

**North Norfolk District Council's
response to the statement from
Martin Robeson Planning Practice in
respect of North Norfolk's submitted
Statement of Community Involvement**



January 2006

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1. Introduction – Preparation of the Statement of Community Involvement

The North Norfolk Statement of Community Involvement (SCI) was prepared in accordance with the requirements set out in The Town and Country Planning (Local Development) Regulations 2004. The pre-submission consultation statement (Appendix 1) gives further details of the consultation undertaken, summarised below:

Regulation 25: Before preparing a draft SCI various bodies were involved in formal and informal consultation. Questionnaires were distributed, workshops organised and meetings held with specific groups. The points raised informed the preparation of the draft SCI which was then advertised and distributed for comments at the Regulation 26 stage.

Regulation 26: A statutory six-week consultation period was held for the draft SCI from 6 June to 15 July 2005. 68 representations were received within the statutory period and the majority of these were generally supportive of the draft SCI. Most comments and queries were able to be answered or addressed by a revision to the draft SCI.

Regulation 28 (Submission): A revised SCI was duly submitted to the Secretary of State on 26 September 2005 along with the consultation statement and statement of compliance with the tests of soundness (attached as appendices 1 and 2). A statutory six-week period for comments was held from 26 September to 4 November 2005.

Ten representations were received, of which four were objecting to the SCI. Nine of the respondents were happy that their comments be addressed by the Inspector via their written representations, but Martin Robeson Planning Practice wished to present their case at a public examination. Therefore an informal hearing has been arranged for Tuesday 24 January 2006 at the North Norfolk District Council offices.

This Statement is a response to the Statement from Martin Robeson Planning Practice received on 23 December 2005 enlarging on their submissions in respect of the examination considering the soundness of North Norfolk District Council's SCI.

2. Summary of Martin Robeson Planning Practice Statement:

The statement centres around three concerns:

- A. The definition of major developments and the use of this definition to determine if pre-application consultation with the community is required.
- B. The basis for additional pre-application consultation.
- C. Matters of commercial confidentiality.

3. North Norfolk District Council Response

North Norfolk District Council (NNDC) would like to respond to the main areas of concern as follows:

A. The definition of major development

The definition of major applications used in the SCI is the recognised definition for major applications. It has the advantage of being easily understood and is a generally accepted definition as well as being used by the ODPM in guidance

notes issued to local planning authorities to interpret the quarterly returns relating to determination of planning applications (see Appendix 3)

The use of this definition to determine if pre-application consultation is required.

Martin Robeson Planning Practice (MRPP) raise the issue of a tiered approach to consider potential thresholds for determining which applications should be subject to community involvement.

However, it is considered that the use of the definition of major applications as the basis for determining if pre-application consultation is required is appropriate for the following reasons:

- i. It is a recognised definition which gives a sound and transparent basis for decisions
- ii. It gives certainty and clarity to developers and the public as to when pre-application consultation is expected.
- iii. The ‘tiered’ system set out in table 7.4 of ‘Creating LDFs’ ‘illustrates a range of community involvement methods appropriate to the three different tiers of planning applications suggested’. (para 7.9.2). However, these are not prescriptive and are only suggestions, whereas the approach taken in paras 5.2.2 and 5.3.1 of NNDC’s SCI gives certainty to developers and the public as to what is expected.
- iv. The Government allows local planning authorities 13 weeks to determine major applications (as opposed to 8 weeks for minor and other applications) which reflects the higher importance and stature that these applications have and the extra period that is required for consultation. It is therefore entirely logical that these, the most important, applications be the subject of formal pre-application consultation with the community.
- v. Section 7.7 of ‘Creating Local Development Frameworks’ discusses SCIs and planning applications and recognises that for ‘small applications it is likely to be sufficient to meet the statutory requirements that apply once they are submitted to authorities....’ Therefore it is not a formal requirement of the SCI for developers to undertake pre-application discussions for minor applications, however the Council would be happy for applicants to undertake these discussions with the community if they so desire

In response to the concerns raised by MRPP about ‘misdirected engagement’ (para 22), ‘the extent of community consultation expected for major applications’ (para 24) and ‘the prescriptive approach...that all applications that are larger than the thresholds will be expected to meet all of these requirements’ (para 28) it is pointed out that the requirements in para 5.3.1 are mainly administrative in nature and are not considered to be overly onerous on applicants.

