

Report to Sustainable development panel
5 June 2013
Report of Head of planning services
Subject Statement of Community Involvement 2013

Item

6

Purpose

To consider the revised statement of community involvement (SCI), following public consultation. (The SCI is the Council's code of practice on how people can expect to be involved in the planning process in plan-making and on planning applications.)

Recommendation

That the SDP recommends that cabinet approves the Statement of Community Involvement for adoption.

Corporate and service priorities

The report helps to meet the corporate priority A prosperous city and the service plan priority to produce the Local plan for Norwich and related documents to guide future development.

Financial implications

There are no direct financial implications of this report.

Ward/s: All wards

Cabinet member: Councillor Stonard - Development

Contact officers

Graham Nelson, head of planning services 01603 212530

Judith Davison, planning policy team leader (projects) 01603 212529

Sarah Platt, planner (policy) 01603 212500

Background documents

None

Report

Introduction

1. The Statement of Community Involvement (SCI) is the Council's code of practice on how people can expect to be involved in the planning process, either at plan-making stage or during the planning application process.
2. This report updates members on the revised SCI document. The purpose of this report is to seek a recommendation to cabinet to adopt the document.
3. The current SCI was adopted in 2010 and was prepared under the previous planning regulations. Since then the planning system has changed significantly, with the new National Planning Policy Framework (NPPF) published in March 2012, the Localism Act being given royal assent in November 2011 and the introduction of new planning regulations in 2012.
4. Members will recall a previous committee report presented to SDP in October 2012 which sought a resolution to recommend that Cabinet approve a new draft version of the SCI for public consultation, revised to reflect national policy changes which have occurred since the adoption of the previous SCI in 2010. At its meeting on 14th November Cabinet resolved to approve the draft SCI for public consultation.

Public Consultation

5. The draft SCI underwent public consultation under Regulation 18 of the Planning regulations 2012 from 28 November 2012 to 19 February 2013.
6. A total of 26 representations were received, from 17 individuals. One response was invalid and was passed to the local highway authority given it raised issues concerning traffic.
7. Overall there were 7 representations of support (representing 28% of the response rate), 1 objection (4%) and 17 comments or suggested changes (68%).
8. The analysis of the representations and the Council's response to them is set out in detail in Annex 1. Officers' responses to each representation falls into one of three categories outlined below:
 - **Change** – 7 representations make suggestions or comment on the draft SCI which can be responded to through minor changes to the document without affecting its substantive content.
 - **No Change** – 13 representations make suggestions or comment on the draft SCI which relate to, amongst other things, the specific considerations of determining planning applications, amendments to overarching Council documents, such as the Corporate plan, or comments on wider Council projects or strategies, for example, the changes to Chapelfield North. The SCI document is not able to address these issues.
 - **No Change: comments noted** – 5 representations make comments which do not require a change to be made. The comments are noted.

Additional Changes

9. Additional changes have been made to the document that do not relate to specific representations and are therefore not included in Annex 1. These are mainly changes for clarity, but also include updates in relation to revised planning application procedures since publication of the draft SCI.
10. The revised SCI is attached at annex 2.

Key issues raised in representations

11. There were three main areas of concern raised by representations. In terms of plan making, the use of non-IT methods of consultation was of high importance to those who made representations. It is important to note that whilst technology is moving quickly to a more electronic era which should be embraced, there are still a number of people for whom IT can be a barrier to information. The document has been amended to reflect this requirement to ensure that all interest groups or individuals have access to information.
12. Secondly the pre-application community involvement section of the draft SCI caused some confusion. This process has been clarified in this draft and clearly states the Council's expectations of developers with regard to involving the local community before a planning application is submitted. The section also outlines the validation requirements for major schemes with regard to community involvement.
13. The third main issue raised through representations relates to formal planning applications and clarification of what is and what is not a "material planning consideration". A section detailing material considerations and some examples has been added for clarity.

Next Stage

14. A report will go to Cabinet on the 10 July 2013 seeking a resolution to adopt the revised Statement of community involvement. Following this the adopted document will be published on the Council's website, hopefully by the end of July 2013.

Annex 1: Representations on the Draft Statement of Community Involvement

NB:

1) Items in square brackets [] are inserted for information/clarity by the officer.

2) Paragraph numbers in brackets under the column 'Paragraph' is the new paragraph numbers where a change has been made to the document.

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
001	Mr JW	1	Suggests change	Appendix 1	Needs amendment to reflect current organisations e.g. Police Authority is defunct.	CHANGE: All 'Specific consultation bodies' have been checked and amended as necessary, e.g. Police Authority will be amended to Norfolk Constabulary and the Police and Crime Commissioner.
002-1	Norwich Access Group	1	Comments and suggests changes	Para 7 & 9 (Para 8 and Figure 1)	In your stated aims etc for Norwich, you do not express any aims for accessibility.	NO CHANGE. This plan sets out the ways we involve people in the planning process and does not deal with detailed arrangements relating to accessibility, which are covered in the Development Management policies. Involvement of Norwich

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
						Access Group in the plan making process helps to achieve equality for all in communities.
002-2	Ms SOH	1	Suggests changes	Para 28 (Para 26)	<p>When considering minor changes [to supplementary planning documents] that only require a reduced consultation period, how do you determine who is one of the interested parties or specialist groups? What criteria do you use?</p> <p>How are the stakeholders (other than statutory) chosen and selected? How often are these 'stakeholders' reviewed for relevance?</p> <p>Do you count community interest groups as stakeholders? If so, how do you source them and how do I get my community groups involved?</p>	<p>NO CHANGE. The interested party or specialist group would be determined by the topic of the SPD, e.g. an SPD on Transportation issues would result in the local highway authority being consulted. The Council will advise about the up-coming consultations in accordance with the LDS schedule and by notification on the forward agendas of the relevant committees.</p> <p>Any individual can request to be added to the LDF database to be kept informed of future policy changes.</p>
002-2	Ms SOH	2	Comments and suggests changes	Paras 32-45 (Paras 32-46)	<p>[The use of] social media: do you use Streetlife? If not, please investigate as a useful communication tool.</p> <p>For those without access to the city, or</p>	<p>NO CHANGE. Social media will be used as appropriate to the relevant plans undergoing consultation. Local radio could be used where appropriate and necessary. This will</p>

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
					with visual impairment, have you considered use of local radio for reaching communities?	be added to the list of consultation approaches in paragraph 21 . Social media is not used in the consultation on formal planning applications.
003	Mr DW	1	Comment and suggests changes	General	<p>I think the document looks fine. However it might be too wordy if a person is dyslexic or has special educational needs or English as a second language and therefore quite difficult for them to understand succinctly. Interest perhaps would be maintained better by many with some pictures/photos/diagrams to illustrate a bit better. The diagrams you have are fairly good, though some maybe a bit wordy.</p> <p>Just two questions</p> <ol style="list-style-type: none"> 1. What is the Coal board and how are they involved in city communities? 2. Will you consult interested/involved parties and groups (faith organisations, 	<p>NO CHANGE. Ideas on formatting noted and diagrams/pictures will be used where appropriate to stimulate the reader.</p> <ol style="list-style-type: none"> 1. NO CHANGE: The Coal authority is a statutory Consultee required to be consulted by the Planning Regulations 2012. It is unlikely there would be much involvement with any consultations undertaken by Norwich City Council; however we have an obligation to consult them. 2. NO CHANGE: The bodies we will consult with are listed in Appendix 1 of the SCI and this includes focus groups. Any individual can request to be

