish and town councils) in the area of Swindon Borough Council have agreed to publish a charter that sets out how they aim to work together across the two tiers. This Charter is the result of discussions locally and across Swindon Council to establish a new way of working and to confirm existing good practice. There are 14 parish and town councils in Swindon Borough Council's area, all playing a valuable role in local democracy and service provision.
2. The councils jointly represent all levels of democratic local government, to whose principles they are committed. They are keen to see continued efforts made to improve our system of local democracy and to see greater public participation in and appreciation of this system.
3. Swindon Borough Council acknowledges that parish and town councils are the grass-roots level of local government. By working with them and the Swindon Area Committee of the Wiltshire Association of Local Councils, Swindon Council aims to act in partnership with local communities, while balancing the needs of the wider community.
4. In their role as democratically accountable bodies, parish and town councils help to shape the decisions that affect their communities. They offer a means of decentralising the provision of certain services and of revitalising local communities. In turn, they recognise the strategic role of Swindon Borough Council and the equitable distribution of services that it has to achieve.
5. This Charter reflects the increasing importance attached by the Council and the Government to partnership working. It also recognises that Swindon Borough Council and the Swindon Strategic Partnership have made a commitment to work together with local people through One Swindon and Stronger Together. The Charter applies to the relationship between the Council and the parish and town councils on a collective and individual basis. The Borough Council and the Swindon Area Committee of the Wiltshire Association of Local Councils will regularly review this Charter to ensure it remains fit for purpose.

Sustainability

6. Swindon Borough Council will work in partnership with parish and town councils to promote sustainable social, economic and environmental development for the benefit of local communities.

Community Strategies and Local Partnerships

7. Swindon Borough Council and the Swindon Strategic Partnership will involve parish and town councils in the process of implementing and developing the Community Strategy for Swindon which aims to promote and improve the economic, social and environmental well-being of the area. Swindon Borough Council and Swindon Strategic Partnership will consult and involve parish and town councils on the direction of the Community Strategy as it affects the local communities they represent.
8. Swindon Borough Council and the Swindon Strategic Partnership will recognise parish and town councils as partners in the development and delivery of One Swindon and public service transformation, and will build on the work parish and town councils are already doing in this area. Stronger Together, and its commitment to locality working, aims to support a sense of community, enable more meaningful engagement with local people and ensure the delivery of services that better meet the needs of our communities.

Local Governance

9. Representatives of the Swindon Area Committee of the Wiltshire Association of Local Councils will sit on the Council's Borough / Parish Advisory Forum (Borough/Parish Consultation Meeting).
 - The Forum will, as required, hold liaison meetings with parish and town councils.
 - The Swindon Borough Council will maintain its close working relationship with the Swindon Area Committee of the Wiltshire Association of Local Councils and may hold an annual meeting between senior Council Members and the Committee if this is requested.
 - Parish and town councils will invite appropriate members and officers of the Swindon Borough Council to their meetings. The Charter recognises that attendance at parish and town council meetings by members and officers is not compulsory but members and officers may properly be called upon to support and contribute to such deliberations by parish and town councils either by attendance or by preparing documentation for discussion by parish or town council, subject to the availability of resources.
10. The Swindon Borough Council will help organise the administration of parish and town council elections. The respective authorities will work together to ensure such elections will be delivered in the most cost effective way.

Consultation

11. Swindon Borough Council will involve parish and town councils in decisions that affect the local community and work with parish and town councils to involve a wider range of community members in those decisions. Swindon Borough Council has adopted a Consultation Policy that sets out the Council's commitment to effective consultation with residents, businesses, partner bodies and other stakeholders. Swindon Borough Council will notify and

circulate its public reports to the Clerk to the local councils at the same time as they are notified / sent to Councillors so that the parish / local council can respond directly or through the local ward Councillor(s).

