

APPENDIX 2: DRAFT STATEMENT OF COMMUNITY INVOLVEMENT

READING BOROUGH COUNCIL

**DRAFT STATEMENT OF COMMUNITY  
INVOLVEMENT**

NOVEMBER 2013

## Introduction

- 1.1 Under the Planning and Compulsory Purchase Act 2004, the Council is required to produce a Statement of Community Involvement (SCI). This document sets out how the authority intends to achieve continuous community involvement in the preparation of local development documents in their area. The SCI also covers how people and the community will be engaged in decisions on planning applications for major development that affect the authority's area.
- 1.2 The SCI needs to set out a clear framework for how to involve the community, whilst allowing for the fact that different consultations will have different purposes and emphases. It should give clarity about what standards the Council will be expected to adhere to in carrying out community involvement on planning matters.
- 1.3 The statement will apply to all planning projects: Local Development Documents (LDD's); Supplementary Planning Documents (SPD's) covering policy interpretation, development frameworks, development briefs; changes to the service and procedures of the Planning Section; major planning applications; monitoring/ information packs; etc.
- 1.4 This version of the SCI is a draft for community involvement. Your comments on the document are welcomed. Please send any comments to:

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Please ensure that any comments are received by 5pm on xxx January 2014.

## 1. Statutory Requirements

- 2.1 In consulting with the community and other key stakeholders, the Council must comply with some minimum statutory requirements. For planning policy documents, these requirements are at the time of writing set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. For planning applications, the requirements are in xxx.
- 2.2 The main requirements of the 2012 Regulations for local plans and supplementary planning documents can be summarised as follows:
- For local plans, two period of consultation or community involvement are required - an early stage where representations are invited on the scope and content of the document, and a pre-submission stage when representations are invited on the full document (Regulations 18, 19, 20). The pre-submission consultation should be a minimum of six weeks;
  - For supplementary planning documents, a single consultation period is required which cannot be less than four weeks (Regulation 12);
  - Documents should be available at the Council's principal offices during normal office hours, and published on the web (Regulation 35);
  - For local plans, a number of specific bodies must be consulted if they have an interest in the area (e.g. English Heritage, Natural England, Highways Agency, utilities providers and adjoining authorities); and
  - For local plans, the Council must consult whichever more general bodies (voluntary groups, groups representing ethnicities or nationalities, businesses etc) it considers appropriate.
- 2.3 Other legislation, whilst not dictating the form and timing of planning consultations, has an impact on how they should be carried out. In summary:
- The Local Government and Public Involvement in Health Act 2007 placed a duty on local authorities to involve local people by keeping them informed, consulting them and involving them in other ways in the design and delivery of services
  - The Equality Act 2010 places an 'Equality Duty' on public bodies, to understand how their plans to introduce new, or change existing, policies, procedures or services will affect groups protected under equality legislation
  - The Gunning principles (1985)<sup>1</sup> established 4 necessary elements for statutory consultations:
    - Consult when proposals are still at a formative stage
    - Give sufficient reasons (and information) for your proposals to permit 'intelligent consideration'
    - Give adequate time for consideration and response
    - Take responses conscientiously into account
- 2.4 What is demonstrated above is that the minimum statutory requirements for consultation are actually quite limited. The Council generally significantly exceeds the statutory minimum on every major planning policy consultation. Of most importance is the requirement to carry out consultation in line with an adopted Statement of Community Involvement, which underlines the importance of this document.

