

Appendix 2: Report of Consultation

DRAFT STATEMENT OF COMMUNITY INVOLVEMENT REPORT OF CONSULTATION March 2014

1. INTRODUCTION

- 1.1 This report summarises the consultation on the Draft Statement of Community Involvement (SCI), which was carried out between November 2013 and January 2014. It summarises the consultation measures undertaken in section 2, and discusses the results of consultation in section 3.
- 1.2 The next stage after consultation is to adopt the SCI. This is expected to take place in March 2014.
- 1.3 For any further information on this consultation exercise or the production of planning policy for the area, please contact the Planning LDF Team:

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2. DESCRIPTION OF CONSULTATION EXERCISE

- 2.1 The Draft Statement of Community Involvement was published for consultation on 26th November 2013. Consultation lasted until 24th January 2014. This was a period of eight weeks, longer than the standard planning consultation due to the fact that the period took in the Christmas and New Year period, and it therefore reflected the approach set out within the SCI itself.
- 2.2 The consultation was undertaken alongside consultation on two other issues - proposed alterations to affordable housing policies, and the Sustainability Appraisal Scoping Report.

- 2.3 The consultation consisted of an e-mail or, in exceptional cases, a letter to around 750 contacts on the Council's consultation database, which consists of developers, landowners, adjoining authorities, national organisations, community and voluntary groups and interested individuals. The Draft SCI was published online, and hard copies were available in all Reading Borough libraries and in the Civic Offices.

3. RESULTS OF CONSULTATION

- 3.1 A total of five responses were received to the Draft Statement of Community Involvement. The responses were from:

- English Heritage
- Environment Agency
- Taylor Wimpey West London
- Thames Valley Police Crime Prevention Design Advisor
- University of Reading

- 3.2 The results are summarised in Annex 1, together with a Council response to each point made. The responses were to matters of detail with the document, and did not raise any fundamental issues with the overall approach.

ANNEX 1: SUMMARY OF WRITTEN COMMENTS RECEIVED AND COUNCIL RESPONSE

Ref	Respondent	Document section/topic	Summary of response	Council response
002645	Environment Agency	General	We are pleased to see that Reading Borough Council has paid regard to statutory requirements and that the Council generally exceeds that statutory minimum on every major planning policy consultation. In this respect the Environment Agency have no objections to the aims and content of the DSCI. This DSCI does not prejudice our consultation under the Town and Country Planning (Development Management Procedure (England) Order 2010 as a statutory consultation body.	Noted. No change needed.
000017	English Heritage	General	English Heritage has no specific comments to make on the Draft Statement, and we are generally very satisfied with how we are consulted by the Borough, both on policy documents and on planning and other applications. However, we would find it very helpful if a copy of the application form was included with the latter consultations, if that was possible please.	Noted. No change needed.
002788	University of Reading	2: Statutory Requirements	Section 2 of the draft SCI should explain the consultation requirements of the Localism Act. The Localism Act reinforced a requirement for applicants to consult local communities before submitting planning applications for some larger scale developments and assess the application in light of feedback received.	Partially agreed. Change proposed. A paragraph should be introduced to highlight the pre-application consultation requirements of Section 122 of the Localism Act, which has currently only been brought into force in relation to certain onshore wind development, but which may be used to require consultation for other forms of development in future legislation.
002788	University of Reading	3: Duty to Cooperate	The University of Reading welcomes the acknowledgement at paragraph 3.2 of the draft SCI that the duty to co-operate is a "substantially more significant task than merely consulting certain organisations within specific periods."	Noted. No change needed.
002788	University of Reading	4: Principles	The principles set out in section 4 of the SCI are considered to provide a clear and concise way of involving the community.	Noted. No change needed.
002788	University of Reading	4: Principles 4.3	Suggest under 'Accessibility and Choice' addition of "that the materials and methods of consultation maximise accessibility;"	Agreed. Change proposed. This is an appropriate change, although it will need to have the caveat "insofar as