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
					local health authorities, the local police, tenant associations etc to name but a few) using focus groups to get a cross section of views of each group of those interested in expressing their views?	added to the LDF database to be kept informed of future policy changes.
004	Mr JB	1	Objects and suggests change	Para 9 (Para 5)	<p>A sixth priority should be added:</p> <p>- To protect and enhance Norwich's outstanding environment.</p> <p>Paragraph 8 mentions "environmental excellence" but paragraph 9 doesn't recognise its importance. It is vital that the quality of Norwich's environment is recognised and protected.</p>	NO CHANGE. This paragraph states the Corporate Plan objectives. The SCI document does not have the remit to amend the Corporate Plan.
005	Anglian Water	1	Comments	General	<p>Anglian Water welcomes consultation on LDF documents and planning applications and is keen to work with and support [the] Council in their Growth aspirations. No comment on this draft document.</p>	NO CHANGE. Comment noted.

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
006	Mr AG	1	Comments	General	Comment made refers to government green belt policy and is not related to the SCI document.	NO CHANGE.
007	Mr RD	1	Comments	General	<p>Plan would have been easier to digest if the changes had been highlighted and present practice shown.</p> <p>Insufficient thought given to communication with individuals who do not have access to electronic forms.</p>	<p>NO CHANGE. The previous practice is available on the Council's website and the consultation page. It is also available in the Council office for viewing.</p> <p>In paragraphs 23 and 40 it is noted that letters and other forms of non-electronic consultation will be used. With regard to this consultation process, the consultation letter/email stated that hard copies of the draft SCI could be sent if necessary.</p>
008	Marine Management Organisation	1	Comments	Appendix 1	The Marine Management Organisation is pleased to see our organisation listed as a specific consultation body for policy, plans and applications in Appendix 1. Under the 'Duty to Cooperate' section of Appendix 1 however there is 'Marine	CHANGE: 'Marine Management Association' to 'Marine Management Organisation' in Appendix 1.

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
					Management Association' listed. The Marine Management Organisation is listed as a body to which the Duty to Cooperate applies and therefore we would like to clarify whether this is meant to read 'Marine Management Organisation'.	
009	Roger Chenery, Highways Agency	1	Support	General	The Highways Agency is responsible for the operation and maintenance of the Strategic Road Network which in the vicinity of Norwich City Council are the A47 and the A11 trunk roads. Whilst the Highways Agency will comment on LDF documents and planning applications it is for Norwich City Council to determine the appropriate means of community involvement. The Highways Agency, whilst supportive of your intentions in this respect, has no comment to make on the published consultation document.	NO CHANGE. Support noted.
010	Cally Smith, Broads Authority	1	Suggest changes	Para 16 (Para 15)	Please make reference to the Broads Authority as a member of GNDP.	CHANGE: Footnote to be amended to include the following wording 'in partnership with the Broads Authority and Norfolk County

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
						Council’.
011	Mr AB	1	Supports and comments	Para 4	The Consultee could not understand the second sentence [paragraph 4].	CHANGE: The wording is un-clear and has now been re-worded to provide clarity. The paragraph number remains as paragraph 4.
011	Mr AB	2	Comments	Paras 42 and 43 (Para 39)	I wonder if the warning about a fee being charged [for pre-application advice] might put people off. Perhaps it could be put into paragraph 43 when developers ignore the invitation to early involvement.	CHANGE: Clarity will be provided with regards to the many levels of pre-application advice and the possibility of a fee being payable. Comments noted but it needs to be advised in this SCI that a fee may be incurred.
011	Mr AB	3	Comment	Para 15 (Para 14 and page 12)	Comments mainly concerned with Chapelfield North proposals but makes some general points about the timetable in paragraph 15 (the Local Development Scheme) and schedule on p11. It is important that stakeholders and affected residents are involved in formulating timetable and identifying where there might be controversy.	NO CHANGE The LDS timetable sets out the council’s work programme for the preparation of planning documents and indicates when consultations aim to be taken forward. This is updated when required and placed on the Council’s website. Any affected parties will be notified as appropriate in accordance with the guidance contained within this SCI in order that their comments can

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
						be taken into consideration.
012	Ms AL	1	Supports and comments	Paras 1, 3 and 4 (Paras 1-5 and Figure 2)	The Neighbourhood Plans box in the diagram concerns me. How much support will communities get in planning change? My fear is that residents will not wish to be involved in the preparation of such plans, only in commenting on them at the consultation stage. If such plans are not prepared then opportunities for constructive change may well be missed. In the event that communities do not produce their own plans, but there is an identified project that could take place, that the council should draft such a plan and consult at local level on it.	<p>NO CHANGE: The Localism Act introduced Neighbourhood Plans. Communities are therefore now able to identify locations and topics for their neighbourhood plans. Such plans would be prepared by local communities themselves, with support from the council.</p> <p>In some instances on larger sites a development brief may be prepared by the council. These development briefs are consulted on.</p> <p>Note: the Council prepares city wide plans to guide development across the city as a whole. These remain in place in the absence of Neighbourhood plans.</p>
012	Ms AL	2	Comments and suggests	Para 24 (Para 22)	I feel it is essential that some sort of non IT method of consultation is always used and available as not all people are, or even want to be, IT literate. Paragraph 24	NO CHANGE: Whilst it is accepted that not everyone is IT literate, it is not possible to state that in every circumstance a non IT method will

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
			changes		should make it clear that a non-IT method will always be used	<p>always be used as this may not be the most appropriate format. However, we will endeavour to ensure that a non IT method is used where possible.</p> <p>Any individual can request to be added to the LDF database to be kept informed of future policy changes.</p>
012	Ms AL	3	Comments and suggests changes	Appendix 1	No involvement of individuals is listed, only groups. "Interested individuals" should be added to the list.	<p>CHANGE: It would be very hard for the Council to identify 'interested individuals'. The LDS outlines upcoming consultations, and the forward agenda of committees also advises members of the public of forthcoming consultations. These two methods are considered sufficient for individuals to identify any plan-making areas on which they may wish to comment. Any individual can request to be added to the LDF database to be kept informed of future policy changes.</p>

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
013	Angela Robson, Norwich University of the Arts	1	Support	Para 1	We welcome the draft Statement of Community Involvement and the public consultation thereon. We also welcome the aspiration to encourage more people to be involved and to make that involvement as easy as possible.	NO CHANGE: Support noted.
013	Angela Robson, Norwich University of the Arts	2	Comments	Paras 14-20 and Paras 21-23 (Paras 12-18 and Paras 19-21)	<p>We welcome the clear presentation of the elements of the local plan and its formative documents, relevant and timely communication and registration of views is dependent on clarity about the document or element under consultation and its position and relevance to the local plan framework.</p> <p>We welcome the commitment to develop an understanding of the different consultation techniques and communication channels and to “learn from what works”. We would however like to see evidence of review of such channels and publication for an assessment of effectiveness and how that assessment has informed future</p>	NO CHANGE: Comments noted.

