

# Cabinet Report



Listening Learning Leading

Report of Head of Policy and Programmes

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To: CABINET

Date: 2 December 2021

## Joint Statement of Community Involvement

### Recommendations

- (a) To adopt the Statement of Community Involvement subject to the amendments set out in this report and in appendix 1
- (b) To delegate to the Head of Policy and Programmes in consultation with the Cabinet Member for Planning to make the changes set out in this report and in appendix 1 and any other minor changes, typographical corrections or non-material amendments to the SCI prior to publication.

### Purpose of Report

1. To report to Cabinet the key issues raised following the six-week public consultation and the changes proposed to the Statement of Community Involvement (SCI) document.

### Corporate Objectives

2. The publication of the SCI supports the delivery of the council's strategic objectives set out in the current Corporate Plan by supporting openness and accountability.

### Background

3. The council is required, as local planning authority, to prepare a Statement of Community Involvement (Planning and Compulsory Purchase Act 2004).

4. Planning Practise Guidance states: “Section 18 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications. The Statement of Community Involvement should be published on the local planning authority’s website”.
5. South Oxfordshire’s SCI was adopted in June 2017. SCI’s must be reviewed every five years, so South Oxfordshire’s SCI is due to be reviewed. Vale’s current SCI was adopted in 2020.
6. A joint SCI is being prepared to cover both districts to reflect the fact that South Oxfordshire and Vale of White Horse have committed to preparing a joint local plan.

## Summary of the Statement of Community

7. The joint SCI follows a similar format to the existing SCI for South. The joint SCI sets out how both councils will engage with the community on planning policy preparation, including neighbourhood planning, and on planning applications. It also covers planning appeals and enforcement.
8. The draft SCI is set out in three sections:
  - 1) **Introduction** – our visions and values for community involvement.
  - 2) **Planning policy** – how we engage when preparing planning policy documents, including neighbourhood planning, and the support we offer to neighbourhood planning groups. This section includes information about the temporary measures in place due to COVID-19 and how we will interact with our communities going forward.
  - 3) **Development Management** – how we consult on planning applications, including information on the pre-application advice service we offer, planning appeals and planning enforcement.
9. Information is presented in a way that is clear and transparent for the wider audience and includes a series of flowcharts and diagrams to help illustrate the council’s practices and procedures for consulting on new planning policy documents and planning applications.
10. The SCI also contains links to all the relevant pages on our websites and other external sites so the reader can easily find out more information if they wish.

## Outcome of public consultation

11. There is no requirement to consult on the SCI, however, it is good practice to do so. A six-week public consultation on the draft SCI ran from 8 September – 20 October 2021. 109 complete responses were received. This included responses from statutory consultees, parish council’s and organisations, with the highest number of responses submitted by members of the public (71%).
12. The consultation survey asked six questions about the SCI. For the first four questions, respondents could choose their level of agreement to a statement, ranging from strongly agree to strongly disagree. There was also the opportunity to leave a free text

response for each question. The first three questions related to the three sections of the SCI: Introduction, Planning Policy, and Development Management, and asked whether respondents found that the information was presented in a simple and easy to understand way. For these three questions the majority of respondents stated that they either strongly agreed or agreed that the information was presented in a simple and easy to understand way – the breakdown of responses is presented below:

**Q1: Section 1 Introduction - Overall did you find that the information in this section was presented in a simple and easy to understand way?**

13. 73% strongly agreed or agreed. Only 8% of respondents either disagreed or strongly disagreed.

| Answer Choices |                     |   | Response Percent | Response Total |
|----------------|---------------------|---|------------------|----------------|
| 1              | Strongly agree      |    | 18.39%           | 16             |
| 2              | Agree               |    | 55.17%           | 48             |
| 3              | Neutral             |    | 17.24%           | 15             |
| 4              | Disagree            |    | 4.60%            | 4              |
| 5              | Strongly disagree   |    | 3.45%            | 3              |
| 6              | I don't have a view |  | 1.15%            | 1              |