The point in paragraphs 20, 24 and 25 that it would not be appropriate to request pre-application consultation for proposals that may be allocated in the Development Plan or in accordance with policies is rejected as the community should still be given the opportunity to be involved in the development of precise details of a scheme.

North Norfolk is a rural district and generally the planning context is one of development restraint. It is important to remember that the SCI needs to be relevant

to North Norfolk which has different requirements from other Districts which may experience higher levels of major development than this area. As an example, during 2005 the authority determined 35 major applications, 648 minor applications and 1,117 'other' applications (householder proposals, listed buildings consent, advertising consent etc). These major applications will inevitably be significant in North Norfolk and merit pre-application consultation as outlined in para 5.3.1 of the SCI. Therefore, the argument put forward by Martin Robeson Planning Practice in paragraphs 22 and 24 that not all major development will require community involvement other than that carried out by the Council once an application is submitted is rejected. Experience shows that major applications receive a far greater number of representations than minor applications, again reflecting their greater significance.

B. The basis for additional pre-application consultation

Whilst the Council would wish to retain the definition of major developments as the basis for pre-application consultation as outlined above, it is considered that the wording in para 5.3.2 could be amended to give a more flexible approach in deciding which applications are subject to additional pre-application consultation (over and above steps 1-6 in para 5.3.1) and what form this extra consultation could take.

The following wording is therefore suggested to replace the first paragraph and points 1 and 2 of paragraph 5.3.2:

“for major developments contrary to the Development Plan or those that may give rise to local controversy or are on sensitive sites further consultation (such as a public meeting, exhibition or other means of engaging with the local community/interest groups) will be required, the details of which will be agreed with the planning officer.”

It is considered that this change addresses the concerns raised by MRPP in paragraphs 25 and 26 of their statement that major developments that are compliant with the development plan and not likely to give rise to significant controversy should not be required to undertake additional pre-application consultation. However, the basic steps for pre-application consultation (1-6 contained in para 5.3.1) are still considered appropriate for the reasons outlined in response to point A. The suggested wording also gives flexibility in determining what form the further consultation will take, taking account of the particular circumstances of each case.

C. Matters of commercial confidentiality

The Council acknowledges that the SCI could make further reference to the issue of commercial confidentiality. However, the wording proposed by MRPP in paragraph 50 suggests that pre-application consultation with the community may be delayed until a late stage in the process, once certain details have been decided, thereby reducing any meaningful input that the local community is able to have.

The principle of front-loading underpins the new system and paragraph 7.7.1 of 'Creating LDFs' states that 'the objective of pre-application discussion should be to confirm whether the principle of development is acceptable and to clarify the format, type and level of detail required to enable the authority to determine an application.'

ODPM guidance ‘SCIs and Planning Applications’ goes on to say that ‘It is at the pre-submission stage that local people can have the most effect in influencing development proposals and feel engaged in the process.’ (para 5.5.3)

Therefore, in light of these principles it is considered important that pre-application consultation is not delayed until late in the process, just before an application is to be submitted.

However, the issue of commercial confidentiality is recognised; therefore, the following suggested wording could be added at the end of para 5.2.1 of the SCI: “The precise timing of the pre-application consultation will be agreed with the planning authority, and will need to strike a balance between involving the community at an early enough stage to be relevant while respecting issues of commercial confidentiality that may arise when developers are involved in site acquisition.”