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
					consultation communication strategy.	
013	Angela Robson, Norwich University of the Arts	3	Supports and comments	Paras 39-40 (Paras 47-48)	We fully support the inclusion of a statement on consultation on planning applications. One way in which stakeholders and other interested respondents may provide more effective inputs is to provide guidance on the parameters of relevant responses and on which basis responses will not be considered in the consideration of a planning application.	CHANGE: A table outlining examples of material and non-material considerations will be added into Section 3 of the SCI.
014	Mr PR	1	Comments and suggests changes	General	<p>Suggest local plan has a minimum of 8 weeks consultation period instead of 6 weeks.</p> <p>Recommend that local radio is used and BBC Look East and ITV several times over several days so that everyone is aware of the changes.</p> <p>I'd suggest more 1, 2 and 3 bedroom properties in Norwich with local access to doctors, dentists, walk-in centres, sports</p>	<p>NO CHANGE: The comments are noted but the Council considers 6 weeks is sufficient given the use of the LDS timetable and forward agendas for the relevant committees advising of forthcoming consultations.</p> <p>CHANGE: The use of local radio will be added into paragraph 21 as part of a range of consultation methods. The use of local TV stations is</p>

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
					<p>facilities and shopping.</p> <p>In today's digital age not everyone has access to the internet or a computer so it is vital that details are sent by letter and can be returned by letter or phone.</p> <p>I found the draft Statement of Community Involvement to be understandable, not too overwhelming which some of the Council's documents tend to be.</p>	<p>unlikely to be taken forward as this is very expensive.</p> <p>NO CHANGE: The SCI document does not have the remit to propose types of development.</p> <p>NO CHANGE: the use of letters, newspapers, paper documents and various public meetings are all noted in paragraph 21 as ways of communicating which are not IT related. As stated above, the use of local radio will be added to this list.</p>
015	RLB	1	Support	General	An interesting document. No specific comments but please don't forget those who do not use the internet.	NO CHANGE; Comments noted and changes will be made as per above comments.

Reference	Consultee	Rep number	Nature of rep	Paragraph	Rep summary	Officer response
016	Jamie Melvin, Natural England	1	Comments	General	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.	NO CHANGE: Comments noted.
017	Ms MK	1	Support	General	The base of your ideas is to make sure that that the citizens of Norwich, whichever part they live in, should be taken into consideration and consulted on any plans you may have.	NO CHANGE: Comments noted.
INVALID REPS						
	Mr DK		Comment		Letter commenting on the bus issues on Castle Meadow and the St Stephens Area Regeneration	NO FURTHER ACTION REQUIRED: The letter has been passed to the Local Highway Authority.

Annex 2:

**Norwich City Council Statement of Community
Involvement: July 2013**



Norwich City Council: Statement of Community Involvement, July 2013



Contents

1. Introduction	2
Why we are preparing the Statement of community involvement	2
The Compact: Code of practice on involvement	3
The Council's commitment to equality	4
The role of councillors	4
RTPI Planning Aid England	4
2. Consultations on planning policy documents	5
Introduction	5
Consultation methods	8
How long will consultations last?	9
Who we will involve, and how	10
Local plan (Development plan documents)	11
Supplementary Planning Documents (SPDs)/Planning briefs	13
3. Consultations on planning applications	14
Introduction	14
Pre-application	14
Planning application consultation	17
Material planning considerations	18
4. Resources and management	19
Appendix 1	20
Local plan consultees	
(Includes specific and general consultees and Duty to Cooperate consultees)	



1. Introduction

Why we are preparing the Statement of community involvement

1. The city council wants to improve the way the community get involved in plan making and in its decisions on planning applications. We want to encourage more people to be involved and to make that as easy as possible.
2. The Statement of community involvement (SCI) is a 'code of practice' of how the council involves people in planning decisions. This can include planning policy (plan-making) and decisions on planning applications.
3. Under the planning policy system the council has to prepare the local plan, which will guide the city's development and growth over the next 15 years. Your local knowledge will help to make sure that development in the city benefits everyone whilst protecting the special qualities of the city. How we will ensure that you are part of this process is set out in this statement.
4. The council produced a Community engagement strategy (CES) in 2009 outlining the council wide approach to community involvement. This Statement of community involvement shows how this approach will be applied to plan making and the determination of planning applications.
5. The Council developed the Community engagement strategy to support the overall citywide vision and objectives as shown in Figure 1 overleaf:



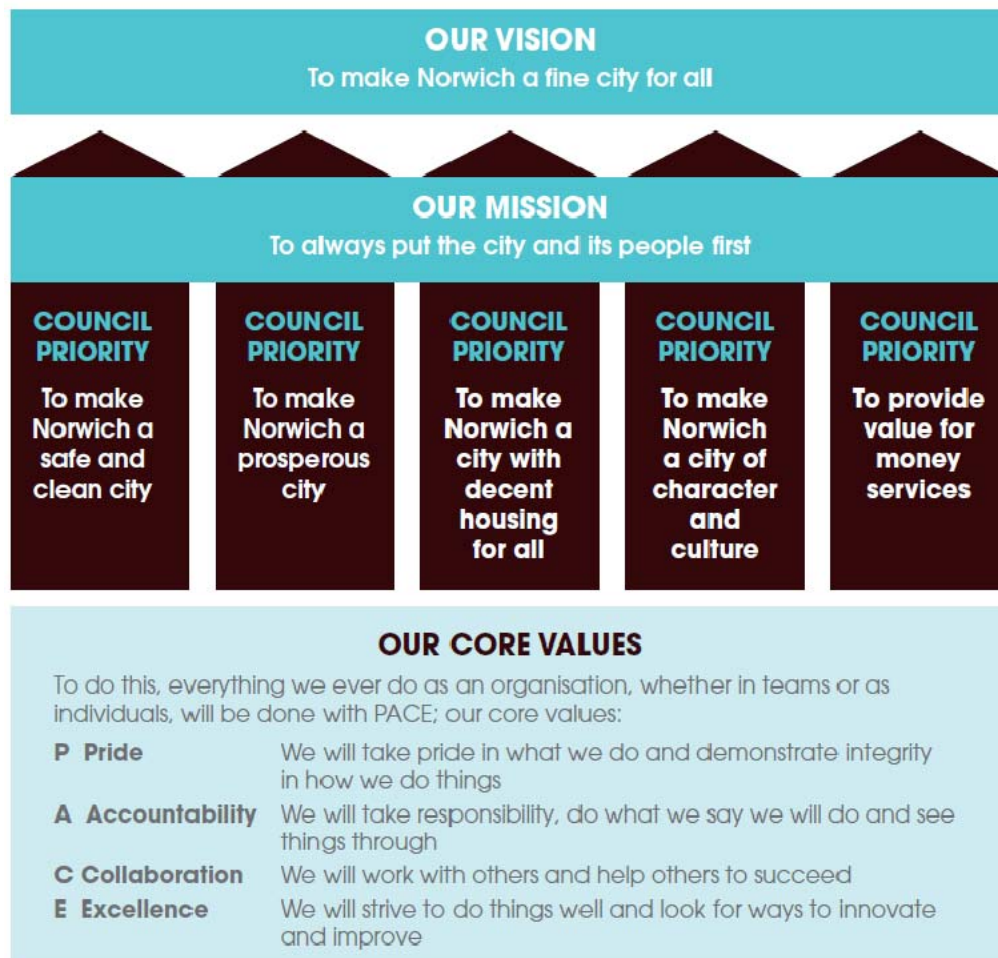


Figure 1: Extract from the Corporate Plan 2012-2015 (Norwich City Council)