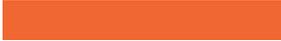
**Q2: Section 2 Planning Policy - Overall did you find that the information in this section was presented in a simple and easy to understand way?**

14. 60% strongly agreed or agreed. 13% disagreed or strongly disagreed.

| Answer Choices |                     |   | Response Percent | Response Total |
|----------------|---------------------|---|------------------|----------------|
| 1              | Strongly agree      |  | 16.28%           | 14             |
| 2              | Agree               |  | 44.19%           | 38             |
| 3              | Neutral             |  | 26.74%           | 23             |
| 4              | Disagree            |  | 8.14%            | 7              |
| 5              | Strongly disagree   |  | 4.65%            | 4              |
| 6              | I don't have a view |   | 0.00%            | 0              |

**Q3: Section 3 Development Management - Overall did you find that the information in this section was presented in a simple and easy to understand way?**

15. 62% strongly agreed or agreed. 13% disagreed or strongly disagreed.

| Answer Choices |                     |   | Response Percent | Response Total |
|----------------|---------------------|---|------------------|----------------|
| 1              | Strongly agree      |  | 12.94%           | 11             |
| 2              | Agree               |  | 49.41%           | 42             |
| 3              | Neutral             |  | 23.53%           | 20             |
| 4              | Disagree            |  | 8.24%            | 7              |
| 5              | Strongly disagree   |  | 4.71%            | 4              |
| 6              | I don't have a view |  | 1.18%            | 1              |

16. Question 4 asked respondents whether they agree that the processes set out in the SCI will enable communities to be informed and have timely and meaningful opportunities to have a say on any planning proposals. There was more of a mixed response to this question, the largest percentage of respondents selected Neutral. Slightly more respondents answered that they agree or strongly agree (37%) than disagree or strongly disagree (31%), but it was a close outcome.

| Answer Choices |                     |   | Response Percent | Response Total |
|----------------|---------------------|---|------------------|----------------|
| 1              | Strongly agree      |   | 11.90%           | 10             |
| 2              | Agree               |  | 25.00%           | 21             |
| 3              | Neutral             |  | 30.95%           | 26             |
| 4              | Disagree            |  | 21.43%           | 18             |
| 5              | Strongly disagree   |  | 9.52%            | 8              |
| 6              | I don't have a view |  | 1.19%            | 1              |

17. Question 5 asked whether respondents had any comments on the general format of the SCI (52 responses). Question 6 provided the opportunity for respondents to leave any other comments (59 responses). These questions were free text questions. All of the comments have been read and the points that were raised most frequently are listed below:

- The document is clear, easy to understand and well presented
- The document contains good use of diagrams
- The SCI is too long / too detailed / contains too much information
- A sense that consultation is a tick box exercise and people's view are not taken into account
- Developers / housebuilders / colleges / central government have too much control over where development happens
- More dialogue is needed to make consultation meaningful, including receiving feedback on consultations
- There should be more engagement at pre-application stage
- Greater emphasis needed on complying with neighbourhood plan policies
- Some planning processes not subject to consultation and transparent – e.g. discharge of conditions

- The hierarchy of planning documents is not clear
18. A summary of all the consultation responses received, along with an officer response and proposed amendments, can be found at **Appendix 1**.
19. The draft SCI document was taken to Scrutiny Committee on 16 November 2021. Scrutiny Committee made a number of comments to help refine the SCI document. These included:
- an easy read format should be available
  - must use Plain English and reduction of jargon or technical language (e.g. 'statutory')
  - remove or move diagrams to an appendix
  - change tone of language from 'feel involved' to 'be involved'
  - communicate to respondents how their comments have been considered by making them aware of consultation statements.