The ODPM Code of Practice on Dissemination of Information discusses the issue of commercial confidentiality in Part II - reasons for confidentiality - and says “the presumption remains that information should be disclosed unless the harm/prejudice likely to arise from disclosure would outweigh the public interest in making the information available.” Developers need to be aware of the Council’s obligations under the Freedom of Information Act and the Environmental Information Regulations and therefore this quote could be inserted in paragraph 5.1.3 of the SCI.

It should also be noted that any pre-application consultation would be led by the applicant with the local authority purely maintaining a ‘watching brief’ role, in order to maintain its impartiality, as recommended in paragraph 5.4.3 of ‘SCIs and Planning Applications’.

4. Conclusion:

North Norfolk District Council consider that the submitted SCI is a sound document that has been through several stages of public consultation and has generally been well received. Appendix 1, Pre-submission Consultation Statement, gives further details on the extensive consultation undertaken and summaries of the responses. Appendix 2, Statement of Compliance with the Tests of Soundness, sets out how the tests are met.

If the procedures outlined in the statement from MRPP were to be adopted there would be increased uncertainty for developers and the community and extra burden placed on developers. It would disadvantage those that were happy with the approach taken in the draft and submitted SCIs which were subject to wide public involvement and support.

NNDC looks forward to receiving the Inspector’s determination of the above matters.

Background Documents:

- PPS12 - Local Development Frameworks
- Creating LDFs - A Companion Guide to PPS12
- ODPM Code of Practice on Dissemination of Information
- ODPM: Statements of Community Involvement and Planning Applications

Appendix 1:

PRE-SUBMISSION CONSULTATION STATEMENT (REGULATION 28 STATEMENT)

Consultation under Regulation 25

Who was consulted

Before preparing the Statement of Community involvement, we consulted with the following bodies in line with Government Regulations (see *appendix A* for detailed list):

- **Specific consultation bodies:** EERA, the Highways Agency, each parish and town council in or adjoining North Norfolk, Norfolk County Council and the other district councils in Norfolk.
- **General consultation bodies:** over 100 local voluntary and community groups including bodies representing the interests of different ethnic and religious groups, disabled persons interests, and business interests (see *appendix A*).

How they were involved

To gather their views on consultation the bodies listed above were:

- Sent a questionnaire asking how they currently find out about planning information and how they would like to find out, how they would like to be contacted, preferred times of meetings and which issues they are interested in.
- Sent a list of groups on the consultation database and asked to suggest any other groups or organisations that should be included.
- Invited to two workshops/seminars explaining the LDF process and asking how they would like to be involved and how we can reach a wider cross-section of the population.

Other involvement

- Key representatives with an interest in community involvement took part in a meeting to discuss effective methods of community participation. Attending were representatives from East of England Planning Aid, Norwich & Norfolk Voluntary services, North Norfolk CPRE, North Walsham Area Partnership, North Norfolk Community Partnership Manager and NNDC officers from the Planning Policy and Active Communities team
- Discussions were held with the Norwich & Norfolk Racial Equality Council and the Norfolk County Association of Parish and Town Councils about how to reach their members.
- A member of the Planning Policy team attended a Traveller Liaison Group meeting to make contact and investigate methods to communicate with gypsies and travellers.
- A consultation database was established containing details of individuals and organisations who have either expressed an interest in the planning process or it was felt should have an input into the preparation of development plan documents.
- Results from the September 2004 Citizens Panel survey were analysed as they provide useful information about how the public want to receive information from the Council.

The main issues raised in this round of consultation and how we have addressed these issues in the SCI are listed below.

1. Questionnaire:

- 250 questionnaires were sent out and 77 were returned (31%)
- Where groups or individuals indicated an interest in a particular topic this was recorded in the consultation database to enable targeted consultation at a later date if appropriate.