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				is possible" due to resource constraints.
004882	Thames Valley Police Crime Prevention Design Advisor	4. Principles 4.3	Thames Valley Police Crime Prevention Design Advisors (CPDA's) are willing to take part in planning major application consultations, where appropriate as regards designing out crime.	Noted. No change needed.
004882	Thames Valley Police Crime Prevention Design Advisor	4. Principles 4.4	I am pleased with the Council's stance that where possible planning consultations over Christmas and New Year will be extended because it is the holiday season.	Noted. No change needed.
002788	University of Reading	4: Principles 4.5	We welcome the focus on young adults between 25 and 35 - often those within the bracket of needing new homes but unaware of the processes which define how these would be delivered.	Noted. No change proposed.
002788	University of Reading	5: Resources 5.2	We agree with the points raised in paragraph 5.2. This updates methods of communication towards electronic notifications - which is a positive step and saves time and money. Indeed, effective use of social media could help the Borough Council reach the wider community, beyond those already on the existing planning consultation list. However, it is important to retain a commitment to make hard copies available for those who do not have access to the internet.	Agreed. Change proposed. This is already implied in paragraph 5.2, but an amendment can make it clearer.
004882	Thames Valley Police Crime Prevention Design Advisor	5. Resources 5.2	Thames Valley Police CPDA's are very happy to correspond via e-mail without the need for letters and the commensurate saving in costs and time for all.	Noted. No change needed.
002788	University of Reading	6: Document Types 6.5	This should be expanded to refer to the use of more innovative and interactive online/mobile webpages as representing one opportunity to gather the views of harder to reach age groups.	Agreed. Change proposed. Use of such methods will not always be possible or appropriate, but can be a useful tool if resources are available.
002788	University of Reading	6: Document Types	Developers and landowners should be engaged in specific forums (as listed under appropriate involvement tools in	Agreed. Change proposed.

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		6.5	paragraph 6.5), to assist in delivering robust development proposals.	This part of paragraph 6.5 can be slightly expanded to reflect this.
004882	Thames Valley Police Crime Prevention Design Advisor	7. Development Proposals 7.1	Thames Valley Police Crime Prevention Design Advisors (CPDA's) are willing to take part in pre-planning major application consultations, where appropriate as regards designing out crime.	Noted. No change needed.
004925	Taylor Wimpey West London	7. Development Proposals 7.1	Paragraph 189 of the National Planning Policy Framework (the Framework) should be reported more fully under paragraph 7.1 to make it clearer that pre-application engagement on development proposals is a recommendation rather than a requirement.	No change proposed. Paragraph 7.1 already quotes the part of this paragraph that refers to pre-application community involvement in full. The remainder of this paragraph is about whether developers engage with the local authority rather than with the community.
004925	Taylor Wimpey West London	7. Development Proposals 7.3	To better reflect the wording of paragraph 189 of the NPPF the wording of paragraph 7.3 should be amended, with the suggested changes shown in bold: <i>"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 the developer will usually be encouraged to follow the guidance in this section."</i>	Partially agreed. Change proposed. It is recognised that the Council cannot insist on pre-application community involvement. However, it still feels that this stage is a very important one for significant and sensitive proposals, so it is considered that "strongly advises" is a more appropriate form of words than "encourages".
004925	Taylor Wimpey West London	7. Development Proposals 7.3	The wording of the final sub-category under the first bullet point (Development Thresholds) is unclear and should be reworded to make it apparent which mixed uses development proposals fall within this category.	Agreed. Change proposed. This will be amended to ensure there is clarity about thresholds. Whilst some development of other types or below the thresholds should also ideally be subject to pre-application consultation, this is picked up by the final bullet point of 7.3 in any case.
004925	Taylor Wimpey West London	7. Development Proposals 7.4	In order to be consistent with the wording of paragraph 7.3, paragraph 7.4 should include reference to sensitive as well as significant development schemes. Paragraph 7.4 should also be reworded to omit "will need to" and replace with "should".	Agreed. Change proposed. Changes would improve clarity and consistency.
004925	Taylor Wimpey West London	7. Development Proposals 7.4	The bullet points could be reduced to a list of acceptable alternative means of public engagement from which the developer could use their discretion to decide which form(s) of engagement would be most appropriate for them and their development schemes.	Partially agreed. Change proposed. The information in these bullet points is considered to be useful and necessary to help to achieve a robust pre-application community involvement process. There is still scope for developers to use their discretion in the methods used, but the principles set out are sound.