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<sup>1</sup> R v LB Brent ex parte Gunning (1985)

### 3. Duty to Co-Operate

- 3.1 In addition to statutory consultation requirements, Section 110 of the Localism Act 2011 introduced a duty to co-operate in relation to planning of sustainable development. The 'duty to co-operate', as it is generally known, requires local planning authorities to engage constructively with one another and with other specified bodies such as the Environment Agency, English Heritage and the Homes and Communities Agency on an ongoing basis in preparing local planning documents.
- 3.2 The duty to co-operate is a substantially more significant task than merely consulting certain organisations within specified periods. It requires ongoing co-operation from the very start of the process, and is the first test that will be considered in an examination on a local plan. Where compliance with the duty to co-operate cannot be demonstrated, local plans will have no hope of being found 'sound'.
- 3.3 Because the duty to co-operate is a separate task from community involvement, and will also be dependent on the timescales and processes of other bodies, this SCI does not set out proposals for how it will be undertaken. However, it is important to be aware of its existence, as it means that consultation with the bodies prescribed in the Regulations<sup>2</sup> will only be part of an overall picture of how those bodies are engaged. The Council is in the process of agreeing Memoranda of Understanding with the other five Berkshire Unitary Authorities in terms of strategic planning and minerals and waste planning to guide how the duty to co-operate will be undertaken with those bodies.

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<sup>2</sup> Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012

## 4. Principles

4.1 The Council produced 'Working Better With You: Community Involvement Guidance' in 2012, which sets out a policy and set of principles for involving residents and customers. The guidance is based around eight principles for community consultation, as follows:

- **Accessibility and choice:** We will ensure that you are informed/consulted/involved in a way that considers your needs. It is your choice whether to be involved, how to get involved and to what extent (within legal boundaries).
- **Timeliness:** We will inform, consult and/or involve you as early as possible.
- **Inclusiveness and equity:** We will seek and welcome all views. We value diversity. Opportunities to get involved will be equally accessible to everyone, young people's views are considered equal to those of adults.
- **Transparency and honesty:** We will be open from the start about our proposals, the process, outcomes, timeframes for implementation and levels of influence, any resource limitations or statutory requirements. You have the right to challenge any barrier to your involvement (e.g. process, approach, assumptions) and to work with us to seek solutions.
- **Respect and listening:** We value, listen to, respect and learn from the contribution of all participants.
- **Accountability:** We will demonstrate what difference your involvement makes in processes or outcomes.
- **Flexibility and evolution:** We will regularly re-evaluate our involvement processes and methods and modify them in response to feedback or changing or developing needs. We will seek and share innovative and creative ways to improve involvement.

4.2 These can be further developed into a number of principles for consulting and involving on planning matters, using the same headings. These principles should be used to guide how consultation and community involvement exercises are carried out. More specific guidance on particular types of planning document is included in section 6.

### 4.3 *Accessibility and Choice*

1. The Council will maintain a list of individuals, groups and organisations that have expressed an interest in being involved in consultations on planning matters, and will consult them on all relevant planning matters.
2. Measures to involve and consult the community will be appropriate to the type, scope and stage of the policy or plan, and to the community itself.
3. The Council will clearly state the methods for responding, and the timescales, at the beginning of the process. This will be on the website, and any consultation material, letters and e-mails produced.
4. The Council is emphasising the importance of working at a neighbourhood level. In consulting on planning documents, the Council will use existing neighbourhood networks and structures to consult and involve, where those networks and structures are representative of the neighbourhood, and this may mean a differing approach in different neighbourhoods.

#### 4.4 *Timeliness*

5. Community involvement on policies and proposals will be front-loaded. This means that the most wide-ranging and open involvement will take place at the earliest stage, when the opportunity to shape the outcome is greatest. As policies and proposals develop further, consultations should become more focussed and seek views on more detailed matters.
6. Any community involvement stage for a planning policy document will last for a minimum of six weeks;
7. The Council will avoid consulting over Christmas and New Year insofar as is possible. Where consultations over these periods are inevitable, consultation periods will be extended to take account of this;
8. Events designed to publicise the community involvement (e.g. public exhibitions) will be held at a time within the community involvement period which allows time for responses afterwards, e.g. not within the last ten days before the period closes.