Issues raised	How we are addressing them
Most preferred methods of finding out about planning information were letters from NNDC, contact with council staff and councillors, the website and public meetings.	The planning policy website has been improved to enable easier navigation. Contact details for the planning policy team are included in all correspondence and contact details for councillors are available from the NNDC website or by contacting the Democratic Services Section of the Council.
Over 70% of those specifying prefer to be contacted by post rather than email.	In recognition of the preference for letters from NNDC we will write directly to those to be involved at the regulation 25 stage, and at the regulation 26 stage we will contact everyone on the consultation database to inform them of the participation period. The majority of written contact with parish councils will be by post; however for businesses, agents and those who have specified that they prefer electronic communication we will make contact by email.
Morning, afternoon and evenings are preferred times for meetings (weekends not popular)	Workshops and public meetings will be held at various times and locations.

2. Workshops/Seminars:

52 people attended the two workshops. Key messages coming through include:

Key Issues	How addressed
The need to be very clear in setting the boundaries about what people can influence, so unrealistic expectations are not being raised.	Noted. Taken into consideration during the development of consultation products, procedures and presentations.
Outlook magazine ¹ is seen as a valuable method for spreading information	Articles will be placed in Outlook magazine updating LDF progress and publicising participation periods and events.

¹ Outlook magazine is the quarterly magazine delivered to all North Norfolk residents

As much notice as possible should be given for meetings and consultation periods as several groups only meet infrequently.	We will aim to give as much notice of meetings as practical and will advertise participation periods in advance so groups can plan discussions with their members
Information needs to come from bottom up – local knowledge is invaluable	Continue to involve local stakeholders and residents throughout the process.
We need to be realistic about what we can expect people to comment on. Many individuals and groups don't have the time or resources to get involved in everything, so we need to target specific groups on specific issues or areas that they actually have an interest in.	We will try and target specific groups on specialist topics where possible.
All information needs to be clear, easy to understand and in plain English	Documents will contain a glossary explaining jargon and we will try and use plain English, however a certain amount of technicality is inevitable given the subjects being discussed.
Recognise low levels of literacy and use other formats where possible	Workshops and public meetings will enable comments and views to be made in methods other than reading and writing.
It is very important to let people know what has happened to their comments and what decisions have been made.	The SCI sets out the commitment to feedback on comments made.

Meetings with other bodies:

Issues Raised:	How we are addressing them:
Some consultation methods only capture a small section of the community. Need to apply suitable methods to different groups, to attract more people and a wider cross-section of the community as a whole.	We plan to use a variety of ways to encourage engagement and will organise events to suit a wide variety of participants. Consultants will be used where appropriate and where funds allow to ensure a professional, objective approach to consultation.
People of different races living in North Norfolk will be captured in the publicity to all households and the general public, ie Outlook magazine and newspaper articles.	These methods will be used for the local population.
The traveller liaison group has wide representation of those working with gypsies and travellers and also gypsy and travellers	The Traveller Liaison Group will be used where appropriate.

themselves and is a useful network of contacts for advice and distributing information	
Parish councils are a key link for involving people, but some are more active than others and they do not all have the capacity to engage parishioners on all issues.	Trying to encourage engagement by allowing sufficient time for response. Encouraging District Councillors to attend Parish Council meetings and engage parishioners.
There is a need to embrace diversity and equality and engage with everyone.	Many different groups are contained in our consultation database and will be involved throughout the process.

Citizens Panel:

Local newspapers and Council leaflets through the door are the two main sources of information people preferred.	Articles will be placed in Outlook magazine updating LDF progress and publicising participation periods and events. Press releases will be issued as appropriate and statutory advertising of consultation periods will be done through local papers. People can call to request information be posted to them or access information through the NNDC web site.
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How all issues were addressed:

- The point raised in the seminars, questionnaire and meetings informed the preparation of the draft SCI which was then advertised for comment under the regulation 26 stage.