- 11.1. There may be occasions where, because of the circumstances associated with the particular consultation exercise, a separate consultation with parish and town councils does not happen, in which case a written explanation will be given on request.
12. To help achieve the objectives laid down in this Charter, liaison and consultation (both formal and informal) will be further developed at parish and town council level through parish involvement in localities and by way of regular Borough/Parish Consultation Meetings and, at officer level, individually or through the Parish and Town Clerks' Forum.
13. Appropriate Swindon Borough Council representatives will attend meetings with parish and town councils (or groups of local parish councils) at a mutually agreed time to discuss matters of common interest when requested to do so and given sufficient notice.
14. Parish and town councils will send copies of their agendas and papers to Swindon Borough Council and to local ward councillors upon request. Officers and councillors of Swindon Borough Council will be given an opportunity to speak at local council meetings on matters of mutual interest if they request to do so.
15. Parish and town councils will play an integral part in how Stronger Together and its commitment to locality working and public service transformation will unfold in their area.

Information and Complaints

16. When Swindon Borough Council consults local councils, it will follow its Consultation Policy and it will provide them with sufficient information to enable them to reach an informed view on the matter and give them adequate time to respond in accordance with the statutory requirements where applicable. An appendix to this Charter sets out a list of items on which the Borough Council will always consult (Appendix 2).
17. Swindon Borough Council will communicate with parish and town councils and other communities through its Website and other publications made available to the local community. It will also keep parish and town councils informed by sending them copies of other relevant publications and local promotional material.
18. Swindon Borough Council and parish and town councils will acknowledge letters, and provide substantive answers to letters that need a reply in accordance with the provisions of their Customer Comments Procedure. A full substantive reply or an acknowledgement will be sent by Swindon Borough Council / parish / town council within ten working days. If an acknowledgement is sent, the full substantive reply will be sent within twenty eight days wherever possible.

19. If a parish / town council is dissatisfied with Swindon Borough Council's actions, their response to a request for information, or their failure to consult, it may initiate that Council's formal Customer Comments procedure.

Standards

20. Both Swindon Borough Council and the parish and town councils have adopted codes of conduct. The parish and town councils will work with Swindon Borough Council to promote and maintain high standards of conduct. The Swindon Borough Council has consulted and agreed the following arrangements with the parish and town councils for the appointment of representative to the Standards Committee (and sub-committees), whilst it remains in existence - The Swindon Area Committee of the Wiltshire Association of Local Councils will nominate two parish councillors from amongst its constituent bodies to serve as lay members on the Standards Committee.

Delegating Responsibility for Service Delivery

21. If a parish / town council (or group of parish councils) wishes to discharge functions or take on delegated responsibility for service delivery from the Borough Council, Swindon Borough Council will actively encourage this, where it provides value for money (taking account of costs, quality, local preferences and practicability). The Borough Council will act in accordance within the statutory provisions of the Community Right to Challenge where applicable. Swindon Borough Council will, in consultation with the parish / town council, also explore alternative solutions to encourage more local-level input into service delivery.
 - 21.1 The services and functions listed Appendix 1, or parts of them, in accordance with the practical and financial arrangements, are examples of possible functions that may be considered for delegation to parish and town councils by Swindon Borough Council by mutual consent.
 - 21.2 This Charter acknowledges the statutory roles and responsibilities of the Borough Council and parish and town councils in the provision of local services.
 - 21.3 However, both the Borough Council and parish and town councils will also recognise the possible benefits to be gained from arrangements enabling certain services for which it is responsible to be provided by a parish / town council acting as its agent.
 - 21.4 Such arrangements should be introduced only after consideration of the following key principles:
 - * The need to provide value for money for the residents of Swindon and individual parishes;
 - * The need to provide a consistent approach across the area of the Borough Council;

- * The availability of the necessary skills and expertise associated with the delivery of the function and the effect the agency work would have on the workload of parish and town councils, their clerks and other staff;
- * Whether or not, where appropriate, TUPE (Transfer of Undertakings Protection of Employment) Regulations apply to any staff affected by the introduction of such arrangements;
- * The need to meet statutory obligations and any prescribed minimum level of service provision; and
- * The effect on the cost-effectiveness of the delivery of the remainder of the service directly by the providing authority if some work is undertaken by the parish / town council as its agent.

21.5 Any application of such an arrangement will be made in writing clearly describing why value for money would be achieved through the proposed arrangements.

21.6 If an application for such an arrangement is turned down, the Borough Council shall provide a written explanation for the decision.

21.7 Should an agreement be reached on the introduction of any particular arrangement, the Borough Council will:

- * Provide detailed information of the requirements of the service and set clear minimum standards for its level of provision and Quality;
- * Allocate the necessary level of funding to enable the service to be provided to that minimum standard; and
- * Allow the parish / town council to provide the service in a style and manner which accords with local needs, and for the service voluntarily to be improved or extended over and above the minimum standard, drawing on funding from the local precept.