#### 4.5 *Inclusiveness and Equity*

9. All groups will have equal opportunities to get involved in the process, and this will include the selection of venues and timing of events.
10. Whilst enabling all groups to be involved in the process, the Council will make particular efforts to reach groups that have typically been difficult to involve in past planning policy consultation exercises in Reading. These include:
  - Younger people (under 40);
  - Black and minority ethnic populations; and
  - Residents of less affluent communities, including much of South Reading and parts of West and Central Reading

#### 4.6 *Transparency and Honesty*

11. Where background evidence is vital to an understanding of the decisions to be made, this will be made available on the Council's website and on request, and will be highlighted within the consultation documents themselves.
12. The Council will highlight any significant constraints that prevent the pursuit of certain options, and will not consult on options that are not realistic or achievable.

#### 4.7 *Respect and Listening*

13. All responses received in writing within the specified consultation period will be taken into account.
14. When publishing consultation results, the Council will publish only the name of the respondent and no other personal details.

#### 4.8 *Accountability*

15. In reporting on the community involvement, the Council will respond to each individual point made, stating what action, if any, the Council will be taking to address the point. Where the number of responses is reasonably low, for example under 50, this may be done individually for each respondent. However, where a significant number of responses have been received, where the same point has been made by a number of different respondents, these may be grouped together with a single Council response.

16. A report of consultation will be published which summarises the consultation undertaken, and summarises the representations received and the Council response to those representations. This will be published at the next stage of the document at the latest and will be available on the website and in hard copy in Reading Borough libraries and the Civic Offices.
17. The Council will contact anyone who made representations on planning policy to notify them of the next stage of that policy production. In doing so, the Council will highlight the availability of the report of consultation.

4.9 *Flexibility and Evolution*

18. The Council will welcome any comments on the community involvement processes used, and will take account of them in future exercises, and will ask for feedback on specific events, e.g. workshops and exhibitions.
19. Lessons learned from individual community involvement stages will be reported on in the Report of Consultation, and will be taken into account in future exercises.
20. The Council will not set consultation processes in stone, but will instead evolve each consultation taking account of past experience, whilst still following the principles of this SCI.

## 5. Resources

- 5.1 Whilst well-designed and appropriate community involvement adds significant value to the process, planning and preparation, carrying out consultation, recording and analysis of results and reporting results and giving feedback does take considerable time and effort, involving significant manpower and financial resources. Therefore, while being fully committed to ensuring that all sections of the community are fully involved in planning decision-making processes and that their views are taken into account, methodologies must be cost effective and capable of being contained within defined manpower and financial budgets, particularly in the current climate. As such, the Council will need to consider at each stage of each document the type and extent of community involvement that represents best use of resources whilst complying with statutory requirements and the principles of this SCI.
- 5.2 In the past, the Council has kept a number of individuals and organisations on its planning consultation lists for years, where there is no e-mail address. This has meant that letters have been sent out every year, costing the Council a great deal in postage and staff time. The response rate has been very poor. This approach is not effective and no longer sustainable, and, as part of the process of producing the Sites and Detailed Policies Document, the Council specifically asked whether respondents without e-mail addresses wished to continue to receive letters. Very few responded positively. Therefore, with a handful of exceptions (such as those who have specifically requested letters), the Council will now send notifications of consultation to those on the lists **by e-mail only**.
- 5.3 Electronic communications are of increasing importance in involvement and consultation, and can be a very resource-efficient measure. The Council will need to continue to evolve the way that it uses such areas as social networking and interactive online tools to better enable community involvement.
- 5.4 An important way of significantly reducing resource burdens is by combining consultations, either with other planning consultations, or with other consultations being carried out by the Council. The recent Residential Conversions SPD, for example, was consulted upon as part of the wider 'Let's Talk Housing' consultation. The Council will continue to look for such opportunities to combine consultations where appropriate.



## 6. Document Types

6.1 This section gives some commentary on the main types of planning policy document and gives some information on how the process of production may fit in with the principles. It also highlights different approaches to engaging with the community, using the five levels of involvement set out in the Council's consultation guidance, as follows:

	Inform	Consult	Involve	Collaborate	Empower
Participation level	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
Example methods	Fact sheets Web sites Road shows	Public comment Focus groups Surveys Public meetings	Workshops Deliberative polling	Citizen advisory committees Consensus-building Participatory decision-making	Citizen juries Ballots Delegated decision

### *Local Plan*

6.2 The local plan comprises a document, or documents, with 'development plan' status, i.e. it is the primary consideration in determining planning applications. These are the most important documents that the Council produces, and the community involvement should reflect the fact that it is in the local plan that the planning strategy for the Borough is decided.