Pre-submission Representation Statement Regulation 26: Public Participation on the draft SCI

We then prepared a draft SCI, and carried out consultation on this draft for a six week period from **6 June 2005** to **15 July 2005**

- 1) We placed an advertisement in
 - The Eastern Daily Press - daily local paper - (Friday 27 May),
 - North Norfolk News - weekly local paper - (Thursday 26 May) and
 - Dereham & Fakenham Times – weekly local paper - (Thursday 26 May)
- 2) The document, including a statement of the proposals matters was available:
 - Council offices in Cromer, Fakenham and North Walsham, and
 - all local libraries in the district and the mobile libraries serving the district.

- 3) The document and proposals matters were available on our website, with a statement explaining where and when paper copies of the document were available for inspection.
- 4) We also sent the draft SCI along with the proposals matters and details of where the documents were available for inspection to all those bodies consulted at the regulation 25 stage (*see Appendix A*)

All the above were accompanied by a statement setting out the places and times at which the draft SCI could be inspected, the period within which representations could be made, the address to which representations should be sent and that a request can be made to be notified when the SCI is submitted to the Secretary of State.

We also:

- Prepared a summary leaflet of the SCI which was distributed to libraries, council offices and those on the consultation database
- Wrote to everyone on the consultation database and advised them that the draft SCI was available for inspection, the period within which representations could be made and where the document could be inspected and enclosed the summary leaflet of the SCI.
- Entered the details of the consultation period on 'Consultation Finder'
- An article was included in the June edition of Outlook magazine advertising the participation period for the SCI

We enclose a copy of the public advertisement that incorporates the proposals matters in *Appendix B*.

Results

68 representations were received within the statutory six week period. The majority of representations received were generally supportive of the draft SCI and most comments and queries were able to be answered or addressed. The tables below summarise the main issues raised and the way they were addressed. A report of all responses received and NNDC response to each one is available to view at Council offices and on the Council website.

The issues raised	How we are addressing them
The need to make documents simple and in plain English with the use of bullet points where possible	Using document templates with bullet points to ensure conformity and documents will be subject to 'plain English' quality control by non-planning staff.
The views of the general public are very important and good publicity, and methods they are familiar with, are needed to raise their awareness and give them the	Views from the general public will be sought during the Public Participation Stages. A wide variety of methods will be used to encourage a wide participation and

<p>opportunity to get involved.</p>	<p>engagement with the process.</p>
<p>The need to involve local residents and not just those on groups and committees</p>	
<p>Landowners, developers and agents also need to be involved early in the process</p>	<p>The planning agents forum is involved in early discussions and local and national developers have been contacted and invited to make us aware of their issues and suggestions prior to formal public participation.</p>
<p>Statutory notices in newspapers are not well read and articles in the newspapers are also needed to raise awareness</p>	<p>Press releases will be issued as appropriate. Further information will also be available in Outlook Magazine.</p>
<p>There was support for developers holding pre-application discussions with the community when proposing a major scheme, with some respondents wanting this to be mandatory, whilst other development industry representatives querying that applicants will be 'expected' to undertake pre-application discussions.</p>	<p>Pre-application discussions can not be mandatory, however the SCI sets out the Councils expectations of developers in terms of undertaking pre-application discussions.</p>