- In order to achieve the council's vision and priorities through the planning service, it is essential that there is public involvement in plan-making and in the determination of planning applications and that clear standards are set for when and how involvement will take place.

The Compact: Code of practice on involvement

- Norwich City Council is a signatory of The Compact. The Compact is a national agreement between the government and community sectors, which aims to improve the way voluntary and community sectors, and local councils involve each other, including involvement in the planning process. We will continue to provide a positive framework for productive working relationships and will ensure that the guidelines set out in the Compact are met where appropriate, unless government legislation provides different regulations for involvement of others in plan-making and planning applications. Further details on consultation arrangements for planning policy are provided in section 2 – Consultation on



planning policy documents. Consultation arrangements for development management are provided in section 3 – Consultations on planning applications.

The Council's commitment to equality

8. The council has a commitment to equality which is a statutory duty under the Equality Act (2010). This is particularly relevant to planning which has a role to play in promoting equality of opportunity and cohesion by considering the needs of the community. The council recognises that equality of opportunity in practice includes ensuring that vulnerable or disadvantaged groups have their voices heard and needs considered. This statement supports that objective through providing guidance on how to get people involved. Planning activities and decisions will be impact assessed in order to ensure that there are no unintended negative impacts on vulnerable or disadvantaged groups. The assessments will focus on the six protected characteristics of race, gender, disability, age, sexual orientation and religion or belief, but will also consider the wider implications of socio-economic inequalities on community cohesion. This is normally carried out through an Equality Impact Assessment (EqIA) which takes place at the beginning of the planning policy production process.

The role of councillors

9. Councillors have two roles: as decision makers and community representatives. Members of the public can make their views known to ward councillors, a representative of the executive of the council, or at planning applications committee in a number of ways; by letter, email, or face-to-face discussion. However, it is important that the consultation process is used because this is how views are registered in the plan-making or application process. This ensures that while councillors hear what you have to say you will not miss the opportunity to be heard at committees or at any subsequent appeal, inquiry, hearing or examination.

RTPI Planning Aid England

10. The Royal Town Planning Institute (RTPI) Planning Aid England offers assistance and advice on the planning system to individuals and groups who are unable to pay for independent professional planning advice. Planning Aid encourages people to get involved in the planning system to help shape their own environment. The council supports the work of Planning Aid and will work with the service to provide independent advice for some of the involvement procedures proposed in this document.

11. RTPI Planning Aid England can be contacted via planning aid advice line:

Tel: 0330 123 9244
Email: advice@planningaid.rtpi.org.uk
Web: www.rtpi.org.uk/planning-aid



2. Consultations on planning policy documents

Introduction

12. The Joint core strategy, together with the Development management policies plan, Site allocations plan, Area action plans and the policies map form the Local plan for Norwich. The Local plan¹ is the statutory development plan for Norwich which will guide the future development and use of land, services and infrastructure in Norwich up to 2026 and sets the parameters for subsequent Supplementary planning documents and Neighbourhood plans.
13. A new version of the Local plan has been produced and has been submitted to the Planning Inspectorate for examination in autumn 2013. Following examination, and if adopted, this will replace the current Replacement local plan adopted in 2004. The table in **figure 2** shows the relationship between the local plan policy documents produced by the Council. The Local development scheme (LDS) and Statement of community involvement (SCI) are procedural documents that support the production of the Local plan setting out what will be produced and explaining how people can get involved with the process.
14. The council will prepare several development plan documents which are identified in the Local development scheme (LDS). The LDS includes a timetable of when we aim to produce the development plan documents, and the various stages they must go through to be adopted. This is available on the Council's website and is reviewed and updated regularly (hard copies are available on request):
<http://www.norwich.gov.uk/Planning/documents/Localdevelopmentscheme.pdf>
15. Norwich City Council is a member of the Greater Norwich Development Partnership (GNDP). The East of England Regional Spatial Strategy² (abolished in January 2013) encouraged coordination between Norwich, Broadland and South Norfolk councils to deliver major growth envisaged for the Norwich Policy Area. The Joint Core Strategy for Broadland, Norwich and South Norfolk was produced by the GNDP, which includes the Broads Authority and Norfolk County Council working in partnership with the three districts. Other documents produced by the GNDP include the Community Infrastructure Levy (CIL) Draft Charging Schedule (for each district/authority area) which is a statutory charge on new development introduced by the CIL Regulations 2010 (as amended).

¹ The term Local development framework (LDF) is no longer used following national reforms to the planning system introduced during 2011/12. Consequently, the new Development plan documents being prepared will no longer be referred to as forming part of the LDF, but as the Local Plan.

² The RSS has been abolished under the powers under the Localism Act 2011 Section 109(3),(5) and (6) and The Regional Strategy for East of England (Revocation) Order 2012.



16. The planning policy documents prepared by the GNDP are guided by the community involvement standards as set by the partnership councils jointly.
17. The Local Plan for Norwich contains a number of development plan documents including:
 - **Local plan.** The Local plan contains a number of Development plan documents including the Joint core strategy, the Site allocations and site specific policies plan (the 'Site allocations plan'), the Development management policies plan and Area action plans. The Policies map also forms part of the Local plan and is produced alongside the Site allocations plan and the Development management policies plan.
 - **Supplementary planning documents (SPDs)** supplement the policies in the Local plan and provide more detail and explanation on these policies where necessary. Planning briefs are produced to provide development and design guidelines for major complex sites. Planning briefs are often adopted with a similar status as supplementary planning documents.
18. The planning policy documents are supported by a range of research, studies and evidence supporting documents. These documents are prepared to contribute to or justify the planning policy documents. The supporting documents could include: Sustainability appraisal, Diversity impact assessment, topic papers, and the evidence base for specific policies.