### Pre-Preparation

6.3 This stage is referred to in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that the local planning authority should consult on what a local plan should contain. This stage is therefore a very wide-ranging stage, where the front-loading referred to in principle 5 should occur. The main emphasis at this stage will be to *involve*.

6.4 This stage may be based around discussions of which issues to cover, and how to approach those issues, together with a range of alternative options. A full draft document would not be available, or appropriate, at this stage.

6.5 Appropriate involvement tools at this stage might include:

- Interactive workshops;
- Questionnaires;
- Leaflet drops across a defined area;

- Exhibitions, particularly in locations and at times which would maximise the number of people not previously involved in planning matters attending, e.g. shopping centres;
- Forum discussions.

#### Pre-Submission Draft

- 6.6 This is the statutory consultation stage on the full draft document, as specified in Regulation 19. A full draft of the document must be published and comments invited. As there is now a full draft in place, there is little purpose in asking open-ended questions, or posing multiple options, and this could in fact be construed as being actively dishonest. Instead, the Council should be asking for views on the document, whether the approach is correct, and how it might be improved. The emphasis here is to *consult*.
- 6.7 Appropriate involvement tools at this stage might include:
- Directly contacting important consultees, including those involved at earlier stages;
  - Direct discussion with key stakeholders;
  - Drop-in events, particularly in locations and at times where interested individuals have a chance to discuss aspects of the policy or plan with Council representatives;
  - Publication of the policy or plan online.
- 6.8 The Pre-Submission Draft consultation stage can be repeated if necessary.

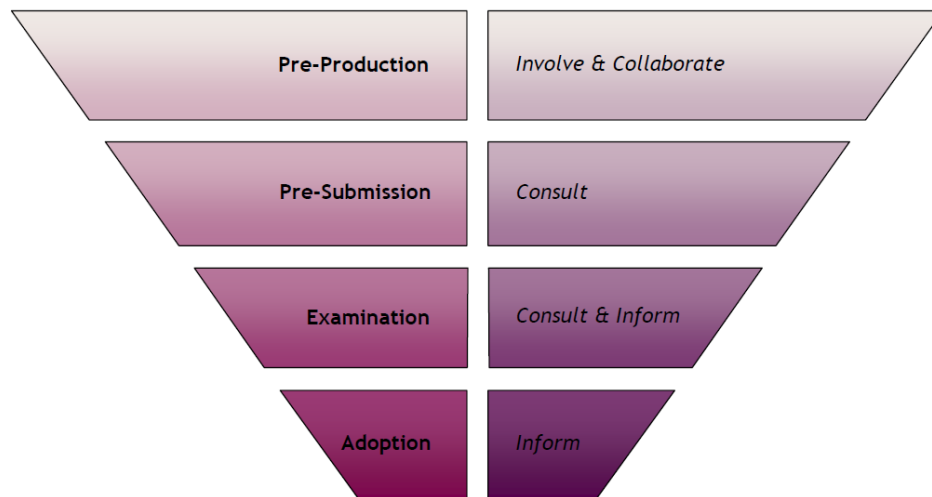
#### Examination

- 6.9 Once the document is submitted to the Secretary of State, this marks the beginning of the process of Examination. Whilst some consultees will be involved in the Examination process, including providing written evidence and appearing at hearings, this will be under the control of the Inspector rather than the Council, so this is not for the SCI to manage.
- 6.10 If it appears during the Examination process that changes are needed that would not result in significant policy shifts, there is a process by which the Council can consult on some limited changes and request that the Inspector make these changes to the document. This happened twice, for instance, during the Examination of the Sites and Detailed Policies Document in spring and summer 2012. The consultation will need to be fairly limited, as there is not scope to make substantial changes at this point. However, the Council will need to consult broadly the same groups and individuals consulted at Pre-Submission stage.