Appendix A: Bodies involved with SCI consultation

<i>Interest</i>	Business	<i>Interest</i>	Economic Development
	Business in the Community		Cromer Regeneration Partnership
	Business Link For Norfolk		East of England Development Agency
	Cromer Chamber of Trade and Commerce		Norfolk Connexions
	Fakenham Business Forum		North Walsham Area Partnership
	Federation of Small Businesses		Sheringham Plus Regeneration Partnership
	Holt & District Chamber of Commerce	<i>Interest</i>	Environment
	Norfolk & Waveney Enterprise Services		British Trust for Conservation Volunteers
	Norfolk Chamber of Commerce		CPRE North Norfolk
	Norfolk Learning and Skills Council		Cromer Preservation Society
	North Norfolk Fishermen's Society		Fakenham Area Conservation Team
	North Walsham Chamber of Commerce		Norfolk Coast Partnership
	Sheringham Chamber of Trade and Commerce		Norfolk Wildlife Trust
	Sheringham Traders Association		North Norfolk Environment Forum
	Stalham Business Association		Sheringham and District Preservation Society
	The Fishermen's Association		Worstead Amenity Society
<i>Interest</i>	Disabled persons	<i>Interest</i>	Farming and Landowners
	Access North Norfolk Action (A.N.N.A)		Country Land & Business Association
	Aylsham Blind Club		
		<i>Interest</i>	Local
Authority			
	BUILD (Learning Difficulties)		
	Deaf Connexions		Borough Council of King's Lynn & West Norfolk
	Disability Rights Norfolk		Breckland District Council
	Holt Blind Club		Broadland District Council
	Norfolk & Norwich Association for the Blind		Broads Authority
	Norfolk Association for the Disabled		Great Yarmouth Borough Council
	Norfolk Coalition of Disabled People Councils		Norfolk County Association of Parish & Town
	Norfolk Deaf Association		Norfolk County Council
	People First of Norfolk (Learning Difficulties)		Norwich City Council
	SIGHT		South Norfolk District Council

Interest Parish Council

Alby With Thwaite Parish Council	East Rudham Parish Council East
Aldborough & Thurgarton Parish Council	and West Beckham Parish Council
	East Roston Parish Council
	Edgefield Parish Council
Antingham Parish Council	Erpingham Parish Council
Ashmanhaugh Parish Council	Fakenham Town Council
Aylmerton Parish Council	Felbrigg Parish Council
Aylsham Town Council	Felmingham Parish Council
Baconsthorpe and Matlaske Parish Councils	Foulsham Parish Council
Bacton Parish Council	Gateley Parish Meeting
Barsham Parish Council	Gimingham Parish Council
Barton Turf & Irstead Parish Council	Gresham Parish Council
Beeston Regis Parish Council	Guestwick Parish Meeting
Blakeney Parish Council	Guist Parish Council
Blickling Parish Council	Hanworth Parish Council
Bodham Parish Council	Happisburgh & Walcott Parish Council
Brampton Parish Council	Helhoughton Parish Council
Briningham Parish Council	Hempstead By Holt Parish Council
Brinton & Gunthorpe Parish Councils	Hempton Parish Council
Briston Parish Council	Heydon Parish Meeting
Brumstead Parish Council	Hickling Parish Council
Burgh & Tuttington Parish Council	High Kelling Parish Council
Burnham Thorpe Parish Council	Hindolveston Parish Council
Buxton with Lamas Parish Council	Hindringham Parish Council
Cley, Langham, Morston, Stiffkey and Wiveton Parish Councils	Holkham Parish Council
Colby Parish Council	Holt Town Council
Colkirk Parish Council	Horning Parish Council
Coltishall Parish Council	Horseley Parish Council
Corpusty Parish Council	Hoveton Parish Council
Cromer Town Council	Ingham Parish Council
Dilham Parish Council	Ingworth Parish Council
Dunton Parish Council	Itteringham Parish Council

Kelling Parish Council	Sloley Parish Council
Kettlestone Parish Council	Smallburgh Parish Council
Knapton Parish Council	Somerton Parish Council
Lessingham & Hempstead With Eccles Parish Council	South Creake Parish Council
Letheringsett With Glandford Parish Council	South Walsham Parish Council
Little Barningham Parish Council	Southrepps Parish Council
Ludham Parish Council	Stalham Town Council
Martham Parish Council	Stibbard Parish Council
Melton Constable Parish Council	Stody Parish Council
Mundesley Parish Council	Suffield Parish Council
North Creake Parish Council	Sustead Parish Council
North Elmham Parish Council	Sutton & Catfield Parish Councils
North Walsham Town Council	Swanton Abbott Parish Council
Northrepps Parish Council	Swanton Novers Parish Council
Oulton Parish Council	Syderstone Parish Council
Overstrand Parish Council	Tattersett Parish Council
Paston Parish Council	Thornage Parish Council
Plumstead Parish Council	Thorpe Market Parish Council
Potter Heigham Parish Council	Thurne Parish Council
Pudding Norton Parish Council	Thurning Parish Meeting
Raynham Parish Council	Thursford Parish Council
Repps with Bastwick Parish Council	Tittleshall Parish Council
Roughton Parish Council	Trimingham Parish Council
Ryburgh Parish Council	Trunch Parish Council
Salhouse Parish Council	Trunch Parish Council
Salthouse Parish Council	Tunstead Parish Council
Scottow Parish Council	Upper Sheringham Parish Council
Sculthorpe Parish Council	Upton with Fishley Parish Council
Sea Palling & Waxham Parish Council	Walsingham Parish Council
Sheringham Town Council	Weasenham St Peter Parish Council
Sidestrand Parish Council	Wellingham Parish Council
Skeyton Parish Council	Wells-next-the-Sea Town Council