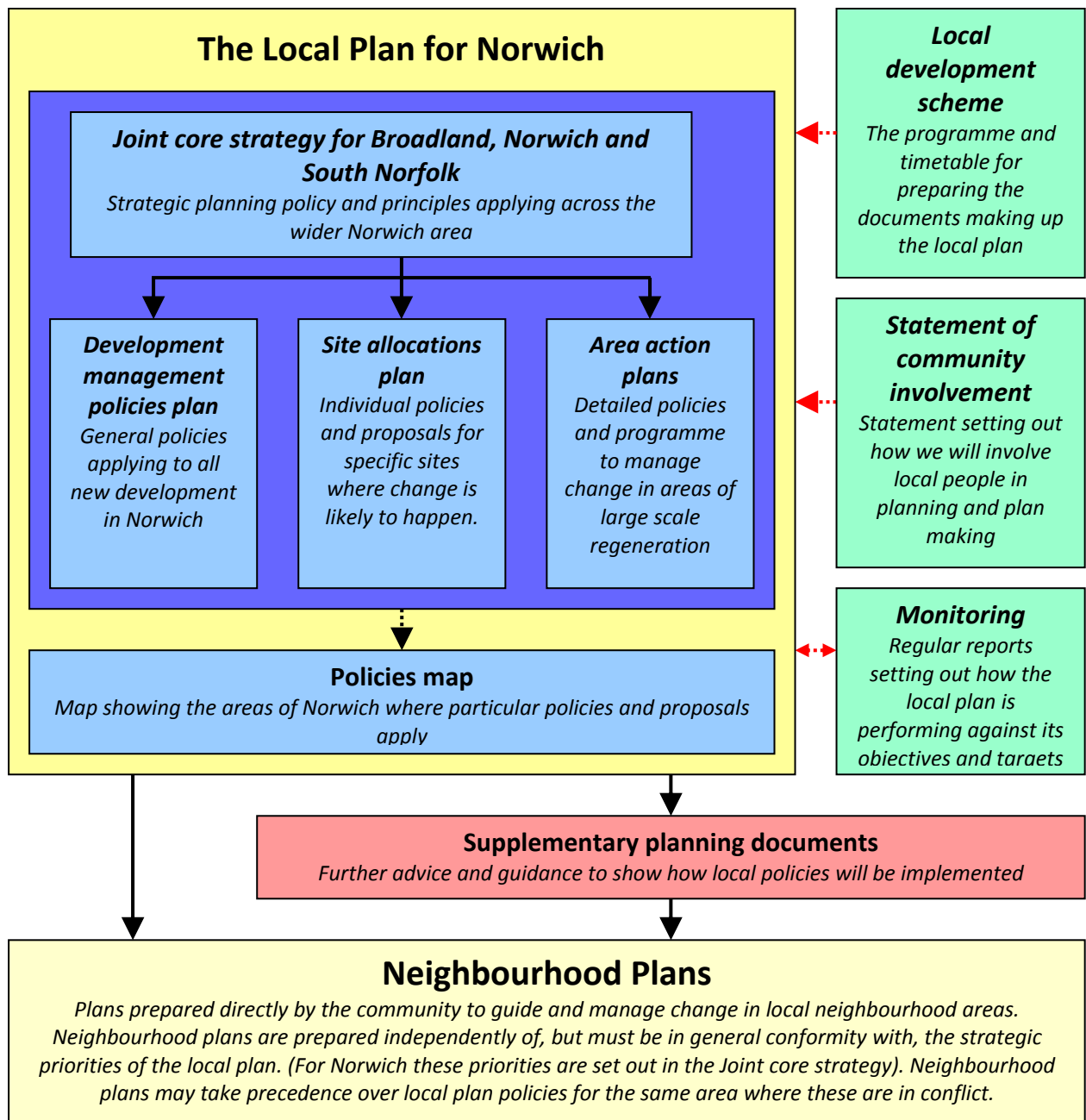


Figure 2: Documents making up the local planning framework for Norwich



Consultation Methods

19. The council has a well established procedure for involving people in planning policy documents. We will continue to develop our understanding of different consultation techniques over time and learn from what works, and what doesn't. A variety of methods have and will be used during consultations, taking into consideration issues being consulted on and the needs of the audience. These include the use of appropriate locations, and/or the use of particular presentation media for presentations to blind people, people with impaired hearing, and people with mental health disabilities.

20. Consultation methods are evolving in the digital age. Whilst almost all the documents are made available electronically, the challenge remains as to how information can be disseminated effectively to attract a wider audience. We will endeavour in future consultations to increase the use of social media (e.g. Facebook/Twitter) where possible to help access "hard to reach" groups especially the younger population. We will also continue to use more traditional methods of consultation to include those without access to the internet or social media.

21. Based on our current success and lessons learned from previous consultations, we will endeavour to use a range of consultation approaches, as necessary, set out in the following list:

- Letters/emails to groups and individuals
- newspapers and Citizen magazine
- paper documents
- council's website
- "planning for real"³ type events
- presentations to community groups
- public meetings
- focus groups
- exhibitions
- local councillors
- social media
- local radio



22. We acknowledge that it is important to make public consultation arrangements as extensive as possible to make sure the public can get their voice heard. However, it is not always possible or appropriate to undertake consultations

³ "Planning for Real" is a nationally recognised planning process where residents take a hands-on role in registering their views, identifying priorities and suggesting solutions for development in their area using 3D models, plans and maps. Sessions are usually facilitated by an independent organisation such as Planning Aid England.



using all the methods listed above. We will endeavour to carry out consultation as appropriate to the nature of the plan/policy or proposal and the stages it involves and endeavour to ensure a non-IT method is used in all occasions.

How long will consultations last?

23. The National Compact states that local authorities should “...where it is appropriate, and enables meaningful engagement, conduct 12-week formal written consultations, with clear explanations and rationale for short time-frames or a more informal approach.” In many circumstances it is considered that 12 week consultation periods are not needed to respond to emerging development plans, especially given that notice is given of forthcoming consultations via the Local Development Scheme and the forward agenda, and consultation versions of the documents are put into the public domain around four to six weeks before the formal consultation period starts.
24. It is therefore considered reasonable if the **minimum** time period for written consultations on development plan documents, minor modifications or focused changes, is set at six weeks with provision for this period to be extended in the following circumstances:
- a) Where the consultation period overlaps with either the holiday periods of Christmas, Easter, or August. In such circumstances the consultation period shall be extended to be 8 weeks.
 - b) Where there is no indication of the intention to prepare the document in the Local Development Scheme. In such circumstances the consultation period shall be 12 weeks;
 - c) Where there has been significant additional material included within the document between first publication of draft papers and formal consultation commencing. Again in such circumstances the consultation period shall be extended to be 12 weeks; and
25. Where a 12 week consultation period (points b and c above) overlaps with any of the three holiday periods mentioned above, the consultation period will not be extended although consultation dates will be adjusted to ensure that consultations do not close on bank holidays or between Christmas and New Year.
26. With regard to supplementary planning documents and planning briefs, regulations only require four week consultation periods. As these normally only relate to small geographical areas or subjects of specialist interest it is considered that shorter consultation periods are justified, particularly as similar lead-in times and reporting arrangements exist for these documents as they do for development plan documents.