#### Adoption

- 6.11 When the DPD is adopted in its final form, the Council simply needs to *inform*, as there is no longer an opportunity to affect the document other than through the judicial review process. Appropriate tools at this stage might include:
- Directly informing important consultees and those previously involved;
  - Publication of the policy and plan online.

Figure 1: Approach to Development Plan Documents



### *Supplementary Planning Documents*

- 6.12 Supplementary Planning Documents (SPDs) supplement policy in higher level Development Plan Documents. They are not able to make entirely new policy themselves. Examples of SPDs include Briefs for specific sites, particularly where they are identified in DPDs, or detailed guidelines on matters such as sustainable design or parking standards. As these are lower-level documents, there are fewer consultation or involvement stages.

#### *Initial Involvement (optional)*

- 6.13 Initial involvement is not a statutory stage in preparing a Supplementary Planning Document, and may only be necessary in certain cases. For instance, where a SPD already provides clear guidance, from which a SPD cannot deviate, there is little benefit of a consultation that seeks to start from scratch.
- 6.14 However, in other cases an initial involvement exercise may be vital. For instance, the Meadway Centre Planning Brief process started with a wide consultation on issues and potential options for the development of the centre, based on a questionnaire. This received a good response, which played a crucial role on the contents of the Brief once drafted. This was appropriate in this case because; (a) the Meadway Centre, as a district centre, plays a key role in the functioning of the local community, who will ultimately be the users of the site; and (b), because the adopted policy that it supplemented did not already give a great deal of specific guidance on the site. An initial involvement exercise can therefore be an extremely useful tool in some circumstances. The emphasis here is to *involve*.
- 6.15 Appropriate involvement tools at this stage might include:
- Interactive workshops;
  - Questionnaires;
  - Leaflet drops across a defined area;
  - Exhibitions, particularly in locations and at times which would maximise the number of people not previously involved in planning matters attending, e.g. shopping centres;
  - Forum discussions.

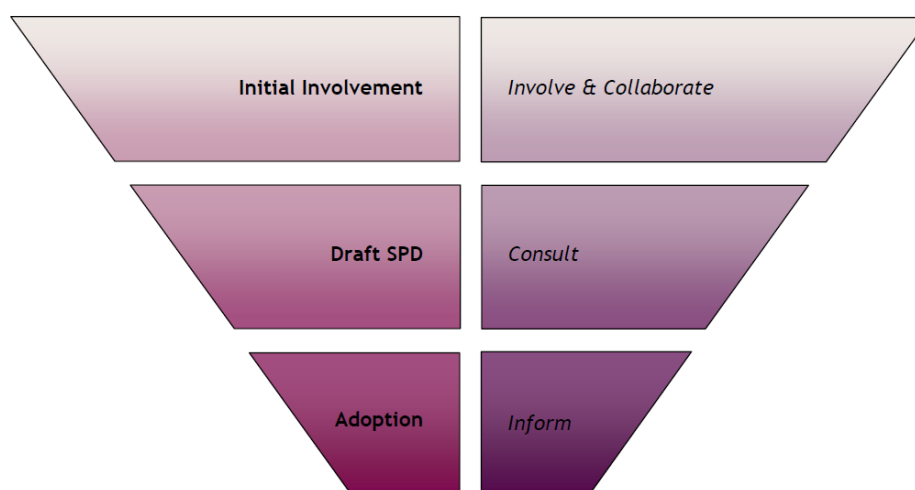
#### Draft SPD

- 6.16 This is the statutory consultation stage on the Draft SPD. A full draft of the document must be published and comments invited. As there is now a full draft in place, there is little purpose in asking open-ended questions, or posing multiple options, and this could in fact be construed as being actively dishonest. Instead, the Council should be asking for views on the document, whether the approach is correct, and how it might be improved. The emphasis here is to *consult*.
- 6.17 The minimum statutory period for a Draft SPD consultation is four weeks, but the Council will consult for at least six weeks to give sufficient time for responses.
- 6.18 Appropriate involvement tools at this stage might include:
- Directly contacting important consultees, including those involved at earlier stages;
  - Direct discussion with key stakeholders;
  - Drop-in events, particularly in locations and at times where interested individuals have a chance to discuss aspects of the policy or plan with Council representatives;
  - Publication of the policy or plan online.
- 6.19 The Draft SPD consultation stage can be repeated if necessary.