Parish and town councils will:

- * Provide the service as efficiently and effectively as possible and at least to the minimum standards laid down by Swindon Borough Council, for the duration of the agreement;
- * Ensure that at all times the service is provided in a way which accords with local needs and wishes;
- * Provide an indemnity in respect of the performance of service provision; and
- * Render proper accounts to the Borough Council for expenditure on the service, excluding any enhancements.

21.8 Any such arrangement will be subject to regular review by both parties, covering standards set and funding allowed for the service.

Financial arrangements

22. The financial arrangements between Swindon Borough Council and parish and town councils are governed by the following principles which are, in effect, among those underlying the principle of Value for Money:

- Fairness between council tax bills in parished and non-parished areas, and between different parish and town councils.
- Fairness in the provision of services (and access to them) by Swindon Borough Council between different parts of the area.
- Simplicity – to keep administrative costs of operation to a minimum.
- Transparency – to help understanding.
- Democratic control and accountability – to let parish and town councils support additional services with additional expenditure while ensuring accountability to all those responsible for funding. This means distinguishing between funding by Swindon Borough Council (for a service carried out by a parish / town council) and funding raised by parish and town councils themselves (e.g. using their precepting powers).

Local Community Life

23. Swindon Borough Council and parish and town councils in parished areas will take responsibility for promoting local community life through various initiatives including participating in locality working and locality meetings where possible, assisting in generating funding for local communities by enabling and supporting grant applications to funding organisations, and by way of the enabling the disposal and transfer of appropriate surplus property.

Community Strategies

24. Where a parish or town council, or group of parish councils, has prepared a “community led plan” to help establish, prioritise and help deliver the improvements needed in their area, Swindon Borough Council will take account of its proposals and priorities in implementing the Community Strategy as it affects the local areas concerned. Swindon Borough Council will strengthen links between these parish and town councils and the Local Strategic Partnership in order to improve delivery of local priorities.
25. In instances where a community led plan has been subject to full consultation and engagement and where they do not conflict with the Borough’s Local development Framework, these Plans will be will be afforded weight as a material consideration in the determination of planning applications.

Neighbourhood Planning

26. With regards to Neighbourhood Plans, the Council has prepared a ‘Neighbourhood Planning Protocol’. Adopted in February 2013, the document provides guidance to parish and town councils and other bodies that wish to undertake Neighbourhood Planning. The guidance is in accord with the Neighbourhood Planning (General) Regulations 2012. The Protocol is available on the Council’s website and will be updated when necessary to reflect the latest guidance.
- 26.1. Regarding support for Neighbourhood Planning, the Council has to be realistic as to what it can do if Neighbourhood Planning applications are to be processed in a cost effective and speedy manner. As clearly stated in the Protocol, support and assistance must be proportionate to the nature of the

plans being prepared, the stage reached in plan making and the impact on the wider community.

Planning Protocol

27. In view of the particular local impact of applications made under the Town and Country Planning Acts, a Protocol will be agreed jointly by the Borough Council and representatives of the Swindon Area Committee of the Wiltshire Association of Local Councils to govern the consultation arrangements relating to "Planning" matters. This is attached to this Charter as Annex 1.

Information and Access Points

28. If a parish or town council, or group of parish councils, wishes to become a local information and / or access point for Swindon Borough Council services the Swindon Borough Council will help it to do so. In particular it will:
- issue to the parish / town council, and up-date as necessary, relevant written information and application forms on its services;
 - give electronic access to similar information and forms, where it provides these electronically, provided the parish / town council has appropriate technology; and
 - provide suitable briefing, training and support to staff of the parish or town council.

Awareness of the Parish Charter and Planning Protocol

29. Swindon Borough Council and town and parish councils will implement procedures to ensure that members, Council officers, local council clerks and staff are made aware of the provisions of the Parish Charter and Planning Protocol.

Failure to Comply with the Parish Charter and Planning Protocol

30. If a Council officer or member or a local parish / town council fails to comply with the provisions of the Parish Charter and / or Planning Protocol then the Council's senior management and all parish and town councils will be informed of such breaches and of the remedial actions taken to prevent any re-occurrence.