West Rudham Parish Council
Westwick Parish Meeting
Weybourne Parish Council/Holt Scout Group
Wickmere Parish Council
Wighton Parish Council
Winterton-on-Sea Parish Council
Witton Parish Council
Wood Norton Parish Council
Woodbastwick Parish Council
Worstead Parish Council

Aylsham

Wroxham Parish Council

Interest Race & Religion

St Andrews Church

St Andrews Methodist Church

St Josephs Church

St. Peters Church

The Vine Family Church

Evangelical Congregational Church

Fakenham Baptist Community Church

Fakenham Congregation of Jehovah's Witnesses

Fakenham Methodist Church

Fakenham Parish Church

Bureau

Fakenham Roman Catholic Church

Holt Methodist Church

(Fakenham)

New Life Community Church

Walsham)

Norfolk & Norwich Asian Society

Norfolk African Community Association

Norfolk Chinese Community Association

North Walsham Baptist Church

North Walsham Congregation of Jehova's Witnesses

North Walsham Methodist Church

North Walsham Quakers

North Walsham Sacred Heart Church

Norwich & Norfolk Racial Equality Council

Norwich Hebrew Congregation

Norwich Interfaith Link

Norwich International Youth Project

Norwich Muslim Association

NW Salvation Army

Quaker Meeting House, Sheringham

Religious Society of Friends (Quakers)

Salvation Army Divisional HQ

Sheringham Baptist Church

Bangladesh Islamic Forum

C of E St Nicholas Church

Caribbean and African Network

Chinese Society

Christian Science Society

Interest Social

Citizens Advice Bureau (Fakenham & Wells)

East of England Planning Aid

Norfolk Rural Community Council

North Walsham & District Citizens Advice

Norwich & Norfolk Voluntary Services (Cromer)

Norwich & Norfolk Voluntary Services

Norwich & Norfolk Voluntary Services (North

Norwich & Norfolk Voluntary Services (NVS)

Wells Learning Community

Interest Statutory

East of England Regional Assembly

The Highways Agency

Appendix 2:

Statement of compliance with the tests of soundness

The preparation of the Statement of Community Involvement (SCI) is governed by the Town and Country Planning (Local Development) (England) Regulations 2004. This prescribes the need for consultation and participation to take place in the preparation of a SCI prior to submission to the Secretary of State for independent examination.

The purpose of the examination stage is to consider the 'soundness' of the SCI. Nine tests of soundness are set out by Government in PPS 12 (para 3.10). These tests are set out below with evidence demonstrating how they have been met:

i) The local planning authority has complied with the minimum requirements for consultation set out in the Regulations.

The Statement of Community Involvement sets out the steps the Council will take for consultation and participation throughout the preparation of development plan documents and supplementary planning documents. The tables in section 4 outline how the Council will comply with the regulations for each document it will prepare.