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			In particular the requirements to agree details in advance with Council officers is not considered necessary and could unacceptably delay the progress of proposals) as could the proposed measure to invite suggestions from the community on how involvement should take place. These are considered to be unnecessarily onerous.	It is considered that there are cases where it would be advisable to engage with the community at the initial stage to discuss how the community involvement will take place. However, it is agreed that there are many cases where this will be unnecessary and would serve only to hold the process up. This should therefore be amended to identify that this is only likely to be necessary in the most significant or sensitive cases.
002788	University of Reading	7: Development Proposals 7.4	The first and second bullet points list the need for a full project plan for the consultation to be discussed and agreed with officers. We do not consider that it is necessary for applicants to outline the manpower and resources which will be made available during the community involvement. We would recommend that this project plan focused instead on the milestones of the project, including the timescales, reach of consultation, materials and methods which will be used. It should also highlight the stakeholders which will be engaged and how they would intend this engagement to take place.	Agreed. Change proposed. The resources and manpower to be made available is relevant only insofar as it relates to the methods and materials to be used, so it is covered elsewhere in this paragraph. A minor change is proposed.
002788	University of Reading	7: Development Proposals 7.4	The fifth bullet point requests that developers agree the form and content of consultation information with officers regarding pre-application consultation. We disagree and consider it more appropriate to discuss these issues and take a steer from the advice of officers. The consultation should be managed by the applicant and be assessed by officers as the planning body, which will make the best use of resources at the authority.	Agreed. Change proposed. In practice there is rarely a need for formal agreement of all of the consultation material. Officers can provide advice, and, where this advice is not taken and the Council feels it has significantly affected the outcome of the consultation, this will be weighed against the results of consultation at application stage.
002788	University of Reading	7: Development Proposals 7.4	We would suggest that, regarding bullet point eight, following initial guidance from officers on the structure of the public consultation, that the requirement to formally pre-agree illustrative materials, facilitation arrangement and event programme is unnecessary.	Agreed. Change proposed. Whilst this is advisable, it is somewhat onerous to require agreement on these detailed issues, and although it is currently in the adopted SCI, is rarely applied in practice. The text should be amended to make it advisory rather than a requirement.
002788	University of Reading	7: Development Proposals 7.4	The eighth bullet point also lists the types of events that could be undertaken. It is considered that the SCI would be a more useful document if it were to provide an explanation of the form that the different types of event could take.	Agreed. Change proposed. The types of event listed may be somewhat confusing for those who do not regularly undertake consultation exercises. It is now proposed to include a glossary, which will set out the meanings of these terms and provide links to further information where needed.
002788	University of	7: Development	Regarding the final bullet point, we would recommend	Agreed. Change proposed.

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	Reading	Proposals 7.4	that the 'public report of the community involvement for submission' reviews the responses to the feedback and in particular listing where changes have been made in response to feedback and where this is not possible, warranted or practical, why this is the case.	Most of these elements are already covered, but where no changes are proposed the report should set out why this is the case.
002788	University of Reading	7: Development Proposals 7.4	The text of the final bullet point is unclear since it states that developers or prospective applicants will be expected to prepare a public report of community involvement for submission with any planning application. That text should be amended since public consultation will not be necessary in all proposals which require a planning application.	Agreed. Change proposed. This should only refer to the types of application covered by this SCI, not all planning applications.
002788	University of Reading	7: Development Proposals 7.4	Officers can play an important role in facilitating pre-application discussions between elected members and applicants - be that individual meetings or wider presentations to broad member groups on more major schemes. The input of elected members is important but can often be missing from initial stages of consultation.	Agreed. Change proposed. This should be reflected in the list of expectations of case officers.
002788	University of Reading	7: Development Proposals 7.6	It appears as though paragraph 7.6 is intended to imply that consultation will be carried out in line with the relevant statutory requirements if the resources are available to do so and if that is its intended meaning is considered inappropriate and must be amended. The Town and Country Planning (Development Management Procedure) (England) Order 2010 (the DMPO 2010) does not provide an opportunity for consultation bodies to be consulted "taking account of resource availability" and instead it is a statutory requirement that they are.	Agreed. Change proposed. This is not intended to imply that the Council will only comply with the statutory requirements when resources are available. The Council will of course seek to comply with all statutory requirements. It was intended to state that resources will be an additional consideration when deciding on to what extent the consultation should go beyond statutory requirements. The text should be amended to make this clearer.