Appendix 1

Possible functions that may be considered for delegation to all parish and town councils by Swindon Borough Council by mutual consent (in accordance with paragraph 21 above and where legislation permits)

- Control of Markets
- Street Cleaning
- Maintenance of Highway Verges, footways and footpaths
- Litter Collection and Litter Control Measures
- Street Lighting (other than principal routes)
- Recycling provisions
- Street naming
- Parking restrictions (and related matters)
- Issue of travel passes and other transport voucher schemes
- Road Safety Measures
- Noise and Nuisance Abatement
- Tree Preservation Orders
- Some aspects of the management of Libraries and Museums
- Some aspects of Leisure and Tourism provision (e.g. bowling greens, playing fields, issue of Leisure permits)
- Public conveniences
- Allotments

Appendix 2

Issues on which Swindon Borough Council will notify and / or consult with and / or discuss with individual Parish and Town Councils directly

- Matters relating to Planning Applications relating to their parish / town council or substantial applications in adjacent parish / town councils. Where agreed by the developer, matters relating to pre and post planning application discussions relating to their parish / town council or substantial applications in adjacent parish / town councils.
- Issues that arise during the determination of a planning application from parish / town council representations received where officers may need to clarify information to directly inform the drafting of Section 106 (s106) planning obligations.
- The allocation or use of Section 106 Planning Agreement (s106) receipts generated from developments within their parish / town council area or that have been allocated to it from development outside that area.
- The requirement for parish and town councils to comply with the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) 'CIL Regulations' in respect of the publication of information relating to CIL receipts passed to parish and town councils.
- The transfer of CIL Receipts under the 'neighbourhood proportion' to relevant parish and town councils informed by the regulatory requirements of the CIL Regulations.
- The localised management and allocation of the 'neighbourhood proportion' of CIL receipts as required by the CIL Regulations.
- The adoption of a CIL Charging Schedule for its administrative area.
- The policy and process for the allocation of 'general fund' CIL receipts.
- Amendments to the adopted CIL Regulation 123 list (in accordance with the Council's (SBCs) adopted consultation procedure for such.
- Drainage Plans (notification of receipt of).
- Local Air Quality Review / Policies for pollution monitoring.
- Footpath Orders.
- Removal of Tree Preservation/Woodland orders.
- Designation of Conservation Areas and environmental schemes.
- Traffic management schemes, road signs, speed limits, road safety initiatives.

- Criteria for allocating housing, particularly for special needs.
- Licence applications.
- The drawing up of Local Development Framework plans.
- The management of Civic Amenities sites.
- Proposals for the reorganisation of local authority schools.
- Proposals for changes in the opening hours of local libraries.
- Routes for mobile libraries.
- Public transport services (Non-commercial).
- Significant changes to local community / leisure facilities.
- Policies for pollution monitoring.
- Arrangements to be made for dog control.
- Provision or withdrawal of local information centres.
- Provision or withdrawal from permanent use of public conveniences.
- Proposals for amendments to or provision of new recycling facilities.
- Provision of new car parking facilities or changes in permitted waiting periods.
- Emergency Planning arrangements with individual parishes.
- Proposed highway works by statutory undertakers (Notification of).
- Adult Social Care (*Comments on future social care services for adults will be sought by circulating a draft of the relevant service plan*).
- Children's Services (*Comments on future services for children in need will be sought by circulating a draft of the relevant Children's Services Plans*).
- Goods Vehicle Operators License (Notification of receipt of application for).
- Identification of Special Expenses.
- Statutory Notices relating to the sale or purchase of open space land owned by the Borough.