In relation to the preparation of the SCI itself, the pre-submission consultation statement describes which specific and general consultees were consulted to comply with regulation 25 and how they were involved. The pre-submission participation statement describes the publicity measures undertaken to comply with regulation 26.

ii) The strategy for community involvement links with other community involvement initiatives e.g. the community strategy

The planning policy team preparing the LDF are working closely with the Community Strategy Manager to ensure that the aims of the two are compatible. The SCI indicates the links between the LDF and the Community Strategy in section 1.5 and 3.2. It is important that these links between the LDF and the Community Strategy are in place as there will be significant overlap of issues and the LDF will be the means of implementing the elements of the Community Strategy that relate to the development and use of land.

Planning Policy staff also work closely with the Active Community team at NNDC who implement various community involvement initiatives (see sections 3.5 and 3.11). We will also work with several other existing groups as described in section 3.2.

As described in paragraph 3.11.4 we recognise that many voluntary groups have limited resources to respond to consultations and we will therefore link consultation exercises on different LDF documents where appropriate.

iii) The SCI identifies in general terms which local community groups and other bodies will be consulted

Appendix 3 lists the specific, general and other consultees as described in PPS12. Sections 3.2 and 3.6 give further information on the general consultees and other 'hard to reach' groups that will be involved.

The consultation database (see para 3.8.1) is maintained by the planning policy team and contains details of over 800 individuals and groups who have an interest in the planning process. To check if a particular organisation is included please contact the planning policy team.

Lists of groups and organisations consulted in the preparation of the SCI are included in the pre-submission consultation statement.

iv) The SCI identifies how the community and other bodies can be involved in a timely and accessible manner.

The tables in section 4 describe the stages of preparation and accompanying consultation and participation intended for each LDF document. The Local Development Scheme gives the dates of the different stages.

Table 1 in section 3.6 and the tables in section 4 discuss the methods of involvement and appendix 4 gives an assessment of the methods proposed.

v) Methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents

Table 1 in section 3.6 and the tables in section 4 discuss the methods of involvement and appendix 4 gives an assessment of the methods proposed.

The suggested methods of involvement were informed by early discussions with a range of general consultees about how they would like to be involved in the planning process. The pre-submission consultation statement sets out the main issues raised at this stage and how they were addressed in the SCI.

vi) Resources are available to manage community involvement effectively

The availability of resources is set out in section 3.11 and also in the Local Development Scheme. Staff resources within the Active Communities team and other organisations will be used to help with consultation events and consultants may be appointed to assist with exercises if required.

Developers and applicants will be responsible for pre-application discussions with the community where a major planning application is proposed. While planning officers will give initial advice about the guidelines for those discussions, the Council should not incur significant resource implications as a result of this requirement.

vii) The SCI shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents

Section 3.9 discusses how decisions are made and acknowledgement and feedback procedures for LDF documents. The tables in section 4 set out feedback mechanisms at each stage for the documents to be prepared.

Sections 5.10 and 5.11 describe how decisions are made in relation to planning applications and the Council leaflet 'have you say on planning applications' describes how planning applications are decided and is included in the SCI as appendix 6.

viii) The Authority has mechanisms for reviewing the SCI

The Annual Monitoring Report will assess if the aims of the SCI are being achieved (Section 3.10). Feedback forms at events and numbers of people attending events and representations received will be assessed to evaluate methods of involvement and the SCI can be reviewed if it is shown to be necessary.

ix) The SCI clearly describes the planning authority's policy for consultation on planning applications.

Section 5 and Appendix 6 discuss the publicity and consultation arrangements in place for planning applications and section 5 encourages developers to undertake pre-application discussions with the community where a major application is proposed.

Appendix 3: Extract from ODPM guidance notes for planning application quarterly returns.

“Major Developments – Definition of major

3. For dwellings, a major development is one where the number of dwellings to be constructed is 10 or more. Where the number of dwellings to be constructed is not given in the application, a site area of 0.5 hectares or more should be used as the definition of a major development. For all other uses, a major development is one where the floorspace to be built is 1000 square metres or more, or where the site area is 1 hectare or more.”