### **Proposed amendments to the SCI**

20. A comment that come up frequently in response to the SCI was that it was too long. The length of the SCI is in part down to the style and formatting of the document, which has been designed to make the document more appealing to look at and easy to read. The document also contains several flowcharts and other graphics that take up space. For accessibility reasons it is important that the text is supplemented by diagrams, rather than being replaced by diagrams. The SCI includes additional information on neighbourhood planning, and the support we offer to groups, and a section on looking ahead, which were not part of the existing SCI's.
21. To address the comment of the SCI being too long we propose to do a final check though and make sure there is no unnecessary repetition of information. Officers will also check for use of Plain English and jargon, whilst recognising that there are times when it is difficult to avoid using technical terms. All technical terms are covered in a glossary.
22. One option considered was to add an executive summary, but it would be difficult to summarise all the information in the SCI in a summary without it becoming lengthy itself. Producing a short summary would run the risk of missing out information.
23. Another proposed amendment relates to the removal of Diagram 6: Relationship of development plan documents and wider national policies and frameworks (p19). This diagram was included to illustrate the different types of planning documents (e.g. NPPF, Local Plan, Arc Framework) and their relationship to each other. However, on reflection and as a result of consultation feedback, officers are of the view that this information is not best placed or required in the SCI. It would be better placed in a planning policy document such as the joint local plan. Several respondents stated that the diagram was confusing as it mentions documents / plans that are not covered in the SCI. Some respondents felt that the hierarchy of plans was not clear. The purpose of the SCI is to set out *how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications* (PPG) – it is

not intended to explain the planning process or the planning system, this information can be found elsewhere. As such officers suggest removing this diagram and inserting some short text to signpost readers to external websites (e.g. the planning portal) should they wish to find out more. Instead of diagram 6 a much simpler diagram showing the Development Plan could be inserted in the relevant section, this is the approach taken in the current Vale SCI.

24. Another comment that was made by several respondents was related to feedback after consultations, and a sense that comments are not taken into account. To address this officers are looking in to how we better communicate the availability of consultation statements. For example, by sending respondents an email with a link to the consultation statement once it has been published.
25. Some respondents commented that whilst forums were mentioned in the text as a possible way of consulting, this was not included in the table that summarises methods of engagement. It is suggested this is added and could be in the form of virtual or face to face forums.
26. Other suggested amendments to the SCI relate to corrections, typos, ensuring all links work correctly and other non-material changes.

### **Climate and ecological impact implications**

27. The SCI states that the councils are using online and social media more than ever and trying to reduce printing as part of our commitment to tackle the Climate Emergency. It provides the contact details if people wish to change their contact preference from post to email. The SCI commits to engaging digitally (e.g. virtual events) and highlights that this reduces the need for people to travel, and the knock-on impact this has on carbon emissions.

### **Financial Implications**

28. There will be limited costs associated with any printing or distribution of the SCI document, however we will limit this to a small number of hard copies for those who wish to make an appointment to view the document at the offices.

### **Legal Implications**

29. The council is legally required, under section 18 of the Planning and Compulsory Purchase Act 2004, to produce an SCI to set out how we will engage with our communities who have an interest in matters relating to development in their area.

### **Risks**

30. The councils would be at risk if they did not have an up-to-date SCI in place: it is a legal requirement as per the implications listed above. Vale's SCI was adopted in 2020. South's SCI was adopted in 2017 and therefore needs updating.

### **Other implications**

31. It is anticipated that the final document, informed by all representations made, will be adopted by Cabinet in both Districts in December 2021.

## **Conclusion**

32. The councils are required, as local planning authorities, to prepare a Statement of Community Involvement (Planning and Compulsory Purchase Act 2004).
33. A joint SCI is being prepared to cover both districts to reflect the fact that South Oxfordshire and Vale of White Horse have committed to preparing a joint local plan.
34. As a result of consultation responses, some amendments are suggested to the final document, as detailed above and in appendix 1. These changes will provide further clarity to the community, developers, development management team, town and parishes and councillors who may wish to be involved in the planning process.
35. Cabinet is asked to approve the SCI for adoption, subject to the changes set out in this report and in appendix 1.

## **Background Papers**

- **Appendix 1** – Summary of consultation responses
- **Appendix 2** – Draft joint Statement of Community Involvement – September 2021