ANNEX 1 - PLANNING PROTOCOL

(DEVELOPMENT MANAGEMENT AND RELATED MATTERS)

SECTION 1. THE BOROUGH COUNCIL WILL:

1. Notify the local council of all planning applications received in respect of their parish, or any substantial application in any adjoining parish, which borders or crosses the parish boundaries relating to:
 - (i) Applications for planning permission, listed building and advertisement consent, demolition within a conservation area, lawful development certificates (where appropriate) and significant matters relating to tree preservation orders;
 - (ii) Telecommunications equipment and proposals relating to agricultural and forestry requiring prior approval under the notifications procedure;
 - (iii) Consultation applications for development by Government Departments and public utilities.
2. Be prepared to clarify issues associated with such applications within the consultation period to ensure the local council can respond in full and in time. It may not always be feasible or reasonable to accept holding representations.
3. Whenever possible allow:
 - (i) 21 days for the submission of representations by the local council on applications;
 - (ii) 42 days for the submission of representations by the local council where a statutory Environmental Assessment has accompanied the application;
 - (iii) 14 days for the submission on representations on submissions for agricultural and forestry buildings as there is a statutory requirement that these be determined by the Borough Council within 28 days from the date of receipt by the Council. If dealt with under the delegated procedure, due to the timescales involved, advise the parish of the officers decision as soon as known;
 - (iv) 21 days for the submission for representations on submissions for prior notification relating to telecommunications equipment. These will in most cases need to be dealt with under delegated procedures due to timescales involved then will advise the parish of the officer's decision as soon as known;

- (v) 14 days for the submission of representations on proposals where there has been a significant amendment to an application (that is where, in the view of officers, the character of the development has materially changed) unless that change accords with the views of or meets the concerns of a local council.
(See Footnote 1);
- 4. Provide details to enable the applications to be viewed on-line via the Councils web site (NB. it is acknowledged that there may be some cases where copies of documents may be made available).
- 5. Ensure that where the local council advises that the proposal raises significant planning issues or is locally controversial and their comments clearly differ from the action initially proposed by the Head of Planning, the parish / town council may request that the application be referred to the Borough Council's Planning Committee.
- 5.1 NB. Where there is an exceptional need to determine an application, contrary to the request for it to be determined by the Planning Committee as provided for in section 5 - such as in a case where no extended period for the consideration of the application has been agreed with the applicant and delayed consideration beyond 26 weeks from validation will result in the LPA being obliged to refund the application fee - the application may be determined by the Head of Planning, Regulatory Services, Heritage and Libraries. The local council will be informed of this course of action as soon as practicable.
(See Footnote 1)
- 6. Keep parish and town councils informed on applications which the parish / town council feel are of a controversial nature and have advised in writing that they wish to be kept informed of progress on the application, including the discharge of specific conditions following a formal decision being made on the application. The Borough Council will keep local councils informed as requested, following receipt of formal notification from the local council.
- 7. Report to the Planning Committee:
 - (i) Any summary of the representations provided by the local council. Where no summary has been provided and the views of the local council accord with the officer's recommendation, a summary will be prepared by the officers of the Council. This will be done on the understanding that a full copy of the local council's representations will be available for inspection on the planning file and web site; and,
 - (ii) Provide an explanation where there is a difference of views.

8. Where a local council has made representations on an application and have requested that application be determined by the planning committee, the local councils will be advised of the date of the meeting.
9. Ensure that copies of Planning Committee minutes and decision notices in respect of their area or where a local council has commented on a significant application that crosses or borders the parish boundary are published and made available on the Borough Council's Website as soon as practicable.
10. Ensure that the local council representatives are able to address the Planning Committee in accordance with the Borough Council's current "open committee" policy.
11. Investigate and respond as promptly as possible to reports made by the local council in connection with any alleged breaches of planning control, in accord with the Adopted Enforcement Protocol.
12. Notify local councils of the receipt of appeals, appeal decisions and upon request, any decision of the Secretary of State falling within the parish. Also, for a significant application that crosses or borders a parish boundary. (NB. Decisions can be requested from the Planning Inspectorate, as the notification letter advises)
13. Provide periodic training on at least an annual basis and seminars for local councillors and their staff to aid an understanding of the planning process and matters that relate to the determination of planning applications.
14. Acknowledge that the Borough Council will not always be able to accede to the requests of parish and town councils but will always seek to use its best endeavours to do so.
15. As part of the Pre-Application process the Borough Council will recommend to the potential developer to consult with the relevant parish / local councils.
16. During the Application Process liaise with the parish / town council(s) in respect of representations received from them in respect of planning obligations matters to clarify information and to directly inform negotiations and the subsequent drafting of planning obligations (s106).
17. Notify the relevant parish / town council(s) in respect of owner / developer requests for variations to secured planning obligations in circumstances where the proposed variation is likely to impact on obligations for which the parish / town council is the primary beneficiary and / or the variation would directly adversely impact on local communities. Liaise with the relevant parish / town council(s) to seek representations on the proposal to inform discussions with the applicant.

