

# Joint Scrutiny Committee



Report of Head of Policy & Programmes

Author: Rona Knott

Telephone: 07717 271934

E-mail: rona.knott@southandvale.gov.uk

Head of service: Harry Barrington-Mountford

Wards affected: All

Vale cabinet member responsible: Cllr Debby Hallett

South Cabinet member responsible: Cllr Anne-Marie Simpson

**Executive member responsible:**

Paper for Scrutiny on 16 November 2021

## Consultation on the draft Joint Statement of Community Involvement (SCI)

### Recommendation(s)

- (a) To consider the outcome of the public consultation on the joint SCI.
- (b) To review and consider some suggested amendments to the joint SCI.
- (c) To provide any comments to inform the final joint SCI for adoption.

### Purpose of Report

1. To report to joint Scrutiny Committee on the key issues raised following a six-week public consultation of the joint Statement of Community Involvement (SCI) (consultation document attached at Appendix 2) and to report on the changes proposed to the document for adoption.

### Strategic Objectives

2. The publication of the SCI supports the delivery of the councils' strategic objectives set out in the current Corporate Plans by working in an open and inclusive way

(Vale corporate objective) and supporting openness and accountability (South corporate objective).

## Background

3. The council's are required, as local planning authorities, 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. Vale's current SCI was adopted in 2020 and is therefore a recent document. 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.
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 Involvement

7. The joint SCI follows a similar format to the existing SCIs for South and Vale. The joint SCI sets out how both council's 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
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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
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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
- 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 views 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**.

## Proposed amendments to the SCI

19. A comment that came 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 chosen 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. 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.

20. There are options to address the comments of the SCI being too long / too detailed:

1) Better use of 'signposts' to direct readers to the parts of the document that contain the key information. For example, the document contains two tables that summarise the methods that the council's use to consult on policy documents and planning applications. The introduction to the SCI could include a link that takes readers straight to that information.

2) Add an executive summary. This was suggested by some of the respondents. This was considered when the document was drafted, but officers decided against an executive summary as it is very difficult to

summarise all the information in the SCI without it being a very lengthy summary, or to make it short there is the risk of missing out important information.

21. Officers recommended option is option 1 – add signposting / links to the key parts of the document that summarise methods of consultation. This would involve some additional text that would add to the overall length of the document, but it would be minimal and much less than including an executive summary.
22. 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 (eg 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 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.
23. Another comment that was made by several respondents was related to feedback after consultations. To address this it is suggested that the SCI explains where consultation statements can be found on our websites.
24. 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.
25. Other suggested amendments to the SCI relate to corrections, typos, ensuring all links work correctly and other minor changes.

## **Climate and ecological impact implications**

26. The SCI states that the council's 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

27. 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

28. 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

29. The council's 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 and Timetable

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

## Conclusion

31. The council's are required, as local planning authorities, to prepare a Statement of Community Involvement (Planning and Compulsory Purchase Act 2004).

32. 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.

33. As a result of consultation responses, some amendments are suggested to the final document, as detailed above. 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.

34. Scrutiny Committee are asked to feedback any comments on the Statement of Community Involvement and proposed changes prior to the final joint SCI adoption.

## Background Papers

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