27. It is therefore considered reasonable if the **minimum** time period for written consultations on supplementary planning documents and planning briefs is set at four weeks with provision for this period to be extended in the following circumstances:

- a) Where the consultation period overlaps with either the holiday periods of Christmas, Easter, or August. In such circumstances the consultation period shall be extended to be 6 weeks.
- b) Where there is no indication of the intention to prepare the document in the Local Development Scheme. In such circumstances the consultation period shall be 8 weeks;
- c) Where there has been significant additional material included within the document between first publication of draft papers and formal consultation commencing. Again in such circumstances the consultation period shall be extended to be 8 weeks; and

28. Where an 8 week consultation period (points b and c above) overlaps with any of the three holiday periods mentioned above, the consultation period will not be extended although consultation dates will be adjusted to ensure that consultations do not close on bank holidays or between Christmas and New Year.

29. To try and ensure meaningful engagement, we will advise as early as possible of forthcoming consultations once a consultation document is scheduled for consideration by the relevant committee.

Who will we involve, and how?

30. The Council's Community engagement strategy (CES) "Working Better Together" identifies five levels of involvement:

- Keeping you informed;
- Asking what you think;
- Deciding together;
- Acting together, and;
- Supporting independent community initiatives.

31. Different types of policy documents need different levels of involvement, depending on factors such as how many people would be affected by the proposed policy and the type of impact it would have. Detailed guidance on who we will involve, how, and at what level at the various stages of the plan making process is given on the following pages.



Norwich City Council Statement of Community Involvement: July 2013

Local plan (Development plan documents):

Key stages	Involvement Level	Public/stakeholder involvement arrangements
1. Pre-production/evidence gathering The information needed for the plan is prepared and potential issues identified.	<ul style="list-style-type: none"> • Asking you what you think • Deciding together 	<ul style="list-style-type: none"> • Writing to statutory environment bodies to initiate Sustainability appraisal screening • Early involvement of relevant stakeholders • Hold focus group sessions where necessary to help decide issues to be included in the plan
2. Draft Local plan The information gathered at first stage is taken into account in the drafting of detailed policies and allocations. Depending on the level of complexity, the draft local plan stage may involve more than one period of consultation.	<ul style="list-style-type: none"> • Asking you what you think 	<ul style="list-style-type: none"> • Publish draft documents for consultation for a minimum of six weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> ▪ publish the Sustainability scoping report or appraisal as appropriate; ▪ send letters/emails to specific consultation bodies; ▪ send letters/emails to relevant consultation bodies , other interested bodies and individuals on the consultation database; ▪ publish electronic copies of the consultation documents on the Council's website; ▪ make hard copies of consultation documents available for inspection at the Council's office and the Millennium library; ▪ issue press release in local papers; ▪ add consultation information on Council's social media sites. • Arrange public meetings, exhibitions, focus groups as appropriate
3. Publication of the Local plan The Local plan is finalised and published for a last stage of consultation. Comments at this stage will only be sought on soundness and legal compliance of the plan.	<ul style="list-style-type: none"> • Asking you what you think 	<ul style="list-style-type: none"> • Publish the Local plan and relevant documents for consultation for a minimum of 6 weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> ▪ publish a statement of the representations procedure; ▪ publish the Sustainability appraisal report for consultation; ▪ publish a consultation statement summarising all comments received from the previous stages and how the comments have been considered and taken into account;



Norwich City Council Statement of Community Involvement: July 2013

		<ul style="list-style-type: none"> ▪ publish relevant supporting documents; ▪ send letters/emails to specific consultation bodies; ▪ send letters/emails to relevant general consultation bodies , other interested bodies and individuals on the consultation database; ▪ publish electronic copies of all the documents on the Council's website; ▪ make hard copies available for inspection at the Council's office and the Millennium library; ▪ issue public notice in local newspapers; ▪ issue press release in local newspapers; ▪ add consultation information on Council's social media sites. • Arrange exhibition or presentation to interest groups if necessary
4. Submission	<ul style="list-style-type: none"> • No involvement 	The draft Local plan, and all supporting documents and the comments received from public consultation are submitted to the Secretary of State, who appoints an independent planning inspector. The hard copy documents are available at Council's offices and the Millennium library.
5. Public examination	<ul style="list-style-type: none"> • No involvement 	The Local plan and the comments received are examined by the planning inspector, followed by the inspector's report.
6. Adoption The Local plan is adopted following the consideration of the recommendations in the inspector's report.	<ul style="list-style-type: none"> • Keeping you informed 	<ul style="list-style-type: none"> • Make the inspector's report available for inspection on the Council's website and at the Council's office • Inform consultees who previously made representations about the availability of inspectors report Following adoption of the Local plan, we will: <ul style="list-style-type: none"> • Publish the Local plan, make electronic copies available on the Council's website and hard copies available at the Council's office • Publish adoption statement in Local newspapers • Send adoption statement to specific and general consultees and those who made representations at previous stages or those who have asked to be notified of the adoption • Make the Sustainability appraisal and other supporting documents available for inspection for six weeks after adoption • Add adoption information on Council's social media sites



Norwich City Council Statement of Community Involvement: July 2013

Supplementary Planning Documents (SPDs)/Planning briefs:

Key stages	Involvement Level	Public/stakeholder involvement arrangements
1. Pre-production/evidence gathering The information needed for the plan needs to be prepared and potential issues need to be identified.	<ul style="list-style-type: none"> Asking you what you think Deciding together 	<ul style="list-style-type: none"> Engaging relevant stakeholders in deciding the level of detail to be included in the plan and to identify key issues that need to be addressed Where necessary, preliminary consultations will be carried out prior to the publication of draft SPDs
2. Draft SPDs/ Planning briefs A Draft SPD/planning brief is prepared following the initial evidence gathering stage. Consultations at this stage will involve publishing a draft of the SPD/ planning brief for comment.	<ul style="list-style-type: none"> Asking you what you think 	<ul style="list-style-type: none"> Publish the Draft SPD/planning brief for consultation for a minimum of four weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> make electronic copies of the plan and supporting documents available on the Council's website; make hard copies of the plan and supporting documents available at the Council's office and Millennium library for inspection; send letters/emails to relevant specific and general consultees and those on the consultation database who may have an interest on the issues; issue a press release for the matters concerned if appropriate; add consultation information on Council's social media sites. Arrange exhibition or presentation to interest groups if appropriate
3. Adoption The Council will consider the representations received through the consultations and make any amendments necessary before adopting the SPD/ planning brief.	<ul style="list-style-type: none"> Keeping you informed 	<ul style="list-style-type: none"> Publish the SPD/planning brief – make electronic copies and any supporting documents available on the Council's website and hard copies available at Council's office Publish a consultation statement summarising all comments received from the previous stages and how the comments were considered and taken into account Send an adoption statement to those who have made representations during the previous consultations and those who have asked to be notified of the adoption of the SPD/planning brief. add adoption information on Council's social media sites



3. Consultations on planning applications

Introduction

32. Planning applications are considered through the development management process. It is important that the views of the general public and stakeholders are taken into account to inform decisions.
33. The legal minimum requirements of publicity on planning applications are set out in legislation. These requirements include publication on the Council's register, notices displayed near the site and/or neighbours being notified directly. For some applications, an advertisement is required in a local newspaper. Similar requirements apply to applications for listed building consent and conservation area consent.
34. This section sets out the council's approach to encouraging, and requiring where necessary, developers to undertake pre-application consultations and for the involvement of the community in commenting on planning applications.
35. The Planning service standards outline how people can expect to be involved in planning applications and the service they can expect to receive including response times to letters, emails and phone calls. The most up-to-date Planning service standards are available on our website at www.norwich.gov.uk; these will be updated when appropriate to reflect any future changes in legislation or internal processes.