18. Parish and town councils will be informed on any design statement or development briefs that are in their parish or will have an impact on their area or is a significant matter in an adjacent parish area.

SECTION 2. THE PARISH / TOWN COUNCIL WILL:

1. Respond promptly in writing, or email to applications received from the Borough in accordance with the time scales described in Section 1 paragraph 3 above.
2. Specify clearly and as fully as possible in writing or email the planning reasons for an objection to or support for a particular planning application. Where the parish / town council is not concerned either way, they will indicate that they have no objection, in order to avoid any ambiguity.
 - 2.1 Where the parish / town council advises that the proposal raises significant planning issues or is locally controversial and their comments clearly differ from the action initially proposed by the Head of Planning, Regulatory Services, Heritage and Libraries and the parish / town council requests that the application be referred to the Borough Council's Planning Committee, the parish / town council shall state their full and clear reasons for doing so. Such reasons should make reference to the relevant national and local planning policy. (Reference to the appended guidance sheet may assist.)
3. Create a means whereby the parish / town council can respond in writing or email to any amended plans received from the Borough Council (as in Section 1 paragraph 3(v) above) within 10 working days or up to the day of the Planning Committee where the application is to be considered by Committee, whichever is the greater.
(See Footnote 2)
4. Notify the Borough Council if they wish to address the Planning Committee in accordance with the Borough Council's current "open committee" policy.
5. Notify the Borough Council in writing or email of applications that they feel are of a controversial nature and wish to be kept informed of progress on the application, including the discharge of specific conditions following a decision being made, to enable the Borough to fulfill its part in complying with Section 1 paragraph 6 above.
6. Assist the Borough Council by reporting, in writing or email, local breaches of planning control under the Town and Country Planning legislation.
7. When requested to do so, submit to the Borough Council evidence to support parish / town council requests for s106 contributions where either additional evidence is required or the evidence is not contained within locally adopted additional planning guidance and evidence base documents.

Footnote 1: This allows for comments to be made by parish and town councils in accordance with timescales available within current legislation. If legislation changes, as far it relates to the publicity and notification procedures relevant to this protocol, the Borough Council will formally notify the parish and town councils and the protocol will need amending accordingly.

Footnote 2 The Planning Committee will not necessarily consider some applications if they fall within the ambit of the current delegated authority. Where the application is to be considered by the Committee and any representations are made after the agenda has been published, but before the Committee considers the application, parish and town councils are urged to submit comments as quickly as possible so their comments can be made available to the Committee on any late list.

Footnote 3 The Borough Council will inform the parish town council of the decision of any application upon which they have commented. In addition, upon request, copies of the weekly list of applications received and determined can be provided electronically.

Guidance sheet to assist with commenting on a planning application appended

Guidance to Assist Parish Councils with Responses to Planning Applications
Amended June 2014

General Requirements: In all cases where applications are refused, the reasons given must state clearly and precisely the full reasons why the proposal is not acceptable including which Paragraph(s) of the NPPF, Policies of the Swindon Borough Local Plan and relevant Supplementary Planning Documents the proposal does not accord with - and if there is an adverse impact, why is harmful?

Taking a house extension as an example:

Impact upon street scene	Too Large Too Prominent Out of Character Introduces alien features Materials Fenestration (windows / doors) Effect upon planting / landscape features e.g. protected trees
Impact upon host building	Design Materials Scale / height Bulk Mass

Overbearing impact upon neighbours	Location Orientation Loss of daylight Loss of sunlight
Loss of privacy / overlooking	Views into habitable/ sensitive rooms Views into private amenity space Separation distances Windows on or close to boundary
Over-development	If 'too large', what is the impact? Extensions larger than guideline may be ok if no harm is caused
Parking / Access	Is Parking adequate / unusable Does provision accord with standards, if not, are there any mitigation measures? Can alternative provision be made?
Accord with policy	May satisfy some but not all Duty to consider all material considerations and reach a balanced decision
Could a condition make it acceptable	E.g. different materials Prevent windows in certain elevations
Access	Is it safe? What is the evidence to counter an 'expert' view

SBC Planning Dept. June 2014