Adopted SPD

- 6.20 When the SPD is adopted in its final form, the Council simply needs to *inform*, as there is no longer an opportunity to affect the document other than through the judicial review process. Appropriate tools at this stage might include:
- Directly informing important consultees and those previously involved;
  - Publication of the policy and plan online.

Figure 2: Approach to Supplementary Planning Documents



*Neighbourhood Plans*

- 6.21 At this point, the Council is not aware of any proposals to produce neighbourhood plans in Reading. However, such plans could emerge over

the life of the SCI. Although the Council has an important role in providing support to those producing neighbourhood plans, it will be for the neighbourhood forum to take the lead on the document. The emphasis at every stage of such a document is therefore to *empower*.

- 6.22 The statutory requirements for consultation on neighbourhood plans are set out in sections 14 and 16 of the Neighbourhood Planning (General) Regulations 2012. Unlike for other planning documents, neighbourhood plans are not required by law to comply with the SCI, so it is not for this document to include any more detail. However, the principles set out in section 4 are a useful guide to how to undertake consultation and involvement on planning matters. The Planning Advisory Service also publishes a useful guide on the process for neighbourhood plans, including undertaking consultation<sup>3</sup>.

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<sup>3</sup> <http://www.pas.gov.uk/process-for-preparing-neighbourhood-plans-and-orders#2>

## 7. Development Proposals

### *Pre-Application Consultation on Significant or Sensitive Proposals*

- 7.1 The Government has identified the importance of applicants engaging with the local community prior to making a planning application, as part of the pre-application process. Paragraph 189 of the National Planning Policy Framework states that a local planning authority:

*"... should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications."*

- 7.2 The Council agrees with this emphasis on engaging the community from the outset. It can result in an improved scheme which takes the needs of the existing community into account, and a better relationship between the developer and the community that carries through the application process and beyond. This is particularly the case for proposals that are sensitive or of a significant scale.

- 7.3 The following categories of development are considered to be sensitive or of a significant scale. If a development falls within any of the following categories, it will generally be expected to follow the guidance in this section:

- Development exceeding the following thresholds:
  - Housing: a net increase of more than 50 units;
  - Retail: a net increase in floorspace of 2,500m<sup>2</sup>;
  - Office: a net increase of 2,500 m<sup>2</sup>;
  - Other employment: development with similar levels of employment to 2,500m<sup>2</sup> office floorspace.
  - Other uses or mixed uses: developments involving other uses or mixed uses will be assessed in terms of being "major" on their individual merits.
- Development which would not be in accordance with the development plan;
- Development proposed on playing fields owned by a local authority or used by an educational institution;
- Development proposed on more than 5 ha of greenfield land;
- Schedule 1 and 2 developments as defined by the Environmental Impact Assessment Regulations;
- Developments involving the loss of allotments; and
- Any other proposals that are judged by the planning case officer to be particularly sensitive or of significant interest to the wider local community.