Pre-application consultation

36. The National Planning Policy Framework (NPPF) states that local planning authorities should encourage parties to take maximum advantage of the pre-application stage and encourage applicants, not already required to do so by law, to engage with the local community. This should improve the efficiency and effectiveness of the planning application system for all parties including the local community.
37. The Council strongly encourages developers and agents of all application types to engage with the community at the earliest opportunity. For major schemes this is a requirement. This will give the best information on which to base proposals and enable any planning application that is subsequently made to have the best chance of success.
38. Early involvement between developers, the community, consultees and the local planning authority allows issues and concerns to be discussed before planning proposals are formally submitted for assessment and decisions are made. Pre-application involvement by all parties allows issues and concerns to be raised at an early stage, potentially enabling them to be addressed and giving communities the opportunity to shape or influence the development proposals.
39. There are several levels of pre-application service available, depending on the type of development proposed. For large and major schemes a fee may be charged for this



service but the level of advice given will also be greater and will involve statutory consultees and the comments of the local Design Review Panel. In the case of strategic sites and major infrastructure projects, a national Design Review Panel may also be consulted. Further guidance can be found on the Council's website at the following link or by calling the planning service: <http://www.norwich.gov.uk/Planning/>; telephone 0344 980 3333.

40. The Council strongly encourages pre-application consultation with the community for all applications which fall in the following categories:

- Housing developments of 10 or more dwellings;
- Any other development with a floor area of 1,000 square metres;

NB. The current Environmental Impact Assessment Regulations (2011) (EIA) do not require consultation on schemes requiring an EIA. However, these regulations are under review and this may become a requirement in the future.

41. The **Validation requirements** produced by the Council provide details of the pre-application consultation requirements for applications. These will be regularly updated in accordance with legislative requirements. The Validation requirements can be accessed from the Council's website: <http://www.norwich.gov.uk/Planning/Pages/Planning-ValidationRequirements.aspx>. If insufficient or inappropriate pre-application involvement has taken place relative to the size, scale, complexity and/or impact of the proposed development, the application may not be validated.

42. The figure on the next page gives some basic advice on how involvement/consultation would be expected to be conducted:

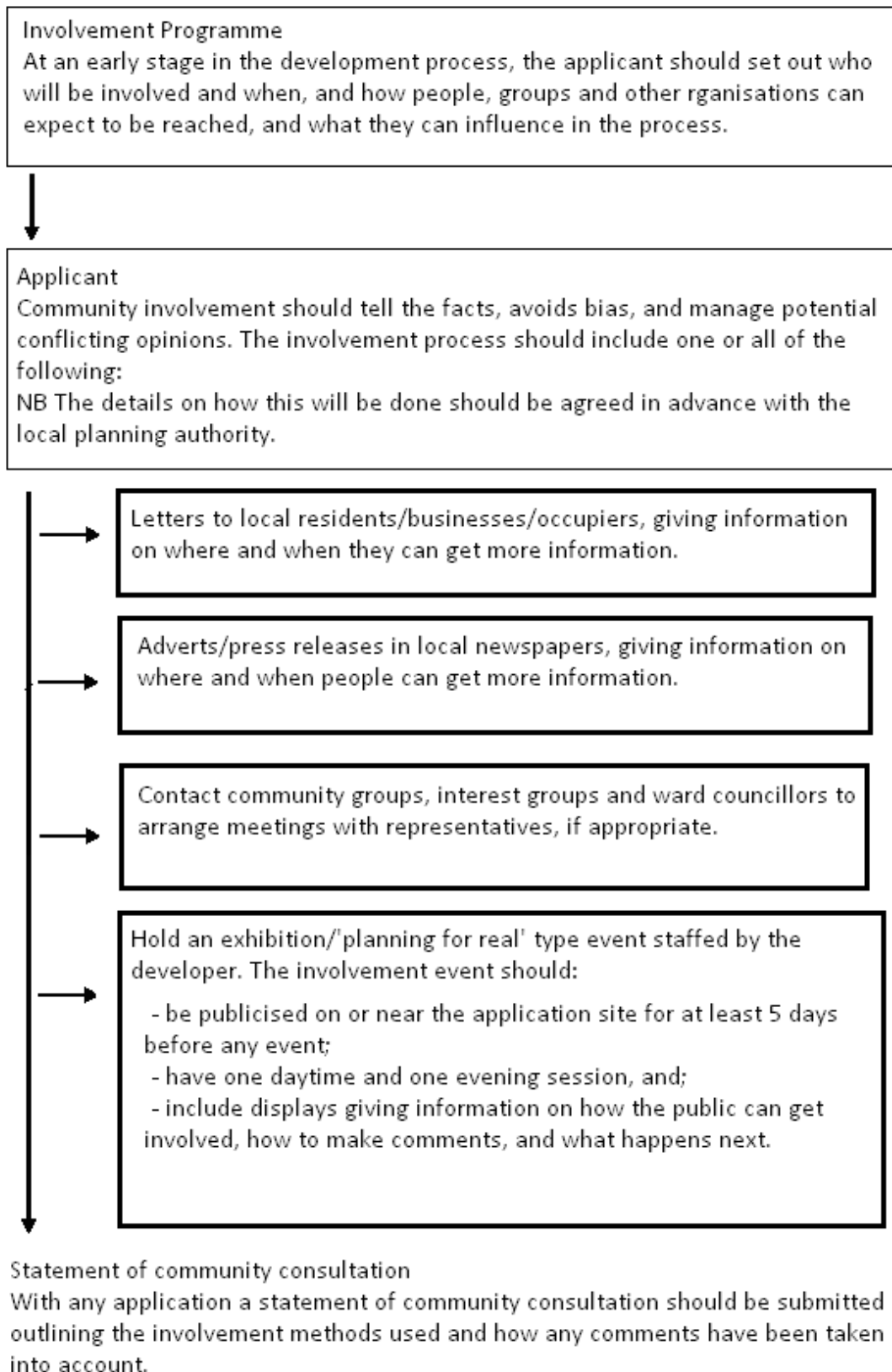


Figure 3: An example of how a pre-application community consultation could be conducted



Planning application consultation

43. It is important that the community have suitable opportunities to be involved in commenting on planning applications and that those comments are taken into account when the decision is made.
44. The council has a well established process of consultation on planning applications. The main way to find out information on planning applications is through the Planning Public Access service⁴ on our website: <http://planning.norwich.gov.uk/online-applications>. You can also sign up to receive e-mail alerts of proposed developments in your area through this service. Other methods currently include:
- i) letters and emails to statutory consultees, other organisations and interest groups;
 - ii) letters and emails to residents, businesses and properties within 10metres of the boundary of the site;
 - iii) the display of site notices (for some applications);
 - iv) publication in local newspapers (for some applications);
- NB The methods listed at ii), iii) and iv) above will be carried out in accordance with at least the minimum requirements of Section 13 of the The Town and Country Planning (Development Management Procedure) (England) Order 2010 (as amended) (or any updated version thereafter)*
- v) viewing of all comments received on our website;
 - vi) viewing of all decision reports on our website;
 - vii) presentations at committee (for some applications) (in accordance with the requirements of the Planning Service Code of Conduct);
 - viii) committee papers – available a week before each meeting (in paper form/website), and;
 - ix) committee minutes – available 7 days prior to the next meeting.
- NB The above list is not exhaustive and should not be taken verbatim. Full details of the consultation methods on planning applications can be found at the following link:***
- <http://www.norwich.gov.uk/CommitteeMeetings/Planning%20applications/Document%20Library/93/Repplanningneighbournotifications20090402.pdf>
45. Should any planning application during the process of its assessment be amended and require a further consultation period, all those who were originally consulted (statutory consultees, internal consultees and neighbouring properties), and any persons or organisations who have made representations, will be re-consulted on the revised proposals. If necessary, the case officer for the application will agree a new determination deadline with the developer/agent as required.
46. The Planning Portal (www.planningportal.gov.uk) provides information on planning in general, with Norwich City Council's website providing more specific information relevant to Norwich. Public Access contains details of all planning applications and

⁴ The Planning Public Access website allows you to search for details of planning applications, plans and supporting documentation that have been submitted to Norwich City Council's planning service.



comments of consultees and the consideration of the application by officers from December 2005 onwards, with some information on applications from January 1988 to November 2005.

Material planning considerations

47. In the process of assessing an application the planning officer must have regard to material planning considerations. Some examples of material considerations and non-material considerations can be found below (please note, this list is not exhaustive). For example, the loss of property value is not a material planning consideration and will not be taken into account in the assessment of an application.

48. More advice can be found on the Royal Town Planning Institute's website at the following link or from Planning Aid England at the second link:

- <http://www.planningportal.gov.uk/general/faq/faqapplyprocess#Whatarematerialconsiderations>
- <http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf>



MATERIAL CONSIDERATIONS 	NON-MATERIAL CONSIDERATIONS 
<ul style="list-style-type: none"> • National and local policies 	<ul style="list-style-type: none"> • Issues considered under Building Regulations
<ul style="list-style-type: none"> • Planning history and previous appeal decisions 	<ul style="list-style-type: none"> • Land/boundary disputes, including rights of access
<ul style="list-style-type: none"> • Case Law 	<ul style="list-style-type: none"> • Opposition to business competition
<ul style="list-style-type: none"> • Impact on sunlight, outlook, privacy and amenity 	<ul style="list-style-type: none"> • Loss of property value
<ul style="list-style-type: none"> • Highways issues (e.g. increased traffic movements) 	<ul style="list-style-type: none"> • Loss of view (<i>NB this does not include 'outlook'.</i>)
<ul style="list-style-type: none"> • Effect on a Listed Building or Conservation Area 	<ul style="list-style-type: none"> • Opposition to the principle of a development if permission has been granted by an outline application or appeal decision.

Figure 4: Examples of Material and Non-material considerations (Source: RTPI Planning Aid England)



4. Resources and management

49. This section discusses the management of the involvement process and the resources available to the council. The local plan is managed by the council's planning policy and projects team and supported by officers from other council departments who will provide expertise, support and advice during the process. The resources are designed to ensure that the Local plan, Sustainable community strategy and other council strategies are linked and that all local community involvement events are coordinated.
50. The council will aim to make the best use of limited staff time and financial resources to prepare the Local plan and involve people throughout the plan-making process. We hope to work closely with those involved to understand and agree policies and proposals at an early stage so that fewer resources are needed at the examination stage. From previous experience of consulting on planning policy documents the use of time and effort at earlier stages can reduce the length of examination time.
51. The council may use specialised agencies or consultants for specific parts of the planning policy framework such as masterplanning. They will be expected to undertake public participation and involvement on their proposals and results which will be consistent with this document.





Appendix 1: Local plan consultees

In the planning policy making process, the Council has to consult organisations which are known as either 'specific' or 'general' consultees. In addition the government has recently introduced a 'Duty to co-operate' in the 2012 planning regulations⁵; many of the consultees required under the Duty to co-operate are already included in the list of 'specific consultees' below, but for completeness they are all listed separately overleaf. Please note, as the legislation and regulations are frequently updated, the lists of consultees below may change over time and must be checked against the requirements set out in any new regulations.

The recent planning regulations set out the specific consultation bodies. Along with relevant government departments, the list contains the following bodies:

Specific consultation bodies

- The Coal Authority
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (English Heritage)
- The Marine Management Organisation
- Natural England
- Network Rail Infrastructure Limited
- The Highways Agency
- Norfolk County Council
- Broads Authority
- Adjacent local authorities
- Norfolk, Suffolk and Cambridgeshire Primary Care Trusts (or successor health care bodies)
- Norfolk Constabulary
- Police and Crime Commissioner
- Relevant telecommunications companies
- Relevant electricity and gas companies
- Relevant water and sewerage undertakers
- The Homes and Communities Agency
- Local nature partnerships

⁵ The Town and Country Planning (Local Planning) (England) Regulations 2012



General consultation bodies - examples

Through this Statement of community involvement, we are committed to involving a wide range of other groups, organisations and interested individuals in the planning process. This will ensure that as many people as possible who are interested are involved in the future development of Norwich.

The list below provides some examples of general consultation bodies:

- Community groups (area based and topic based)
- Parish councils in Norwich policy area
- Housing organisations
- House builders
- Residents and tenants groups
- Business and commerce organisations
- Economic development agencies
- Educational bodies
- School councils
- Community safety bodies
- Environmental and heritage organisations
- Equal opportunities bodies
- Ethnic minority groups
- Disabled people's organisations
- Older people's groups
- Faith groups
- Health and social care groups
- NHS Norfolk
- Norfolk and Waveney Mental Health Trust
- Youth organisations
- Agents/developers
- Landowners
- Regeneration bodies
- Tourism bodies
- Transport bodies
- Community centres
- Volunteer development organisations
- Sports and recreation organisations
- Health and Safety Executive
- Royal Mail
- Emergency services.
- Gypsies, Travellers and Travelling Showpeople
- Norwich Design Review Panel
- Norfolk Historic Environment Service
- Local Enterprise Partnerships
- Interested individuals



Duty to Co-operate: consultees required under the 2012 Planning Regulations

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (English Heritage)
- Natural England
- Civil Aviation Authority
- The Homes and Community Agency
- Norfolk, Suffolk and Cambridgeshire Primary Care Trusts (or successor health care bodies)
- The Office of Rail Regulation
- Integrated Transport Authorities
- Highway Authority (Norfolk County Council)
- The Marine Management Organisation