- 7.3 Developers of schemes proposing lower amounts of development are also invited to carry out similar pre-application involvement and consultation in line with the provisions set out in this paper, as a matter of good practice.
- 7.4 Promoters of significant development schemes will need to have regard to the principles set out in section 4 of this SCI. They should pay particular attention to the need to properly plan and resource community involvement exercises. In particular, the following measures should be taken:
- Developers should prepare a full project plan for pre-application involvement and consultation to be discussed and agreed with the case officer. The case officer will provide assistance in identifying and providing contact information on local representatives, groups and individuals who should be invited by the applicant to become involved in the proposals. This will include local residential and other property, representatives of community groups, including local Councillors, relevant statutory and non-statutory consultees, statutory undertakers and any other bodies or individuals to which such information is deemed relevant by the local planning authority. Where proposals relate to the historic environment, the developer will be required to consult a number of organisations with interests in these matters<sup>4</sup>.
  - The Developers project plan should include an outline of the manpower and other resources that will be made available for the intended community involvement. This should include details of the materials that will be made available to the community and stakeholders and the venues proposed for holding interactive events. Website development resources should also be highlighted.
  - The project plan should also discuss the need for local authority officer resources as part of the involvement process. Reading Borough Council already faces considerable pressure on planning staff resources with continuing issues over recruitment and retention of staff. The Council cannot therefore guarantee to make staff resources available to assist involvement exercises or to attend public events. As a minimum, as part of pre- application discussions and correspondence, case officers from the Planning Section will: -
    - Provide information and advice on consultees and stakeholders relevant to involvement in a particular proposal;
    - Provide information and advice on potential venues for public interactive events;
    - Appraise and provide comment and advice on a community involvement project plan prepared by the developer/ potential applicant; and
    - Arrange for links or material to be loaded onto the Council's website.

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<sup>4</sup> English Heritage; CABE; Ancient Monuments Society; Council for British Archaeology; Society for the Protection of Ancient Buildings; The Georgian Group; The Victorian Society; The Twentieth Century Society; Garden History Society; The National Trust; Local Civic/Amenity Society; Local Building Preservation Trust; Local Archaeological and Antiquarian Societies, and local history societies. Also refer to "Planning and Development in the Historic Environment – A Charter for English Heritage Advisory Services," English Heritage, 2005.

Case officers will make efforts to attend events and take part in involvement exercises as observers, if time and resources allow. Where officer attendance or assistance in pre-application involvement exercises is specifically requested by a developer/ potential applicant, and this is agreed on a "without prejudice" basis by the Planning Manager, any cost to the local authority will be charged to the developer/ potential applicant at the Council's standard rates for officer time and any materials.

- Initial approaches to the community and stakeholders should offer a range of involvement approaches and express willingness to meet groups or hold exhibitions/ meetings to explore proposals. They should invite suggestions from the community and stakeholders on how involvement should take place to best meet the needs of the community. Prospective applicants should discuss with the community matters such as possible venues for exhibitions, meetings and other events, and the timing of those events to meet the needs of all in the community. This will be particularly important in involving hard to reach and specific groups within the community.
- Developers should prepare circular information on the developer/ applicant's intentions to make a planning application and develop a particular site. Developers should agree the form and content of the information to be provided with the local planning authority. Such circular information shall be designed to include a means to feed back appropriate responses either by prompted questions or through other written and digital communication.
- Developers should widely distribute such information as may be agreed by the local planning authority by posting to household addresses and other addresses determined in conjunction with and agreed by the local planning authority.
- Developers should arrange and provide at least one, professionally facilitated, interactive involvement event designed to enable all consultees to attend, receive information, participate and feed back information on their area and its community and their views on possible development or other change in the area.
- Such an event might take the form of a place check, enquiry by design event, exhibition and workshop, a planning for real exercise, public meeting or similar, facilitated interactive event. Details of the time, location, illustrative materials, facilitation arrangements and event programme should be agreed in writing with the local planning authority as part of the project plan. The local planning authority must be invited to send representatives to observe and, if appropriate, to participate in any event.
- Developers should provide a website of relevant information or provide digital images and information (or a suitable document such as a document in .pdf format) that can be put on the planning page of the Reading Borough Council Website.



- Developers or prospective applicants will be expected to prepare a public report of community involvement for submission with any planning application, detailing the extent of the community involvement exercise carried out, reporting all views and responses and indicating the actions that have been carried out or that it is proposed are carried out in order to meet the views and concerns raised by the community involvement.

7.5 In order to meet these requirements, a prospective applicant will need to allow considerable time for carrying out pre-application involvement.

*Consultation on Planning Applications*

7.6 Consultation on planning applications will be carried out in line with the relevant statutory requirements, taking account of resource availability.